

Banksia Grove District Centre

Activity Centre Plan N0. 65
Amendment No. 5

Background, Contexts and Rationale

November 2020

SHRAPNEL URBAN PLANNING

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SUMMARY AND CONCLUSIONS

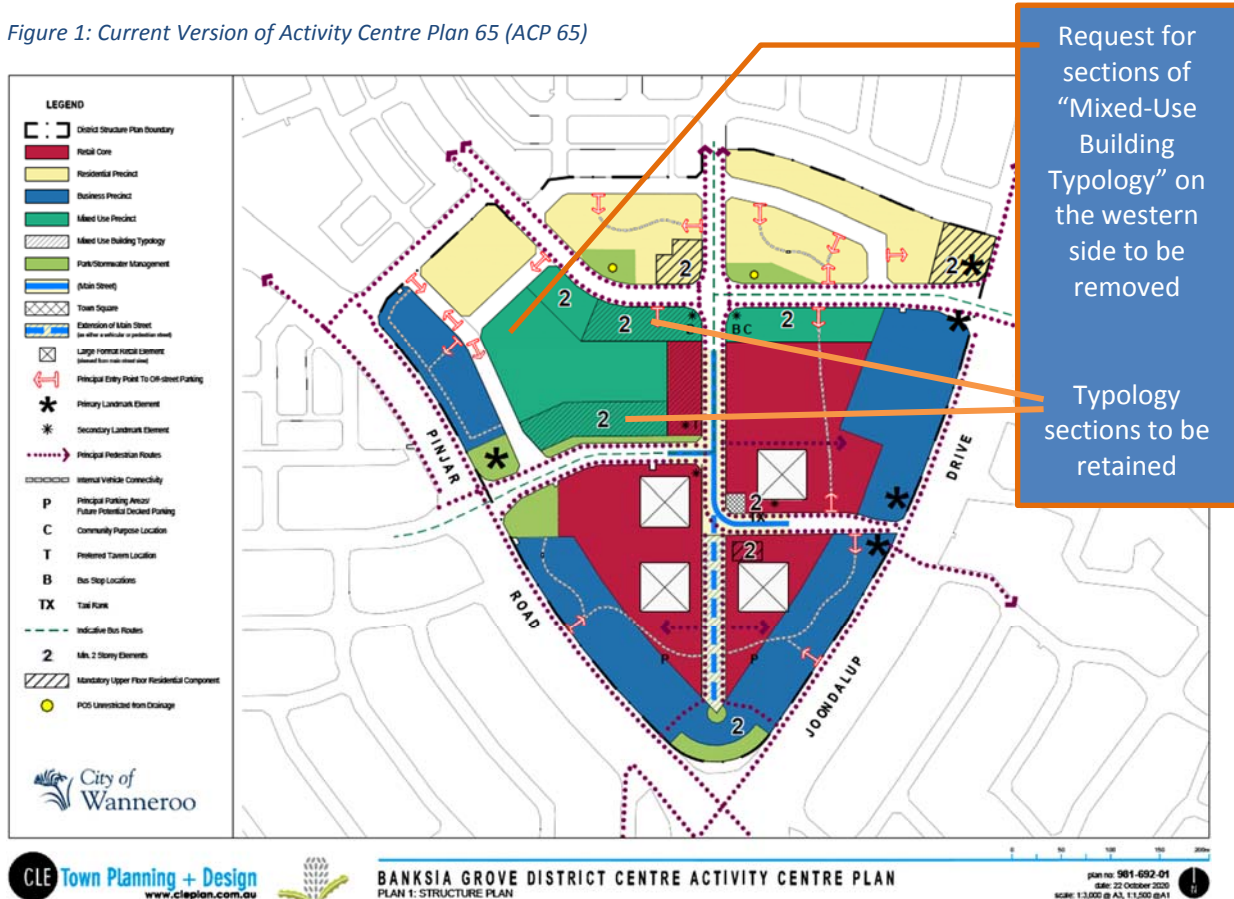
1. This report is in support of a proposal to amend the Banksia Grove district centre Activity Centre Plan No. 65 (ACP 65) which, since its endorsement in 2009, has been amended four times. During a lengthy Amendment No. 3 process, which was finalised in 2017, the WAPC introduced a “Mixed-Use Precinct” into the north-western quadrant of the district centre in preference to the “Residential Precinct” being sought at the time by the applicant.
2. The WAPC also stipulated that land along the boundaries of the Mixed-Use Precinct would be subject to a “Mixed-Use Building Typology” requirement whereby any residential development within the Typology area had to be a minimum of two-storeys with an elevated ground floor ceiling height to facilitate possible commercial use in the future. It is considered that the relevance of this requirement has waned very significantly along the northern and western boundaries of the Precinct due to the evolved nature of existing and planned developments opposite these boundaries. Furthermore, the developers of the subject land have found that, within the Banksia Grove residential market context, the “Typology” requirement is a significant impediment to affordable residential development.
3. This amendment therefore proposes to remove the existing Building Typology requirement from the Mixed-Use Precinct on the western boundaries of the Precinct, while retaining it along the more commercially oriented southern and eastern boundaries. These front the important district centre streets of Ghost Gum Boulevard and Jewel Way. Some changes to land use permissibility are also proposed in the resulting “Typology” and “Non-Typology” areas to reflect the different residential/ commercial contexts that would be enhanced.
4. To ensure that this proposed amendment would not compromise the on-going satisfactory development of the district centre a review and analysis of its context and development progress to date was carried out. Briefly, this review and analysis found that:
 - To date a total of 14,670 sqm of Shop/ Retail floorspace has been developed or is currently under construction in the district centre. There is ample remaining land available in the Retail Core and the Jewel Way frontage of the Mixed-Use Precinct to enable future development of the full 20,000 sqm of Shop/ Retail floorspace currently planned for the centre. There is also sufficient developable area remaining in the Retail Core, Business and Mixed-Use precincts for provision of additional, potentially significant non-retail commercial developments.
 - A comparison between the most recent (2020) population forecast for the district centre’s primary catchment area and the earlier (2008) forecast, which underpinned the original recommended Shop/ Retail floorspace size estimate for the district centre during its major early planning phase (20,000 sqm) concluded that:
 - the centre has, to date, developed in reasonable alignment with earlier expectations in relation to retail floorspace provision.
 - the current planning intention of 20,000 sqm for the Shop/ Retail floorspace component of the centre remains a reasonable target size.

- the proposed Amendment No. 5 for ACP 65 will not adversely affect the potential of the centre to reach this development potential; rather it will enhance its prospects.
5. The proposed amendment, which is in the nature of a refinement of the current situation that has evolved since 2009, rather than being a more radical modification to ACP 65, will benefit the centre by:
- Accelerating the rate of its residential development in the more residentially oriented sections of the Mixed-Use Precinct to the north and west, which will provide flow-on benefits to both residents of the area and the retail and other businesses within the Retail Core.
 - Focusing the commercial component of the precinct's Mixed-Use development more appropriately and beneficially in the vicinity of the district centre itself, particularly along the Ghost Gum Boulevard and Jewel Way frontages.

INTRODUCTION

This report is in support of a proposal to amend the Banksia Grove district centre Activity Centre Plan (ACP 65) by removing a portion of the existing Mixed-Use Building Typology requirement from the northern and western boundaries of the planned Mixed-Use Precinct (Figure 1).

Figure 1: Current Version of Activity Centre Plan 65 (ACP 65)



The Mixed-Use Precinct was introduced by the WAPC during the Amendment No. 3 process¹ as its preferred alternative to the amendment's initial request for virtually the entire north-west quadrant of the Retail Core to be rezoned to "Residential Precinct". While clearly acknowledging the desirability and benefits of "higher medium density" residential development² within and directly adjacent to the centre's Retail Core, the WAPC opted to designate the subject area "Mixed-Use Precinct" rather than the requested "Residential Precinct". The WAPC did nevertheless acknowledge that most of the precinct would likely be developed for residential purposes.

In addition to the Mixed-Use Precinct, the WAPC also stipulated that, in order to facilitate non-residential development within the Mixed-Use Precinct, land around the borders of the Precinct would be subject to a "Mixed-Use Typology" requirement for development within it to be a minimum of two-storeys, with an elevated ground floor ceiling height of 3.5 metres, rather than the regular 2.4 – 2.7 metres ceiling height for normal residential development. It is considered that the relevance of this requirement has now waned very significantly along the northern and western boundaries of the Precinct due to the evolved nature of existing and planned developments

¹ Since first produced ACP No. 65 has now been amended four times

² WAPC Statutory Planning Committee Report 12 December 2017

opposite these boundaries. Furthermore, LWP Property Group, joint developer of the subject land in association with the WA Department of Housing, has advised that, within the overall Banksia Grove residential market context, the specific “Mixed-Use Typology” requirement renders affordable residential development within the affected area impracticable.

This report therefore seeks to support the argument that, within the current context and circumstances of the Banksia Grove district centre it would, on balance, be preferable to facilitate residential development within the district centre’s Mixed-Use Precinct as soon as practicable. This can be achieved by lifting the Mixed-Use Building Typology requirement in those frontages of the Mixed-Use Precinct that are most suitable for residential development and least suitable for commercial development.

It is, however, also proposed to retain the Mixed-Use Building Typology in those frontages of the Precinct most suitable for commercial development at ground level, with either commercial or residential development above. As indicated in Figure 1 the frontages of the Mixed-Use Precinct proposed to be retained face the important centrally focussed main streets of Ghost Gum Boulevard and Jewel Way, whereas the Typology this amendment seeks to have removed is on the more peripheral frontages towards the west. Such a context and orientation does not favour successful Mixed-Use development.

It is considered that, by amending ACP 65 to modify the Mixed-Use Building Typology in the manner indicated, the role, function and performance of the district centre will not be adversely affected but enhanced by accelerating its development.

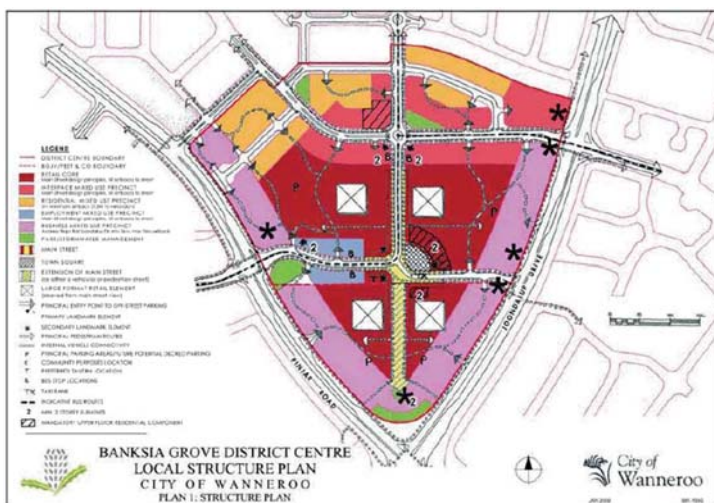
BANKSIA GROVE DISTRICT CENTRE

Background

After several years in the planning (as part of the overall planning and development of the Banksia Grove neighbourhood as a whole), ASP 65 was finalised in June 2009. Construction of the District Centre commenced in February 2014 and the first stage, which included the Coles supermarket, was fully operating by the end of that year.

A significant amount of development has since taken place. Following its initial endorsement, the activity centre plan has been amended four times and is now referred to as the Banksia Grove district centre Activity Centre Plan No. 65 (ACP 65).

Original ASP 65

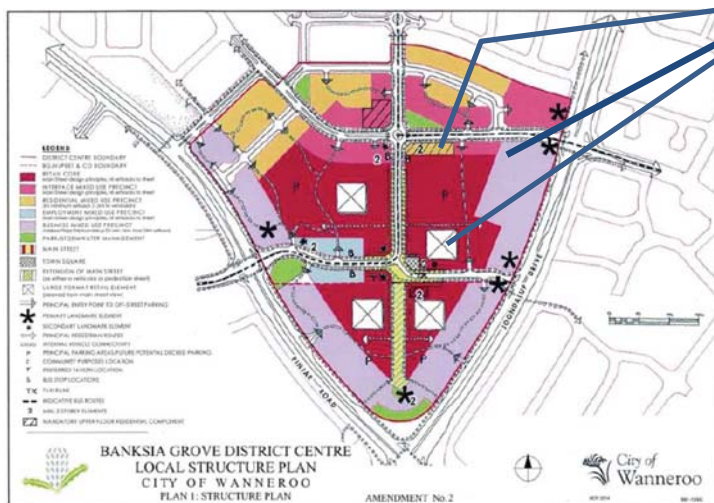


This is the ASP 65 Map the subject of the City of Wanneroo’s original endorsement on 30 June 2009. There were four types of Mixed-Use Precinct envisaged: “Interface”, “Residential”, “Employment” and “Business”. All land north of the “Retail Core” (coloured red) was either “Interface” or “Residential” Mixed-Use.

Amendment No.1

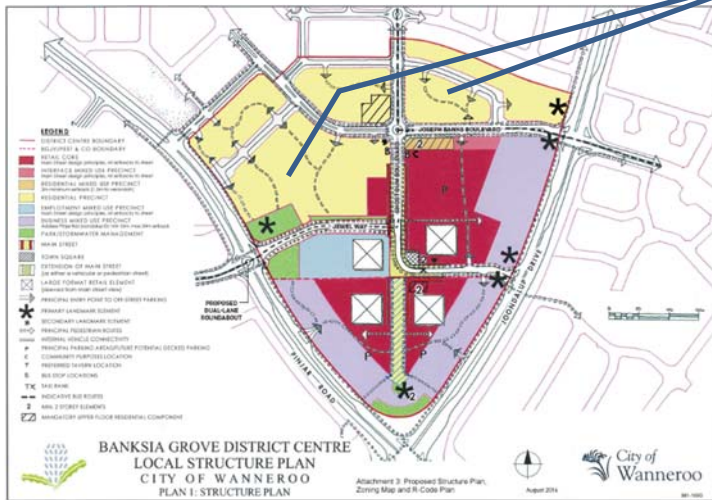
This was a simple 2014 amendment to include a “Drive-Through Food Outlet” as an (A) land use within the Retail Core Precinct. This amendment did not necessitate any changes to the ACP Map.

Amendment No. 2



This Amendment, which was completed in 2016, involved several text and map modifications. The Map modifications mainly included land use and precinct boundary changes to the north-east quadrant of the Retail Core and the “Business Mixed-Use Precinct”.

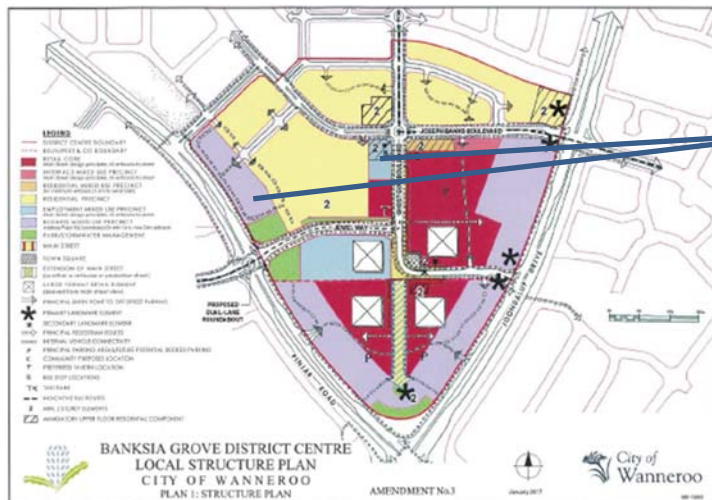
Amendment No 3 (as initially proposed)



New "Residential Precinct Zone" (coloured yellow)

This was the most significant amendment. Initiated in June 2016 and finalised in December 2017, the amendment sought some extensive modifications, the most significant being realignment of Jewel Way and replacement of virtually all of the "Interface Mixed-Use Precinct", "Residential Mixed-Use Precinct" and NW quadrant of the "Retail Core" with a new "Residential Precinct".

Amendment No 3 (as preferred by City of Wanneroo)



City of Wanneroo changes to original proposal

The City of Wanneroo sought some modifications to the original proposal before submitting it to the WAPC for approval in May 2017.

Amendment No. 3 (as finally resolved by WAPC; dated November 2017)



WAPC main modifications: Mixed-Use Precinct and Building Typology

In its report to the SPC recommending changes to the initial amendment proposal, the DPLH emphasised the desirability for predominantly residential development in the Mixed-Use Precinct. However, the perceived need for mixed-use opportunities and significant street front activation in the

“long-term” was also emphasised and the desire to establish this potential is what precipitated the complementary requirement for the “Mixed-Use Building Typology” in Amendment 3. This is understandable given the very significant emphasis put on Mixed-Use in the original structure plan, and the fact that the initial version of Amendment 3 virtually sought to eliminate it entirely.

Amendment No. 4

This most recent amendment (March 2019) simply sought to include a “Drive-Through Food Outlet” as an (A) land use in the Business Precinct and to modify vehicular movements on Pinjar Road and Joondalup Drive, which were expressed as simple text additions to the ACP 65 Map.

Centre Development to Date

Shop/ Retail Floorspace

A review of existing and potential future development in the Banksia Grove district centre has been carried out to help confirm the practicality of the proposed amendment to ACP 65. The precincts and sites within the District Centre which were considered in this review are shown in Figure 2. Photographs, brief descriptions and floorspace estimates are provided on the following few pages. A summary table totalling the retail floorspace is provided at the end of the series of photographs.

Figure 2: Banksia Grove district centre - indicative development precincts



1 Coles-based shopping centre



The total amount of Shop/ Retail floorspace in this centre is 5,920 sqm. Although the future creation of a main street along its eastern frontage would be technically feasible and remains a longer-term possibility, the short-term potential for additional retail floorspace in this centre is minimal.

2 Vacant land to the east of the Coles centre



Most of this land is within the district centre's Business Precinct, however, some potential exists for a retail use on the north east corner, fronting Ghost Gum Boulevard, which could potentially enjoy shared parking with the Coles development. The estimated retail floorspace potential for this concept is approximately 1,700 sqm.

3 Fast food outlets and vacant land to the south



The three existing outlets comprise about 1,100 sqm of Shop/ Retail floorspace.

Although most of the land south of the fast-food outlets is within the Business Precinct, there is some longer-term potential for additional Shop/ Retail floorspace to the south of the fast-food outlets. At present this land is out of the way and retail (other than some form of extension of the fast food offering) would not succeed at this location in the short term.

However, ASP 65 envisages a strong "Minimum two-storey elements" presence on this highly exposed corner in the longer term, an event that could potentially provide a suitable context for additional retail floorspace to the immediate north. The blue-shaded area is approximately 2,000 sqm in area and, associated with other developments yet to come and

accounting for some reasonable amount of shared parking, could facilitate development of some 1,000 sqm of Shop/ Retail floorspace.

4 Vacant site to west



This vacant site to the west of the existing fast-food outlets, although fully within the Business Precinct has the potential to be used for a service station and/ or fast food outlet and therefore has some potential for Shop/ Retail floorspace as its main use, or incidental use.

Because it is in the Business Precinct, however, and its future use is currently unknown, a minimal figure of 100 sqm Shop/ Retail floorspace will be assumed for this site in this assessment.

5 Shops under construction to west, fronting Jewel Way



A row of shops is currently under construction on this site which has the potential to accommodate approximately 650 sqm of Shop/ Retail floorspace. As construction is well underway, these shops are classified as “Existing” in this assessment.

The long, narrow site to the immediate east of these shops is also identified as a future retail site with a potential for 500 sqm of floorspace, if it was able to share the adjacent ALDI supermarket carpark.

6 Aldi supermarket



The ALDI supermarket comprises some 1,500 sqm of Shop/ Retail floorspace.

7 Woolworths-based shopping centre



The Woolworths development comprises a supermarket of 4,000 sqm Shop/ Retail floorspace, 1,350 sqm of specialty shops and a 420 sqm gymnasium which somewhat incongruously occupies a prime retail tenancy right on the Ghost Gum Boulevard "Town Square" corner. The gym is regarded as retail floorspace "potential" in this assessment.

8 Vacant site to east



This currently vacant site with a car wash to the west and KFC fast food outlet to the south is primarily within the Business Precinct and has been marked for a combined service station and convenience store which will provide about 200 sqm of Shop/ Retail floorspace – approximately the same net retail area as in the already-constructed fast food outlet.

9 Various developments in the north-east corner



Most of this precinct is within the Business Precinct but contains about 150 sqm of Shop/ Retail floorspace in a 7-Eleven convenience store associated with a service station, and 350 sqm in a Petbarn showroom.

Southern side of precinct 9

Along the southern boundary of precinct 9 there is a Chicken Treat (not in photo) and three other fast-food outlets. Shop/ Retail floorspace is conservatively estimated at 300 sqm.

10 Vacant site/s west of Ghost Gum Boulevard & north of Jewel Way

These approximately 4,700 sqm vacant site/s extend along the western side of Ghost Gum Boulevard within the Retail Core and along the northern side of Jewel Way within the Mixed-Use Precinct. Both frontages are subject to the Mixed-Use Building Typology which, if implemented in this context, will result in an interesting street front of ground level retail and other commercial floorspace, with one or two storeys of residential apartments above.

The context of the site/s will make it equally attractive for retail, other commercial development (e.g. offices) and personal service businesses (e.g. hairdresser, etc). For this reason, it is conservatively estimated for the purposes of this assessment that up to 3,000 sqm of Shop/ Retail floorspace is able to be accommodated on this site. More will be said about the potential uses in this area in the following major section of this report (Rationale for the amendment).

11 Proposed commercial development -Pinjar Road



This proposed development within the northern part of the Business Precinct fronting Pinjar Road is to accommodate a service station to the north (Shop/ Retail component of 202 sqm coloured purple), a “Salvos” shop of 1,001 sqm (coloured blue), and a bulky goods outlet of 1,482 sqm coloured yellow. For the purpose of this assessment it is assumed that the planned bulky goods outlet is not classifiable as Shop/ Retail.

It is noted that the Mixed-Use Precinct’s south-west frontage faces the rear loading and bin areas of the proposed development across the narrow road to the east of it.

Total Shop/ Retail floorspace potential estimate

The figures quoted in the above paragraphs are summarised and totalled in Table 1.

Table 1: Summary of existing and potential remaining Shop/ Retail floorspace potential

Precinct	Existing (sqm)	Potential (sqm)	Total (sqm)	Notes
1	5,920	-	5,920	site currently at full development
2	-	1,700	1,700	2nd-generation longer-term potential
3	1,100	1,000	2,100	low additional potential
4	-	100	100	low additional potential
5	650	500	1,150	under construction/ high additional potential
6	1,500	1,000	2,500	some 2nd-gen additions possible
7	5,350	800	6,150	420 sqm of potential relies on gym move
8	-	200	200	fast-food only
9	150	-	150	convenience store only
10	-	2,500	2,500	excellent future potential
11	-	1,200	1,200	excellent future potential (fully planned)
Full Total	14,670	9,000	23,670	The figures in this table have been estimated using a variety of methods and are best regarded as "reasonable approximations"
Low/ Longer		3,800		
Adj. Total	14,670	5,200	19,870	

This assessment indicates that there is approximately 14,670 sqm of existing (and under construction) Shop/ Retail floorspace in the district centre at present. The currently planned Retail floorspace estimate of 20,000 sqm therefore remains a feasible target, with some 5,200 sqm of additional retail floorspace readily able to be developed within the Retail Core in the short-term. ***The largest future potential is within the subject land (precinct 10).*** In the longer-term this potential could be increased by some more intense, second-generation retail development such as, for example, creation of shopfronts along a new main street opposite the existing Coles development, or even office and other non-retail developments in suitable locations.

Non-retail commercial development

There are some significant Non- Retail developments already established in the district centre, with significantly more being planned. Most of this has occurred, and is continuing to occur, within the Business Precinct and includes showrooms, a gymnasium and substantial community service establishments such as this early learning centre:

Early learning centre in the north-east quadrant



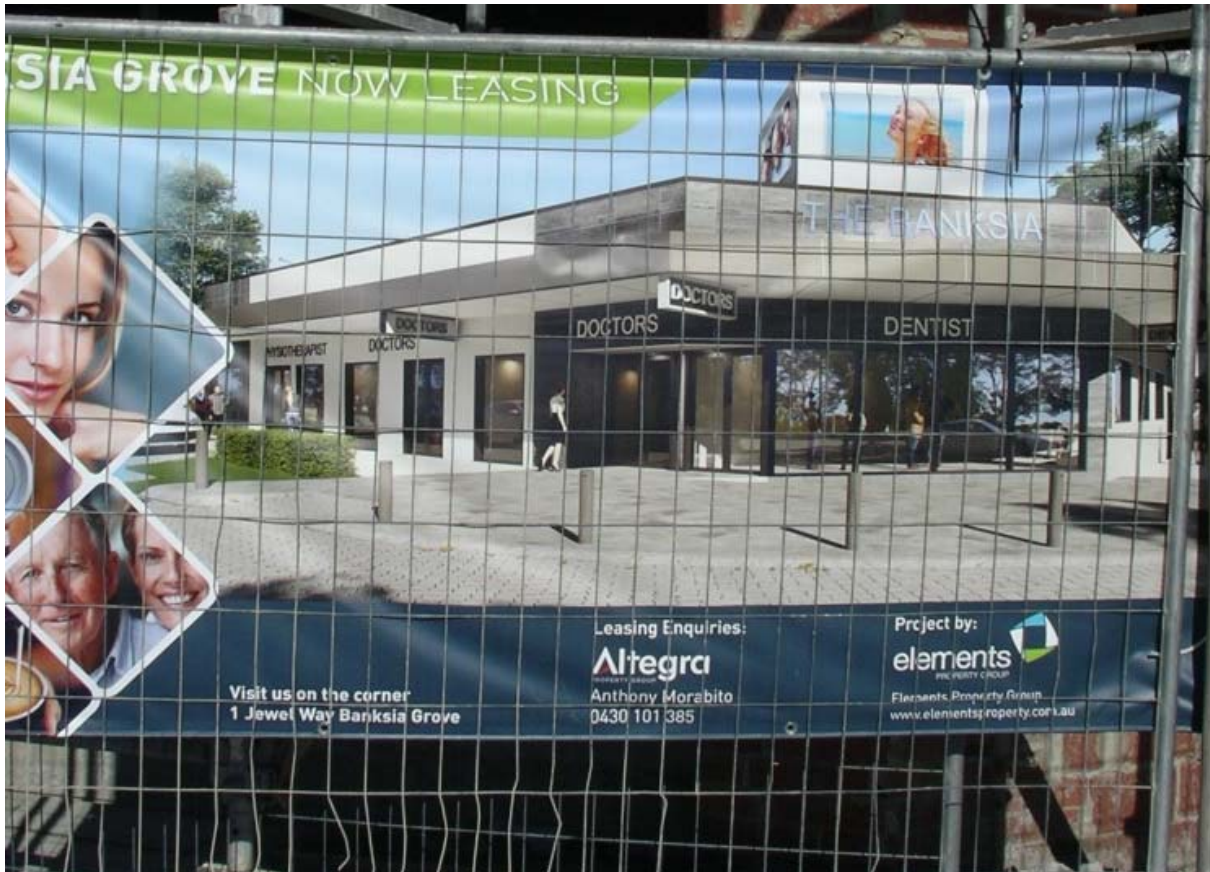
Although this development is mostly within the Business Precinct, it does intrude somewhat into the Retail Core. Although such intrusions are inevitable due to the (generally) indicative nature of the Precinct boundaries on the ACP 65 Map, they have the potential to reduce the

future amount of retail floorspace potential available in the centre, particularly in the Retail Core.

The possible realisation of this eventuality is enhanced by the wide range of non-retail uses, both Permitted and Discretionary, potentially allowable under ACP No. 65. For example, what appears to be intended as a significant medical centre is currently under construction at a prime site on the southern corner of the Ghost Gum Boulevard/ Jewel Way junction.

Medical centre under construction, corner of Jewel Way and Ghost Gum Boulevard + sign close-up





There are still several sites available for non-retail commercial development within the Business Precinct, particularly along the northern frontage of Pinjar Road, but these will almost certainly be taken up reasonably quickly. Over time – in the short-term – offices and several other forms of non-retail development will vie for sites within the Retail Core, as they are permitted to do under ACP No. 65, and as they should be encouraged to do in order to make the centre more diverse and interesting as a community focal point.

THE RATIONALE FOR ACP 65 AMENDMENT No. 5

Review of Primary Catchment Area Population Forecasts

The Shop/ Retail and other commercial floorspace potential of the Banksia Grove district centre was originally based on population forecasts for its catchment area that were produced in 2008. The purpose of this section is to review and update the catchment area's population forecasts in order to ascertain whether more recent forecasts present any implications for the planned size and capacity of the district centre. A comparison between the population forecast in the 2008 Banksia Grove district centre Retail Potential and Staging Assessment for the centre's primary trade area and the most recent population forecast available for the City of Wanneroo is presented in Table 2.

Table 2 Primary trade area population forecasts 2008 and 2020

Population Forecasts (persons)	2016	2021	2026	2031	2036	2041
2008 Forecast*						
Banksia Grove	8,146	11,817	14,100	14,100	No forecast	
Carramar	518	490	475	468		
Tapping	12,011	12,634	12,600	12,600		
Mariginiup	835	2,532	6,604	6,955		
Total	21,510	27,473	33,779	34,123		
2020 Forecast**						
Banksia Grove	9,684	10,976	11,619	12,465	12,547	12,403
Carramar	7,408	7,392	8,126	8,260	8,097	7,948
Tapping	9,779	9,799	9,689	9,450	9,264	9,164
Gnangara-Jandabup-Mariginiup	2,327	2,404	2,574	2,589	3,177	5,075
Total	29,198	30,571	32,008	32,764	33,085	34,590
* SHRAPNEL URBAN PLANNING (April 2008)						
** City of Wanneroo (id.Consulting May 2020)						

Although some of the figures suggest otherwise, with the exception of Mariginiup, both forecasts in this table cover the same urban areas, with "Banksia Grove" referring to exactly the same suburban area in both forecasts. In the 2008 forecast, however, "Carramar" referred to the existing Rural Residential/ golf course area only, while "Tapping" referred to the entire urban area both north and south of Joondalup Drive. In the 2020 forecast "Carramar" now refers to both the existing Rural Residential/ golf course area, and the large urban area north of Joondalup Drive; while "Tapping" now refers only to the suburb directly south of Joondalup Drive.

As evident in Table 2, in the 2008 forecast Mariginiup, a suburb in East Wanneroo adjacent to Banksia Grove, was expected to rapidly urbanise from 2016 onwards. Based on the 2020 forecast it is now clear that the previously anticipated forecast growth of Mariginiup to 6,955 persons by 2031 is very unlikely to be realised. The current City of Wanneroo forecast is that all three suburbs comprising East Wanneroo will account for only 5,075 persons by 2041, with only 2,589 persons (just 262 more than in 2006) being anticipated by 2031.

The 2008 Retail Potential and Staging assessment presented two possible scenarios for the potential size of the Banksia Grove district centre:

- Without any significant East Wanneroo urbanisation (District Centre retail potential: 20,000 sqm)
- With significant East Wanneroo urbanisation (District Centre retail potential: 28,000 sqm).

This review and comparison between the 2008 population forecasts to 2031 and the City's 2020 forecasts to 2041 clearly indicate that the **20,000 sqm retail floorspace potential** for the Banksia Grove district centre remains the appropriate figure, as the centre continues to complete its first generation of development. This potential outcome was envisaged in the 2008 report as it was recognised that there were some doubts over the timing and feasibility of any future East Wanneroo urbanisation. The final point in the report's Summary and Conclusions was:

12. Rather, the true potential of East Wanneroo urbanisation should preferably be known prior to the development of Stage 2, and this information used to fine-tune the planning of Stages 2, 3 and 4.

Stage 2 of the centre was envisaged as being completed by the end of 2016, with Stage 3 estimated to occur during 2016-21, which now appears to be just a little behind the 2008 expectations. The main variation from 2008 development expectations is the absence of a 'half' discount department store in the district centre. Due to the recent relative under-performance and subsequent rationalisation of DDS's generally, however, and their readily accessible presence in both the Wanneroo Secondary Centre and Joondalup Strategic Metropolitan Centre, it now seems unlikely that it would be feasible to develop a DDS in the Banksia Grove district centre.

This review and update of the population forecasts for the Banksia Grove district centre's primary catchment area confirms that the centre has, to date, developed in reasonable alignment with earlier expectations in relation to retail floorspace provision. Furthermore, it is concluded that the current planning intention of 20,000 sqm for the Shop/ Retail floorspace component of the centre remains a reasonable target. It is clear that the proposed Amendment No. 5 for ACP 65 will not adversely affect the potential of the centre to reach this development potential. Rather, as indicated in the rest of this report, the proposed amendment, which is in fact just a refinement of current intentions, will likely benefit the centre by accelerating the rate of its development.

Land Use Contexts

The purpose of, and rationale for, Amendment No. 5 are, while maintaining and supporting the main intent of the significant Amendment No. 3, to introduce some modest, practical refinements in order to encourage more rapid and appropriate development within the north-east quadrant of the Banksia Grove district centre. Within the planning framework now guiding development in the north-east quadrant of the centre, the main intent of the Amendment is to:

- Encourage and facilitate the timelier establishment of "higher medium-density" residential development within the defined Mixed-Use Precinct by **removing** the Mixed-Use Typology requirement from the western and part of the northern boundaries of the Precinct.
- Encourage and facilitate denser vertical and horizontal mixed-use development with commercial ground-level main-street frontages to Jewel Way and Ghost Gum Boulevard by **retaining** the Mixed-Use Typology requirement along these frontages.

Mixed-Use Precinct and required “Building Typology”

The purpose of the Mixed-Use Precinct is to facilitate and encourage development of various compatible commercial and other non-residential uses, as well as residential uses, in order to create a more interesting and sustainable urban environment. In the ACP 65 Mixed-Use Precinct, however, there is no specific requirement for the development of non-residential uses. It is therefore possible that the operation of market forces will favour residential development only, within the Precinct. This is the most likely scenario in the short, medium and (arguably) longer terms.

Although there is no requirement for non-residential development within the Mixed-Use Precinct, under ACP 65 the “Building Typology” requirement is obviously intended to more strongly encourage and facilitate Mixed-Use development by requiring the ground floor of any residential development to have an increased ceiling height of 3.5 metres, thus making it more suitable for conversion to a retail or other non-residential use in the future. The problem with this in relation to the Mixed-Use Precinct in the Banksia Grove context is that the requirement significantly increases the cost of a typical dwelling within the Typology area by some \$15,000 to \$20,000 (Source: LWP Property Group), making most residential development within the Typology area economically unfeasible.

Therefore, rather than facilitate and encourage mixed-use development, the Typology requirement is resulting in a reluctance by the developer to carry out any development at all in the Mixed-Use Precinct. For this reason, it is also proposed, as part of Amendment 5, to reduce the first-level height of the Mixed-Use Building Typology within the Mixed-Use Precinct from 3.5 metres to 3 metres. This modification is intended to ensure that buildings are designed to maintain the ability to adapt over time within a residential scale that doesn’t unduly restrict the developer’s ability to provide affordable residential development within the Typology area.

Natural residential frontages

However, even the proposed building Typology modification is likely to strongly discourage residential development within the Typology area in a context where the boundaries of the Mixed-Use Precinct to the north and north-west are now more obviously within a “natural” residential context. These frontages would have little or no appeal as commercial sites due to their location at the outer edges of the district centre, with an orientation away from the centre towards extensive existing residential development on the opposite sides of the frontage streets.

On the south-western boundary of the Mixed-Use Precinct, buildings would face the backs of a future large bulky goods outlet and Salvos shop across a narrow street to the rear of these planned uses, which will themselves front Pinjar Road (see overlay image on Page 10). This would be the case unless the Mixed-Use Precinct development was oriented so that its side boundaries, rather than its frontages, faced these other commercial outlets. Although such side boundaries would reasonably result in dwellings facing one-another across narrow streets they would be very unsuitable for commercial businesses which, within any activity centre, require accessibility, visibility and foot traffic.

For these reasons the market is unlikely to be interested in commercial developments on the north-west and western boundaries of the Mixed-Use Precinct due to their second-rate locations for commercial purposes. Therefore, because feasible residential development along these frontages is not possible due to the Building Typology requirement, it is likely that any development at all along

these frontages could take an inordinate amount of time to materialise. This would be a detrimental drag on the economic and timely development of the Banksia Grove district centre.

In contrast, it is apparent, based on market experience in Banksia Grove, that there will be considerable demand for residential development within the interior of the Mixed-Use Precinct, which is unaffected by the Typology requirement. Furthermore, for reasons that are elaborated on below, it is highly beneficial, to both residents and commercial operators, for residential development to be established within and in immediate proximity to activity centres. It is the Typology requirement that is the impediment to development along the northern and western street frontages, not the Mixed-Use Precinct itself.

Natural commercial frontages

While the northern and western frontages of the Mixed-Use Precinct are “natural” **residential** frontages, it is clearly the case that the eastern frontage to Ghost Gum Boulevard and the southern frontage to Jewel Way are both excellent “natural” **commercial** frontages, strongly oriented to and helping to physically define the district centre itself. These frontages are also subject to the Building Typology requirement but in their case such a requirement is both warranted and beneficial as it is likely to encourage commercial development at ground level (and potentially upper levels) in the first instance along what are excellent commercial frontages. This is clearly preferable to uneconomic forms of residential development that may transition to commercial development sometime in the future. Should, however, ground level residential nevertheless be proposed along these important frontages, it will be absolutely necessary for it to comply with the Building Typology requirement as it will almost certainly be converted to commercial uses sooner or later – probably sooner.

For the above reasons it is considered that it clearly makes sense to encourage more appropriate, beneficial and timely development of the Banksia Grove district centre by strongly facilitating commercial development along the more suitable commercial frontages and residential development along the more suitable residential frontages of the Mixed-Use Precinct. As discussed, this objective is being sought through a more ***selective application of the Mixed-Use Building Typology*** than is currently possible under ACP 65 as it now stands.