



WESLEY COLLEGE  
By daring & by doing



CELEBRATING 100 YEARS (1923-2023)



# Wesley College and Penrhos College Boatshed



**ROWE**  
GROUP

**TR  
CB.**

 **four** LANDSCAPE  
STUDIO



# Document Control

Printed 08 September 2023

9216\_IND01A\_20230908 Wesley College and Penros College Boatshed Boatshed DA Report.indd

Version	File Name	Prepared	Approved	Date
1	2023_Jul01_R_ac.docx	Andrew Cumming	Greg Rowe	08/09/2023

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1. Certificate Of Titles
2. Architectural Plans
3. Landscape Concept
4. Sewer Connection Information



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# 1. Introduction

Rowe Group acts on behalf of Wesley College and Penrhos College with respect to the enclosed Application for Development Approval ('Application').

We note that, Wesley College holds a lease over the existing boatshed at Lots 778 and 780 Coode Street, South Perth (the 'existing development site'), until 31 May 2037. The boatshed itself is owned by the City of South Perth (the 'City'), who holds a management order over the existing development site and surrounding land as vested by the Department of Planning, Lands and Heritage.

This report has been prepared in support of an Application to redevelop the existing Boatshed for the dual purposes of Wesley College and Penrhos College.

This report includes a description of the following matters:

- Description of the subject site and locality;
- Description of the proposed development;
- Statement of town planning compliance; and
- Explanation of planning merit and community benefits.



## 2. Description Of Site

### 2.1. Location

The subject site is located in the municipality of the City of South Perth ('City') approximately 2 kilometres south-east of the Perth Central Area.

Refer **Figure 1 – Regional Location**.

The subject site is located within the South Perth foreshore (Sir James Mitchell Park), fronting directly onto the Swan River / Derbarl Yerrigan and adjacent to the Coode Street boat ramp. The subject site is situated immediately east of the termination of Coode Street and Douglas Avenue. A footpath is located directly south of the subject site, which provides pedestrian access further east, west and south within the confines of the foreshore reserve.

The subject site is located in close proximity of the following facilities within the foreshore:

- 100m of the Boatshed Restaurant;
- 10m of the Coode Street Boat Ramp Car Parking 15;
- 60m of Sir James Mitchell Park playground; and
- 100m of the Coode Street jetty.

Refer **Figure 2 – Local Location**.

### 2.2. Cadastral Information

The subject site comprises of two (2) land parcels and is legally described as:

- Lot 778 on Deposited Plan 163503, Certificate of Title Volume LR3012, Folio 983;
- Lot 780 on Deposited Plan 91394, Certificate of Title LR3012 Volume, Folio 894; and
- Lot 11835 on Deposited Plan 240379, Certificate of Title Volume LR3141, Folio 191.

Refer **Attachment 1 – Certificates of Titles**.

Refer **Figure 3 – Site Plan**.

### 2.3. Existing Improvements

The subject site currently accommodates the existing Wesley College Boatshed with a floor area of 450m<sup>2</sup>. The boatshed includes three (3) roller doors for boat access, one (1) storage shed and a concrete ramp. The existing boatshed height allows for a maximum wall and overall height of 3.2m and 5m, respectively. The surrounding foreshore is comprised of limestone retaining walls, linking pedestrian pathways and existing non-endemic trees.



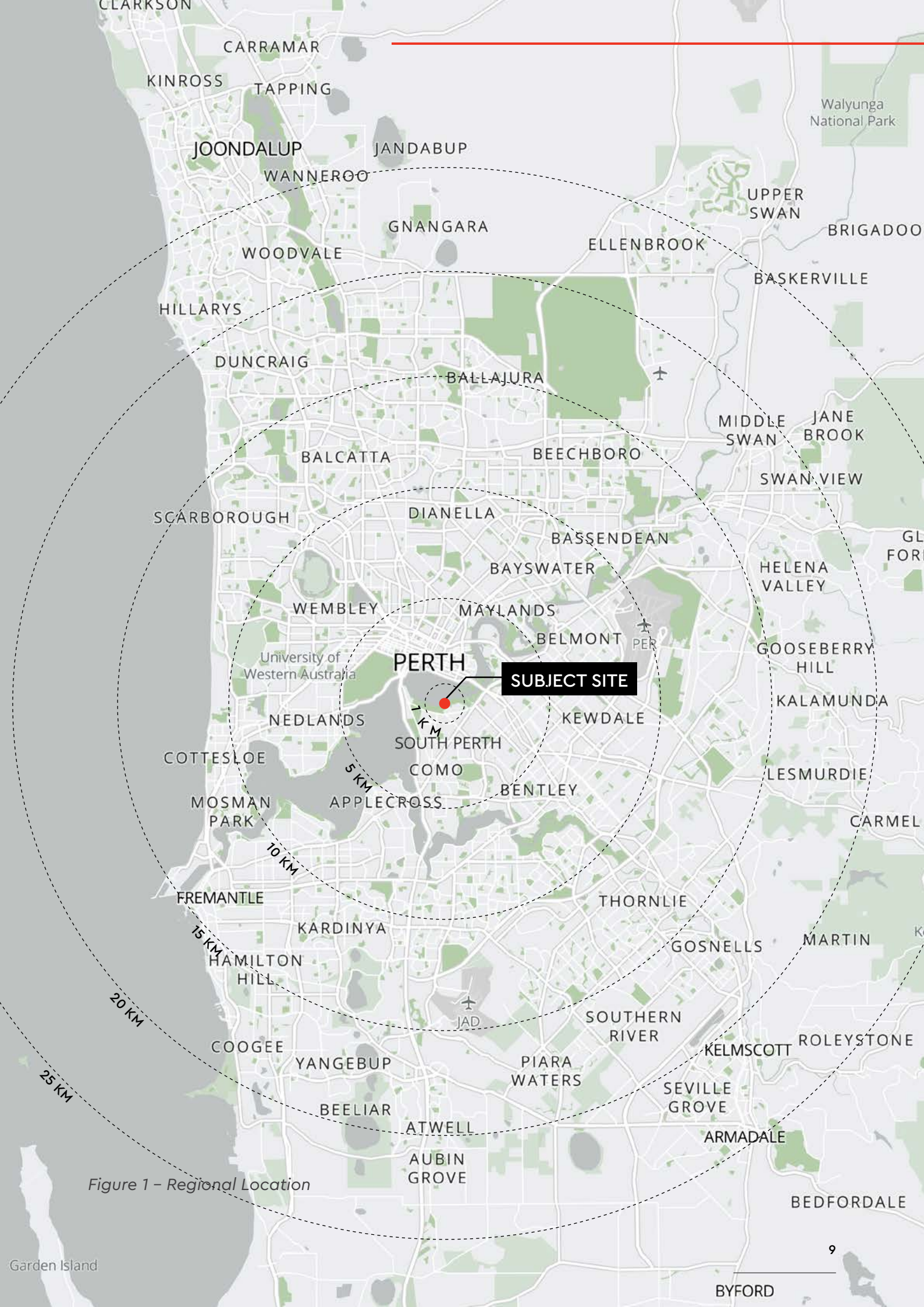
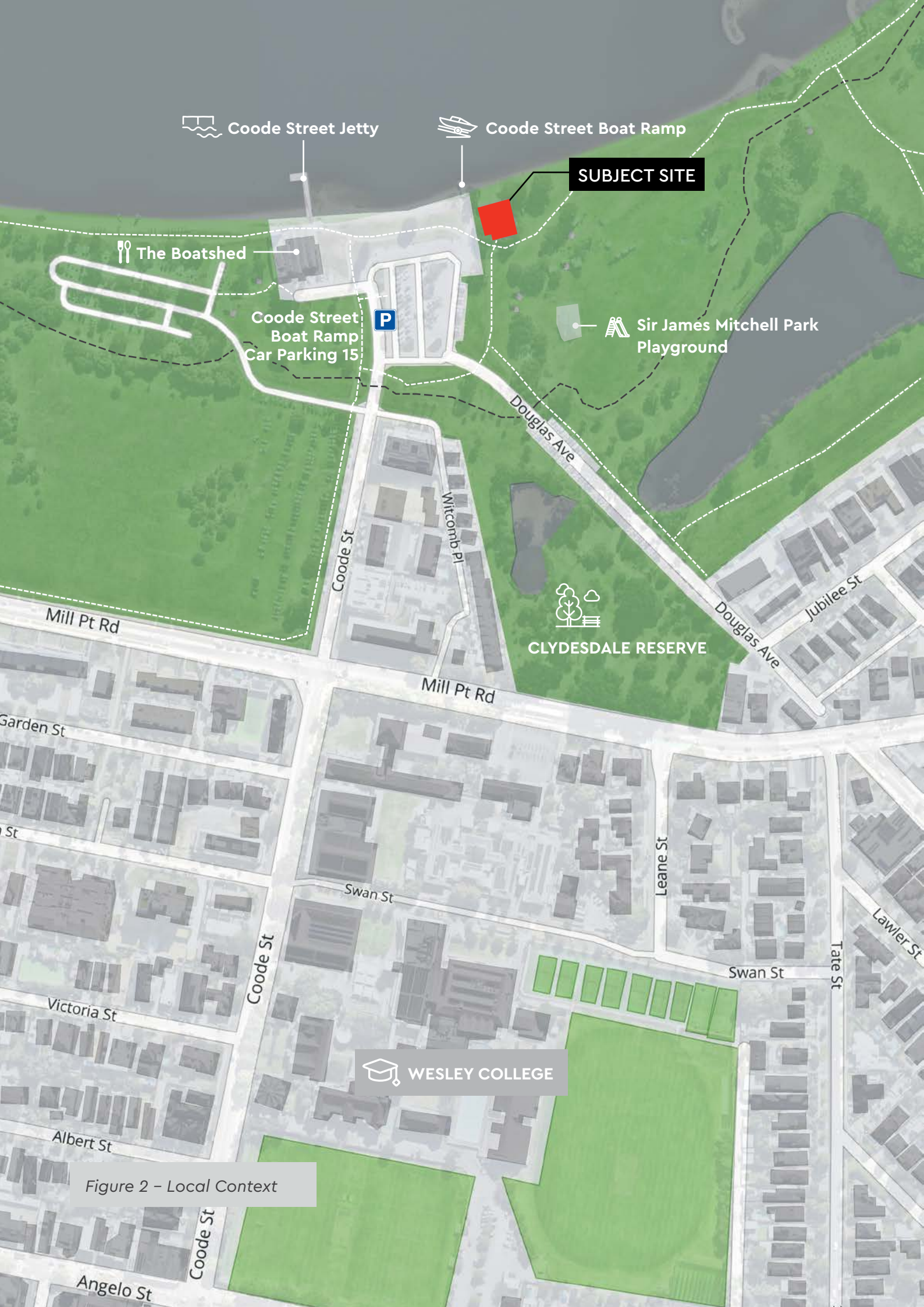


Figure 1 – Regional Location



Coode Street Jetty

Coode Street Boat Ramp

SUBJECT SITE

The Boatshed

Coode Street Boat Ramp Car Parking 15

Sir James Mitchell Park Playground

Douglas Ave

CLYDESDALE RESERVE

Mill Pt Rd

Mill Pt Rd

Douglas Ave

Jubilee St

Garden St

Swan St

Leane St

Swan St

Tate St

Lawler St

Victoria St

Albert St

WESLEY COLLEGE

Figure 2 - Local Context

Angelo St

Coode St



Figure 3 – Site Plan

### 3. Description Of Proposal

This Application seeks approval for the construction of a new Boatshed for Wesley College and Penrhos College. The proposed development includes additional boat storage bays and improved internal amenities for students.

The proposed development will involve the demolition of the existing Wesley College Boatshed, supporting limestone retaining walls and pedestrian paths, and is proposed that the existing boat concrete boat ramp will be retained within the new design.

As part of the development, portions of the existing pedestrian path to the south will need to be removed to enable the expansion of the boatshed.

More specifically, the proposed development will include:

- A 1,059m<sup>2</sup> boatshed, with the following amenities:
  - Five (5) roller door boat storage bays;
  - A 71m<sup>2</sup> rowing gym;
  - Improved general amenities such as kitchen, storage, bathrooms and covered verandah area (71m<sup>2</sup>);
  - New sewer pump station; and
  - Improved vehicle access from the existing car park.
- Replacement of the existing pedestrian path adjoining to the wider path network; and
- New landscaping, including the planting of 18 mature endemic trees. (45 Litre and 100 litre stock).

Refer **Attachment 2 – Architectural Plans and Attachment 2 – Landscape Concept**.

## 4. Pre-Lodgement Engagement Process

Rowe Group and TRCB, along with both Colleges, have undertaken a collaborative process in order to lodge this Application. This has involved multiple meetings with the City, as the local government in this location, and the Department of Biodiversity, Conservation and Attractions ('DBCA'), as the planning authority in this location.

The following table describes the continued engagement to date prior to lodgement of the Application.

Meeting/Date	Subject / Location	Attendees Outcomes
15 June 2021	Meeting with City of South Perth (City of South Perth)	Vicky Lummer (COSP) Fiona Mullen (COSP) Mark Taylor (COSP) Leigh Robinson (TRCB) Ross Barron (Wesley)
28 June 2021	Boatshed (DPLH)	Trinh Nguyen (DPLH) Vicky Lummer (COSP) Lucy Shurman (DPLH)
23 July 2021	Boatshed – City of South Perth and DBCA (City of South Perth)	Glen McLeod-Thorpe (DBCA) Leigh Robinson (TRCB) Vicki Lummer (COSP) Mark Taylor (COSP)
3 August 2022	10am Wesley / Penrhos planning   City of South Perth (City of South Perth)	Ross Barron (Wesley) Mike Bradford (COSP) Kalea Haran (Penrhos) Greg Rowe (RG) Eamon Broderick (TRCB)
23 September 2022	Boatshed Discussion (DBCA)	Glen McLeod-Thorpe (DBCA) Greg Comiskey (DBCA) Eamon Broderick (TRCB) Greg Rowe (RG)
16 November 2022	Boatshed (City of South Perth)	Ross Barron (Wesley) Mike Bradford (COSP)

Meeting/Date	Subject / Location	Attendees Outcomes
15 December 2022	Boatshed – City of South Perth and DBCA (City of South Perth)	Glenn McLeod-Thorpe (DBCA) Mike Bradford (COSP) Fiona Mullen (COSP) Chris Jansen (COSP) Anita Amprimo (COSP) Mathew Irving (Wesley) Stephen Cooper (Penrhos) Greg Rowe (COSP) Eamon Broderick (TRCB) Josh Mangan (TRCB)
19 May 2023	Boatshed (City of South Perth)	Mike Bradford (COSP) Ross Barron (Wesley) Stephen Cooper (Penrhos) Victoria Kelleher (Penrhos) Donna Shaw (COSP)

Table 1 – Pre-Lodgement Engagement Process



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## 5. Town Planning Considerations

### 5.1. Strategic Context

#### 5.1.1. State

##### 5.1.1.1. State Planning Policy 2.6 Coastal Planning

State Planning Policy 2.6 Coastal Planning ('SPP 2.6') provides for the long-term sustainability of Western Australia's coast and is relevant to those local governments that contain coastal areas. The purpose of the policy is to provide guidance for decision-making within the coastal zone including managing development and land use change, establishment of foreshore reserves and protecting, conserving and enhancing coastal values.

It is noted that SPP 2.6 does not include any specific policy measures for development applications as it requires strategic planning to be undertaken in order to inform decision making on such matters.

Notwithstanding, the proposed development responds to section 4.1.2 Subdivision and development of the State Coastal Planning Policy Guidelines as follows:

- The proposed development would not discharge any sewerage into the riverine environment;
- The proposed development would not substantially alter existing drainage patterns; and
- The proposed development includes the planting of 18 additional endemic trees to increase vegetation coverage.

##### 5.1.1.2. Draft State Planning Policy 2.9 – Planning For Water

Draft State Planning Policy 2.9 Planning for Water ('Draft SPP 2.9') seeks to ensure that planning and development considers water resource management and includes appropriate water management measures to achieve optimal water resource outcomes. The policy establishes objectives relating to improving environmental, social, cultural and economic values of water resources; protecting public health through appropriate water supply and waste-water infrastructure; sustainable use of water resources and managing the risk of flooding and water related impacts of climate change on people, property and infrastructure.

Draft SPP 2.9 and Guidelines will streamline and simplify the current water-related policy framework, consistent with the State Government's current planning reform agenda. Once gazetted, draft SPP 2.9 and Guidelines will supersede State Planning Policy 2.10 Swan Canning River System.

The proposed development responds to section 7.1 of Draft SPP 2.9, which includes various general policy measures, as follows:

- The proposed development includes the planting of 18 additional endemic trees to increase vegetation coverage;
- Includes a sufficient habitable floor level above identified flood events; and
- Ensures the stormwater and wastewater strategy for the development can respond to section 7.4 Infrastructure and Supply of the Draft SPP 2.9. In this regard, please refer to Attachment 4 for further information.

Section 7.7 of Draft SPP 2.9 includes specific policy measures for the Swan Canning river system. The proposed development responds to the policy measures of section 7.7 of Draft SPP 2.9 as follows:

- Consolidates two (2) boat shed facilities along the river in one location with a smaller footprint than what would be possible should two (2) separate facilities be proposed by the respective Colleges. This maintains and improves access to the River than would otherwise be achievable and represents a functional need to be located adjacent the river in this location.
- The proposed development is compatible with its riverine environment and maintains access and views up and down the foreshore and from the foreshore to the river.
- The proposal maintains and enhances the natural landscape character and sense of place via the design of the proposed development.

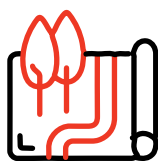
### 5.1.1.3. State Planning Policy 7.0 Design Of The Built Environment

State Planning Policy 7.0 – Design of the Built Environment (‘SPP 7’) provides the broad framework for the design of the built environment across Western Australia. The design has considered and responded to the ten (10) design principles, with this demonstrated below.



#### 1. Context and Character

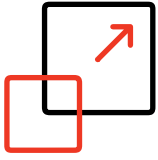
The proposed development is compatible with its riverine environment and maintains views up and down the foreshore and from the foreshore to the river. Importantly, the proposed development would ensure a consolidated built form outcome for both Colleges rather than two (2) separate buildings. This consolidation also allows the required amenities to be shared, creating efficiency and reducing the built form footprint that two (2) separate buildings would require.



#### 2. Landscape Quality

The proposed development includes high quality landscaping and introduces 18 new trees. To ensure new landscape has the best chance of success and to prevent vandalism, tree protection fences (or similar) will be installed and should new trees fail, replacement stock will be installed for a period of two (2) planting seasons.





### 3. Built Form and Scale

The overall built form and massing of the development is considered appropriate to respond to the riverine environment and is of an appropriate scale so as to not negatively impact the surrounding locality.



### 4. Functionality and Build Quality

The development has been architecturally designed and responds to the requirements of both Colleges. The proposed development will be constructed of quality, durable materials to ensure a high-quality outcome is provided. The material selection and detailing proposed has considered the ongoing maintenance of the building to ensure the outcome is of high-quality now and into the future.



### 5. Sustainability

The orientation of the development enables appropriate passive sun access and natural ventilation. This also balances the need for appropriate shade to be afforded to the building. High-quality and varied landscape treatments are incorporated into the proposal to further enhance the riverine setting and diversity of native flora and fauna. In addition, a solar PV array is proposed.



### 6. Amenity

The internal amenity provided for staff, children and visitors, particularly increased safety for staff and students, is of a high standard and commensurate with expectations placed on such facilities.



## 7. Legibility

The proposed building entrance will be paved and accessible via the reinstated pedestrian pathway. The entry will also include elements of soft and hard landscaping to provide a well-defined access way. The proposed accessways for vehicles and pedestrians are easily distinguishable through material and location.



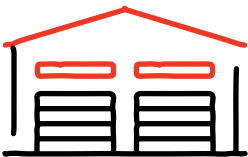
## 8. Safety

The proposed design includes strong passive surveillance to the public realm. The building is oriented towards the foreshore as well as other parts of the adjoining public realm. CCTV and lighting are also incorporated.



## 9. Community

The proposed development will provide a high-quality and essential service and offering to both College communities. Further, the proposal includes a covered “sunrise verandah” that is accessible to the public. The College’s anticipate that this will further enhance the existing public covered spaces in the Coode Street node and add to the buildings use outside of rowing times.



## 10. Aesthetics

The overall aesthetic appearance of the development is of a high-quality that is cohesive with the with nearby Boatshed restaurant, utilising similar materials and form, while responding to its context in a respectful manner to the wider amenity of the foreshore and river. The material selections are derived from a long lineage of “boathouse architecture” using timber for its durability and resilience in the marine setting.

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## **5.1.2. Local**

### **5.1.2.1. City Of South Perth Local Planning Strategy**

The City of South Perth Local Planning Strategy (the Strategy) was endorsed in 2021 and is a fundamental part of the local planning framework. It is a strategic document that provides long term guidance for land use planning and development within the City.

The Strategy provides the interface between regional and local planning by providing appropriate local responses to state government direction and requirements. It sets out the local government's objectives for managing future planning and development and provides appropriate strategies and actions to achieve the objectives.

While the Strategy does not include any specific strategic directions for the subject site and broader surrounding area, it does refer to the need to implement other strategies such as the South Perth Foreshore Strategy and Management Plan, which will be discussed below.

Notwithstanding, the proposed development is considered consistent with the objectives of the Strategy for the following reasons:

- It would continue to support the Coode Street activity node by improving facilities for both Colleges, which in turn can lead to the viability of the node through increased patronage and use of the boat sheds.
- The proposed development would improve activation of the immediate area and provide usable and enjoyable public spaces that encourage active living.

### **5.1.2.2. South Perth Foreshore Strategy And Management Plan**

The South Perth Foreshore Strategy and Management Plan (The SPF Plan) was adopted by the City of South Perth and Swan River Trust in 2015. The purpose of the SPF Plan is to guide the management of the foreshore into the future. This includes the improvement of public infrastructure, recreation and tourism experiences, and environmental values and management. The primary aim is to balance the competing demands for use, development and management of this precious regional public open space with the need to conserve and enhance a functional healthy river and foreshore environment for now and for future generations.

The SPF Plan identifies the most appropriate combination of uses for the SPF, while maintaining and preserving the environmental and heritage values of the area and its surrounds. It complements the regional planning approach of the Swan River Trust as well as providing for local residents, regional users, and commercial, event, and tourism enterprises.

The Coode Street area is identified as 'Foreshore Node N2 Coode Street' within the SPF Plan. The proposed development is consistent with the identified objectives and node strategies as follows:

- The proposed development would improve the amenity of the foreshore node via a significant upgrade to the current boat shed facilities;
- The proposed development would increase opportunities for children of both Colleges to access the river and water based activities. This is particularly important for Penrhos College, which do not have access to a permanent boat shed.

## 5.2. Zoning

### 5.2.1. Metropolitan Region Scheme

The subject site is reserved under the Metropolitan Region Scheme ('MRS') as 'Parks and Recreation'.

Refer **Figure 4 - Metropolitan Region Scheme Mapping**.

### 5.2.2. City Of South Perth Local Planning Scheme No. 6

Consistent with the MRS, under the provisions of the *City of South Perth Local Planning Scheme No. 6* ('LPS 6'), the subject site is reserved for 'Parks and Recreation'.

Refer **Figure 5 - Zoning Plans**.



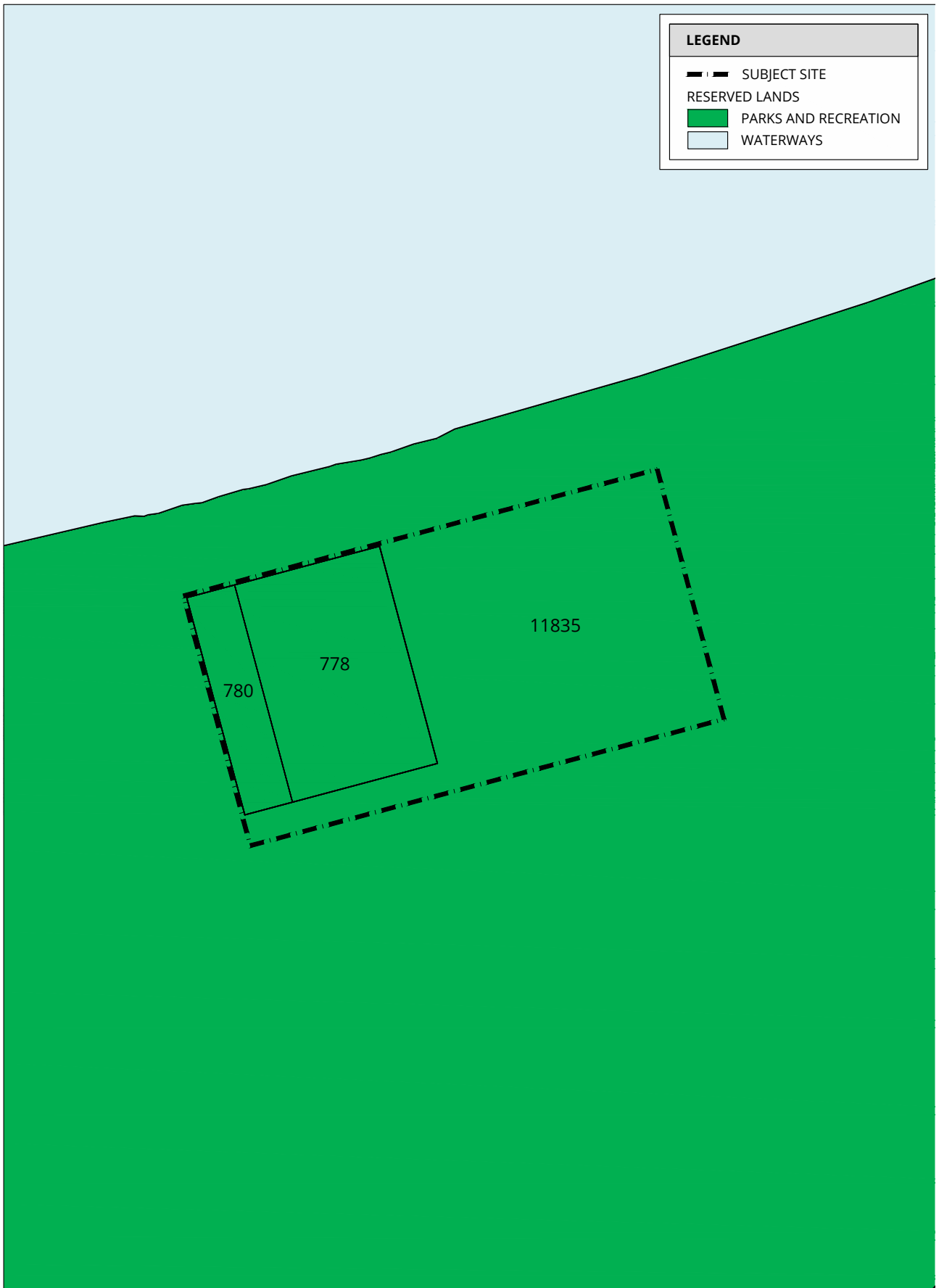


Figure 4 – Metropolitan Region Scheme Mapping

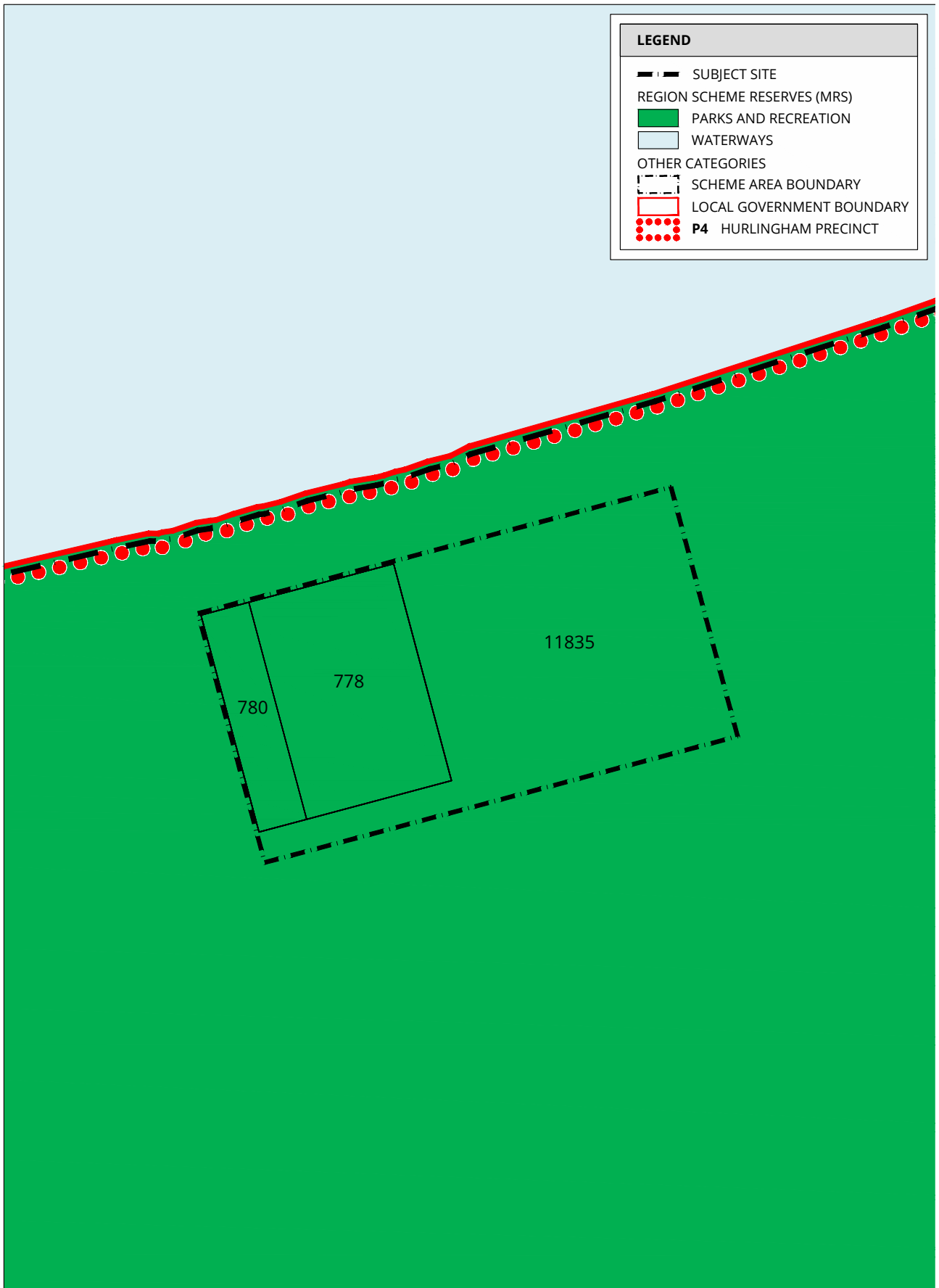


Figure 5 – Zoning Plan

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## 5.3. Swan And Canning Rivers Management Act 2006

The *Swan and Canning Rivers Management Act 2006* ('SCRM Act 2006') aims to ensure that land use planning and development protects and enhances the ecological health, amenity and heritage value of the Swan Canning River System.

### 5.3.1. Swan And Canning Development Control Area

Under the SCRM Act 2006, the subject site is located within the Swan Canning Development Control Area ('DCA'). The DCBA has responsibility for planning, protection and management of the Swan Canning River System under the SCRM Act 2006. The DBCA provides advice, makes recommendations to, and comes under the jurisdiction of the Minister for Environment. The Swan River Trust (the Trust) acts as an advisory body to the Minister for Planning.

As a result, the proposed development is subject to consideration and assessment by the DBCA for determination by the Minister for Environment.

Refer **Figure 6 – Development Control Area & Riverpark Map 15**.

### 5.3.2. Objectives And Principles

The SCRM Act includes a number of objectives and principles which the DBCA is required to have regard to in undertaking its functions and powers under the SCRM Act.

The proposed development responds positively to the objectives of the SCRM Act, as follows:

- The proposed development restores and protects the DCA and wider Riverpark;
- The proposed development provides for the future requirements of each College in one location, rather than separate facilities in separate locations; and
- The Nyunhah community will be involved with the proposed development, particularly through the proposition of public art to reflect the significance of the location for this community.

The proposed development also responds positively to the relevant principles of the SCRM Act, as follows:

- Sustainability – The proposed development responds to the three (3) pillars of sustainability by:
  - Providing a significant economic contribution to the local area and wider Swan River foreshore through increased visitation and a new facility more broadly;
    - planting 18 additional endemic trees and including solar panels to provide an improved environmental outcome; and
    - consolidating each College's facilities in one location to provide a social outcome for the students at each school and the wider school community, with pedestrian facilities to be replaced and upgraded and other elements to be included, such as public art.
- Intergenerational – The proposed development would enhance the health, diversity and productivity of the local environment as has been described throughout this report.
- Biodiversity and ecological integrity – As noted above, the proposed development includes the planting of 18 additional endemic trees that would maintain and enhance the local environment.

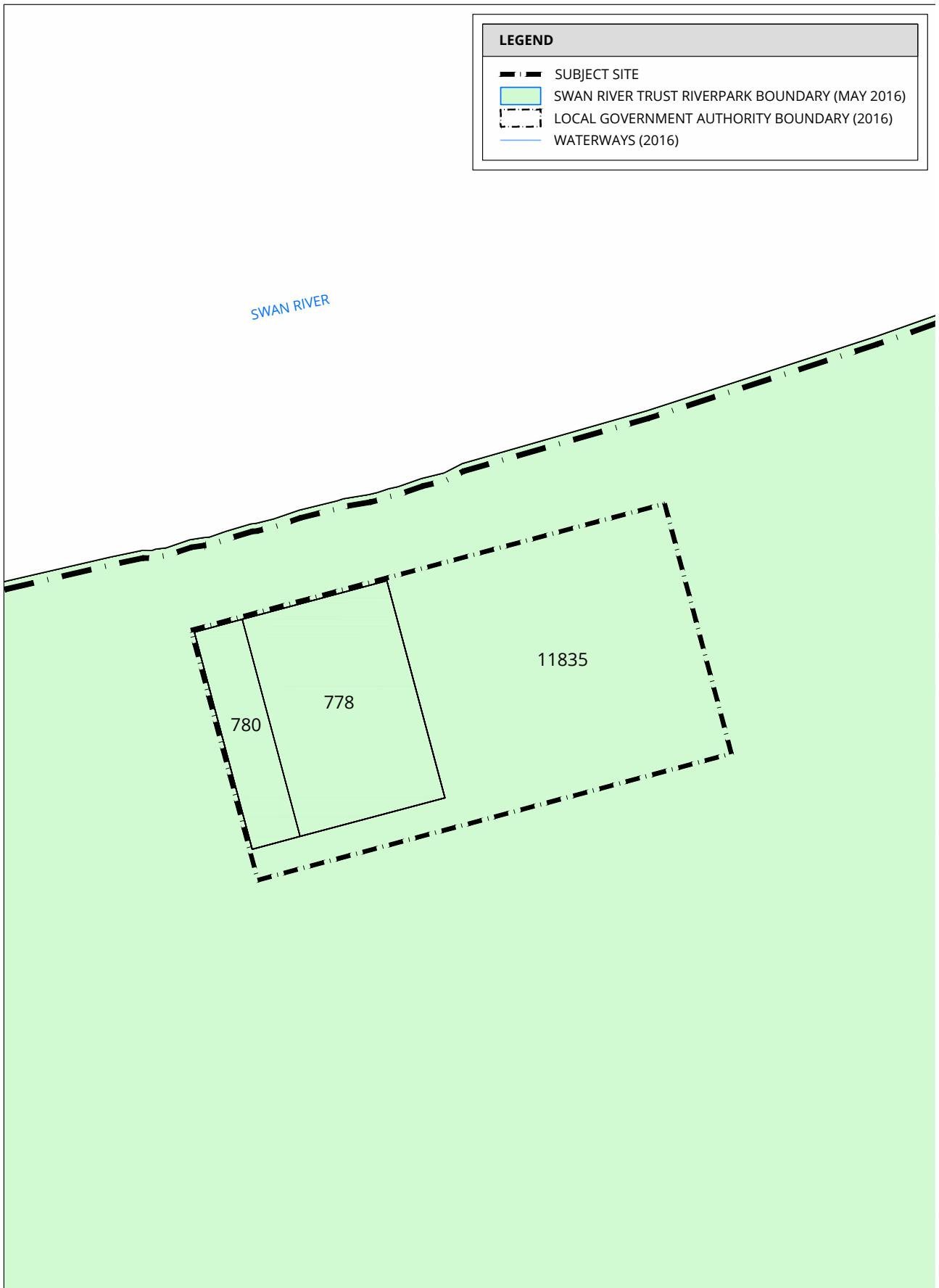


Figure 6 – Development Control Area & Riverpark Map 15



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### 5.3.3. Policy Statements

#### 5.3.3.1. Policy Statement No. 42 – Planning For Land Use, Development And Permitting Affecting The Swan Canning Development Control Area

This policy provides direction and guidance regarding how the DBCA assesses development applications in accordance with the SCRM Act and the *Swan and Canning Rivers Management Regulations 2007* ('SCRM Regulations'). The policy includes three objectives and a number of broad policy measures which reflect those objectives inclusive of 'Ecological Health', 'Landscape Protection', 'Recreation Opportunities and Public Access', 'River Foreshores', 'Flood Prone Land' and 'Heritage'.

Each of the relevant policy measures is addressed below:



#### Ecological Health

- The proposed development does not involve the removal of any endemic trees and importantly, proposes the planting of 18 endemic trees.
- In preparing this Application and the development plans, due regard for the provisions of relevant State planning strategies and policies has been made.



#### Landscape Protection

- The proposed development consolidates each Colleges' boatshed facilities in one (1) location rather than requiring replacement of the Wesley College boatshed and a separate facility at a different location, which collectively could result in a greater impact to the foreshore.
- In this regard, views towards the river and vice versa are considered to be enhanced in comparison to two (2) separate development proposals for similar facilities.
- It is important to point out that the subject site is not located directly at the termination of Coode Street and is located to the eastern side of this view line. For this reason, it is not considered to impact on a key local view line towards the river.
- The maximum height of the proposed development is 8.58m. This ensures the proposed development is low in scale and does not dominate its setting.
- The planning of 18 endemic trees will, in time, obscure the view of the proposed development, as viewed from the south and ensure a landscaped setting is provided for this location.
- The proposed development includes a variety of materials, colours and finishes appropriate for its riverine setting. These are included in a schedule of materials, colours and finishes attached to this report.



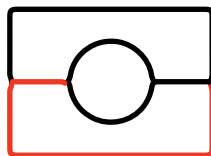
## Recreation Opportunities and Public Access and River Foreshores

- The proposed development would ensure Wesley College continues to provide a rowing facility in this location, consistent with all other Public Schools Association schools. This will continue to encourage this form of recreation for the school. Further, and importantly, the proposed development would ensure Penrhos College has access to a rowing facility on the river, which it has not had available during the College's 70 year existence. This will ensure the College can continue to support a rowing programme for girls, consistent with all other Independent Girls School Sports Association schools that offer a rowing programme.
- The provision of an additional pedestrian pathway between the proposed development and the foreshore and a replacement pedestrian pathway to the south of the facility will ensure the river foreshore is linked to connect places of natural and cultural interest as well as commercial and community facilities.



## Flood Prone Land

- The proposed development is designed for boat storage and is therefore not habitable by definition. The design works with the existing levels of the site, tying into the existing concrete boat ramp on the river side.



## Heritage

- As part of developing a public art proposal for the proposed development, local Aboriginal people will be consulted in acknowledgement of the spiritual and mythological cultural significance that the Swan River holds for Aboriginal people.

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### 5.3.3.2. Policy Statement No. 43 – Planning For Marinas, Yacht Clubs And Aquatic Clubs In The Swan Canning Development Control Area

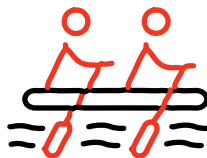
This policy provides direction and guidance regarding how the DBCA assesses development applications for marinas, yacht clubs and other aquatic clubs, including facilities or operations in accordance with the SCRM Act and SCRM Regulations. The policy includes three broad policy measures for planning and land tenure and policy measures specific to aquatic club buildings and facilities, such as the proposed development.

Each of the relevant policy measures is addressed below:



#### Planning and Land Tenure

- The relevant foreshore management plan for the subject site and surrounding land has been addressed earlier in this report.
- It is acknowledged that the proposed development extends beyond the boundary of the existing lease area, which relates to the extent of the existing boatshed. Wesley College, as holder of the existing lease, will seek to update the existing lease with the City and DPLH as part of a separate process that is required for such matters.
- All other policy measures under the 'Planning and Land Tenure' section of this policy have been addressed elsewhere in this report.



#### Aquatic Club Buildings and Facilities

- The proposed development includes a consistent setback from the waterway to the current boatshed.
- The proposed development includes a variety of materials, colours and finishes appropriate for its riverine setting and that are of a low reflective nature. These are included in the architectural drawings attached to this report.
- The existing boat ramp will be retained as part of this Application.
- Due to the use of the proposed development by students in early morning periods, car parking for the facility is either not required as students walk to the facility, or there is sufficient space for students to be dropped off within the adjoining car park. Given the early morning period of use, staff that do drive to the facility can be accommodated within the adjoining car park.
- Given the subject site is located over 130m away from any surrounding residential land, it is considered reasonable to suggest that undue or adverse amenity impacts will not be caused to these occupants.
- Light spill to land within and adjoining the DCA is designed to reduce anti-social behaviour while ensuring no adverse impact to any fauna, consistent with the principles of the 'Guide on the Limitation of Effects of Obtrusive Light from Outdoor Lighting Installations'.

## 6. Planning Merit And Community Benefits

Other than proposing a high-quality boatshed for Wesley College and Penrhos College at the subject site, it is important to acknowledge that the proposal will also provide greater amenity to the Coode Street activity node through the following improvements:

- Increasing interaction and connection to the Swan River;
- The provision of public art in due course, in consultation with the Nyungah community;
- Upgraded lighting in accordance with crime prevention through environmental design principles, for the wider public good;
- Removal of introduced species and planting of endemic species;
- Rainwater harvesting to irrigate new landscaping;
- A new verandah for public use; and
- Improved safety for the immediate area with CCTV included.

Furthermore, the Colleges commit to the following, to be considered and discussed outside of the development application process:

- Contribution to future City led 'super playground'; and
- Removal of the western boat ramp and revegetation of the area (900m<sup>2</sup>).

Finally, we submit that approval of the proposed development would continue to improve access to sport for children which is a fundamental goal for Wesley and Penrhos College. Moreover, this would markedly improve Penrhos Colleges' ability to promote woman and girls in sport.

This is important as demonstrated by the Federal Government in its Department of Health report "Get Up & Grow – Healthy Eating and Physical Activity for Early Childhood", which states the following:

*Participating in physical activity and limiting sedentary behaviour is central to a child's health, development and psychosocial wellbeing. Regular activity supports brain development, bone strength, muscle control, balance and coordination, and helps to achieve and maintain a healthy weight. Being active can positively affect sleep patterns, mental health, concentration, self-esteem and confidence.*

This comes at a time when (according to the Federal Government - ABS National Nutrition and Physical Activity Survey) on average, children aged 5-14 spend more than 2 hours (123 minutes) each day sitting or lying down for screen-based activities and less than one-quarter (23%) of children aged 5-14 are undertaking the recommended 60 minutes of physical activity every day.



## 7. Conclusion

The Application seeks approval for a new boatshed for Wesley College and Penrhos College that would replace existing facilities for Wesley College. The proposed development is considered consistent with the State and local planning framework for the following reasons:

- The proposed development consolidates two (2) boat shed facilities along the river and provides for the future requirements of each College in one location;
- The proposed development would improve activation and amenity of the immediate area and provide usable and enjoyable public space;
- The proposed development would increase opportunities for staff and students of both Colleges to access the river and water based activities whilst restoring and protecting the DCA and wider Riverpark.

On the basis of the above and attached, we respectfully request the DBCA support the proposed development and that the Minister for Environment grant development approval for this application.

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