Metro Inner Development Assessment Panel Agenda

Meeting Date and Time: Thursday, 26 November 2026; 2.00pm
Meeting Number: MIDAP/167
Meeting Venue: 140 William Street, Perth

A live stream will be available at the time of the meeting, via the following link:
MIDAP/167 - 26 November 2026 - City of Vincent - City of Nedlands

PART A – INTRODUCTION

1. Opening of Meeting, Welcome and Acknowledgement
2. Apologies
3. Noting of Minutes

PART B – CITY OF VINCENT

1. Declarations of Due Consideration
2. Disclosure of Interests
3. Form 1 DAP Applications
   - 3.1 Lot 101 (No.19) Wright Street, Perth - Proposed demolition of existing buildings and construction of six storey aged care facility (use not listed) – DAP/26/03187
4. Form 2 DAP Applications
5. Section 31 SAT Reconsiderations

PART C – CITY OF NEDLANDS

1. Declarations of Due Consideration
2. Disclosure of Interests
3. Form 1 DAP Applications
4. Form 2 DAP Applications
   - 4.1 Lot 381 (No.6) Alexander Road, Dalkeith – Amendments to approved multiple dwelling development – DAP/24/02820
5. Section 31 SAT Reconsiderations

PART D – OTHER BUSINESS

1. State Administrative Tribunal Applications and Supreme Court Appeals
2. Meeting Closure

Please note, presentations for each item will be invited prior to the items noted on the agenda and the presentation details will be contained within the related information documentation

DAP Members
Karen Hyde (Presiding Member)
Francesca Lefante (Deputy Presiding Member)
Luigi D'Alessandro
Cr Suzanne Worner (Part B – City of Vincent)
Cr Nicole Woolf (Part B – City of Vincent)
Cr Charles Pan (Part C – City of Nedlands)

DAP Secretariat
Kristen Gray
Tenielle Brownfield

PART A – INTRODUCTION

1. **Opening of Meeting, Welcome and Acknowledgement**

2. **Apologies**

3. **Noting of Minutes**

PART B – CITY OF VINCENT

1. Declarations of Due Consideration

2. Disclosure of Interests

3. Form 1 DAP Applications

3.1 Lot 101 (No.19) Wright Street, Perth - Proposed demolition of existing buildings and construction of six storey aged care facility (use not listed) – DAP/26/03187

4. Form 2 DAP Applications

Nil

5. Section 31 SAT Reconsiderations

Nil

PART B – ITEM 3.1 - LOT 101 (NO. 19) WRIGHT STREET, PERTH

RESPONSIBLE AUTHORITY REPORT – FORM 1	
DAP Name:	Metro Inner DAP
DAP File No:	DAP/26/03187
LG Reference:	5.2026.298.1
Proposed Development:	Proposed demolition of existing buildings and construction of six storey aged care facility (use not listed)
Value of Development:	$55.7 million
Owner:	Aegis Aged Care Group Pty Ltd
Applicant:	Planning Solutions
Local Government Area:	City of Vincent
Responsible Authority:	City of Vincent
Authorising Officer:	Michael Hancock – Manager Development and Design
Application Acceptance Date:	25 August 2026

LOCATION PLAN

RESPONSIBLE AUTHORITY RECOMMENDATION

That the Metro Inner DAP resolves to **APPROVE** DAP Application reference DAP/26/03187 for Aged Care Facility (use not listed) at Lot 101 (19) Wright Street, PERTH in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015*, and the provisions of the City of Vincent Planning Scheme No. 2, subject to the following conditions:

Conditions

1. General

1.1 The development is to be undertaken in accordance with the approved plans and documents attached to this approval, as listed below, except where amended by subsequent conditions:

Plan/ Document Name	Reference	Date
Site Survey	SK.00.100	31 July 2026
Existing Context Plan	SK.01.100	18 August 2026
Existing Site Plan	SK.01.101	18 August 2026
Proposed Site Plan	SK.01.200	5 November 2026
Overshadowing Diagram	SK.01.300	18 August 2026
Demolition Site Plan	SK.02.100	18 August 2026
Basement Plan	SK.03.001	18 August 2026
Ground Floor Plan	SK.03.100	18 August 2026
Level 01 Floor Plan	SK.03.101	18 August 2026
Level 02 Floor Plan	SK.03.102	18 August 2026
Level 03 Floor Plan	SK.03.103	18 August 2026
Level 04 Floor Plan	SK.03.104	18 August 2026
Level 05 Floor Plan	SK.03.105	18 August 2026
Level 06 Floor Plan	SK.03.106	18 August 2026
Roof Plan	SK.04.100	18 August 2026
Elevations	SK.06.100	18 August 2026
Elevations	SK.06.101	18 August 2026
Sections	SK.07.100	18 August 2026
Sections	SK.07.101	18 August 2026

1.2 This decision constitutes planning approval only and is valid for a period of four years from the date of approval. If the subject development is not substantially commenced within the specified period, the approval shall lapse and be of no further effect.

2. Building Design

2.1 All external fixtures, such as television antennas (of a non-standard type), radio and other antennas, satellite dishes, solar panels, external hot water heaters, air conditioners, and the like, are designed integrally with the building, and be located so as not to be visually obtrusive, to the satisfaction of the City.

2.2 Meter boxes, fire boosters and other service utilities shall be located behind the street setback area, and where integrated into the building, designed and located so as not to be visually obtrusive, to the satisfaction of the City.

2.3 The colours, materials and finishes of the development shall be in accordance with the details and annotations as indicated on the approved plans (or as amended) which forms part of this approval. The development must be finished and thereafter maintained in accordance with the approved plans, **prior to occupation of the development**.

3. Car Parking and Access

3.1 **Prior to the occupation or use of the development**, a minimum of 75 car parking bays shall be provided on site. The bays shall be permanently marked for their approved purpose in accordance with Australian Standard AS2890.1, to the satisfaction of the City.

3.2 **Prior to the occupation or use of the development**, all vehicle parking, manoeuvring and access areas shall be constructed, drained and line marked in accordance with the approved plans and are to comply with the requirements of Australian Standards 2890.1, and maintained thereafter by the owner/occupier to the satisfaction of the City.

3.3 **Prior to the first occupation of the development**, redundant or "blind" crossovers shall be removed and the verge and kerb made good to the satisfaction of the City, at the applicant/owner's full expense.

4. Landscaping

4.1 All works shown in the approved landscaping plan shall be undertaken in accordance with the approved plans to the satisfaction of the City, **prior to the occupation or use of the development** and maintained thereafter to the satisfaction of the City, at the expense of the owners/occupiers.

4.2 No verge trees are permitted to be removed as part of this approval, unless otherwise annotated on the approved plans.

4.3 **Prior to occupation or use of the development**, three replacement trees shall be planted within the Wright Street verge in accordance with the approved Landscape Plan.

5. Acoustic Management

5.1 **Prior to the issue of a Building Permit**, an updated acoustic report shall be submitted to the City to demonstrate compliance with the City's Sound Attenuation Policy No. 7.5.21, and in order to assess compliance with *the Environmental Protection (Noise) Regulations 1997* for any selected plant, equipment and other potential noise sources.

5.2 All recommended measures included in the approved Acoustic Report shall be implemented **prior to the occupation or use of the development** and be

maintained thereafter, to the satisfaction of the City, at the expense of the owners/occupiers.

5.3 Written certification from an acoustic consultant shall be provided to the City demonstrating that the recommended measures have been undertaken to the City's satisfaction, **prior to the occupation or use of the development**.

6. Public Art

6.1 In accordance with the City's Local Planning Policy – Percent for Art a public art contribution of $557,000 is required, being one percent of the $55.7 million cost of development.

To comply with the Policy, the owner(s) or applicant, on behalf of the owner(s) shall submit a statutory declaration **prior to the issue of a building permit** stipulating the choice of:

Option 1: Owner/Applicant chooses to co-ordinate the Public Art project themselves or by engaging an art consultant.

OR

Option 2: Owner/Applicant chooses to pay cash-in-lieu. Owner/Applicants who choose Option 2 will receive a 15 percent discount on the Percent for Art contribution.

6.2 The owner(s), or the applicant on behalf of the owner(s), shall comply with the City's Local Planning Policy - Percent for Art in conjunction with the above chosen option:

Option 1: **Prior to the occupation or use of the development**, obtain approval for the Public Art Project and associated Artist and install the approved public art project, and thereafter maintain the art work;

OR

Option 2: **Prior to the occupation or use of the development** pay the above cash- in-lieu contribution amount.

7. Waste Management

The approved Waste Management Plan prepared by Talis dated 13 July 2026 (or as amended) shall be implemented and complied with at all times for the duration of the development, to the satisfaction of the City.

8. Construction Management Plan

Prior to the commencement of works, a Construction Management Plan shall be submitted to, and approved by, the City. Once approved, the Plan shall be implemented in full and complied with at all times for the duration of construction of the development, to the satisfaction of the City. The Plan is to address, but not limited to, the following:

i. public communication and complaint handling procedures;
ii. temporary fencing, hoarding, gantries and signage;
iii. construction methods;
iv. protection of trees and public realm infrastructure;
v. site access and egress;
vi. construction traffic management;
vii. deliveries and storage of construction materials and machinery;
viii. pedestrian and cyclist management and any footpath obstructions;
ix. parking arrangements for staff and contractors;
x. hours of construction;
xi. management of noise, lighting, vibration, dust and erosion;
xii. construction waste management, recycling, and removal; and
xiii. management of any site dewatering or stormwater discharge.

9. Stormwater

Stormwater from all roofed, paved and awning areas shall be collected and contained on site. Stormwater must not affect or be allowed to flow onto or into any other property or road reserve.

10. Heritage

A program of monitoring any structural movement and potential vibration impacts on Silver Chain Nursing League Building, Perth is to be implemented at the commencement of works. The Heritage Council is to be notified immediately if any impact occurs and advised on a recommended course of action by a suitably qualified structural engineer.

11. Signage

All signage is to be in strict accordance with the City's Local Planning Policy: Signs and Advertising, unless further development approval is obtained.

Advice Notes

1. An Infrastructure Protection Bond together with a non-refundable inspection fee should be lodged with the City by the applicant, prior to the commencement of works, and will be held until all building/development works have been completed and any disturbance of, or damage to the City's infrastructure, including verge trees, has been repaired/reinstated to the satisfaction of the City. An application for the refund of the bond should be made in writing. The bond is non transferable.

2. The movement of all path users, with or without disabilities, within the road reserve, shall not be impeded in any way during the course of the building works. This area shall be maintained in a safe and trafficable condition and a continuous path of travel (minimum width 1.5m) shall be maintained for all users at all times during construction works. Permits are required for placement of any material within the road reserve.

3. All pedestrian access and vehicle driveway/crossover levels shall match existing verge, footpath and reserve levels to the satisfaction of the City.

4. All stormwater produced on the subject land should be retained on site, by suitable means to the full satisfaction of the City. No further consideration shall be given to the disposal of stormwater 'off site' without the submission of a geotechnical report from a qualified consultant. Should approval to dispose of stormwater 'off site' be subsequently provided, detailed design drainage plans and associated calculations for the proposed stormwater disposal shall be lodged together with the building permit application working drawings.

5. With reference to the Construction Management Plan, the owner/applicant may be required to obtain a Work Zone Permit from the City in order to satisfy this Condition due to the location of the site with access constraints. The requirement for, and cost of any such permit shall be determined by the City following the lodgement of a Building Permit.

6. The Construction Management Plan should be prepared in accordance with the City of Vincent's Local Planning Policy: Construction Management. The City's Construction Management Information Sheet provides guidance in preparing a Construction Management Plan.

7. Any external artificial lighting installations, including in car parks and common areas, is to comply with Australian Standard AS 4282-1997 'Control of the obtrusive effects of outdoor lighting' and must not be permitted to shine or reflect into other properties, creating a nuisance.

8. Any noise created at the premises must ensure compliance with the provisions within the *Environmental Protection (Noise) Regulations 1997*.

9. The approved landscaping plan is required to be maintained once implemented. Modifications to the approved landscaping that has been installed on site at the time of occupancy will require subsequent approval of the City.

PROPOSAL:

The application seeks approval for a six-storey Aged Care Facility (use not listed) at No. 19 Wright Street, Perth. A location plan is included in **Attachment 1.**

The proposal includes the demolition of four existing buildings, existing at-grade car parking areas, loading facilities and associated back-of-house infrastructure within the southern portion of the site.

Following demolition, a six-storey building to the existing aged care facility is proposed, comprising 147 additional aged care beds and increasing the total capacity of the facility from 46 beds to 193 beds.

The development includes resident accommodation, nurse stations, therapy rooms, dining areas, lounges, communal facilities, administrative offices, landscaped courtyards and balconies, together with car parking, plant and service infrastructure.

A total of 75 car parking bays are proposed, comprising 41 basement bays, 19 at-grade staff bays and 15 existing bays. Access is proposed via Wright Street and Lincoln Street.

Landscaping works include the retention of two existing trees and planting of 18 new trees, together with deep soil planting, raised garden beds and landscaped communal outdoor areas. The proposal includes the removal of 12 existing trees on-site. One existing verge tree is proposed to be removed and replaced with three new verge trees.

The proposed development plans subject of this application is included in **Attachment 2.**

The applicant's justification and supporting technical reports are included in **Attachments 3 to 9**.

Staging of Development

The applicant has advised that the subject development represents Stage 1 of a broader staged redevelopment of the site. Future stages do not form part of the subject application and would be subject to separate development applications and approvals.

BACKGROUND

Site Details

The subject site is bound by Wright Street to the east, a commercial building (rehabilitation service) to the south, multiple dwellings, the Highgate Hill Police Station Museum and Lincoln Street Ventilation Stack to the west, and Lincoln Street to the north.

The subject site accommodates an existing aged care facility operating from a series of attached single-storey buildings located in the northern portion of the site. A series of two-storey buildings is located towards the southern boundary, all of which are currently vacant. The application does not propose a change to the existing land use and relates only to the proposed building and associated works as an extension of the existing aged care facility.

The site contains two parking areas, one accessed from Wright Street and the other from Lincoln Street.

Surrounding Area

Surrounding properties in the immediate area are zoned Residential R80 under Local Planning Scheme No. 2 (LPS2) and within the Residential Built Form Area under the City's Policy No. 7.1.1 – Built Form (Built Form Policy) with a three-storey building height.

The zoning and density of the subject site and surrounding properties is shown in **Attachment 1.**

Immediately Adjacent Properties

The surrounding area is characterised by a range of commercial and residential land uses. Key features of the immediately adjacent properties are summarised below:

- South: Adjoining the site to the south is a single-storey commercial building located at Nos. 11–15 Wright Street, which operates as a rehabilitation centre. The building is oriented towards Wright Street and is setback 4.3 metres from the street frontage. A car parking area is located at the rear of the site, with vehicular access provided along the southern boundary. Outdoor areas associated with several bedrooms are located along the northern elevation.

- West: There are two multiple dwelling developments adjoining the Stage 1 development area to the west.

  No. 34 Bulwer Street is a two-storey multiple dwelling development comprising 20 dwellings. The site has direct vehicular access from Smith Street to a car parking area located along the western elevation. Outdoor living areas associated with ground-floor dwellings are located towards the rear of the site, along the northern and eastern elevations.

  No. 12 Smith Street is a four-storey multiple dwelling development comprising 23 dwellings. The site has direct vehicular access to an at-grade car parking area located on the ground floor beneath the development. The eastern elevation incorporates balconies and major openings associated with dwellings on all levels.

Planning Context

Zoning, Density and Built Form Area

The subject site is zoned Residential (R80) under LPS 2 and is located within the Residential Built Form Area under the Built Form Policy. The site has a three-storey permitted building height under the Built Form Policy.

City of Vincent Local Planning Strategy

The City's Local Planning Strategy (Planning Strategy) was endorsed by the WAPC on 8 November 2016.

The Planning Strategy identifies the subject site as falling within the High-Density Residential area in the Perth precinct, as shown in **Figure 1** below.

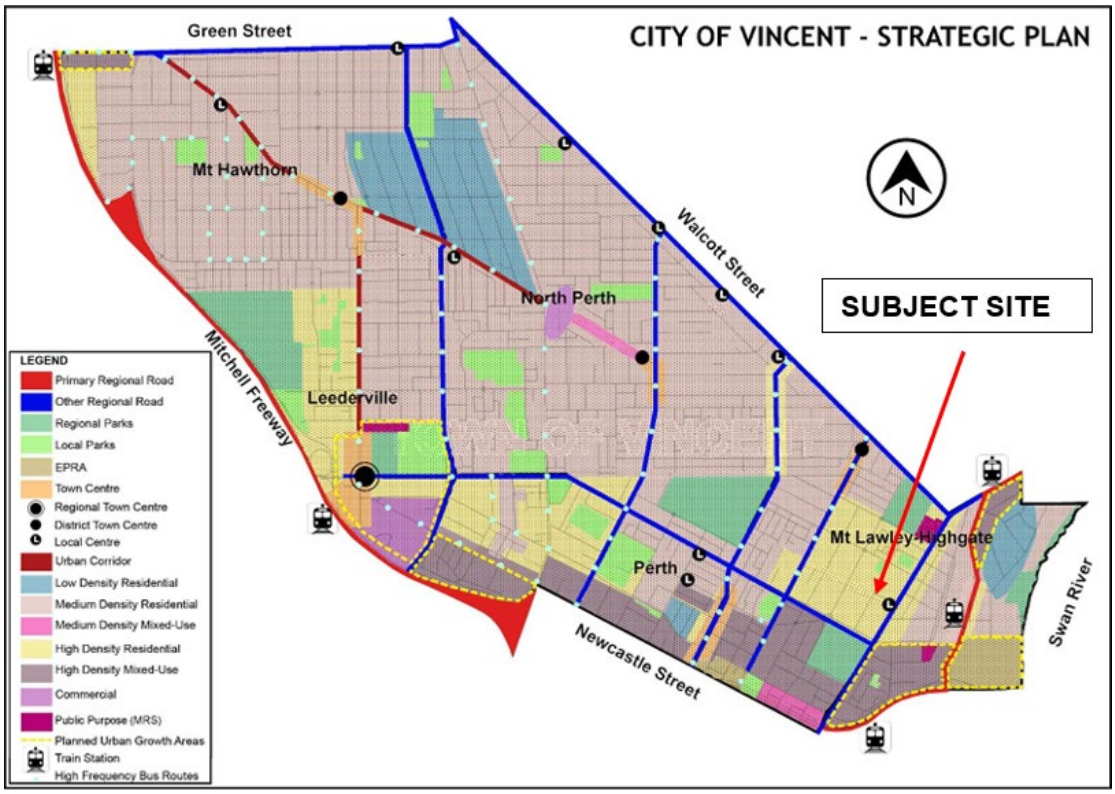


Figure 1: *City of Vincent Planning Strategy Map*

The key recommendations of the Planning Strategy and subsequent strategies and actions of the Planning Strategy relevant to the proposed development include:

Key Recommendations:

- Facilitate a diverse range of affordable housing options through applying recommendations in the City's Affordable Housing Strategy, and by including specific reference to encouraging and facilitating affordable housing in scheme and policy provisions.
- To provide a range of housing choice for the diverse population of Perth.
- To allow for higher density residential development that is cognisant of the residential character dwellings within the area.

Draft Planning Strategy

The City's Draft Local Planning Strategy (draft Strategy) was endorsed by Council on 8 April 2025 to commence advertising. Following Western Australian Planning Commission consent to advertise, the draft Strategy was advertised for community consultation between 22 June 2026 and 3 August 2026. The draft Strategy does not specifically reference the subject site.

In the absence of this, the following broader actions and directions are relevant to the site and proposed development:

- The strategy supports the provision of housing diversity and affordability.

- The strategy supports development that is reflective and responsive to its surrounds and contributes positively to the streetscape and surrounding private and public realm.
- The strategy aims to increase the range of housing types and tenures in Vincent to meet the changing needs of its community and lifestyle trends.

Draft Station Precinct Improvement Scheme

On 5 November 2026, the Department of Planning, Lands and Heritage announced the Draft Station Precincts Improvements Scheme, which identifies eight station precincts for increased residential development within walking distance of train stations.

Claisebrook Station is one of the eight precincts identified under the draft Scheme. As illustrated in Figure 2, the subject site is located within the Claisebrook Station catchment.

Under the draft Scheme, the subject site is identified as having a permitted building height of eight storeys. However, as the draft Scheme remains subject to consultation and has not yet been formally adopted, its provisions do not form part of the statutory planning framework applicable to the assessment of this application.

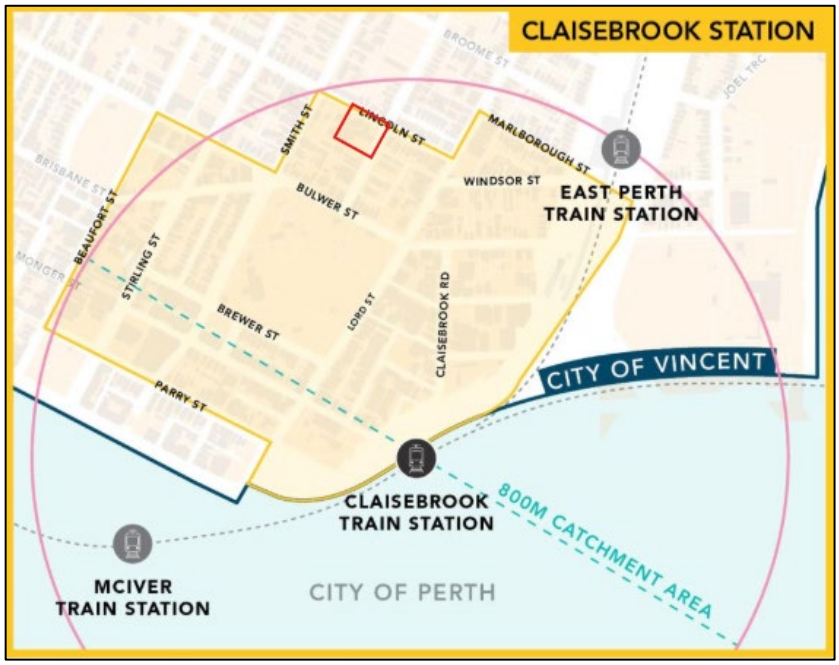


Figure 2: Location of site (red) within Claisebrook Station catchment (yellow shading)

LEGISLATION AND POLICY:

Legislation

- *Planning and Development Act 2005.*
- *Planning and Development (Local Planning Schemes) Regulations 2015.*
- *Planning and Development (Development Assessment Panels) Regulations 2011*
- *Environmental Protection (Noise) Regulations 1997.*

- Metropolitan Region Scheme.
- City of Vincent Local Planning Scheme No.2.

The objectives of the Residential zone under LPS2 are:

- *To provide for a range of housing and a choice of residential densities to meet the needs of the community.*
- *To facilitate and encourage high quality design, built form and streetscapes throughout residential areas.*
- *To provide for a range of non-residential uses, which are compatible with and complementary to residential development.*
- *To promote and encourage design that incorporates sustainability principles, including but not limited to solar passive design, energy efficiency, water conservation, waste management and recycling.*
- *To enhance the amenity and character of the residential neighbourhood by encouraging the retention of existing housing stock and ensuring new development is compatible within these established areas.*
- *To manage residential development in a way that recognises the needs of innovative design and contemporary lifestyles.*
- *To ensure the provision of a wide range of different types of residential accommodation, including affordable, social and special needs, to meet the diverse needs of the community.*

State Government Policies

- State Planning Policy 5.4 – Road and Rail Noise (SPP 5.4)

Local Policies

- City of Vincent Community and Stakeholder Engagement Policy
- City of Vincent Policy No. 7.1.1 – Built Form
- City of Vincent Policy No. 7.5.21 – Sound Attenuation (Sound Attenuation Policy)
- Local Planning Policy: Construction Management
- City of Vincent Local Planning Policy – Percent for Art
- City of Vincent Local Planning Policy – Non-Residential Parking
- Local Planning Policy: Development Guidelines for Heritage Places

Planning and Development (Local Planning Schemes) Regulations 2015

Clause 67 of Schedule 2 to the *Planning and Development (Local Planning Schemes) Regulations 2015* sets out matters to be given due regard by the decision maker in the consideration of an application.

The City has provided more detailed comments on matters relevant to the acceptability of the proposed development throughout the Report. The key matters of Clause 67(2) relevant to this application include the following:

(a) – Aims and provisions of the local planning scheme;
(b) – the requirements of orderly and proper planning
(c) and (g) – Approved State and local planning policies;
(fa) – Consideration of Local Planning Strategies;

(k) – Built heritage conservation
(l) – Development impact on the cultural heritage significance of the area
(m) – Compatibility of the development with its setting;
(n) – The impact on the amenity of the locality;
(p) – Adequacy of landscaping provision and retention;
(s) and (t) – Access, manoeuvring, parking and traffic;
(u) – The availability of services;
(w) – History of the site;
(x) – Development impact on the community as a whole;
(y) – Any submissions received on the application;
(za) – Comments received by another agency; and
(zb) – Comments from the City's Design Review Panel

PLANNING ASSESSMENT:

PLANNING FRAMEWORK	
Region Scheme	Metropolitan Region Scheme
Region Scheme - Zone/Reserve	Urban
Local Planning Scheme	City of Vincent Local Planning Scheme No. 2
Local Planning Scheme - Zone	Residential
Structure Plan/Precinct Plan	N/A
Structure Plan/Precinct Plan - Land Use Designation	N/A
Lot Size	10,051 square metres
Existing Land Use	Aged Care Facility
Heritage Status	☐ N/A ☒ State Register of Heritage Places ☒ Local Heritage List ☐ Local Heritage Area
Bushfire Prone Area	No

The table below summarises the assessment of the proposal against the provisions of LPS2, the Built Form Policy and the City's Non-Residential Parking Policy.

The Built Form Policy contains objectives and standards for each design element. A proposal that does not satisfy a standard may still be considered acceptable where it adequately responds to the relevant objective.

Where the proposal does not achieve a standard, the relevant design element is identified in the table below and its acceptability is discussed in further detail.

The standards not achieved by the proposal are as follows:

Building Height	
Standard	**Proposal**
Built Form Policy – Clause 1.1.1	

Storeys: 3 Height: 10 metres	Storeys: 6 Height: 25.9m
Street Setback	
Standard	**Proposal**
Built Form Policy – Clause 2.3.1 Street setback: 4.3 metres	 Ground floor: 4 metres Level 1 to 5: 2 metres
Visual Privacy	
Standard	**Proposal**
Built Form Policy – Clause 6.1 There is no standard for visual privacy; therefore, an objective assessment is required.	
Pedestrian Access and Entries	
Standard	**Proposal**
Built Form Policy – Clause 8.1.2 Access for pedestrians which directly fronts the primary street (Wright Street).	 Access for pedestrians does not directly front Wright Street.
Vehicle Access	
Standard	**Proposal**
Built Form Policy – Clause 9.1.8 Existing trees must not be removed to provide for vehicle access.	 Verge tree proposed to be removed for vehicle access.
Built Form Policy – Clause 9.1.9 Each lot is to provide a maximum of one crossover.	 Site would have two crossovers located along Wright Street and one to Lincoln Street.
Built Form Policy – Clause 9.1.10 The maximum width of a double crossover is 5m.	 Crossover proposed to be 6m.
Car Parking	
Acceptable Outcome	**Proposal**
Non-Residential Parking Policy – Car Parking The Non-Residential Parking Policy has no established car parking standard as the use is not identified in the policy.	 56 car parking bays, together with the retention of 19 existing bays, providing a total of 75 bays.
Non-Residential Parking Policy – Bicycle Parking	

The Non-Residential Parking Policy has no established bicycle parking standard as the use is not identified in the policy.	No bicycle parking spaces provided.
Universal Design	
Standard	**Proposal**
Built Form Policy – Clause 12.1 There are no standards for universal design; therefore, an objective assessment is required.	
Facade Design	
Standard	**Proposal**
Built Form Policy – Clause 13.1.3 Commercial Development shall provide a continuous protective awning over the pedestrian footpath.	No awning proposed.

These matters are discussed in the Officer Comments section below, together with other relevant planning matters as considered against the planning framework.

Officer Comments:

Building Height and Visual Privacy

The Built Form Policy identifies a maximum building height of three-storeys and 10 metres. The application proposes a building height of six-storeys, with a maximum height of 25.9 metres.

There are no standards for visual privacy for commercial development within the Residential built form area of the Built Form Policy. In this regard, a discretionary assessment is required.

Community Submissions

The City received submissions during the consultation period raising concerns that the proposed building height exceeds the Built Form Policy standard, and that the development would be inconsistent with the Wright Street streetscape and increase overshadowing of adjoining properties.

Applicant Justification

The applicant's justification for the proposed building height is included in **Attachment 3**, and response to submissions included in **Attachment 11**, and is summarised as follows:

- There are a variety of building heights in the surrounding area, including a four-storey building abutting the site and a 10-storey building at 4 Bulwer Street opposite the site, behind a three-storey block of apartments.
- The development is a high-quality, contemporary design, with articulation that reduces the perceived bulk and scale of the additional height. This is achieved

through setbacks and varied building depths, vertical shading elements contrasting the horizontal façade, balcony design, and complementary materials, textures and colours, which together break the building into four distinct parts.

- The development has been designed with generous lot boundary setbacks to ensure overshadowing impacts are minimised.

City Assessment – Acceptability of Building Height and Visual Privacy Proposed

The proposed building height does not satisfy the Built Form Policy standard of three storeys and 10 metres. Notwithstanding this, the City considers that the proposed six-storey building height satisfies the Objectives of the Built Form Policy for the following reasons:

- Context of the Site: The subject site is approximately one hectare in area and is bound by Wright Street to the east and Lincoln Street to the north. It has two street frontages, with adjoining properties to the south and west.

  The proposed Stage 1 building is located within the southern portion of the site, away from the Lincoln Street frontage, and fronts Wright Street, the southern and western neighbours. The size of the site enables the additional height to be accommodated, as it provides greater separation to adjoining properties than could be achieved on a standard residential lot within the locality, where the three-storey building height standard applies. This is reflected in the 9 metre setback to the southern boundary and 4 metre setback to the western boundary.

  The context of the site is also influenced by the adjoining Lincoln Street Ventilation Stack, which reaches a height of 38 metres. The proposed development at 25.9 metres, would remain lower than the height of the ventilation stack. In conjunction with the varied building heights in the surrounding area, the ventilation stack contributes to a built form context where taller built form is already established.

  The existing built form in the locality is also varied and includes the following:

  - A four-storey multiple dwelling development adjoining the site to the west.
  - Two to three-storey multiple dwellings on the opposite site of Wright Street.
  - A 10-storey multiple dwelling development to the south-east, approximately 90 metres from the subject site.

  The proposed six-storey development would sit within the existing range of building heights in the surrounding area and would not present as an isolated development within the streetscape.

- Amenity Impacts to Adjoining Properties: The proposed setbacks and building design assist in reducing amenity impacts on adjoining properties. To the south, the adjoining rehabilitation centre includes outdoor areas associated with bedrooms along its northern elevation. The proposed building is set back 9 metres from the southern boundary, with balconies further positioned to maintain separation from these areas. This separation assists in reducing the visual impact of the additional height and maintaining an appropriate level of amenity to the adjoining property.

To the west, the site adjoins two multiple dwelling developments. No. 34 Bulwer Street includes outdoor living areas associated with ground-floor dwellings towards the rear of the site, while No. 12 Smith Street includes balconies and major openings along its eastern elevation facing towards the subject site. The proposed development is set back 4 metres from the western boundary, providing separation from these sensitive areas. Together with the design and positioning of balconies, this assists in managing the visual bulk and privacy impacts associated with the additional height.

The adjoining properties contain sensitive areas that have the potential to be affected by the development. However, the setbacks and separation provided, together with the design of the building and balconies, ensure that the additional height would not result in an undue impact on the amenity of these properties.

- Building Design and Articulation: The building incorporates a high level of articulation, which assists with reducing the perceived bulk and scale of the additional height when viewed from Wright Street and the adjoining properties. The façade is divided into four distinct material sections, with a face brick base, a white screened middle sections and darker upper levels with open balconies. The façade proposes vertical shading elements that contrast with the horizontal balcony bands, which further breaks down the mass of the building to the street and adjoining neighbours. The use of balconies, screening and variations in the façade treatment along the southern and western elevations also limits areas of continuous building mass and reduces the visual presence of the additional height when viewed from adjoining properties.

  The design of the upper levels and roofline incorporates variations in setbacks and façade treatments, which assist in breaking up the building mass and providing articulation to the roof form.

  At ground level, the face brick base, landscaping and outdoor terrace within the front setback area provide a pedestrian-scale interface along Wright Street and soften the building at street level.

  The proposal has therefore incorporated appropriate design measures that reduce the impact of the additional height, bulk and scale on adjoining properties and the streetscape.

- Overlooking and Overshadowing: Through the location and setback of balconies, the proposal minimises overlooking impacts on adjoining properties. The two potentially affected properties are those adjoining the site to the south and west. To the south, the rehabilitation centre includes outdoor living areas associated with units along its northern elevation. To the west, the adjoining multiple dwelling developments include outdoor living areas, balconies and major openings facing towards the subject site.

  While balconies are proposed along both elevations, and are not screened, all elevated balconies are set back 7.5 metres from the southern boundary and at least 4 metres from the western boundary. These setbacks provide separation from the sensitive areas of adjoining properties and assist in maintaining visual privacy.

In relation to overshadowing, the southern adjoining property is zoned Residential R80; however, it operates as a non-residential land use, being a rehabilitation centre. Under the City's Built Form Policy, overshadowing is not required to be assessed where an adjoining property is coded R80 or above and operates as a non-residential land use. Accordingly, overshadowing of the southern adjoining property does not require assessment against the Built Form Policy.

- Future Character: The subject site and surrounding properties are zoned Residential R80 under LPS2 and are within the Residential Built Form Area under the Built Form Policy, which has a three-storey building height standard. Notwithstanding this, the City's Local Planning Strategy identifies the site as being within the High-Density Residential area of the Perth precinct. The Local Planning Strategy also recognises the need to focus higher-density development around public transport, and to increase the provision of aged care housing. This strategic direction is also reflected in the Draft Local Planning Strategy.

  The existing character of Wright Street is varied, comprising a mix of development typologies, building heights, setbacks and architectural styles. This includes lower-scale development together with multiple dwelling developments of a greater scale, and there is no single prevailing built form or architectural character along this section of Wright Street. The proposed development would contribute to this varied built form while providing a contemporary redevelopment of an existing aged care site.

  The site is located approximately 150 metres from the Lord Street Local Centre and 500 metres from East Perth Train Station, and is within walking distance of high-frequency bus routes. This level of access to public transport and services supports a more intensive form of development on the site. This is further reinforced by the WAPC's Position Statement: Residential Accommodation for Ageing Persons, which encourages aged care facilities to be located within residential zones.

  The proposal would deliver 147 aged care beds on an existing aged care site, while retaining a significant portion of the site for open space and landscaping. Given this planning context, the proposed building height is considered to respond to the desired future character of the area and would contribute to achieving objectives set out within the City's strategy.

- Response to Topography: The subject site is level, with no significant changes in topography that the development would need to appropriately respond to. The proposed height therefore responds appropriately to the existing site levels.

- Heritage Impact: The subject site contains the Silver Chain Nursing League Building, which is listed on the State Register of Heritage Places. The application was referred to Heritage Council WA, which supported the proposal, subject to a condition requiring structural movement and vibration monitoring at the commencement of works. A copy of Heritage Council WA's advice is included as **Attachment 10**.

  The additional height would have a minor impact on the setting of the heritage building. Notwithstanding this, the impact is acceptable based on the location of the proposed building being within the southern portion of the site, which would

be separated from the heritage building by an existing car park. The separation ensure that the heritage significance of the building is retained, despite the additional height being proposed.

- Design Review Panel: The application was presented to the DRP on four occasions, including one referral specifically to the DRP Chair. When first presented, the DRP did not support the proposed building height, on the basis that its impact on Wright Street would be undue. In response, the applicant modified the proposal by increasing the primary street setback and revising the proposed material palette to soften the streetscape interface and mitigate the impacts associated with the additional height. These modifications addressed the concerns raised by the DRP and resulted in the DRP supporting the proposed building height and its relationship with Wright Street and the surrounding area.

Street Setback, Façade Design, Pedestrian Access and Entries, and Universal Design

The Built Form Policy establishes a street setback of 4.3 metres to Wright Street. The application proposes the following setbacks to Wright Street:

- Ground Floor: 4 metres; and
- Level 1 to 5: 2 metres to the balcony, with the main building setback 4 metres.

The Built Form Policy states that a continuous awning is to be provided along the pedestrian path. The application has not proposed an awning for the pedestrian footpath.

The Built Form Policy states that pedestrian entrances are to be directly accessible from the primary street (Wright Street). The application proposes the pedestrian access to be located on the northern elevation, away from Wright Street.

The Built Form Policy does not have a standard for universal design. In this regard, a discretion assessment is required to be undertaken.

Community Submissions

The City received submissions during the consultation period raising concerns that the proposal is inconsistent with the established character of Wright Street.

Applicant Justification

The applicant's justification for the proposed Street Setback, Façade Design, Pedestrian Access and Entries, and Universal Design is included in **Attachment 3**, and response to submissions included in **Attachment 11**, and is summarised as follows:

- The existing streetscape and character of this section of Wright Street contains a mix of buildings of differing typologies, setbacks and architectural styles. The proposed development will add to this diversity.
- High quality landscaping is proposed in the front setback area, which would positively contribute to the streetscape.

City Assessment – Acceptability of Street Setback, Façade Design, Pedestrian Access and Entries, and Universal Design

The proposed street setback, façade design, pedestrian access and entries, and universal design satisfy the objectives of the Built Form Policy and are supported for the following reasons:

- Building Bulk and Passive Surveillance: The ground floor is setback 4 metres from the primary street, with the upper floors maintaining this setback to the main building façade. Balconies to the upper floors project 2 metres forward, resulting in a 2 metre setback from the primary street. The use of face brick, openings and a terrace that is connected to a lounge area at ground level assists in reducing building bulk and provides activation of the street frontage, as well as passive surveillance.

  The open design of the upper floor balconies further reduces the appearance of building bulk by limiting the extent of solid wall when viewed from the street. The balconies also provide opportunities for passive surveillance of the streetscape.

- Open Space and Landscaping: The proposed primary street setback provides sufficient space for tree planting, landscaping and tree planting. Landscaping is proposed to screen the parking areas and extend into the verge, where three additional trees are proposed. The setbacks provide sufficient space for dense vegetation and the growth of large trees, creating a landscaped interface to the street and assisting in softening the presentation of the development.

- Character of the Street: Wright Street comprises a mix of development typologies, architectural styles, building forms, and street setbacks, with no consistent setback pattern that defines the streetscape.

  The varied setback pattern along Wright Street means that there is no consistent street setback that defines this section of the streetscape. In this context, the proposed 4 metre ground floor setback and 4 metre setback to the main building line on the upper floors would complement the established variation in setbacks along the street, rather than being inconsistent with an established streetscape pattern. The upper-floor balconies project forward of the main building façade; however, their open design assists in reducing their visual bulk and maintaining a relationship with the street.

  The proposed façade design and landscaping would further soften the presentation of the development and provide an improved interface with Wright Street. The proposed setbacks therefore respond to and complement the varied character of Wright Street, while the overall design would positively contribute to the evolving character of this section of the street.

- Transition Between Public and Private Realm: The main pedestrian entry to the building is accessed from the northern elevation and does not directly front Wright Street. Notwithstanding this, the street setback area provides a clear transition between the public and private realm.

  The ground floor is set back 4 metres from Wright Street, with landscaping and outdoor terraces provided within the front setback area. This provides a defined,

landscaped interface between the street and the building. The face brick base also gives the building a pedestrian-scale presence at street level, while the ground floor terraces and the balconies above face Wright Street provide passive surveillance and activation. This ensures the building continues to address the street, despite the entry not being located on the Wright Street frontage.

The pedestrian entry remains identifiable from Wright Street through the design of the building and the pedestrian path that extends from Wright Street along the buildings northern elevation to the entry. The pathway provides a clear connection between the street and the entry, while the building form assists in identifying the entrance and directing pedestrians towards it.

The location of the entry on the northern elevation is also consistent with the operation of the Aged Care Facility. It allows access to be consolidated with the existing facility and parking area, and allows the operator to manage access for residents and visitors. As such, the Wright Street frontage functions as a landscaped interface to the street, rather than a primary point of pedestrian access.

- Natural Light, Ventilation, and Privacy: The 4 metre setback to the main building line provides adequate separation from Wright Street, allowing for natural light and ventilation to rooms along the eastern elevation. The setback and balcony design, which proposes balustrading and batten screening, would provide an appropriate level of internal and external privacy for residents while maintaining an outlook towards the street.

- Universal Design: The proposal is for an Aged Care Facility, which would provide transitional care for elderly people who have been discharged from hospital and are awaiting placement in a permanent aged care facility. The development is purpose built to accommodate residents with limited mobility and varying levels of care needs. As such, universal design is fundamental to the function of the development, and has been incorporate through the following designs:

    - The building is services by lifts to all levels, with level access provided to communal access and outdoor terraces
    - The corridors, resident rooms and bathrooms are designed to accommodate residents using mobility aids, and to allow staff to provide assistance where required.
    - Communal living areas and outdoor spaces are also provided on each level, allowing residents to move around and use the building without the need to leave the facility.

    The facility would be required to comply with the accessibility requirements of the National Construction Code and the relevant aged care standards. These would be addressed at the building permit stage.

- DRP Comment: The proposed street setback was considered through the DRP process. The DRP initially raised concerns regarding the relationship of the building with Wright Street, including the presentation of the additional building bulk to the street. In response, the proposal was modified to increase the street setback and revise the material palette, resulting in an improved streetscape

interface. The DRP subsequently supported the revised building setback and its relationship with Wright Street.

Car and Bicycle Parking, and Vehicle Access

The application proposes an additional 56 car parking bays, together with the retention of 19 existing bays, providing a total of 75 bays. The City's Non-Residential Parking Policy does not identify an Aged Care Facility as a listed land use. For this reason, there is no prescribed car parking requirement, and a discretionary assessment is required.

The application also proposes the removal of a street tree for the purpose of vehicle access. The Built Form Policy states that vehicle access of proposed developments are not to remove existing street trees.

Community Submissions

The City received submissions during the consultation period raising concerns that the parking provided was inadequate relative to the proposed increase in accommodation capacity, which would have an impact on the areas parking infrastructure.

Applicant Justification

The applicant's justification for the proposed Car and Bicycle Parking, and Vehicle Access is included in **Attachment 3**, and response to submissions included in **Attachment 11**, and is summarised as follows:

- The City's Non-Residential Parking Policy does not prescribe a parking rate for an Aged Care Facility. The former policy applied a rate of one bay per three beds, which would equate to 65 bays for the 193-bed facility. The proposed 75 bays exceeds this rate by 10 bays.
- The site is well serviced by nearby train and high-frequency bus services, reducing reliance on private vehicles for staff and visitors.
- The proposed crossover would require the removal of one existing Callistemon street tree, which is relatively small, in poor health and provides limited canopy contribution. The landscape design proposes three new Eucalyptus spathulata trees within the Wright Street verge, which are capable of growing to more than 10 metres in height. The replacement planting would provide a net increase in long-term canopy cover and improve the landscape character and amenity of Wright Street.

City Assessment – Acceptability of Car Parking

The proposed car parking satisfies the objectives of the Non-Residential Parking Policy and is supported for the following reasons:

- Nature of Use: The nature of the Aged Care Facility is relevant to the provision of car parking. With the facility providing transitional care to the elderly and not permanent residency, it is not anticipated that residents would drive or keep vehicles on site. The parking demand would therefore come from staff and

visitors rather than residents. This would result in a lower parking demand per bed than other forms of residential or commercial development.

- Allocation Between Staff and Visitors: Of the 75 bays proposed, 60 bays would be allocated to staff, comprising 41 bays within the basement and 19 at-grade bays accessed from Lincoln Street. The remaining 15 bays within the Wright Street forecourt would be retained for visitors. This provides a ratio of approximately one bay per 2.6 beds across the 193-bed facility. The applicant's Transport Impact Assessment (TIA) advises that a rate of one bay per three beds has previously been applied to aged care developments, which is generally consistent with the operator's experience at its other facilities. Applying this rate would equate to 65 bays, which the proposed 75 bays would exceed by 10 bays.

  Visitor parking demand is likely to be moderated by the nature of the use as a transitional care facility, where residents stay on a short-term basis following discharge from hospital. Staff parking demand is likely to be greatest during shift changeover periods. The separation of staff parking within the basement and Lincoln Street car park from the visitor bays on Wright Street would assist in keeping the visitor bays available during these periods.

- On-Street Parking and Parking Impacts: The provision of 75 on-site car parking bays, including dedicated staff and visitor parking, is sufficient to accommodate the anticipated parking demand associated with the development. This results in the development having no reliance on on-street car parking to meet its parking demand. The majority of parking is located within the basement and Lincoln Street car parking area, with 15 visitor bays retained within the Wright Street forecourt. This arrangement also limits the visual presence of parking from Wright Street and ensures that parking does not dominate the streetscape or detract from the legibility of the development. In any event, the surrounding Wright Street and Lincoln Street on-street parking is time restricted for three hours, between 8:00am and 5:30pm, Monday to Friday, with no parking restrictions for the weekend.

- Public and Sustainable Transport: The site is located approximately 150 metres from the Lord Street Local Centre and 500 metres from East Perth Train Station, and is within walking distance of high-frequency bus routes. The nearby access to public transport services, along with good pedestrian path connectivity, supports a reduced reliance on private vehicles.

- Staged Development: The application relates to Stage 1 only. Future stages would be subject to separate development applications, which would allow the City to review the adequacy of parking provision across the full facility as the remaining stages progress.

- Removal of Verge Tree: The removal of the existing verge tree for the purpose of vehicle access is acceptable despite not satisfying the Built Form Policy standard. The proposal includes three replacement Eucalyptus spathulata trees within the verge, which would provide a greater long-term canopy contribution. The City’s Parks team supports the concept of providing additional replacement trees within the verge, subject to appropriate planting and establishment requirements. The provision of these three trees within the verge would be enforced through a recommended condition of approval. On balance, the

replacement planting would offset the loss of the existing tree and provide an improved long-term streetscape and landscaping outcome.

- DRP Comment: In the first DRP meeting, the panel advised that a strength of the proposal was that parking had been located at basement level and concealed from the public realm.

Waste Management

The applicant has submitted a Waste Management Plan (WMP) which is included in **Attachment 4** and it proposes the following:

- A bin store area located at the rear of the building, on the ground floor, comprising:
    - Four 100L refuse bins.
    - Four 660L and four 1100L recycling bins.
    - Two 1100L cardboard bins.

- The bins would be collected by a private contractor. The private contractor will collect refuse three times each week, recyclables once each week and cardboard twice each week utilising a rear loader waste collection vehicle.
- The private contractor's rear loader waste collection vehicle will service the bins onsite, directly from the bin storage area.
- Ongoing maintenance of the bins including cleaning of bins and storage area, overseeing bulk waste, and monitoring staff and cleaner behaviours.

The proposed WMP has been reviewed by the City and satisfies its Waste Guidelines for New Developments, and is supported. A recommended condition of approval is included for the ongoing implementation of the WMP.

Public Art Contribution

The proposal is subject to the City's Percentage for Art Policy, which requires one percent of the total project cost to be allocated to public art, being a contribution of $557,000 for this proposal.

The Percent for Art Policy provides two options for this to be provided, being either the payment of cash-in-lieu to the city, or the owner/applicant coordinating and delivering the public art project in consultation with the City.

Should the application be approved, a condition should be imposed requiring this public art contribution to be made.

Noise

The applicant submitted an Acoustic Report prepared by Herring Storer Acoustic to address the City's Policy No. 7.5.21 – Sound Attenuation (Acoustic Policy) in relation noise received and generated by the development. The Acoustic Report is included in **Attachment 7**.

The City has reviewed the Acoustic Report and is satisfied that the proposed development would appropriately manage the impacts of noise. This is for the following reasons:

- Sound Attenuation Policy: The Acoustic Assessment sets out that the proposed development can be designed to achieve compliance with the *Environmental Protection (Noise) Regulations 1997* (Noise Regulations) and the Sound Attenuation Policy. It considers noise emissions associated with mechanical services and delivery vehicles, as well as acoustic treatments required to manage traffic noise received by the development. The Acoustic Assessment notes that final mechanical plant selections and locations are yet to be determined and recommends that a detailed assessment be undertaken once these are known. To this end, a condition has been recommended requiring a detailed Noise Assessment to be provided prior to the issue of a building permit.

- State Planning Policy 5.4: The subject site is within the SPP5.4 trigger distance of Lord Street. The Acoustic Assessment considered existing and future traffic noise and identifies acoustic treatments to the external walls and glazing of affected façades to achieve the required internal noise levels. Subject to these measures being incorporated into the development, the proposal would satisfy the relevant requirements of SPP5.4 and the City's Sound Attenuation Policy.

Construction Management

The careful management of the construction process and associated off-site impacts is required to ensure that the development does not have an adverse impact on the amenity of the surrounding properties.

A condition of approval is recommended to be imposed requiring the submission of a construction management plan prior to the issue of a building permit in accordance with the City's Local Planning Policy: Construction Management.

This would require the developer to demonstrate how the construction process and off-site impacts would be managed, including details on construction hours and noise control, and parking and traffic management and access.

CONSULTATION:

Public Consultation

Community consultation was undertaken in accordance with *Planning and Development (Local Planning Schemes) Regulation 2015* for a period of 28 days from 25 September 2026 to 23 October 2026.

This includes 755 letters being mailed to all owners and occupiers within a 200 metre radius of the subject site (as shown in **Attachment 1**), a sign being erected on site, a notice being placed in the local newspaper and a notice on the City's website in accordance with the City's Community and Stakeholder Engagement Policy.

At the conclusion of the consultation period, a total of 22 submissions were received which comprised of:

- 10 submissions supporting the development
- 11 submissions objecting to the development
- One submission neither supporting nor objecting, but providing comments.

The key submissions in support are summarised as follows:

- Support for the provision of additional aged care accommodation within the locality.
- The proposal would increase housing and accommodation diversity within the area.
- The development would provide additional accommodation options for older residents and enable ageing within the community.

The key submissions in objection are summarised as follows:

- Concerns that the proposed six-storey building exceeds the height contemplated under the City's planning framework.
- Concerns that the building is incompatible with the predominantly one to three-storey character of Wright Street and surrounding residential areas.
- Concerns that the development is more appropriately located on a major road rather than a local residential street.
- Concerns that the parking provision is inadequate relative to the proposed increase in accommodation capacity, which would have an adverse impact on the surrounding streets.
- Concerns that the development would increase overshadowing of adjoining properties.

A summary of the submissions received and the Applicant's and City's response to these is included in **Attachment 11** and **12** respectively.

Heritage Council of Western Australia

The application was referred to the Heritage Council of Western Australia (HCWA) on 15 September 2026 under Section 73 of the *Heritage Act 2018*, due to its proximity to the Silver Chain Nursing League Building (Place No. P11451), which is listed on the State Register of Heritage Places.

HCWA's advice, dated 22 October 2026, is included in **Attachment 10**. The key findings are summarised as follows:

- The Silver Chain Nursing League Building has cultural heritage significance as the only remaining structure of the previously expansive cottage homes complex linked to the services provided by the Silver Chain organisation.
- The proposed six-storey building would be substantially taller than the prevailing built form along Wright Street and would visually dominate the heritage building, whose modest scale and presence would be diminished, resulting in an adverse impact on its setting.
- The existing buildings proposed to be demolished are vacant and do not contribute to the cultural heritage significance of the adjacent place. However, the proximity of the demolition and excavation works raises concerns regarding potential vibration impacts on the significant built fabric.

- The Lincoln Street Ventilation Stack is a distinctive and prominent element of the local townscape. While it would remain visible from Wright Street, further development of the site may reduce its visual prominence and adversely affect its setting.
- Overall, the proposal would have a minor adverse impact on the cultural heritage significance of the Silver Chain Nursing League Building.

HCWA supports the proposal in accordance with the submitted plans, subject to a condition requiring a program of monitoring structural movement and potential vibration impacts on the Silver Chain Nursing League Building to be implemented at the commencement of works. HCWA is to be notified immediately if any impact occurs and advised on a recommended course of action by a suitably qualified structural engineer.

Design Review Panel Advice

The application was presented to the City's DRP on three occasions, all of which were prior to the lodgement of the subject development application.

A further DRP Chair and Landscaping Specialist referral was undertaken once the application was lodged, with this referral completed on 23 October 2026.

An extract of the DRP meeting minutes is included in **Attachment 14.**

The table below outlines how the proposal has progressed through the DRP process in accordance with the Ten Principles of Good Design

	Design review progress report
	Design quality evaluation
	Supported
	Pending further attention – refer to detailed comments provided
	Not supported
	Insufficient information for comments to be able to be provided.

	DRP 1 17 December 2025	**DRP 2 11 March 2026**	**DRP 3 29 April 2026**	**DRP Chair Referral 23 October 2026**
Principle 1 - **Context and character**				
Principle 2 - **Landscape quality**				
Principle 3 - **Built form and scale**				
Principle 4 - **Functionality and build quality**				
Principle 5 –**Sustainability**				
Principle 6 – **Amenity**				

Principle 7 – **Legibility**				
Principle 8 – **Safety**				
Principle 9 – **Community**				
Principle 10 - **Aesthetics**				

The key comments from the DRP are summarised as follows:

- The proposal has progressively improved throughout the DRP process, with the applicant responding to the vast majority of the DRP's previous comments.
- The interface to Wright Street at ground level is more open and interactive than earlier versions of the proposal.
- The increased setbacks and façade modifications made throughout the pre-lodgement stage assist in addressing building bulk, streetscape presentation and visual privacy.
- The proposed materiality and articulation assist in breaking down the visual bulk and scale of the development and provide a complementary relationship with the heritage-listed vent stack.
- The landscaping response, including deep soil areas, tree planting, relocation of existing trees and landscaping within the front setback and verge, is supported.
- The engagement of a Heritage Architect results in the development having minimal impact on Meade Cottage.
- The proposed ESD strategy and commitments are supported, including the targeted 5 Star Green Star outcome, all-electric development, solar PV, EV charging, double glazing and low-carbon materials.

The DRP is largely supportive of the development, with the outstanding acceptable principles listed in the table below, with the City's response to the acceptability of outstanding items.

DRP Comments Received	City's Comment
Principle 7 – Legibility The primary pedestrian entry to building is orientated to the carpark rather than the streetscape and is recessed deep in the site, requiring people to walk down a long pathway and make a dog-leg turn to enter the building. This limits its legibility from the streetscape. The relationship with the existing main entry on the site is acknowledged however it is hard to fully support in its current form. To mitigate this issue the applicant is encouraged to include further architectural cues on the corner of the building at the start of the pedestrian pathway to the entry, such as adjusting	The primary pedestrian entry is located on the northern elevation to provide a direct connection with the existing facility and adjoining visitor car parking area. While the entry is not directly visible from Wright Street, the pedestrian pathway is clearly defined and supported by landscaping that assists with wayfinding and legibility. Locating the entry on the northern elevation also allows for increased landscaping within the Wright Street setback area, providing an improved streetscape interface and assisting in reducing the perceived bulk of the development. The building continues to

DRP Comments Received	City's Comment
the architectural form / language of the building on the corner and / or including an entry canopy on the corner to increase the legibility of the entrance pathway from the streetscape.	address Wright Street through its landscaping, terraces and upper-floor balconies. On balance, the location and design of the pedestrian entry provides an appropriate connection between the public and private realm and is considered acceptable.

CONCLUSION:

The application proposes a six-storey extension to the existing aged care facility, providing an additional 147 aged care beds together with associated car parking, landscaping and supporting facilities.

The proposal seeks discretion against a number of provisions of the City's planning framework, including building height, street setback and car parking. These matters are acceptable having regard to the context and size of the site, the varied built form of the locality, separation from adjoining properties, the design and articulation of the development, and the nature and parking demands of the proposed use.

Overall, the proposal appropriately respond to the applicable planning framework and would provide additional aged care accommodation within the City. The application is therefore recommended for approval, subject to the recommended conditions.

ATTACHMENTS

1. Location and Consultation Plan
2. Development Plans
3. Applicant's Planning Report
4. Waste Management Plan
5. Transport Impact Assessment
6. Landscape Plan
7. Acoustic Report
8. Heritage Impact Statement
9. Sustainability Report
10. Heritage Council of Western Australia's Submission
11. Applicant's Response to Submissions
12. City's Response to Submissions
13. Clause 67 Assessment
14. Design Review Panel Minutes

CITY OF VINCENT

ATTACHMENT 1

DEVELOPMENT ASSESSMENT PANEL MEETING

Location and Consultation Plan

CITY OF VINCENT
LOCAL PLANNING SCHEME NO. 2
SCHEME MAP 1 - LEEDERVILLE

LEGEND

METROPOLITAN REGION SCHEME RESERVES

Note: The Western Australian Planning Commission care of the Department of Planning should be consulted for full information on the actual land requirements for all Metropolitan Region Scheme Reserves.

- PARKS AND RECREATION
- R — Restricted Pubic Access
- PRIMARY REGIONAL ROADS RESERVATION
- OTHER REGIONAL ROADS RESERVATION
- RAILWAYS
- PUBLIC PURPOSES (Particular use denoted as follows:)
  - H — Hospital
  - HS — High School
  - TS — Technical School
  - CP — Car Park
  - U — University
  - CG — Commonwealth Government
  - SU — Special Use
  - WSD — Water Authority of Western Australia
  - P — Prison

CITY OF VINCENT LOCAL SCHEME RESERVES

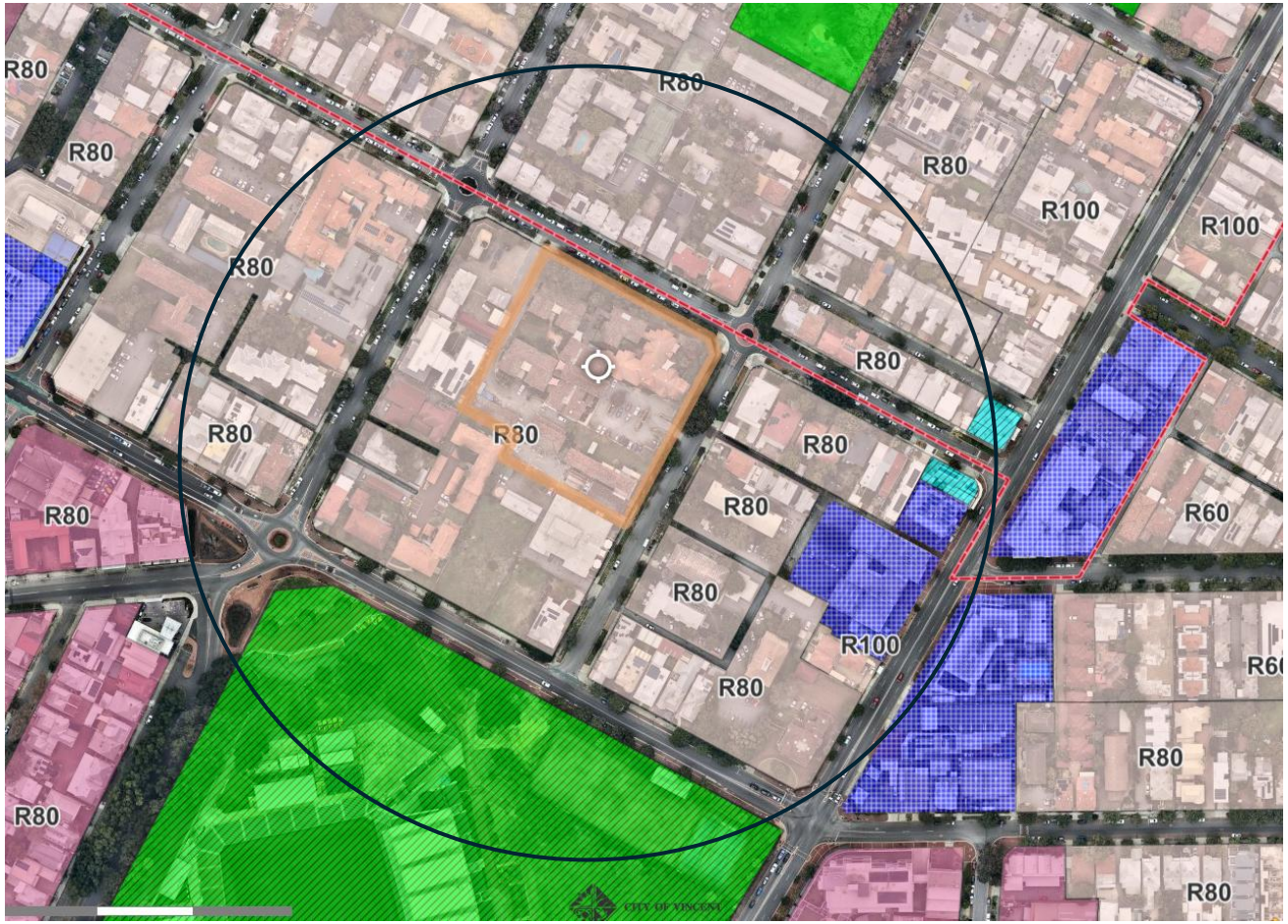
- PUBLIC OPEN SPACE
- R — Restricted
- PUBLIC PURPOSES (Particular use denoted as follows:)
  - PS — Primary School
  - CP — Car Park
  - CU — Civic Uses
  - HS — High School
  - I — Institute for the Deaf
  - W — Water Supply Sewerage and Drainage
  - TS — Technical School

CITY OF VINCENT SCHEME ZONES

- RESIDENTIAL
- MIXED USE
- COMMERCIAL
- LOCAL CENTRE
- DISTRICT CENTRE
- REGIONAL CENTRE
- SPECIAL USE (Particular use denoted as follows:)
  - CP — Car Park
  - CU — Community Use
  - FC — Function Centre
  - HC — Hall and Non Residential Club
  - H — Hotel
  - PW — Place of Worship
  - S — Service Station
- A — ADDITIONAL USE

ADDITIONAL INFORMATION & RESIDENTIAL PLANNING CODES

- CODE AREA BOUNDARY
- SCHEME AREA BOUNDARY
- R20 — DENSITY CODE



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Consultation and Location Map

19 Wright Street, Perth

Extent of Consultation

N

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19 Wright Street, Perth

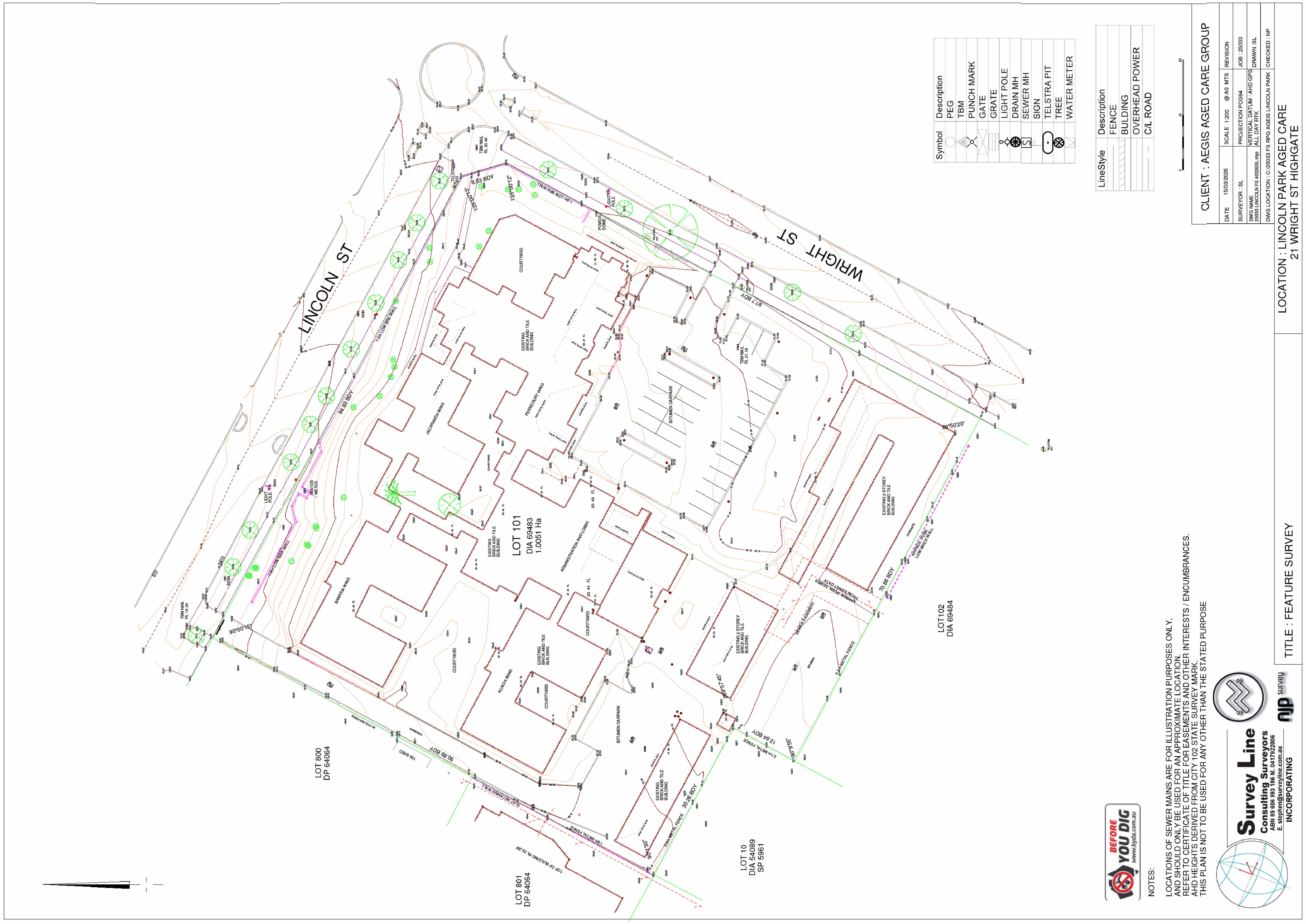
N

CITY OF VINCENT

ATTACHMENT 2

DEVELOPMENT ASSESSMENT PANEL MEETING

Development Plans



silver thomas hanley
ARCHITECTURE

SITE SURVEY
AEGIS LINCOLN PARK

Scale 1:400 @ A1

16m 12m 8m 4m 0m 32m

SCALE BAR 1:400

Date 31/7/2026

Project No.	Sheet No.	Revision	Revision Date
3426	SK.00.100	C	31/7/2026

silver thomas hanley
ARCHITECTURE

EXISTING CONTEXT PLAN
AEGIS LINCOLN PARK

Scale 1:500 @ A1 / 1:1000 @ A3 **Date** 18/8/2026

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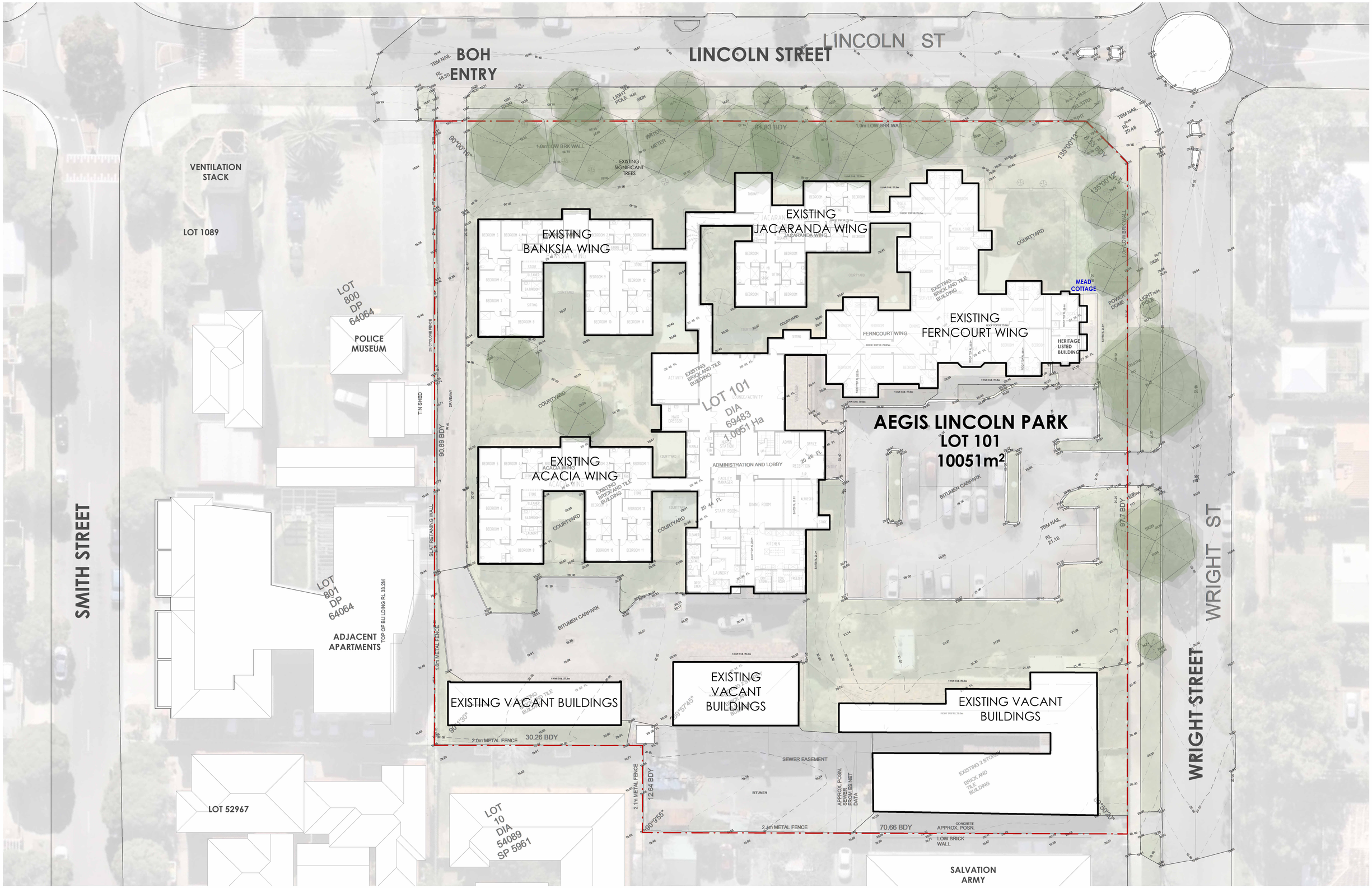
SCALE BAR 1:500

Project No.	Sheet No.	Revision	Revision Date
3426	SK.01.100	D	18/8/2026



silver thomas hanley
ARCHITECTURE

EXISTING SITE PLAN
AEGIS LINCOLN PARK

Scale 1:250 @ A1 / 1:500 @ A3 **Date** 18/8/2026

10m 7.5m 5m 2.5m 0m 20m

SCALE BAR 1:250

Project No.	Sheet No.	Revision	Revision Date
3426	SK.01.101	E	18/8/2026

ADJUST LINEMARKING TO INDICATE NO PARKING TO FIRST CAR BAY

MOUNTABLE CROSSOVER

NEW ENCLOSED ELECTRICAL SUBSTATION

REFER HERITAGE ARCHITECT'S HERITAGE IMPACT STATEMENT (HIS) FOR PROPOSED WORKS

EXISTING TREE TO BE RETAINED

EXISTING MAIN ENTRY

EXISTING CARPARK TO BE MODIFIED AND REALIGNED

EXISTING TREE TO BE RETAINED

FIRE APPLIANCE HARDSTAND

EX. BOUNDARY FENCE TO BE RETAINED

EX. FENCE TO BE RETAINED

NEW COLORBOND BOUNDARY FENCE

EXTENT OF BASEMENT BELOW

JACARANDA WING

BANKSIA WING

ACACIA WING

FERNCOURT WING

MEADE COTTAGE

PEDESTRIAN PATHWAY

FOOTPATH

TERRACE

PLANTER

LANDSCAPE

RESIDENT COURTYARD

LOADING BAY

FIRE BOOSTER CABINET

EX.RL 20.460

1089

101
19 WRIGHT STREET, PERTH
1
6 STOREYS
147 BEDS
20.460

SITE AREA = 10051m²
OPEN SPACE = 6200m² (62% OF SITE)
GROUND FLOOR AREA = 1275m²

52967

silver thomas hanley
ARCHITECTURE

AEGIS LINCOLN PARK

1:250 @ A1 / 1:500 @ A3 05/11/2026

10m 7.5m 5m 2.5m 0m 20m

1:250

3426	SK.01.200	G	05/11/2026

silver thomas hanley
ARCHITECTURE

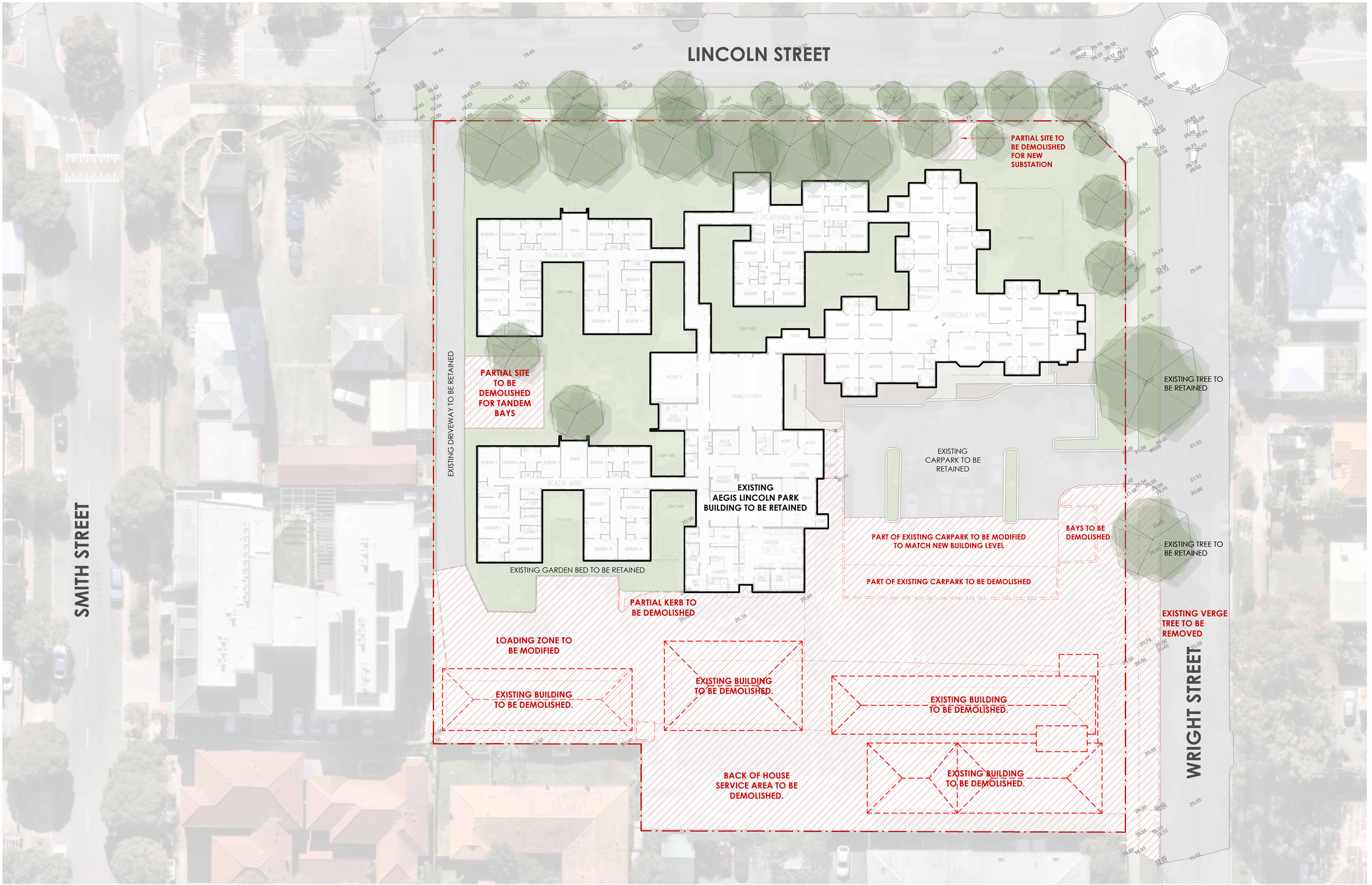
OVERSHADOWING DIAGRAM
AEGIS LINCOLN PARK

Scale 1:500 @ A1 / 1:1000 @ A3 **Date** 18/8/2026

20m 15m 10m 5m 0m 40m

SCALE BAR 1:500

Project No.	Sheet No.	Revision	Revision Date
3426	SK.01.300	C	18/8/2026



silver thomas hanley
ARCHITECTURE

DEMOLITION SITE PLAN
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

8m 6m 4m 2m 0m 16m

SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.02.100	E	18/8/2026

ACCESS ROAD OVER

SK.06.100
1

EXISTING CARPARK OVER

EXISTING BUILDINGS OVER SHOWN DASHED

PLANT
FIRE TANKS

STORE

PLANT
POTABLE WATER

1:5 RAMP UP
FROM BASEMENT TO GROUND

FIRE PUMP

STAIR

LOBBY

PLANT

BOH LIFT

LIFT

LIFT

5500

6200

STAIR

5500

6200

5500

41 STAFF BAYS

AREA = 1935m²

ALLOW PROVISION FOR
EV CHARGERS = 15% OF
TOTAL CAR BAYS

6200

5500

A
SK.07.101

C
SK.07.101

2
SK.06.100

SK.06.101 4

3
SK.06.101

D
SK.07.101

B
SK.07.100

silver thomas hanley
ARCHITECTURE

BASEMENT PLAN
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

8m 6m 4m 2m 0m 16m

SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.03.001	E	18/8/2026

POLICE MUSEUM

ADJACENT APARTMENTS

8 NEW TANDEM BAYS

4 EXISTING STAFF BAYS

7 NEW STAFF BAYS

EXISTING LOADING AREA TO BE MODIFIED AND REALIGNED

BANKSIA WING

ACACIA WING

FERNCOURT WING

3 EXISTING VISITOR BAYS

12 EXISTING VISITOR BAYS

EXISTING CARPARK TO BE MODIFIED AND REALIGNED

EXISTING MAIN ENTRY

PEDESTRIAN PATHWAY

FOOTPATH

REFER TO LANDSCAPE PLANS

RAMP ACCESS TO BASEMENT PARKING

WRIGHT STREET

SALVATION ARMY

RL.20.40

RL.20.78

RL.20.26

RL.20.46 AREA = 1275m²

EXTENT OF BASEMENT BELOW

CANOPY OVER

ENTRY

TERRACE

BUILDING OVER

RESIDENT COURTYARD

CORRIDOR

LANDSCAPE

PLANTER

FIRE BOOSTER CABINET

FIRE APPLIANCE HARDSTAND

4.0

9.0

4500

6000

15000

BIN STORE 59 m²

STORE 37 m²

ENTRY LOBBY 55 m²

DINING 63 m²

SERVERY 20 m²

OFFICE 15 m²

S.WC 6 m²

WC 5 m²

NURSE STATION / RECEP. 29 m²

COMMS 12 m²

THERAPY 20 m²

BOH LIFT

LIFT

LIFT

BOH CORRIDOR

STAIR

LOUNGE 30 m²

SITTING 23 m²

RAC BED 21 m²

RAC BED 24 m²

ENS 7 m²

SK.06.100 1

SK.06.101 4

SK.06.101 3

SK.07.100 A

SK.07.101 C

SK.06.100 2

SK.07.101 D

SK.07.100 B

silver thomas hanley
ARCHITECTURE

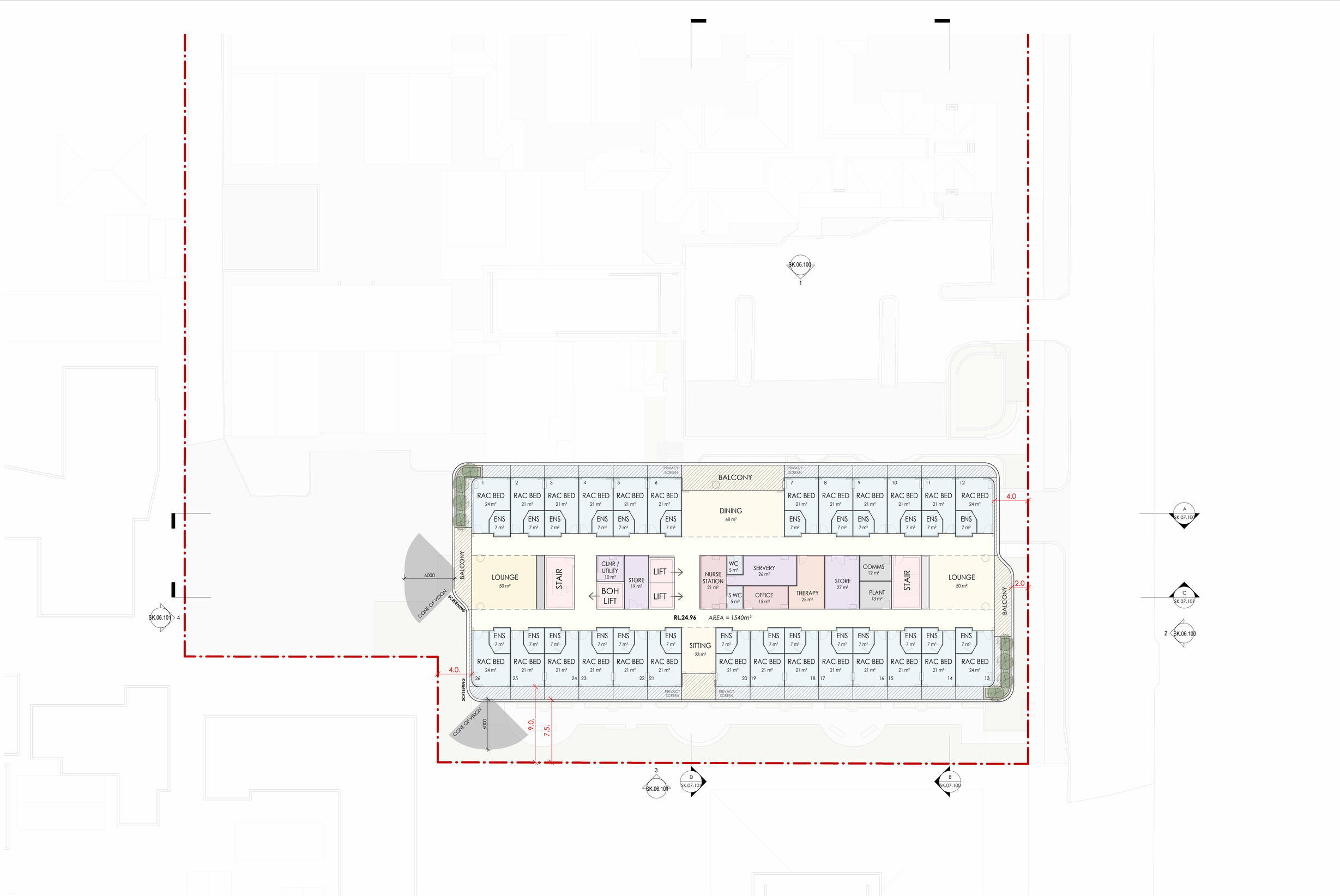
GROUND FLOOR PLAN
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 Date 18/8/2026

8m 6m 4m 2m 0m 16m

SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.03.100	F	18/8/2026



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ARCHITECTURE

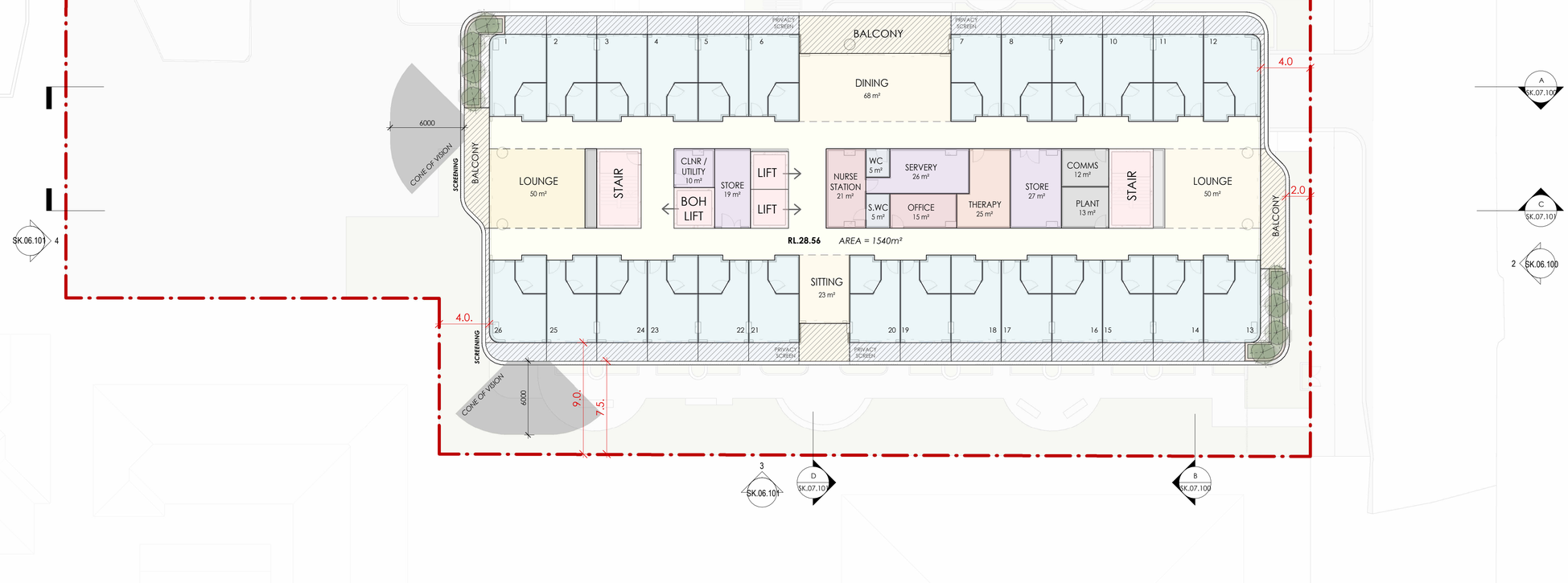
LEVEL 01 FLOOR PLAN
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

8m 6m 4m 2m 0m 16m

SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.03.101	E	18/8/2026



silver thomas hanley
ARCHITECTURE

LEVEL 02 FLOOR PLAN
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

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SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
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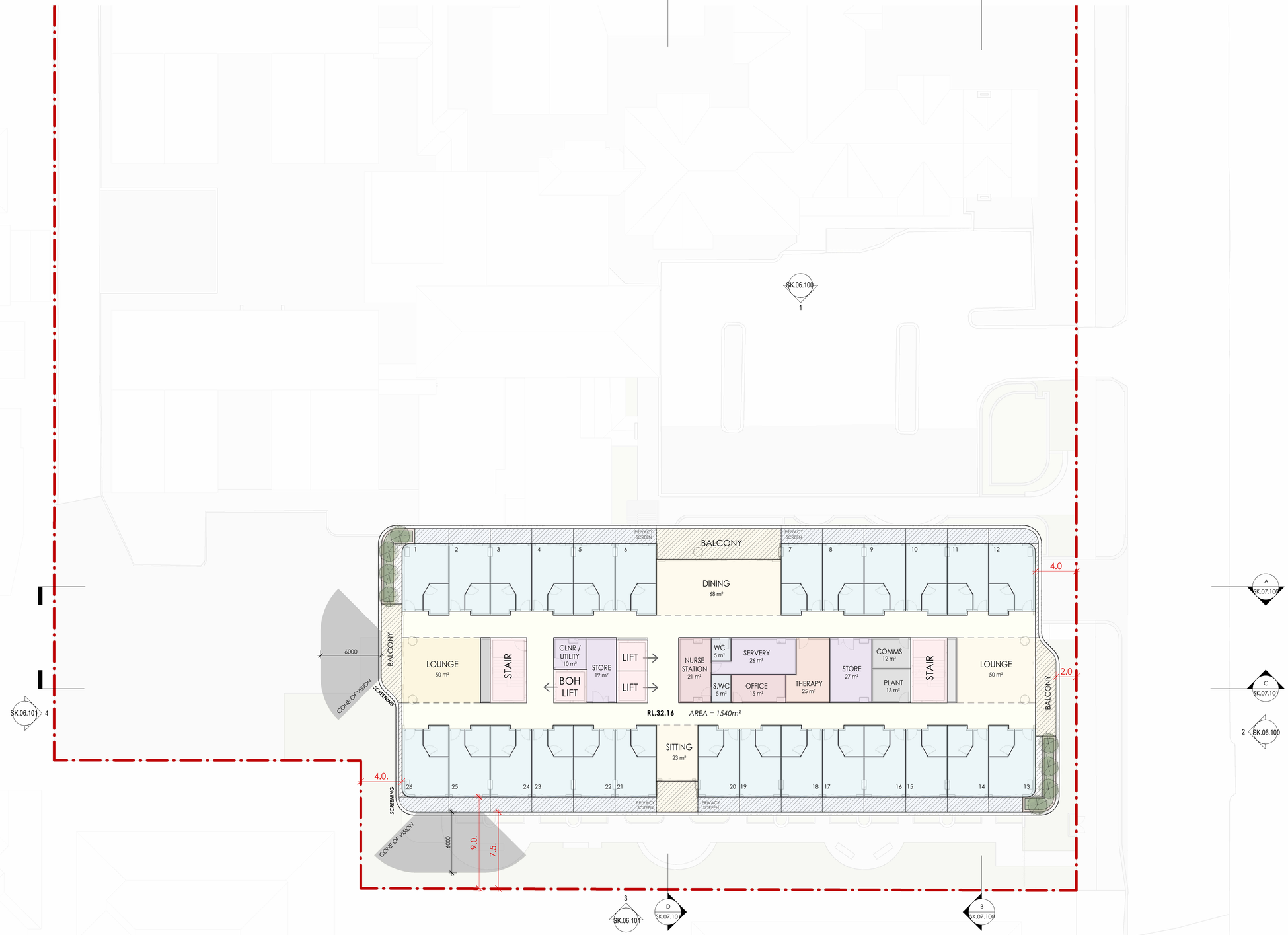


silver thomas hanley
ARCHITECTURE

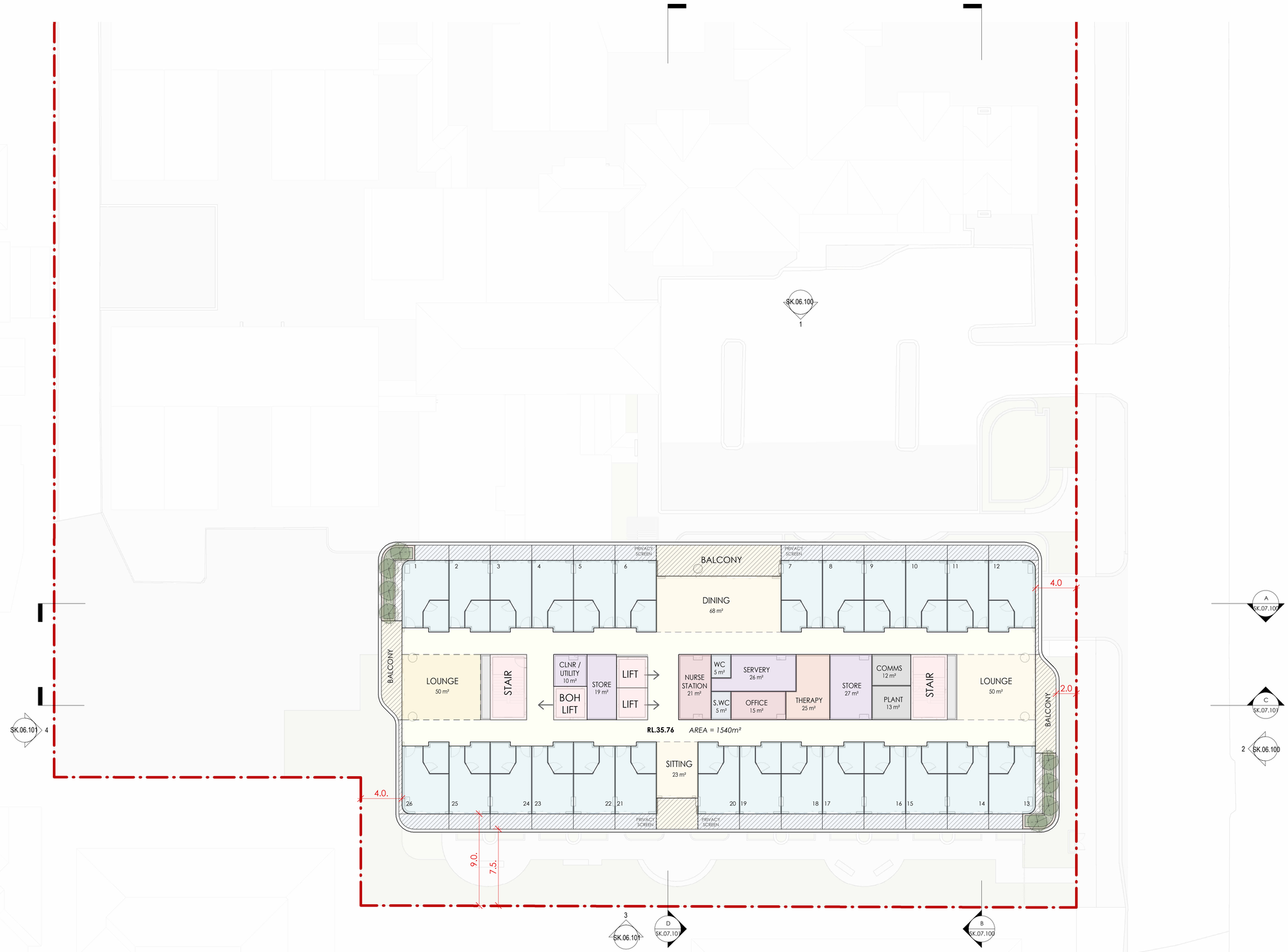
LEVEL 03 FLOOR PLAN
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

8m 6m 4m 2m 0m 16m

SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.03.103	E	18/8/2026



silver thomas hanley
ARCHITECTURE

LEVEL 04 FLOOR PLAN
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

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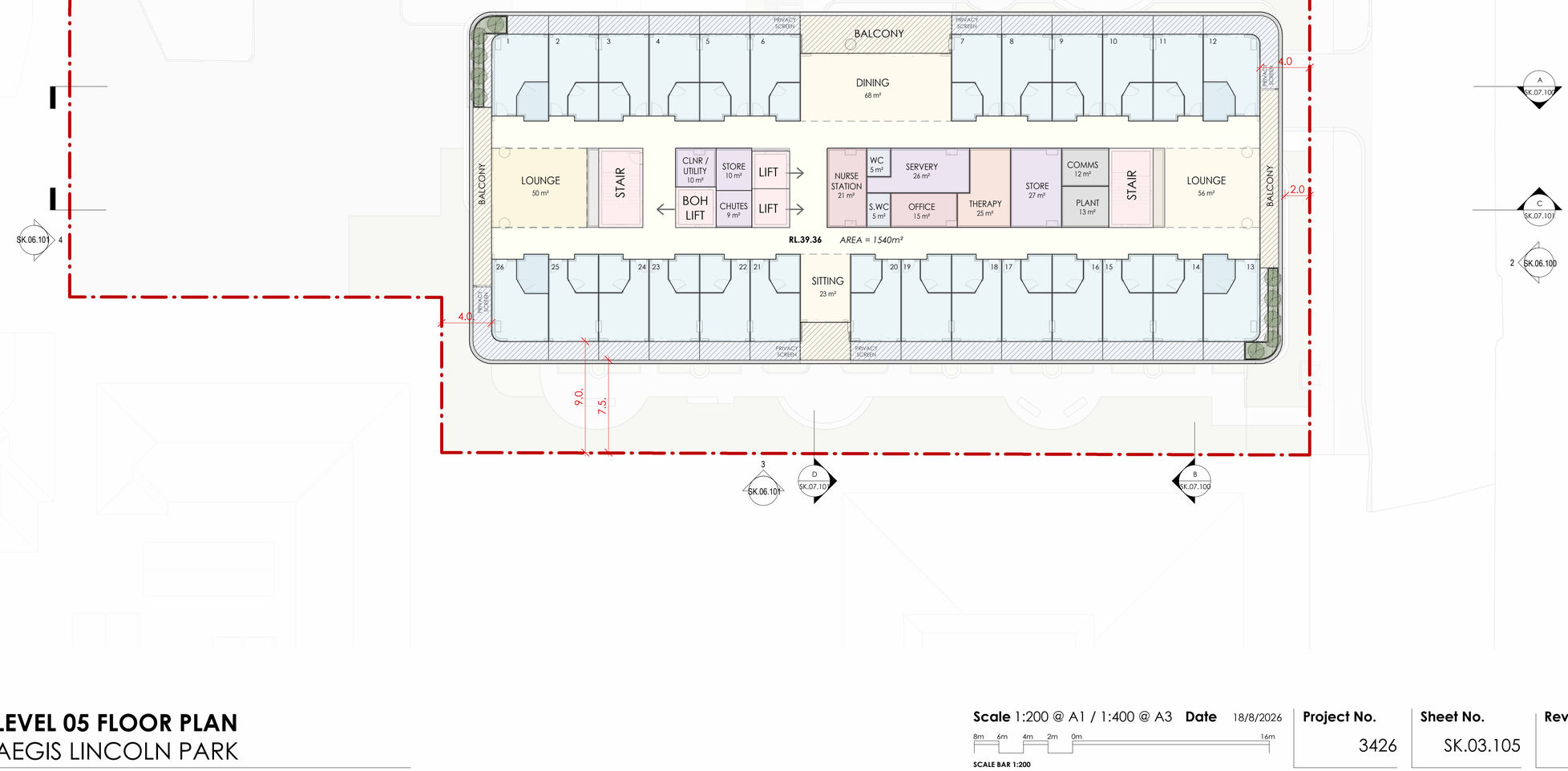
SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.03.104	E	18/8/2026



silver thomas hanley
ARCHITECTURE

LEVEL 05 FLOOR PLAN
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

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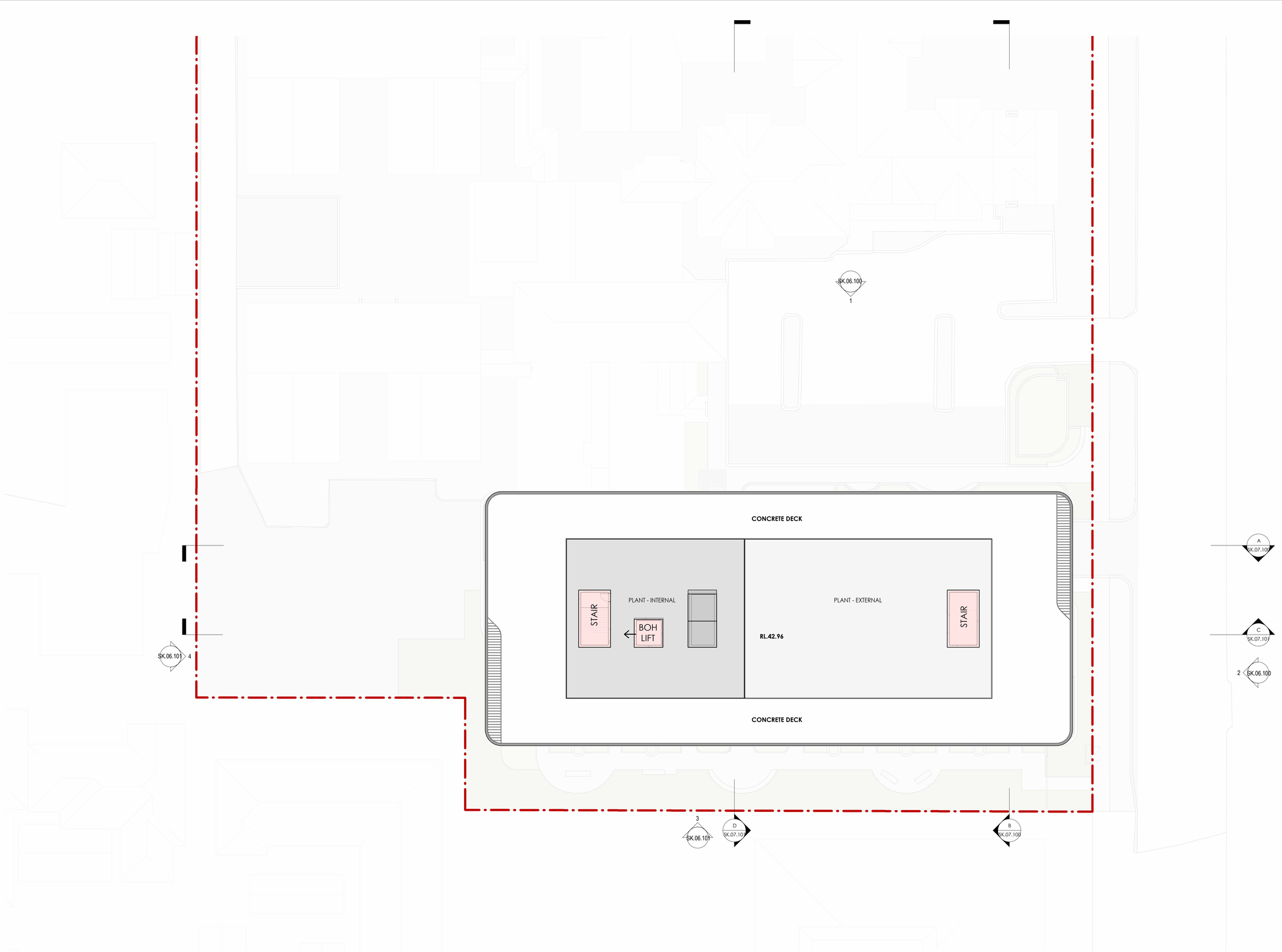
SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.03.105	E	18/8/2026



silver thomas hanley
ARCHITECTURE

LEVEL 06 FLOOR PLAN
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

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SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
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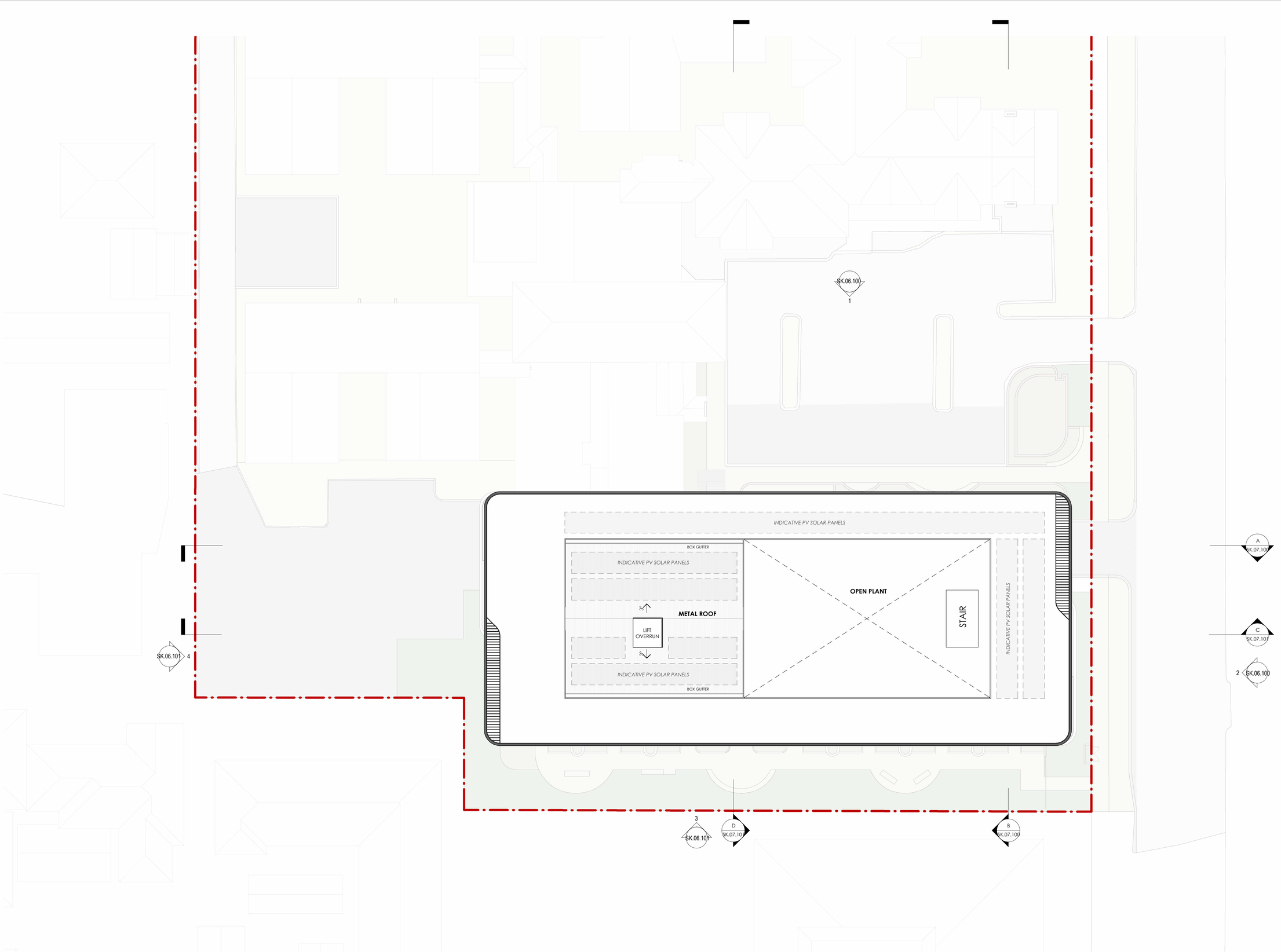


silver thomas hanley
ARCHITECTURE

ROOF PLAN
AEGIS LINCOLN PARK

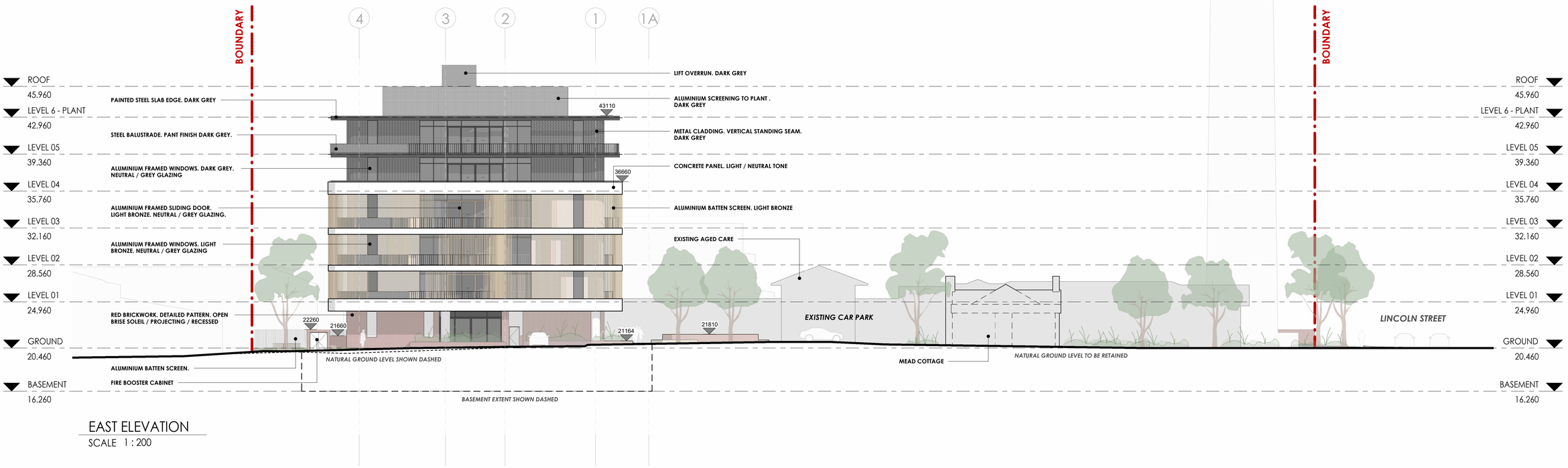
Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

8m 6m 4m 2m 0m 16m

SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.04.100	E	18/8/2026

NORTH ELEVATION
SCALE 1 : 200



EAST ELEVATION
SCALE 1 : 200

silver thomas hanley
ARCHITECTURE

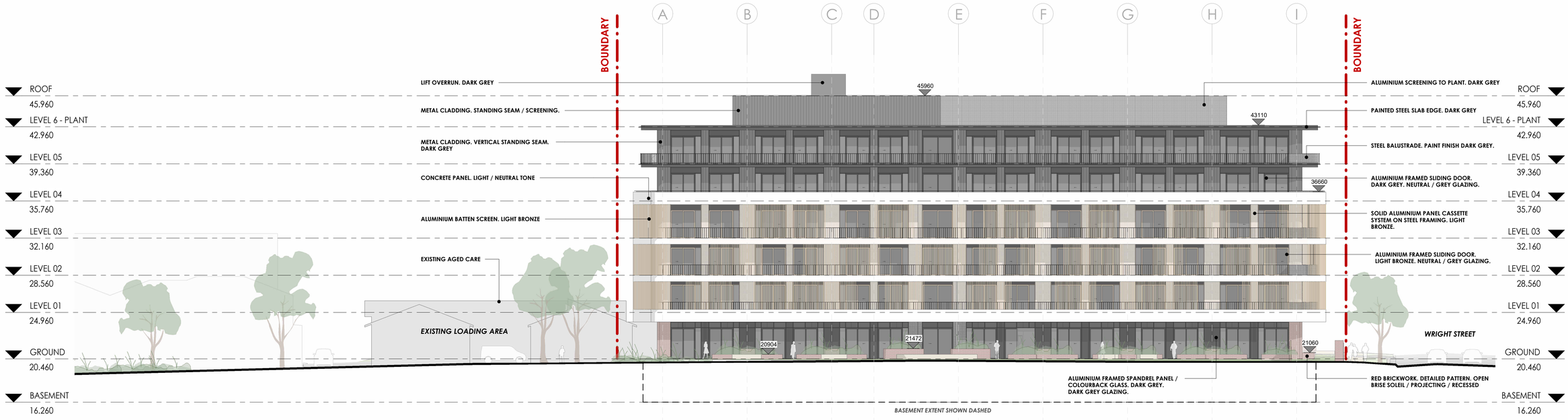
ELEVATIONS
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

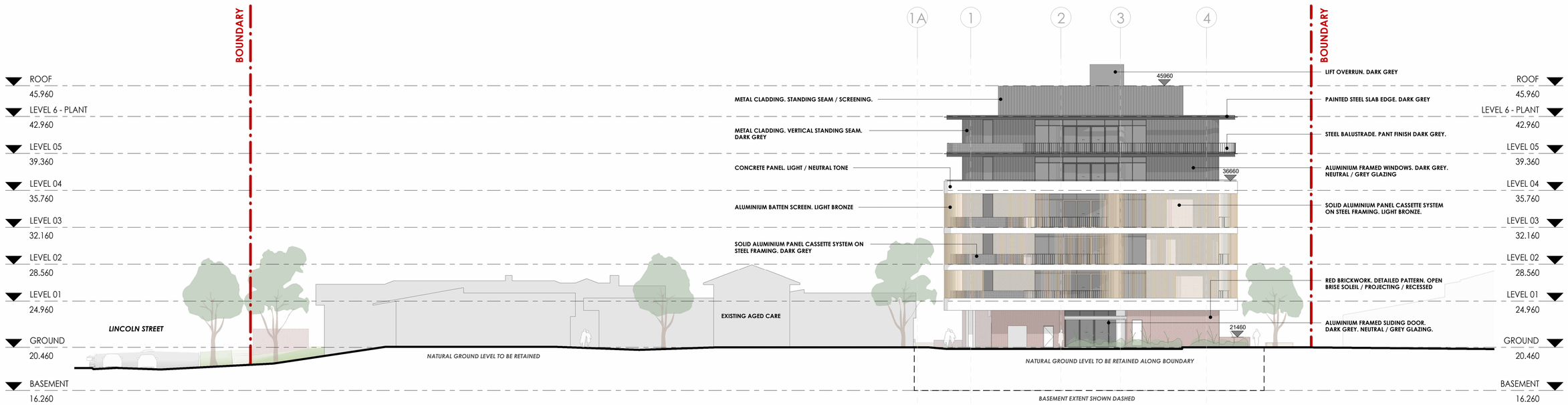
8m 6m 4m 2m 0m 16m

SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.06.100	E	18/8/2026



SOUTH ELEVATION
SCALE 1 : 200



WEST ELEVATION
SCALE 1 : 200

silver thomas hanley
ARCHITECTURE

ELEVATIONS
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

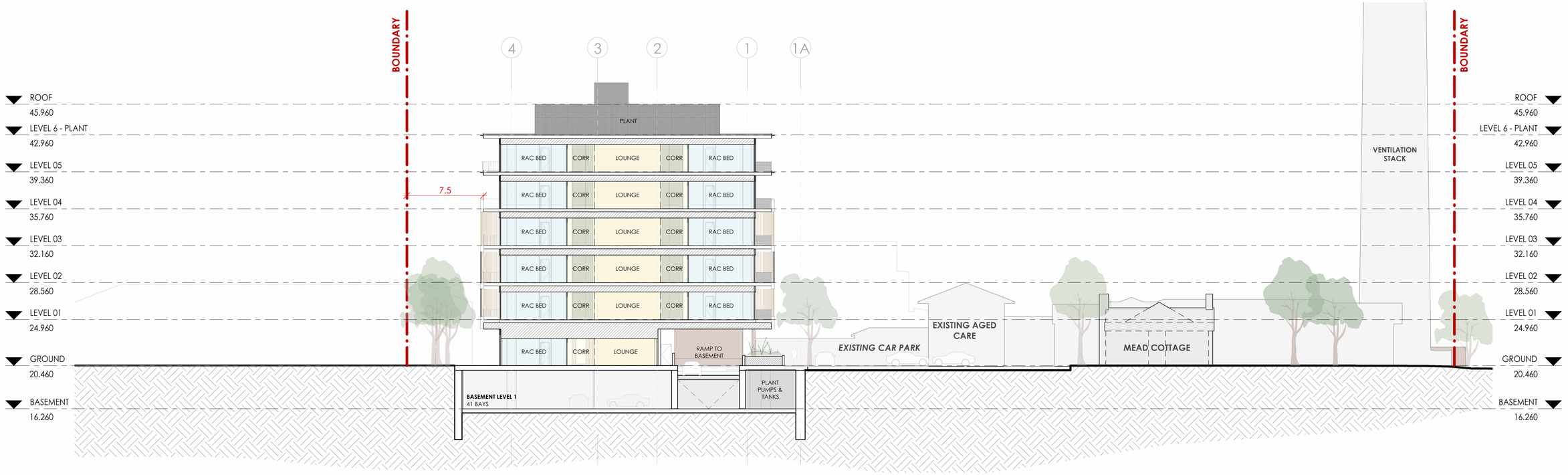
8m 6m 4m 2m 0m 16m

SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.06.101	E	18/8/2026

Stage 1 - Section A

SCALE 1 : 200



Stage 1 - Section B

SCALE 1 : 200

silver thomas hanley
ARCHITECTURE

SECTIONS
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

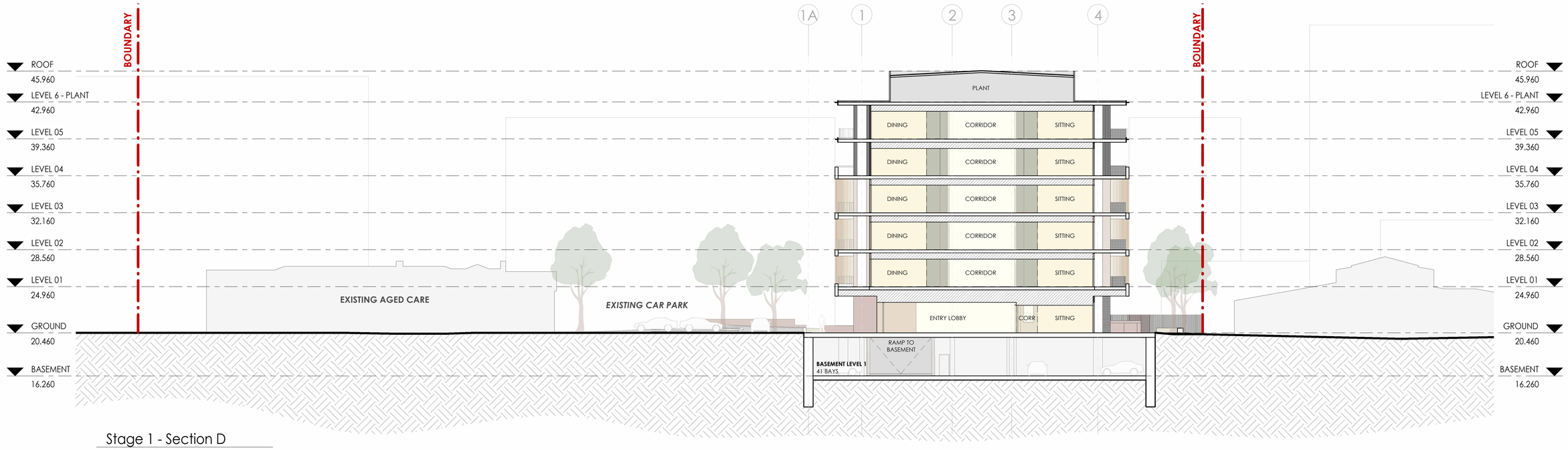
8m 6m 4m 2m 0m 16m

SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.07.100	E	18/8/2026

Stage 1 - Section C

SCALE 1 : 200



Stage 1 - Section D

SCALE 1 : 200

silver thomas hanley
ARCHITECTURE

SECTIONS
AEGIS LINCOLN PARK

Scale 1:200 @ A1 / 1:400 @ A3 **Date** 18/8/2026

8m 6m 4m 2m 0m 16m

SCALE BAR 1:200

Project No.	Sheet No.	Revision	Revision Date
3426	SK.07.101	E	18/8/2026

CITY OF VINCENT

ATTACHMENT 3

DEVELOPMENT ASSESSMENT PANEL MEETING

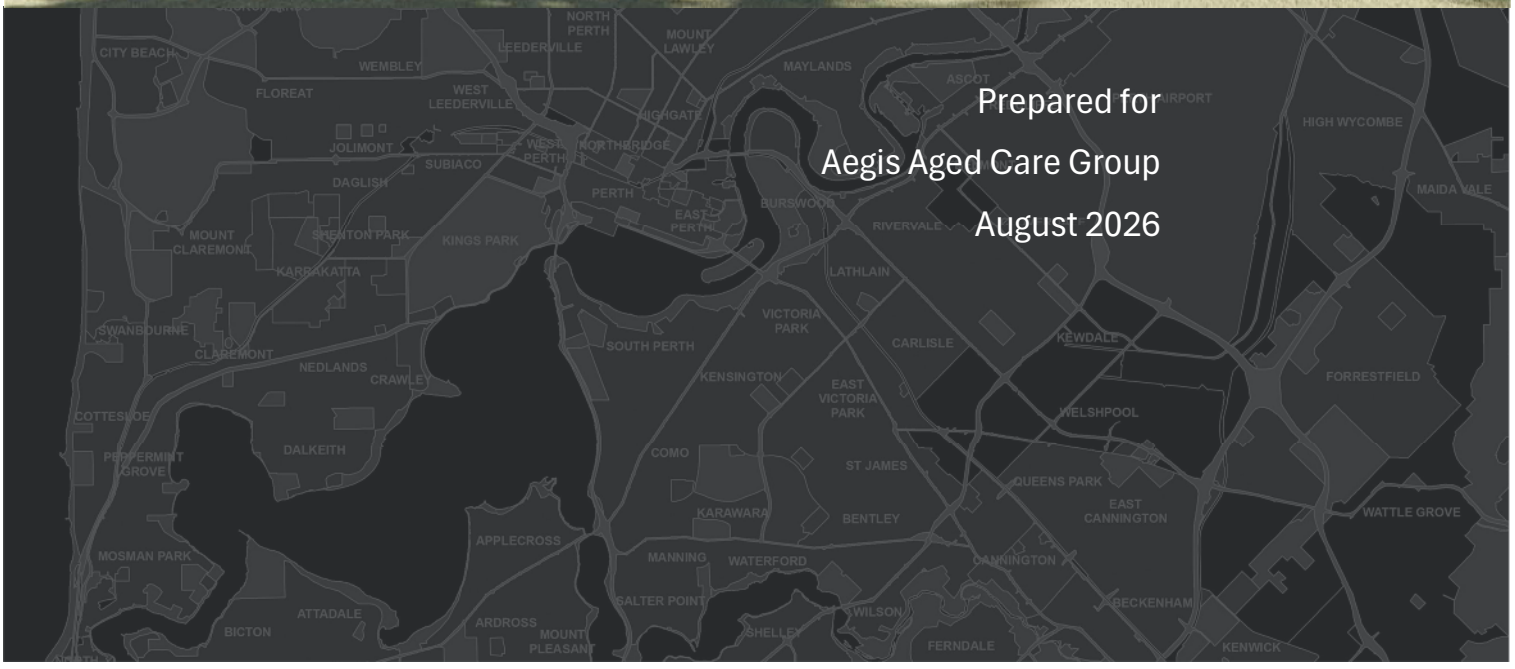
Applicants Planning Report

Development Application Report

Residential Aged Care Facility

Lot 101 (19) Wright Street
Perth WA 6000

PLANNING SOLUTIONS
URBAN & REGIONAL PLANNING
PS



Prepared for
Aegis Aged Care Group
August 2026

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- the Client's implementation, or application, of the strategies recommended in this report.

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Project Details

Job number	9831	
Client	Aegis Aged Care Group	
Prepared by	Planning Solutions	
Consultant Team	Town Planning Drafting and Design Traffic Engineering Landscaping Plan Sustainability Waste Acoustic Heritage	Planning Solutions Silver Thomas Hanley Transcore CaPA Summation Talis Consultants Herring Storer Acoustics Griffiths Architects

Document Control

Version	File Name	Date	Author	Reviewer
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Contents

1 PRELIMINARY 1
1.1 Introduction 1
1.2 Demand analysis 1

2 BACKGROUND 2
2.1 Pre-lodgement engagement with City of Vincent 2
2.2 Design Review Panel 2

3 SITE DETAILS 4
3.1 Land description 4
3.2 Location 4

4 PROPOSED DEVELOPMENT 10
4.1 Development Summary 10
4.2 Built form 12
4.3 Landscaping 12
4.4 Sustainability 13
4.5 Access, parking and traffic management 13
4.6 Waste 14
4.7 Acoustic 14
4.8 Heritage 14

5 STRATEGIC PLANNING FRAMEWORK 16
5.1 Local Planning Strategy 16

6 STATUTORY PLANNING FRAMEWORK 17
6.1 Metropolitan Region Scheme 17
6.2 State Planning Policies 17
6.3 Improvement Plan 65 17
6.4 Local planning scheme 18
6.5 Local Planning Policies 22
6.6 Other relevant policies and/or guidelines 24

7 CONCLUSION 26

Appendices

Appendix 1: Certificate of Title
Appendix 2: DRP3 Minutes
Appendix 3: DRP3 Responses
Appendix 4: Development Plans
Appendix 5: Design Report
Appendix 6: Landscape Plans
Appendix 7: Transport Impact Assessment
Appendix 8: Waste Management Plan
Appendix 9: Acoustic Report
Appendix 10: Heritage Impact Assessment
Appendix 11: Sustainability Report
Appendix 12: Assessment Against Policy No. 7.1.1 - Built Form

1 PRELIMINARY

1.1 Introduction

Planning Solutions acts on behalf of Aegis Aged Care Group, the registered proprietor of Lot 101 (19) Wright Street, Perth (**subject site**) and proponent of the proposed development of a Residential Aged Care Facility on the site.

Planning Solutions has prepared the following report in support of an application for development approval. This report will discuss various matters pertinent to the proposal, including:

- Background.
- Site details.
- Proposed development.
- Strategic planning framework.
- Statutory planning framework.

The application seeks approval for the redevelopment of part of the existing Aegis Lincoln Park Residential Aged Care Facility. This proposal represents Stage 1 of a broader masterplanned redevelopment of the site, which ultimately seeks to provide transitional care for approximately 300 to 450 residents transitioning from hospital settings into residential aged care.

The site is approaching the end of its functional life and is no longer optimally suited to contemporary aged care practices, presenting an opportunity for redevelopment.

The current application relates solely to Stage 1, with any future stages to be subject to separate development applications. Stage 1 includes the demolition of existing redundant structures on the site and the construction of a new bespoke facility.

1.2 Demand analysis

There is a clear and pressing demand for transitional aged care services within the metropolitan area. The proposed facility is critically needed to help address ongoing pressures in the public hospital system, including ambulance ramping, emergency department congestion, and limited bed availability.

A significant proportion of hospital beds are currently occupied by elderly patients who are medically stable but unable to be discharged due to a lack of appropriate transitional care options.

By providing capacity for patients requiring short-term care, the facility will enable the transfer of these patients from hospital beds to a more suitable care environment for aged persons. This will free up hospital beds and alleviate systemic pressures that are continuing to worsen across the healthcare network.

2 BACKGROUND

2.1 Pre-lodgement engagement with City of Vincent

Pre-lodgement consultation has been undertaken with officers of the City of Vincent (**City**), with a meeting held on 28 November 2025. During these discussions, the project team presented the development concepts and the high-level planning considerations related to the proposal.

The proposal was generally well received by City officers. Officers acknowledged the design rationale underpinning the additional building height sought, particularly in relation to the operational requirements of the proposed use, which constrain the ability to incorporate upper-level setbacks. It was also recognised that the subject site, due to its size and surrounding context, is capable of accommodating additional height. It was noted that the appropriateness of the proposed height would ultimately be determined through the statutory planning assessment and design review process.

The City also confirmed that a Local Development Plan is not required in this instance.

Key matters suggested for consideration through the DA process were:

- Retention of the heritage building, Mead Cottage.
- Opportunities for additional landscaping.
- Opportunities to retain significant trees on the northern Lincoln Street frontage.

2.2 Design Review Panel

The development proposal was presented to the City's Design Review Panel (**DRP**) in three instances:

- DRP1 on 18 December 2025
- DRP2 on 11 March 2026
- DRP3 on 29 April 2026

The DRP3 noted that the applicant has responded to a large portion of the DRP's previous comments and the proposal has progressively improved throughout the DRP process, however there are some further amendments, design development and detail required in order to achieve full DRP support for the proposal.

Following DRP3, the DRP minutes confirmed that the proposed development included the following key strengths:

- *A Heritage Architect has been engaged who has provided a Heritage Impact Statement*
- *The Heritage Impact Statement notes conservation works to Meade Cottage as a positive and the impact of the new development on Meade Cottage to be minimal*
- *The interface to Wright Street at ground level is more open and interactive than the previous version*
- *The setback at the rear of the site (near the kink in the boundary) has increased to 4m*
- *Fire pumps and tanks are located in the basement*
- *Sections have been included which are helpful in understanding building*
- *The Landscape Plan has been developed further from the previous sketch drawings provided*
- *Landscaping metrics (deep soil area, soft planting and trees) on the site are generally supported*
- *An Arborist has been engaged and relocation of existing trees on the site is supported*

- *Landscaping has been extended in the front setback to screen the new parking area*
- *Landscaping of the verge is supported*
- *An ESD professional has been engaged who has provided a strong ESD strategy / framework and the proposal is targeting a 5 star Greenstar outcome*
- *ESD initiatives include a 70kW minimum PV solar system, all electric development (no gas), EV charging, central heat pump HWS, double glazing, low carbon materials and a light colour roof*
- *Involvement of the ESD professional throughout the construction stage of the project is supported*
- *HVAC plant is shown on the roof screened*
- *Further information has been provided in the form of elevations and in relation to external materiality*
- *Face brick materiality at ground level, a white screened middle section and darker colours with more open balconies / corners on the upper levels plays a role in breaking down the proposal's visual bulk and scale*
- *The renders illustrate a complimentary relationship between the proposed building and heritage listed vent stack within the surrounding context*

The DRP provided a range of potential recommendations for consideration as the design progresses. The following summary recommendation was provided following DRP3:

- *Increase the primary street setback on Wright Street significantly and introduce larger trees / denser landscaping in the front setback area to soften the streetscape interface*
- *Improve the legibility of the main pedestrian entrance to the building from the streetscape*
- *Undertaking further design development and providing further detail in relation to the landscaping aspect*
- *Include the Meade Cottage maintenance works noted in the Heritage Impact Statement in this stage of works*
- *Resolve the visual privacy non-compliances from the rooms on the south west corner of the building*

Refer to **Appendix 2**, DRP3 Minutes.

Following DRP3, the design has been further progressed to address the key recommendations by the DRP. Refer to **Appendix 3**, DRP3 Responses.

3 SITE DETAILS

3.1 Land description

Refer to **Table 1** below for the lot details and a description of the subject site.

Table 1: Lot details

Lot	Diagram	Volume	Folio	Area (ha)
101	69483	1731	241	1.0051

Refer to **Appendix 1** for a copy of the Certificate of Title and Diagram.

3.2 Location

3.2.1 Regional context

The subject site is located in the Perth locality, within the municipality of City of Vincent. The site is located approximately 1.3km north-east of the Perth city centre and the Perth railway station, and 150m west of the Lord Street Local Centre. The site is also within an 800m catchment from the North Claisebrook Precinct, an area transitioning from traditional industrial uses to a niche of creative industries and higher density, diverse living opportunities.

The site benefits from strong regional connectivity due to its proximity to multiple high-frequency public transport services.

The site is well served by rail, with the East Perth Railway Station and Terminal located approximately 500m east of the site, and the Claisebrook Station located 680m south. These provide convenient access to the Airport, Armadale, Ellenbrook, Midland, and Thornlie-Cockburn railway lines, and ultimately to the wider metropolitan area.

The site is also serviced by several bus routes, with bus stops located along Lord Street (approximately 200m east), Beaufort Street (approximately 620m west), and Newcastle Street (approximately 700m south).

Road connectivity is also strong, with the site having convenient access to East Parade and the Graham Farmer Freeway, and nearby Newcastle Street provides a direct connection to the Mitchell Freeway.

The surrounding area accommodates a range of key land uses, services, and facilities, including Perth Oval, multiple public open space areas, supermarkets, and health services, contributing to a well-established and highly accessible environment.

3.2.2 Local context, land use and topography

The subject site comprises a substantial landholding of approximately 1 hectare and contains a number of single- and double-storey buildings, some of which are interconnected, forming part of the existing and operational Aegis Lincoln Park Residential Aged Care Facility (**Figure 1**).

The existing facility provides a range of residential care for up to 46 residents across four areas. Each wing is supported by dedicated dining areas and has access to gardens and patio areas.

Figure 1: Aerial image of the subject site

The immediate context contains a range of built form typologies at differing scales and intensity, including:

- Salvation Army Bridge House rehabilitation service.
- Heritage Listed ventilation, police museum and police cottages.
- A contemporary four-storey apartment development backing onto the subject site.
- Two-storey apartment development to the southwest (rear) boundary.
- Two to three-storey apartments opposite on Wright Street.
- Ten storey apartment tower to the southeast.
- A range of single and double storey detached housing.

Appendix 5 contains a more detailed analysis of the surrounding context.

Photographs 1 to 4 provide a snapshot of existing buildings and surrounds subject to this application.

Photograph 1: View of the south-eastern portion of the site from Wright Street

Photograph 2: View of the south-eastern entrance and driveway

Photograph 3: View of the south-western portion of the site and neighbouring multiple dwelling development

Photograph 4: View of the south-western portion of the site boundary fences

3.2.3 Heritage context

3.2.3.1 Within the site

The subject site contains the Silver Chain Nursing League Building (1920), located on the eastern portion of Lot 101 near the intersection of Wright and Lincoln Streets. The remainder of Lot 101 is occupied by the existing Aegis Lincoln Park Residential Aged Care Facility (**Photograph 5**).

The Silver Chain Nursing League Building is listed on both the State Register of Heritage Places and the City of Vincent Heritage List.

Photograph 5: Silver Chain Nursing League Building

3.2.3.2 Outside the site

Adjoining the subject site to the west are two State-registered heritage places:

- The Lincoln Street Ventilation Stack (1941)
- The Highgate Hill Police Station, Lockup & Quarters (former) (1897, 1906, 1916)

In addition, a row of former Police Cottages located on the northern side of Lincoln Street is included on the Heritage Council's assessment list and is identified as Category A on the City of Vincent Heritage List (**Photographs 6 & 7**).

Photograph 6: Lincoln Street Ventilation Stack

Photograph 7: Highgate Hill Police Station, Lockup & Quarters

4 PROPOSED DEVELOPMENT

4.1 Development Summary

The subject application seeks development approval for the proposed redevelopment of part of the site. The development area is located on the southern portion of the subject site and comprises the construction of a 6-storey building accommodating 147 beds, new link connections to the existing main entry and back of house areas, and a realigned loading dock.

All existing buildings, car parking areas and the loading area within the development footprint will be demolished to facilitate the new development.

The existing 46 bed care facility will remain on-site and continue to operate. The existing kitchen and laundry (recently refurbished) will also be retained on-site and will continue to service the existing and new development.

The total number of beds on site will increase to **193**.

4.1.1 Use

The site is currently used for residential aged care, and as noted above, this land use is proposed to be retained and continued as part of the redevelopment.

The new facility will operate as a transitional aged care facility, providing short-term accommodation for elderly persons who have been discharged from hospital and are awaiting placement in a permanent aged care facility. Residents will rehabilitate and recover on site until a suitable permanent bed becomes available. This model supports the broader health system by enabling aged persons occupying hospital beds to transition into an appropriate aged care environment.

4.1.2 Masterplan and site redevelopment

The existing buildings within the facility are approaching the end of their operational life. This presents a clear opportunity for redevelopment to meet contemporary aged care standards and community needs. Accordingly, the redevelopment will deliver contemporary, fit-for-purpose facilities that respond to current operational standards for such use.

The site itself is a key, strategically located landholding, and its scale and configuration make it particularly well suited for redevelopment opportunities.

A masterplan (non-statutory) has been prepared for the long-term redevelopment of the entire site. The masterplan identifies a staged redevelopment of the site, ultimately seeking to accommodate approximately 450 aged care beds across the entirety of the site.

The site's context and characteristics make it well-suited to this form of redevelopment, enabling the continued provision of care services within an established residential setting. Future stages will be subject to separate development applications.

A detailed summary of the Stage 1 development is provided in **Table 2** below. Refer to **Appendix 4 & 5**, Development Plans and architectural Design Report for further detail.

Table 2: Development description

Element	Description	
General		
Use	• Residential Aged Care Facility (continuation of existing use)	
Demolition	• Four (4) existing buildings to be demolished • Existing at-grade car park to be demolished and modified • Loading zone to be demolished • Back of house area to be demolished	
Yield	• 193 beds (147 new beds subject to this application + 46 existing retained beds)	
Height	• 6 storeys • Up to 22.5m in height (excluding plant)	
Setbacks	*Eastern (front) boundary* • 4m setback at ground level • Balconies set back 2m with main building set back 4m *Southern (side) boundary* • 9m setback at ground level • Balconies set back 7.5m with main building set back 9m *Western (rear) boundary* • 4m setback at ground level • Building set back 4m	
Parking	• 15 car bays within the at-grade car park (retrofitted) • 41 new staff car bays within basement, including provision for EV charging bays (15% of total bays)	
Landscaping	• 480sqm deep soil planted areas • 108sqm low planter (less than 600mm deep) areas • 178sqm raised planter (600-900mm deep) areas • 286sqm planting on structure	
Levels		
Basement	• Basement car park featuring 41 car bays • Plant • Stairs and lifts	
Ground	• 17 care beds • Entry lobby • Lounge areas • Support areas	• Servery • Dining area • Outdoor terraces and resident courtyard • Stairs, lifts and corridors
Levels 1-5	• 26 care beds • Nurse station • Therapy room • Office • Lounge areas • Servery	• Dining area • Utility room and stores • Plant and comms rooms • Balconies wrapping around much of the building • Stairs, lifts and corridors
Level 6	• Internal and external plant area • Stairs and lifts	

4.2 Built form

The proposed residential aged care facility has been designed in a contextual and site-responsive manner, with the existing and emerging context as key considerations that influenced the building form, materials, finishes and colours. The development is a high-quality, contemporary architectural design that will serve as a purpose-built facility.

The development provides a high-quality built form, referencing its heritage context and the site's strategic location within close proximity to the North Claisebrook Precinct. The development supports higher density, diverse living opportunities in an area that lends itself for this type of redevelopment opportunities.

The high-quality built form is achieved through a high level of articulation of the built form used to reduce the perception of bulk associated with the increased heights. This includes setback treatment and use of varied building depths, incorporation of vertical shading elements that contrast the façade's horizontal elements, balcony design, choice of complementary materiality, varied textures and a contrasting colour palette. Combined, these elements break the building mass into 4 distinct parts to reduce the perceived bulk and scale of the development. This creates a cohesive and aesthetically appealing experience for future residents and visitors.

The development provides high level of amenity to future residents by developing a series of communal spaces across all levels that allow for resident interaction, as well as the provision of generous balconies (both private to each unit as well as communal private open space areas). These will support social engagement and enhance resident amenity.

The redevelopment further has been carefully designed with strong emphasis on the streetscape experience and consideration to the development's interface with the public realm. The design outcome at ground level includes significant landscaping opportunities and a legible pedestrian pathway from Wright Street. Resident lounges, outdoor terraces and balconies are provided across all levels, and are oriented towards the Wright Street interface to provide activation and passive surveillance to the public realm.

4.3 Landscaping

The landscaping strategy envisages a landscape environment of clear legibility at street level, and focuses on selecting species suited to local conditions and aims to deliver multiple benefits, including increased canopy cover, mitigation of urban heat island effect, and tree planting within the car park and in the verge area.

Importantly, substantial planting and landscaped treatments are proposed along the site's boundaries and key interfaces to create a high-quality visual edge, soften the perceived building bulk, and enhance the visual amenity of the development when viewed from the public realm and neighbouring properties.

Outdoor terraces and balconies will also incorporate integrated landscaping and planter elements to enhance the amenity, privacy and overall quality of these outdoor private open spaces.

The landscape strategy for the development proposes:

- A total deep soil area of 26% of the overall site.
- Some targeted on-structure planting.
- Retention of 2 trees and an additional 18 trees planted on site.
- An increase of 672sqm of mature tree canopy due to additional tree planting.

A Landscaping Plan has been prepared to demonstrate the intended landscape strategy, as well as planting typology for the proposed development.

Refer to **Appendix 6**, Landscape Plan.

4.4 Sustainability

A Sustainability Report has been prepared in support of this application which outlines the sustainability initiatives proposed to enhance the development's environmental performance. The report assesses the project's commitment to achieve a 5-Star Green Star Equivalency and identifies sustainability initiatives considered for inclusion in the design.

The Sustainability Report addresses the following key requirements:

- 10% reduction of upfront carbon emissions through good design (design efficiency) and material selection.
- Electrification of building services including space heating, domestic hot water.
- High efficiency façade to exceed Section J, including double glazing.
- Design to and testing of Building air tightness.
- 50% increase in minimum mechanical ventilation for fresh air requirement.
- Solar PV (estimated 70kW to 100kW given scale of building) to be targeted. Pending further spatial coordination.
- At least 90% of construction and demolition waste is diverted from landfill.
- Extensive metering and monitoring to facilitate performance tracking and assist in fault finding.
- Healthy building with focus on Air Quality, Light Quality and Acoustic Comfort with reduced VOC to maximise staff and resident's comfort and wellbeing.
- Climate Resilience Assessment to future proof the building and reduce Heat Island Effect through light coloured roof and landscaping selections.
- Sustainable Transport Plan including provision for EV transition through appropriate enabling infrastructure

Refer to **Appendix 11**, Sustainability Report.

4.5 Access, parking and traffic management

Primary pedestrian access to the ground floor of the building is proposed via a principal entry located on the northern façade. A dedicated pedestrian pathway will provide a direct connection from the footpath to the new building, as well as to the main entry of the existing building which is to be retained.

Vehicular access to the site is afforded via two left-in/left-out crossovers from Wright Street, located to the east of the site:

- One existing crossover (to remain) provides access to/egress from the at-grade car parking area, situated behind a landscaped setback. A new crossover will service the basement car park of the new facility. The redundant crossover to the south will be removed and verge reinstated.
- A total of 75 car parking spaces are proposed to service the development comprising:
    - 15 bays at grade off Wright Street in the building forecourt (existing retained bays).
    - 19 bays at grade accessed of Lincoln Street for staff parking.
- 41 car parking spaces in the basement of the new development, including provision for EV charging bays (15% of total bays).

A Transport Impact Statement (**TIS**) has been prepared for the proposed development, addressing transport related matters including vehicle access and egress, traffic generation and distribution, and car parking. The TIA demonstrates the surrounding road network will be able to accommodate the proposed development and its associated traffic generation.

Refer to **Appendix 7**, Transport Impact Statement.

4.6 Waste

A Waste Management Plan (**WMP**) has been prepared in support of the proposed development. The WMP considers estimation of general waste volumes and recommendations for appropriate collection, storage, handling and management of waste and recycling for the development.

The development proposes a centralised bin store able to accommodate seven 1,100L refuse waste bins (collected three times per week), four 660L recycling bins (collected once per week), and three 1,100L cardboard bins (collected twice per week).

A private contractor will service the development onsite, directly from the loading area. The private contractor's waste collection vehicle will enter and exit the site in forward gear via the existing driveway off Lincoln Street. Managers / caretakers oversee the relevant aspects of waste management.

A swept path assessment has been undertaken for a 10.0m Medium Rigid Vehicle (MRV), confirming that collection can be completed safely within the proposed street embayment without obstruction to general traffic.

The WMP confirms that the proposed development provides sufficient bin storage and adequate bins to service the site for refuse waste, recycling bins and cardboard bins, and that the servicing of the bins by the private contractor can be adequately achieved without having an adverse impact on the site and the local street network.

Refer to **Appendix 8**, Waste Management Plan.

4.7 Acoustic

The subject site is in within the trigger distance to Lord Street, which is identified as a significant freight/traffic route.

A preliminary acoustic report was prepared in support of this application. The acoustic report identifies potential noise and vibration sources and mitigations measures for the proposed development. The assessment provides minimum construction recommended for the development associated with wall construction, floor construction, general building notes, noise emission and noise ingress. These mitigation measures will be incorporated into the development as part of the detailed design process.

Further noise assessment and modelling may need to be undertaken as the detailed design progresses to confirm compliance, as outlined in the assessment.

Refer to **Appendix 9**, Acoustic Report.

4.8 Heritage

A Heritage Impact Assessment (**HIA**) has been prepared in support of this application. The HIA assesses the proposal against the heritage values of the state-registered place. The assessment considers the extent to which the development may affect those values, evaluates whether any mitigation measures are required, and provides an overall conclusion regarding the acceptability of the proposal in the context of the site's heritage significance.

The Silver Chain Nursing League Building, located on the eastern edge of Lot 101, is the only remaining element of the former Wright Street cottage homes complex, the majority of which has been demolished over time. The Silver Chain Nursing League Building is now incorporated into the Aegis Lincoln Park residential aged care facility, although it is currently unused. The broader site has undergone several redevelopment phases. Surrounding buildings dating from the 1950s, 1980s and 1995-2000 do not form part of the heritage curtilage.

Importantly, this stage of development does not involve the Silver Chain Nursing League Building, nor does it interface with the Lincoln Street Ventilation Stack or the Highgate Hill Police Station, Lockup & Quarters.

The HIA concludes that the proposed development will not result in any adverse impacts on the heritage values of the surrounding heritage structures. The conservation works proposed represent a positive heritage outcome, supporting the ongoing preservation of the place ahead of future stages.

Refer to **Appendix 10**, Heritage Impact Assessment.

5 STRATEGIC PLANNING FRAMEWORK

5.1 Local Planning Strategy

The City of Vincent's Local Planning Strategy (**Strategy**) was endorsed by the Western Australian Planning Commission in 2016 and provides the strategic direction and spatial framework for the long-term growth and development of the municipality.

The strategy identifies the subject site to be within a high-density residential area (refer to **Figure 2** below). Importantly, the Strategy specifically targets high density mixed use and high density residential development within close proximity to train stations and along high frequency bus routes. The Strategy also supports the development of accommodation forms that cater for the diverse needs of residents.

The proposal is consistent with the City's strategic directions for the site, as it delivers a redeveloped residential aged care facility at increased densities on a site specifically identified for higher-density development due to its strategic location. The proposal supports the City's intent to facilitate diverse housing and accommodation options and to concentrate higher-intensity development in areas with strong access to public transport, services and amenities.

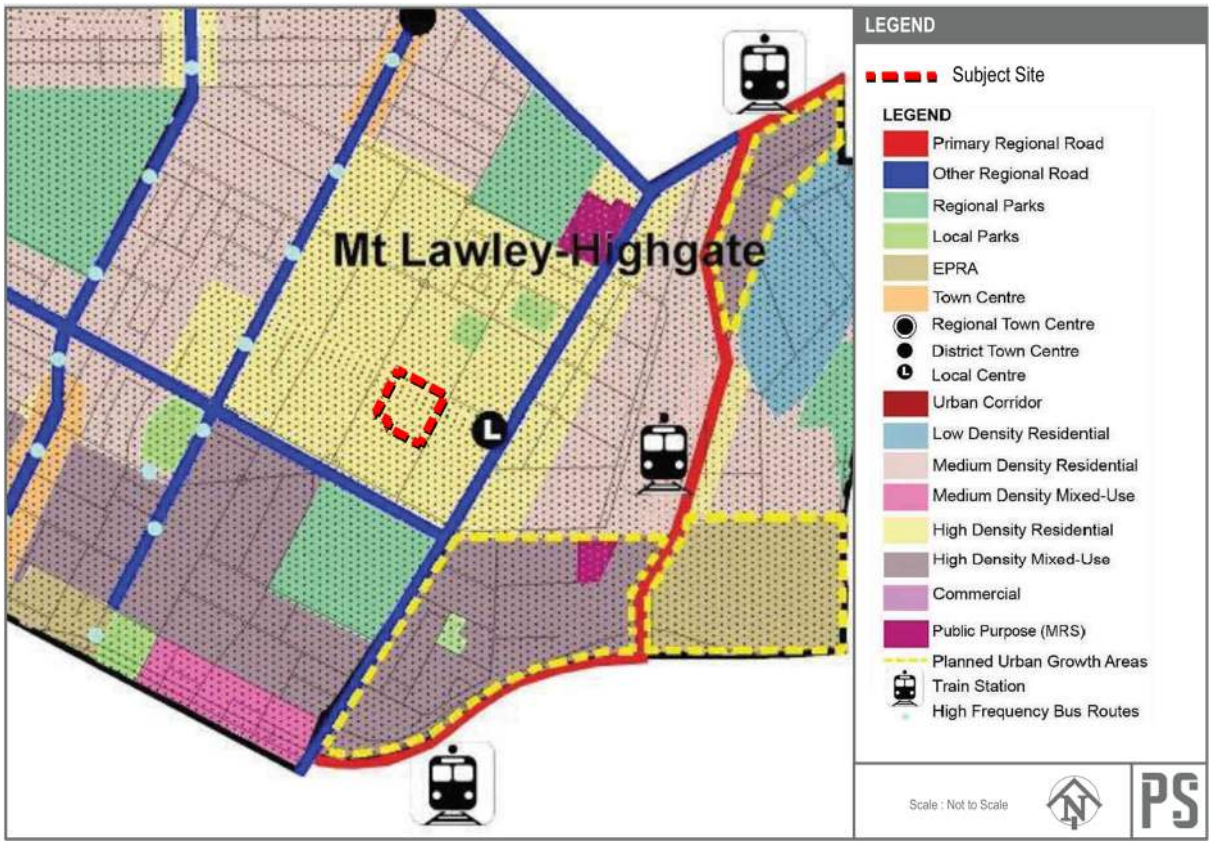

Figure 2: City of Vincent's Local Planning Strategy, Strategic Plan

6 STATUTORY PLANNING FRAMEWORK

6.1 Metropolitan Region Scheme

Under the provisions of the Metropolitan Region Scheme (**MRS**) the subject site is zoned Urban.

The subject site is not affected by land reserved by the MRS, nor is it subject to any resolution or declaration made under the MRS

6.2 State Planning Policies

6.2.1 State Planning Policy 5.4 – Road and Rail Noise

State Planning Policy 5.4 Road and Rail Noise (**SPP 5.4**) seeks to minimise the adverse impact of road and rail noise on noise-sensitive land-use and or developments within a specified trigger distance of strategic freight and traffic routes.

The subject site is in within the trigger distance to Lord Street, which is identified as a significant freight/traffic route. The preliminary acoustic report prepared for the development considers the provisions of SPP 5.4. The acoustic report identifies potential noise and vibration sources and mitigations measures for the proposed development. These mitigation measures will be incorporated into the development as part of the detailed design process.

All requirements of SPP5.4 will be achieved, where reasonable and practical to do so.

Refer to **Appendix 9**, Acoustic Report.

6.2.2 State Planning Policy 7.0 – Design of the Built Environment

State Planning Policy 7.0 Design of the Built Environment (**SPP7**) is the lead policy that elevates the importance of design quality, and sets out the principles, processes and considerations which apply to the design of the built environment in Western Australia, across all levels of planning and development.

SPP7 establishes a set of ten 'Design Principles', providing a consistent framework to guide the design, review and decision-making process for planning proposals. These principles guide the DRP.

Silver Thomas Hanley has prepared a detailed design report, having regard to the ten design principles, and feedback through the DRP process. The proposed development provides design outcomes which are consistent with the intent of SPP7 and therefore warrants support accordingly.

Refer to **Appendix 5**, Design Report.

6.3 Improvement Plan 65

Improvement Plan No. 65 – Station Precincts (**IP65**) was endorsed by the Western Australian Planning Commission (**WAPC**) in June 2026 and came into effect on 28 July 2026, following publication of the notice in the Government Gazette. IP65 is the first step in establishing precinct boundaries and objectives that will guide future planning in the Station Precincts.

IP65 does not introduce new zoning, building heights or development controls. These will be developed as part of the forthcoming 'Improvement Scheme'. However, IP65 sets clear strategic direction for increased future residential development opportunities.

The Precinct Plan applies an indicative core-and-frame approach, with high-density residential and mixed-use development intended to be concentrated in the station 'core' and medium-density residential development in the surrounding 'frame' to transition to nearby neighbourhoods.

As shown below in **Figure 3** the subject site is located within the Claisbrook Station Precinct 'frame' area indicating the subject site will be expected to support higher density residential development. It is noted the site is the largest remaining undeveloped site in frame area which would support a higher density of development.

Until formal notice of the Improvement Plan's commencement is issued, the City of Vincent's existing planning framework will continue to apply.

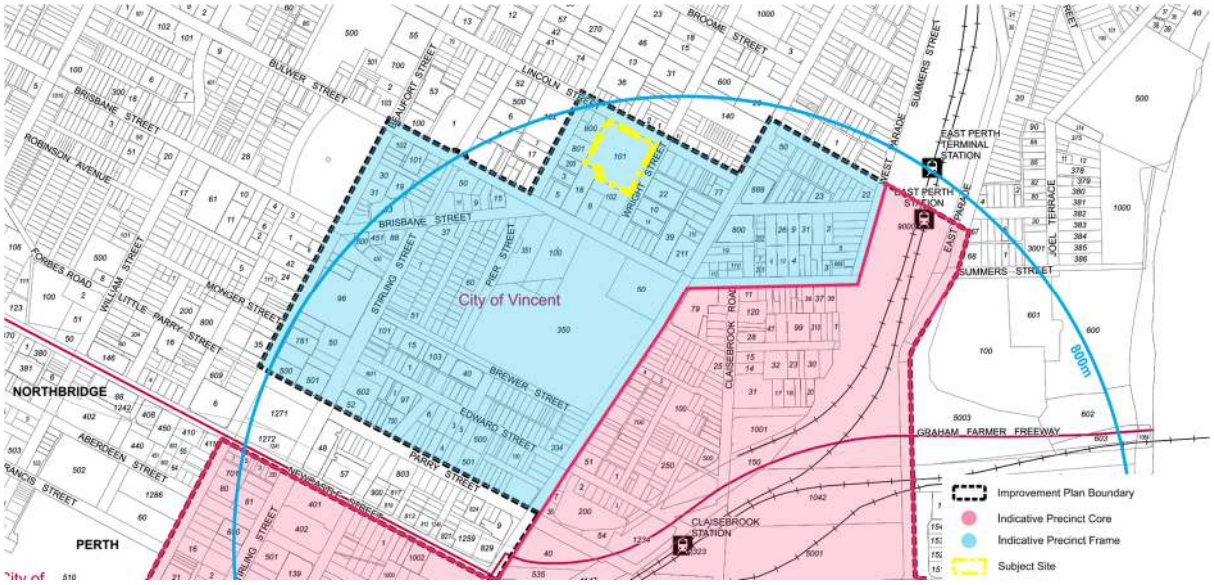

Figure 3: Improvement Plan 65 Map (extract)

6.4 Local planning scheme

The site is subject to the provisions of the City of Vincent's Local Planning Scheme No. 2 (**LPS2**).

6.4.1 Zoning

The site is zoned 'Residential' under the LPS2, with a density code of R80. The objectives of the Residential zone are:

- *To provide for a range of housing and a choice of residential densities to meet the needs of the community.*
- *To facilitate and encourage high quality design, built form and streetscapes throughout residential areas.*
- *To provide for a range of non-residential uses, which are compatible with and complementary to residential development.*
- *To promote and encourage design that incorporates sustainability principles, including but not limited to solar passive design, energy efficiency, water conservation, waste management and recycling.*
- *To enhance the amenity and character of the residential neighbourhood by encouraging the retention of existing housing stock and ensuring new development is compatible within these established areas.*

- *To manage residential development in a way that recognises the needs of innovative design and contemporary lifestyles.*
- *To ensure the provision of a wide range of different types of residential accommodation, including affordable, social and special needs, to meet the diverse needs of the community.*

The proposed development is consistent with the objectives of the Residential zone, contributing to the diversity of residential products within the municipality while remaining compatible with standard residential uses. The design presents a high standard of architectural quality, enhancing the streetscape through a carefully considered built form, presentation and materiality, and positively contributing to the amenity of the surrounding area.

Importantly, the proposal supports an innovative residential offering, providing short-term accommodation for elderly individuals transitioning from hospital care and awaiting placement in permanent aged care facilities, thereby supporting the broader health system. The development will deliver a bespoke aged care facility in a central location, catering to the needs of the wider metropolitan community.

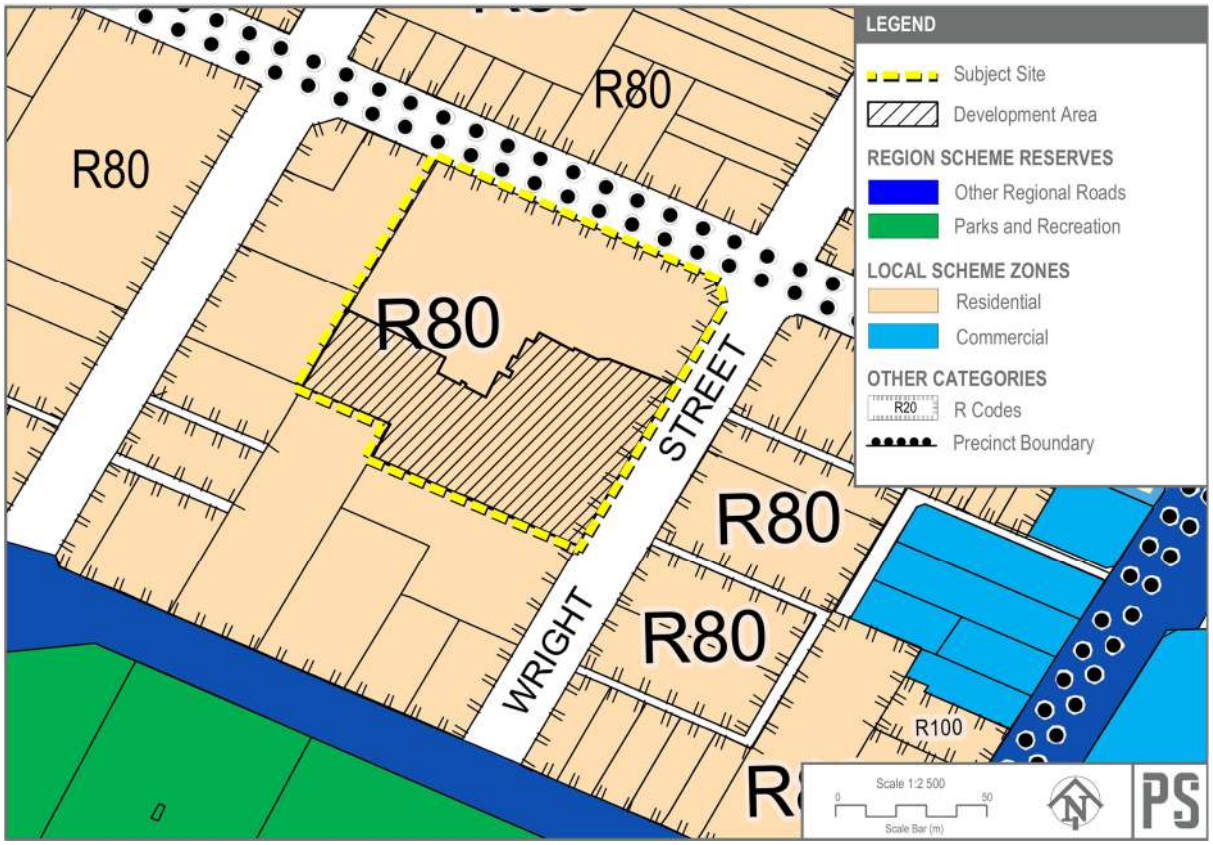

Figure 4: Zoning map

6.4.2 Land use permissibility

The proposal seeks to continue the existing Residential Aged Care Facility use on the site. While the use is not specifically listed under the LPS2, it represents the continuation of a lawful, existing use. The activity will be assessed as a 'use not listed'. Given the use is residential is nature it is considered to meet the objectives of the zone.

6.4.3 Development standards and requirements

The LPS2 does not prescribe any specific development standards or requirements relevant to the proposed development and subject site.

6.4.4 Matters to be considered

Clause 67(2) of the Deemed Provisions sets out the matters for which due regard is to be given when considering a development application. Refer to **Table 3** below for an assessment of the relevant matters.

Table 3: Matters to be considered

Matter to be considered	Provided
(a) the aims and provisions of this Scheme (including any planning codes that are read, with or without modifications, into this Scheme) and any other local planning scheme operating within the Scheme area;	The proposal is generally consistent with the aims and objectives of the LPS2.
(b) the requirements of orderly and proper planning including any proposed local planning scheme or amendment to this Scheme that has been advertised under the Planning and Development (Local Planning Schemes) Regulations 2015 or any other proposed planning instrument that the local government is seriously considering adopting or approving;	There are no known scheme amendments that would affect the assessment of this application. The proposed development is considered to be consistent with the principles of orderly and proper planning, as outlined in throughout this report.
(c) any approved State planning policy	The relevant SPPs have been considered in **Section 6.2** of this report.
(e) any policy of the Commission	The relevant policies of the commission have been considered in **Section 6.5** of this report.
(fa) any local planning strategy for this Scheme endorsed by the Commission	The City's local planning strategy has been considered in **Section 5.1** of this report.
(g) any local planning policy for the Scheme area;	The relevant LPPs have been considered in **Section 6.4** of this report.
(h) any structure plan or local development plan that relates to the development	There are no structure plans nor local development plans that apply to the site.
(k) the built heritage conservation of any place that is of cultural significance	Refer to **Sections 3.2.3** and **4.8** of this report.
(l) the effect of the proposal on the cultural heritage significance of the area in which the development is located;	Refer to **Sections 3.2.3** and **4.8** of this report.
(m) the compatibility of the development with its setting, including — *(i) the compatibility of the development with the desired future character of its setting; and* *(ii) the relationship of the development to development on adjoining land or on other land in the locality including, but not limited to, the likely effect of the height, bulk, scale, orientation and appearance of the development;*	The proposal is considered to be of high-quality and will be compatible with the existing and desired future development in this setting, as follows: i. The proposal is generally in accordance with the applicable planning framework, and is compatible with the development expectations in a high amenity area with regards to intensification and diversity of housing.

Matter to be considered	Provided
	ii. The development is of high-quality contemporary architectural design and is of a scale and design which complements the existing character of the area as well as supports the operations of the established residential aged care facility. Any potential perceived impacts of bulk or scale are adequately mitigated through a high level of articulation of the façade and incorporation of setbacks at varied distances from the street frontage.
(n) the amenity of the locality including the following — *(i) environmental impacts of the development;* *(ii) the character of the locality;* *(iii) social impacts of the development;*	The proposed development is considered to have a positive impact on the amenity of the locality as follows: i. The application proposes sufficient landscaping, contributing to the amenity of the locality. ii. It is considered to respect the heritage context of the site while also complement the pattern of emerging development in the immediate surrounds. iii. The development will deliver a bespoke aged care facility in a central location, catering to the needs of the wider metropolitan community. Importantly, the proposal supports an innovative residential offering, providing short term accommodation for elderly individuals transitioning from hospital care and awaiting placement in permanent aged care facilities, thereby supporting the broader health system.
(o) the likely effect of the development on the natural environment or water resources and any means that are proposed to protect or to mitigate impacts on the natural environment or the water resource	The proposed development will not detrimentally impact on the natural environment or water resources.
(p) whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved;	A landscaping strategy has been prepared demonstrating the additional areas of vegetation and trees that will be planted within the proposed development.
(q) the suitability of the land for the development taking into account the possible risk of flooding, tidal inundation, subsidence, landslip, bushfire, soil erosion, land degradation or any other risk	The area is characterised by established residential and other complementary development. The proposed development is not at a significant risk of natural disaster and will not increase the possible risk to human health or safety.
(r) the suitability of the land for the development taking into account the possible risk to human health or safety	As above.
(s) the adequacy of — *(i) the proposed means of access to and egress from the site; and* *(ii) arrangements for the loading, unloading, manoeuvring and parking of vehicles;*	i. The proposal seeks to retain the existing crossover to the at-grade car park, and to create an additional crossover leading to the proposed basement car park within the new building. Pedestrian access is afforded from a continuous pedestrian pathway from the footpath into the existing main entry as well as the entry to the proposed new facility building. Proposed access arrangements are considered to be adequate to support the continuous operations of the facility. ii. Service and loading/unloading areas have been appropriately located within the car park, screened for public view, and will allow for full vehicle manoeuvrability within the parking area.

Matter to be considered	Provided
(t) the amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety;	A TIS has been prepared, demonstrating the proposed development is appropriate from a traffic and access perspective.
(u) the availability and adequacy for the development of the following — *(i) public transport services;* *(ii) public utility services;* *(iii) storage, management and collection of waste;* *(iv) access for pedestrians and cyclists (including end of trip storage, toilet and shower facilities);* *(v) access by older people and people with disability;*	i. The subject site serves the wider metropolitan catchment with regards to resident opportunities. The site is also conveniently located within walking distance and is also serviced by multiple bus routes and train stations within walking distance, which connect the site to the Perth city centre and the wider metropolitan area. ii. Utility services will be adequately integrated throughout the development site. iii. A WMP has been prepared, outlining sufficient storage, management and collection of waste. iv. Pedestrian access is sufficient. v. The development has been designed to be universally accessible.
(v) the potential loss of any community service or benefit resulting from the development other than potential loss that may result from economic competition between new and existing businesses;	The development provides a community benefit in respect of delivering a bespoke aged care facility in a central location, catering to the needs of the wider metropolitan community. Importantly, the proposal provides short term accommodation for elderly individuals transitioning from hospital care and awaiting placement in permanent aged care facilities, thereby reducing pressure on hospitals and supporting the broader health system. It is also noted that the proposed development will provide additional employment opportunities for the aged care sector.

As outlined above, the proposed development is considered to satisfy the relevant matters to be considered by the local government.

6.5 Local Planning Policies

6.5.1 7.1.1 Built Form

This policy provides guidance on the planning and design of all development in the City of Vincent. This policy seeks, amongst others, to respect local context; preserve and reinterpret established built form and social character; create high quality and well-designed buildings; maximise street level interest, articulation and materiality; improve resource, energy and water efficiency; and provide a range of development types to cater to the needs of the community.

The policy has a number of element objectives and acceptable outcomes that development should be in accordance with. An assessment against these is provided in **Appendix 12**. As it can be seen, the development is generally in accordance with the element objectives and acceptable outcomes of Policy No. 7.1.1 - Built Form. Where discretion is sought, this has been appropriately justified as part of the assessment.

Refer to **Appendix 12**, Assessment Against Policy No. 7.1.1 - Built Form.

6.5.2 7.5.10 Sustainable Design

This policy encourages the incorporation of sustainable design principles and features in existing and new development in the City of Vincent as standard practice.

As noted above, the development is committed to achieve a 5-Star Green Star Equivalency, and identifies sustainability initiatives considered for inclusion in the design.

Refer to **Appendix 11**, Sustainability Report.

6.5.3 7.5.21 Sound Attenuation

This policy seeks to minimise the adverse impacts of noise and preserve the amenity of existing and future residential buildings.

The development is for the redevelopment of a Residential Aged Care Facility in a Residential zone.

A preliminary acoustic report was prepared in support of this application. The acoustic report identifies potential noise and vibration sources and mitigations measures for the proposed development. The assessment provides minimum construction recommended for the development associated with wall construction, floor construction, general building notes, noise emission and noise ingress. These mitigation measures will be incorporated into the development as part of the detailed design process.

Further noise assessment and modelling may need to be undertaken as the detailed design progresses to confirm compliance, as outlined in the assessment.

Refer to **Appendix 9**, Acoustic Report.

6.5.4 Local Planning Policy Percent for Art

This policy details the requirements for public art contributions as part of a development proposal and provides performance standards to guide the assessment of development applications that include public art.

Public art contributions are required for proposals for residential and commercial developments with an estimated cost of development of $1,221,224 or greater, and for residential developments of more than ten dwellings, three storeys and in areas coded R60 and above. Under this policy, a contribution of 1% of the total cost of development is required to be paid to the City for the provision of public art.

A suitably flexible condition of approval that affords the option to include public art within the development or as a cash contribution is requested.

6.5.5 Heritage List and Local Heritage Survey

The wider site contains the Silver Chain Nursing Association heritage place (Place No. 11451). The place is assigned a Category 1 level of management, which relates to rare or outstanding examples, essential to the heritage of the locality. The building is a notable example of the Inter-War California Bungalow architectural style. The place is valued for its longstanding presence within the streetscape since the early 20th century, as well as its association with the provision of community services to all sectors of the community.

The proposed redevelopment has been designed to retain and conserve the heritage place, ensuring the ongoing provision of community services while maintaining its recognised heritage values.

Refer to **Appendix 10**, Heritage Impact Assessment.

6.5.6 Development Guidelines for Heritage Places

The policy applies to the development of a place that is adjacent to a heritage listed place or heritage area. The wider site contains the Silver Chain Nursing Association heritage place, and is also near two places which are entered on the State Register of Heritage Places: Highgate Hill Police Station and Lockup, and the Lincoln Street Ventilation Stack.

This policy outlines principles to guide decisions around the conservation and development affecting heritage places. It is noted that Stage 1 does not involve any works on the Silver Chain Nursing League Building, nor does it interface with the Lincoln Street Ventilation Stack or the Highgate Hill Police Station, Lockup & Quarters. While the extent of the works reaches close to the Silver Chain Nursing League Building, these relate only to car parking and will not impact the integrity or character of the heritage place.

The proposed development will not result in any adverse impacts on the heritage values of the surrounding heritage structures, and the conservation works proposed represent a positive heritage outcome, supporting the ongoing preservation of the place ahead of future stages.

Refer to **Appendix 10**, Heritage Impact Assessment.

6.5.7 Local Planning Policy: Signs And Advertising

Other than internal wayfinding signage no advertising or business name signage is proposed at this stage. If signage is proposed it will be modest, respectful of its context and address the City's signage policy. It is suggested that a condition requiring a signage strategy and plan be applied to address any future signage. This will ensure any signage can be dealt with at building permit stage through conditions clearance.

6.5.8 Local Planning Policy - Non-Residential Parking

The purpose of this policy is to guide parking supply for non-residential development within the City of Vincent.

The policy does not prescribe a specific parking rate for a Residential Aged Care Facility or similar use. The City's previous policy prescribed 1 bay per 3 beds, **requiring 65 car bays** to service the development. As such, the appropriate level of parking provision is subject to the discretion of the planning authority.

The subject site benefits from a highly accessible and central location, with strong public transport connectivity, including a range of train and bus services. This level of accessibility reduces reliance on private vehicles for visitors and staff. Having regard to the operational characteristics of the proposal, the provision of 75 car parking bays is considered appropriate for the following reasons:

- The site is within close walking distance to several train stations (Perth Central Station - 1.5km; Claisebrook Station - 900m; East Perth Station - 450m).
- High frequency bus routes along Beaufort Street are a short 300m walk from the site.
- The site abuts a designated cycle route along Smith Street, providing great access for alternative transport modes.
- The provision of on-site parking also allows for staff to carpool.

The development supports a shift towards active and sustainable transport modes by virtue of its location within a well-serviced urban area.

6.6 Other relevant policies and/or guidelines

6.6.1 Residential Design Codes

The Residential Design Codes (**R-Codes**) provide planning and design provisions for residential development across Western Australia.

We note that the R-Codes are not applicable to this proposal as the development is classified as a Residential Aged Care Facility. The design is in turn informed by the criteria outlined in the City's local planning policy 7.1.1 Built Form.

6.6.2 Position Statement: Residential Accommodation for Ageing Persons

The Western Australian Planning Commission's (**WAPC**) Position Statement: *Residential Accommodation for Ageing Persons* (released March 2024) outlines requirements to support the provision of appropriate residential accommodation for ageing persons within Western Australia's local government planning framework.

The Position Statement encourages the provision of appropriate supply and diversity of residential accommodation options to meet the needs of an ageing population. It also recommends that local planning schemes incorporate clear land use definitions to support this objective. In particular, the following definition is to be included:

> **Residential Aged Care Facility**:
>
> *A residential facility providing personal and/or nursing care primarily to people who are frail and aged or dependent persons which, as well as accommodation, includes:*
>
> *a) appropriate staffing to meet the nursing and personal care needs of residents*
>
> *b) meals and cleaning services*
>
> *c) furnishings, furniture and equipment.*
>
> *This may consist of multiple components that include communal amenities and facilities for residents and staff that are incidental and ancillary to the provision of such accommodation, residential respite (short-term) care, and/or an independent living complex, but does not include a hospital, rehabilitation or psychiatric facility.*

The Position Statement further advises that, where applicable, the Residential Aged Care Facility land use should be classified as a 'P' (permitted) use within Residential zones under local planning schemes. A discretionary classification ('D' or 'A') should only be applied where supported by appropriate planning justification relating to orderly and proper planning or locational considerations.

Overall, residential aged care facilities and independent living complexes are strongly encouraged within residential zones to support ageing-in-place and community integration outcomes.

The proposal is consistent with the Position Statement, as it facilitates the redevelopment of a Residential Aged Care Facility within a Residential zone. The facility incorporates appropriate staffing arrangements to support the care needs of residents, together with essential services and facilities including dining areas, communal spaces, and associated amenities. The design supports a high standard of living for residents through the provision of purpose-built accommodation in an appropriate and accessible location.

7 CONCLUSION

In summary, the proposed two-storey multiple dwelling development meets the intent of the applicable planning framework. The proposal represents a well-considered, high-quality redevelopment of the Aegis Lincoln Park Residential Aged Care Facility. Key considerations include:

- The proposal delivers a six-storey residential aged care building containing 147 new beds, supported by high-quality landscaping, parking and safe access arrangements.
- The sites' beneficial location in close proximity to the Perth City Centre and key amenities supports the establishment of a higher density of Residential Aged Care.
- The scale of development is contextually appropriate and site-responsive. The architectural design incorporates materials and tones that complement surrounding development, respond to the heritage character of the area, and enhance the streetscape.
- All areas of discretion have been justified and are consistent with overarching planning objectives. The proposal demonstrates a high standard of design, delivering sustainable, liveable resident beds and well-integrated communal spaces.
- Considerations relating to transport and waste have been appropriately addressed, ensuring the development will positively contribute to the amenity and function of the surrounding area.

On this basis, it is respectfully requested that the Metro Inner Development Assessment Panel (**DAP**) approve the development accordingly.

PS ref: 9831

9 November 2026

City of Vincent
PO Box 82
Leederville WA 6902
Via email: mail@vincent.wa.gov.au

Attention: Callum Radecki

Dear Callum,

LOT 101 (19) WRIGHT STREET, PERTH
RESIDENTIAL AGED CARE FACILITY (DA REF. 5.2026.298.1 – DAP REF. DAP/26/03187)
RESPONSE TO REQUEST FOR FURTHER INFORMATION

Planning Solutions acts on behalf of Aegis Aged Care Group, the registered proprietor of Lot 101 (19) Wright Street, Perth (**subject site**) and proponent of the proposed development of a Residential Aged Care Facility on the site.

We refer to the Request for Further Information (**RFI**) received from the City of Vincent (**City**) during assessment of the development application, as well as the public submissions received following the period of public advertising of this application.

This letter outlines how the public comments and requests for additional information have been addressed. The following documentation has been enclosed in this RFI response package:

- Updated Development Plans (**Attachment 1**).
- Updated Transport Impact Statement (**Attachment 2**).
- Response to Public Submissions (**Attachment 3**).

The following section provides a response to the RFI items.

RESPONSE TO RFI

Request	Response
Parking and Traffic	
Tandem Bay The application was referred to the City's Engineering Department, who reviewed the car parking arrangement and assessed its compliance against AS2890.1. The Engineering Department determined that majority of the car parking bays were compliant, with exception of the eight at grade tandem spaces external to the proposed development. The minimum aisle width for tandem bays is 5.8 metres. The application proposes an aisle width of 4.2m for these bays, which is non-compliant. This is required to be amended to ensure sufficient space for maneuvering and compliance with AS2890.1.	The layout has been revised to have a 6m aisle for the tandem bays. Refer to Attachment 1, Updated Development Plans.

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Planning Solutions (Aust) Pty Ltd

Request	Response
Transport Impact Assessment It has been identified that the following items are required to be addressed by Transcore in relation to the Traffic Impact Assessment: • Demonstrate that adequate sight distance is available at the proposed new crossover in accordance with the relevant standards. • Correct the missing reference identified on page 9 of the report. • Provide justification for the assumption that vehicle trips will be distributed 50/50 northbound and southbound on the surrounding road network. • Confirm the specific AM and PM peak hours used in the traffic assessment. • Clarify whether the trip generation figures relate to Stage 1 only or the ultimate development. • Include available traffic count data for Wright Street and Lincoln Street and update the assessment accordingly. • Identify any on-street parking bays that may be removed, modified or rearranged as a result of the proposed crossover works, and confirm the net impact on parking supply.	Refer to Attachment 2, Updated Transport Impact Statement, which addresses all matters raised. The proposed access arrangements on Wright Street will require the removal of approximately 6-7 on-street parking bays. However, this is not expected to result in a material impact on the overall on-street parking supply within the locality. Sufficient on-street parking capacity will remain available in Wright Street and nearby roads. Additionally, a review of recent aerial imagery indicates that on-street parking in the vicinity does not typically approach full occupancy. Accordingly, the removal of these bays is not anticipated to create any detrimental impacts to parking availability or adversely affect the surrounding road network.
Vehicle Access and Tree Removal	
Clause 9.1.8 of the City's Built Form Policy states that existing trees must not be removed to provide for vehicle access. The removal of a street tree within the Wright Street road reserve is proposed for the purpose of providing vehicle access to the development. For the City to consider the removal of the tree, justification is required to be provided regarding the selection of this specific location for the purpose of providing vehicle access. The justification is also required to demonstrate how the proposed vehicle access location achieves an acceptable planning outcome, having regard to the loss of the street tree and the potential for alternative access arrangements that would allow its retention. Alternatively, other locations for the vehicle access can be explored to ensure the street tree is retained.	Wright Street currently contains a substantial canopy of established street trees, including large Eucalyptus and Corymbia species, as well as medium Lophostemon and Melia azedarach trees. The streetscape is characterised by a strong medium- to large-scale tree canopy. The landscape design for the development proposes significant enhancement of the verge and streetscape through the planting of three new Eucalyptus spathulata trees within the verge. The proposed verge trees can achieve heights exceeding 10m at maturity and will contribute positively to the long-term canopy cover, landscape character and amenity of the Wright Street. While the proposed crossover will result in the removal of one existing street tree (Callistemon species), the subject tree is relatively small in scale, in poor health, and can only achieve up to 4m height at maturity. As such, it provides comparatively limited canopy and streetscape amenity and is not representative of the established canopy character of Wright Street. On balance, the removal of the existing Callistemon tree and its replacement with three new Eucalyptus spathulata trees is considered to provide a superior long-term streetscape and landscape outcome. The proposal will result in a substantial net increase in canopy contribution and improve the overall amenity of the area.
Design Review Panel	
The application was referred to the City's Design Review Chair, who reviewed the submitted application. The Chair was supportive of the development; however, provided the following comments for further consideration:	• The proposed tree planting along the southern boundary will provide a green visual buffer between the development and the adjoining property, contributing

Request	Response
• The edge condition / fence between the site and adjoining south property has not been shown but noted as a Colorbond fence. Given communal spaces are located on the south side of the proposed building the applicant is encouraged to consider this interface as an opportunity for climbing planting to generate a soft boundary edge condition.	to a softened landscaped interface and enhanced views from upper levels. Shade-tolerant shrubs and climbing trellis planting will be incorporated adjacent to the boundary fencing to further soften the interface and improve landscape amenity for residents at ground level.
• In earlier versions of the proposal a 'legacy tree' was proposed on the north side of the Stage 1 building works which was supported. The current scheme has removed this and left the garden bed as low planting and hedges. The applicant is encouraged to re-instate this or provide rationale for its removal.	• The previously identified 'legacy tree' has been removed from the landscape proposal due to the site's staging and future development requirements. The south-western portion of the site is currently required for service and access. Future development on site would require the removal of the 'legacy tree'. As such, its inclusion is not be practical or realistic. Notwithstanding, additional tree planting has been incorporated throughout the proposed development to maintain the proposed canopy cover and deliver a high-quality landscape outcome on the site.
• The Landscape Plan shows a number of black areas which are not defined on the legend. Confirm if these are an error or the intention for these.	• Please provide further clarification and screenshots of the black areas.
• The crossovers are currently shown as bitumen. Footpath materiality should extend through the crossovers indicating pedestrian movement as a priority over vehicle movement. The applicant may also consider lowering wall heights near the crossover to footpath intersections to improve pedestrian visibility and safety.	• Refer to updated development plans, which show the footpath material as continuous through the ramp.

Should you have any queries or require further clarification in regard to the proposal, please do not hesitate to contact the writer.

Yours faithfully,

ALEXIA YACOUBIAN
SENIOR PLANNER

ATTACHMENT 1:
UPDATED DEVELOPMENT PLANS

ATTACHMENT 2:
UPDATED TRANSPORT IMPACT STATEMENT

ATTACHMENT 3:
RESPONSE TO PUBLIC SUBMISSIONS

CITY OF VINCENT

ATTACHMENT 4

DEVELOPMENT ASSESSMENT PANEL MEETING

Waste Management Plan

Waste Management Plan

Aegis Lincoln Park – Stage 1

Prepared for Aegis Group

13 July 2026

Project Number: WMP26064

DOCUMENT CONTROL

Version	Description	Date	Author	Reviewer	Approver
2.0	First Approved Release	13/07/2026	KW/JL	AB	AB

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Executive Summary

Aegis Group is seeking development approval for the proposed Aegis Lincoln Park residential aged care (Stage 1) located at 19 Wright Street, Highgate (the Proposal).

To satisfy the conditions of the development application the City of Vincent (the City) requires the submission of a Waste Management Plan (WMP) that will identify how waste is to be stored and collected from the Proposal. Talis Consultants has been engaged to prepare this WMP to satisfy the City's requirements.

A summary of the bin size, numbers, collection frequency and collection method is provided in the below table.

Proposed Waste Collection Summary

Waste Type	Generation (L/week)	Bin Size (L)	Number of Bins	Collection Frequency	Collection
Refuse	12,279	1,100L	Four	Three times each week	Private Contractor
Recyclables	6,170	1,100L	Four	Once each week	Private Contractor
		660L	Four	Once each week	Private Contractor
Cardboard	3,039	1,100L	Two	Twice each week	Private Contractor

A private contractor will service the Proposal onsite, directly from the Loading Area. The private contractor's waste collection vehicle will enter and exit the Proposal in forward gear via the existing driveway off Lincoln Street.

Management/caretakers will oversee the relevant aspects of waste management at the Proposal.

Table of Contents

1 Introduction 1
1.1 Objectives and Scope 1
2 Waste Generation 2
2.1 Proposed Tenancies 2
2.2 Waste Generation Rates 2
2.3 Waste Generation Volumes 2
3 Waste Storage 4
3.1 Internal Transfer of Waste 4
3.2 Bin Sizes 4
3.3 Bin Storage Area Size 5
3.4 Bin Storage Area Design 5
4 Waste Collection 7
4.1 Bulk and Speciality Waste 8
5 Waste Management 9
6 Conclusion 10

Tables

Table 2-1: Waste Generation Rates 2
Table 2-2: Estimated Waste Generation 3
Table 3-1: Typical Bin Dimensions 4
Table 3-2: Bin Requirements for Bin Storage Area 5

Diagrams

Diagram 1: Bin Store
Diagram 2: Waste Truck Entry
Diagram 3: Waste Truck Exit

Figures

Figure 1: Locality Plan

1 Introduction

Aegis Group is seeking development approval for the proposed Aegis Lincoln Park residential aged care development (Stage 1) located at 19 Wright Street, Highgate (the Proposal).

To satisfy the conditions of the development application the City of Vincent (the City) requires the submission of a Waste Management Plan (WMP) that will identify how waste is to be stored and collected from the Proposal. Talis Consultants has been engaged to prepare this WMP to satisfy the City's requirements.

1.1 Objectives and Scope

The objective of this WMP is to outline the equipment and procedures that will be adopted to manage waste (refuse, recyclables and cardboard) at the Proposal. Specifically, the WMP demonstrates that the Proposal is designed to:

- Adequately cater for the anticipated volume of waste to be generated;
- Provide an adequately sized Bin Storage Area, including appropriate bins; and
- Allow for efficient collection of bins by appropriate waste collection vehicles.

To achieve the objective, the scope of the WMP comprises:

- Section 2: Waste Generation;
- Section 3: Waste Storage;
- Section 4: Waste Collection;
- Section 5: Waste Management; and
- Section 6: Conclusion.

2 Waste Generation

The following section shows the waste generation rates used and the estimated waste volumes to be generated at the Proposal.

2.1 Proposed Tenancies

The anticipated volume of refuse, recyclables and cardboard is based on the number of apartments and the waste generating floor areas (m^2) of the associated amenity areas at the Proposal. The Proposal consists of the following:

- Residential Aged Care Beds – 147; and
- Support, Office, Therapy and Nurse Stations – 371m^2.

2.2 Waste Generation Rates

In order to achieve an accurate projection of waste volumes for the Proposal, consideration was given to the City of Vincent's *Waste Guidelines for New Developments* (2023).

Table 2-1 shows the waste generation rates which have been applied to the Proposal.

Table 2-1: Waste Generation Rates

Tenancy Use Type	City's Guideline Reference	Refuse Generation Rate	Recycling Generation Rate
Residential Aged Care Beds	Retirement Village	80L/apartment/week	60L/apartment/week
Office, Therapy, Nurse Station and Support	Offices	20L/100m^2/day	15L/100m^2/day

**As the Proposal will generate minimal FOGO waste and be serviced by a private contractor, the FOGO waste generation rate has been accounted for within the refuse waste generation rate for this waste assessment.*

As medical waste is highly dependent on the nature and scale of medical practices undertaken, there are currently no medical/clinical waste generation rates available within published waste management guidelines. Aged care facilities typically manage medical waste (i.e. sharps, infectious waste, pathological waste, pharmaceuticals, chemical waste and non-regulated medical waste) in-situ meaning storage space is not required within the Bin Storage Area. Therefore, medical waste has not been included within this waste generation assessment.

2.3 Waste Generation Volumes

Waste generation is estimated by volume in litres (L) as this is generally the influencing factor when considering bin size, numbers and storage space required.

Waste generation volumes in litres per week (L/week) adopted for this waste assessment is shown Table 2-2. It is estimated that the Proposal will generate 12,279L of refuse and 9,210L of recyclables.

Table 2-2: Estimated Waste Generation

Tenancy Use Type	Number of Beds/Floor Area (m^2)	Waste Generation Rate	Waste Generation (L/week)
Refuse			
Residential Aged Care Beds	147 beds	80L/apartment/week	11,760
Office, Therapy, Nurse Station and Support	371m^2	20L/100m^2/day	519
		Total	**12,279**
Recyclables			
Residential Aged Care Beds	147 beds	60L/apartment/week	8,820
Office, Therapy, Nurse Station and Support	371m^2	15L/100m^2/day	390
		Total	**9,210**

3 Waste Storage

Waste materials generated within the Proposal will be collected in the bins located in the Bin Storage Area as discussed in the following sub-sections.

3.1 Internal Transfer of Waste

To promote positive recycling behaviour and maximise diversion from landfill, internal bins will be available throughout the Proposal for the source separation of refuse and recycling.

These internal bins will be collected by the staff/cleaners as required and transferred to the Bin Storage Area for consolidation into the appropriate bins.

All bins will be colour coded and labelled in accordance with Australian Standards (AS 4123.7) to assist residents, visitors, staff and cleaners to dispose of their separate waste materials in the correct bins.

Additionally, clinical/sharps bins will be available throughout the Proposal for the storage of clinical waste. Management/staff/cleaners will monitor accumulation and organise their collection by a suitably qualified private contractor, as required.

Instructions on identification and separation of medical wastes will be posted at each waste collection point to remind staff of procedures.

The following points are indicative of minimum requirements for environmental best practice relating to controlled clinical wastes and will be considered within the Proposal:

- Ensuring all clinical and related waste is properly contained;
- Ensuring all relevant measures are taken to reduce risk to staff, the community, and the environment; and
- All waste containers to meet the Australian Standards and are to be of the appropriate colour and have suitable symbols/wording for the waste types to be deposited into that container.

3.2 Bin Sizes

Table 3-1 gives the typical dimensions of standard bins sizes that may be utilised at the Proposal. It should be noted that these bin dimensions are approximate and can vary slightly between suppliers.

Table 3-1: Typical Bin Dimensions

Dimensions (m)	Bin Sizes		
	240L	660L	1,100L
Depth	0.730	0.780	1.070
Width	0.585	1.260	1.240
Height	1.060	1.200	1.330

Reference: SULO Bin Specification Data Sheets

3.3 Bin Storage Area Size

To ensure sufficient area is available for storage of the bins, the amount of bins required for the Bin Storage Area was modelled utilising the estimated waste generation in Table 2-2, bin sizes in Table 3-1 and based on collection of refuse three times each week, recycling once each week and cardboard twice each week.

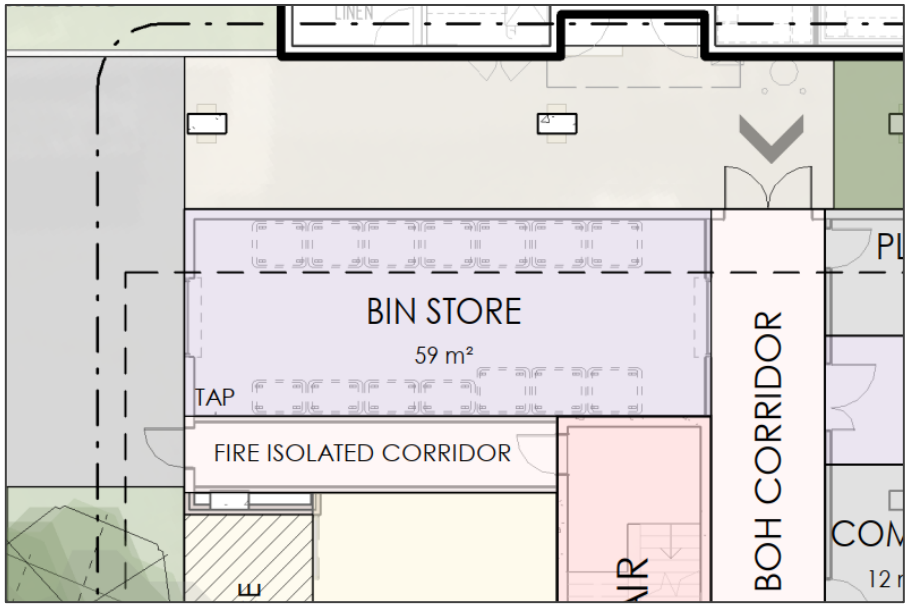
It is the intention of the Proposal to separate a number of waste streams onsite for collection. Table 3-2 below shows the bins required for the source separation of waste streams. This breakdown has been based on industry specific waste composition data which has been averaged across the proposal.

Table 3-2: Bin Requirements for Bin Storage Area

Waste Stream	Waste Generation (L/week)	Bin Size (L)	Total Required	Collection Frequency
Refuse	12,279	1,100	Four	Three times each week
Recycling	6,170	1,100	Four	Once each week
		660	Four	Once each week
Cardboard	3,039	1,100	Two	Twice each week

The size and location of the Bin Storage Area is shown in Diagram 1.

Diagram 1: Bin Store



3.4 Bin Storage Area Design

The design of the Bin Storage Area will take into consideration:

- Easily accessible Bin Storage Area;
- A minimum aisle width of 1,000mm for access, turning and movement of bins for collection. The aisle shall be kept free of obstructions;

- Sufficient space provided to store refuse waste, recyclables and cardboard in separate bins;
- Located behind the front building setback;
- Bins shall not be visible from the property boundary except when presented for collection;
- Bins are reasonably secured from theft and vandalism;
- Concrete floors (in accordance with AS2870) grading to an industrial floor waste, with a hose cock to enable bins and the Bin Storage Areas to be washed out;
- Undercover and be designed to not permit storm water to enter the drain;
- Bin Storage Areas shall have enough space to facilitate the cleaning of bins;
- Walls and floors of Bin Storage Areas constructed of a material which facilitates the cleaning of the Bin Storage Areas;
- Roller doors to the Bin Storage Areas vermin proof;
- Ventilated to a suitable standard;
- Bin Storage Areas shall be provided with artificial lighting, sensor or switch controlled both internal/external to the room or area. All lighting in open areas shall comply with AS4282-1997 (Control of Obtrusive Outdoor Lighting); and
- Signage shall be incorporated into the Bin Storage Areas to inform users of the appropriate bins for disposing of waste and guidance for the separation of refuse waste, comingled recyclables and cardboard.

Bin numbers and storage space within the Bin Storage Area will be monitored by management/caretakers during the operation of the Proposal to ensure that the number of bins and collection frequency is sufficient.

4 Waste Collection

A private waste collection contractor will service the Proposal and provide four 1,100L bins for refuse, four 660L and four 1,100L bins for recyclables, and two 1,100L bins for cardboard.

The private contractor will collect refuse three times each week, recyclables once each week and cardboard twice each week utilising a rear loader waste collection vehicle.

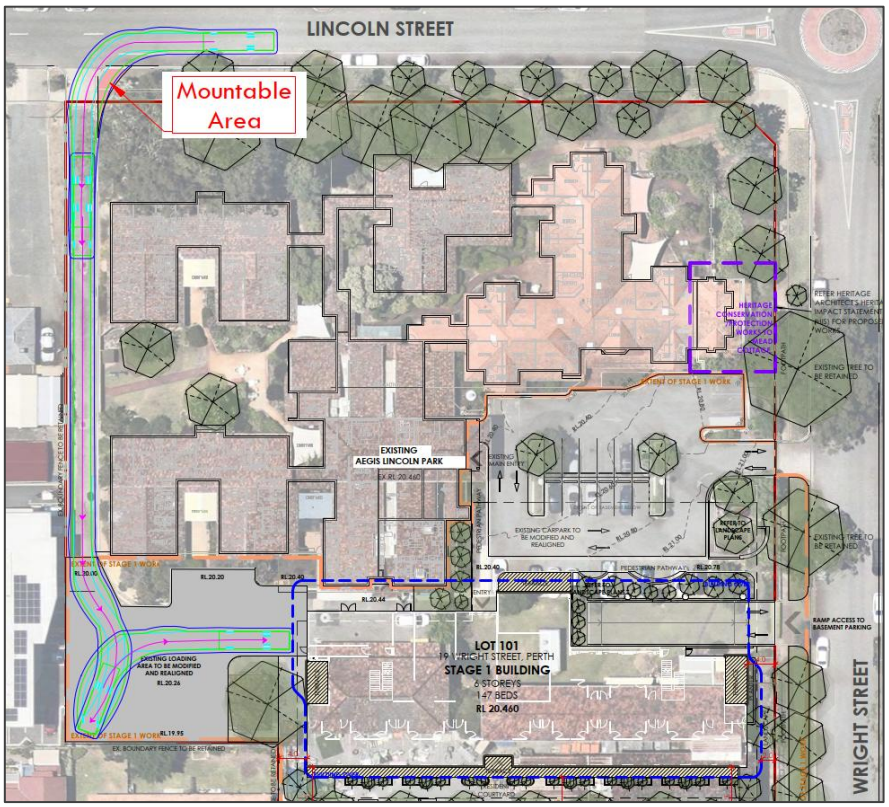
The private contractor's rear loader waste collection vehicle will service the bins onsite, directly from the Bin Storage Area. The private contractor's rear loader waste collection vehicle will travel with left hand lane traffic flow on Lincoln Street, turn into the Proposal in forward gear utilising the access driveway and pull into the Loading Area for servicing, refer Diagram 2.

Private contractor's staff will ferry bins to and from the rear loader waste collection vehicle and the Bin Storage Area during servicing. The private contractor will be provided with key/PIN code access to the Bin Storage Area and security access gates to facilitate servicing, if required.

Once servicing is complete the private contractor's rear loader waste collection vehicle will exit in forward motion down the access driveway, turning onto Lincoln Street moving with traffic flow, refer Diagram 3.

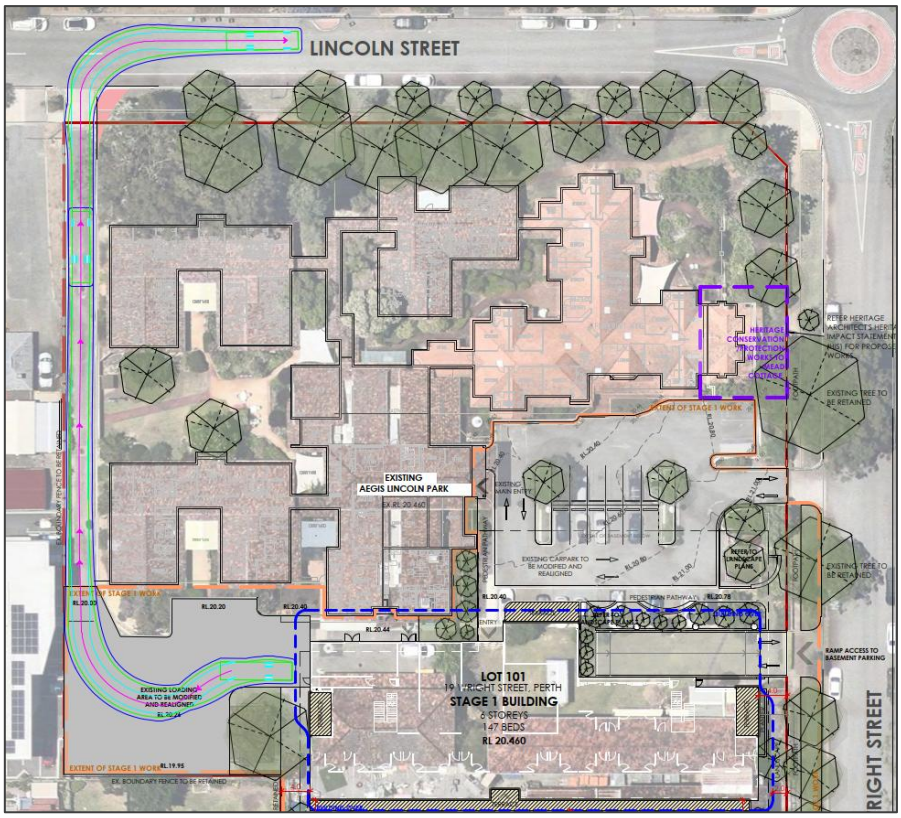
The above servicing will method will preserve the amenity of the area by removing the requirement for bins to be presented to the street on collection days. In addition, servicing of bins onsite will reduce the noise generated in the area during collection. Noise from waste vehicles must comply with the Environmental Protection (Noise) Regulations and such vehicles should not service the site before 7.00am or after 7.00pm Monday to Saturday, or before 9.00am or after 7.00pm on Sundays and Public Holidays.

Diagram 2: Waste Truck Entry



Transcore (June 2026) Waste truck swept path analysis: Waste Truck Entry T26.099.SK01.

Diagram 3: Waste Truck Exit



Transcore (June 2026) Waste truck swept path analysis: Waste Truck Exit T26.099.SK02.

4.1 Bulk and Speciality Waste

Adequate space may be allocated throughout the Proposal for placement of cabinets/containers for collection and storage of bulk and specialty wastes that are unable to be disposed of within the bins in the Bin Storage Area. These may include items such as:

- Mattresses;
- Clothing;
- Batteries and E-wastes;
- White goods/appliances;
- Used cooking oil;
- Cleaning chemicals; and
- Commercial light globes.

These materials will be removed from the Proposal once sufficient volumes have been accumulated to warrant disposal. A temporary skip bin could be utilised for collections, if required. Bulk and specialty waste collection will be monitored by management who will organise their transport to the appropriate waste facility, as required.

5 Waste Management

Management will be engaged to complete the following tasks:

- Monitoring and maintenance of bins and the Bin Storage Area;
- Cleaning of bins and Bin Storage Area, when required;
- Ensure all staff/cleaners at the Proposal are made aware of this WMP and their responsibilities thereunder;
- Monitor staff/cleaner behaviour and identify requirements for further education and/or signage;
- Monitor bulk and speciality waste accumulation and assist with its removal, as required;
- Monitor controlled medical waste accumulation and assist with its removal, as required;
- Regularly engage with staff/cleaners to develop opportunities to reduce waste volumes and increase resource recovery; and
- Regularly engage with the private contractors to ensure efficient and effective waste service is maintained.

6 Conclusion

As demonstrated within this WMP, the Proposal provides a sufficiently sized Bin Storage Area for storage of refuse, recyclables and cardboard, based on the estimated waste generation volumes and suitable configuration of bins. This indicates that an adequately designed Bin Storage Area has been provided, and collection of refuse, recyclables and cardboard can be completed from the Proposal.

The above is achieved using:

- Four 1,100L refuse bins, collected three times each week;
- Four 660L and four 1,100L recycling bins, collected once each week; and
- Two 1,100L cardboard bins, collected twice each week.

A private contractor will service the Proposal onsite, directly from the Loading Area. The private contractor's waste collection vehicle will enter and exit the Proposal in forward gear via the existing driveway off Lincoln Street.

Management/caretakers will oversee the relevant aspects of waste management at the Proposal.

Figures

Figure 1: Locality Plan

P: PO Box 454, Leederville WA 6903 | A: 604 Newcastle St, Leederville WA 6007 | T: 1300 251 070 | W: www.talisconsultants.com.au

LEGEND

- Site Boundary

Cadastre

- Crown Allotment
- Freehold
- Strata Plan or Lot
- Road
- Easement
- Reserve

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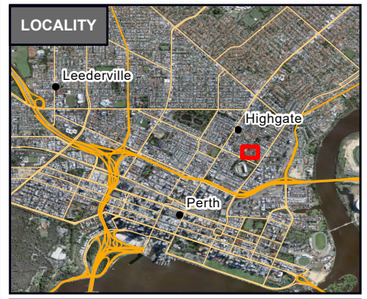
LOCALITY



0 1 2 3 4 5 km

LOCALITY

19 Wright Street
Highgate WA 6000

Aegis Group

N 0 5 10 15 20 25 m

Coordinate System: GDA2020 MGA Zone 50
Scale @ A3: 1:600

Prepared:	EJ	Date:	8/06/2026
Reviewed:	KW	Revision:	A
Project:	WMP26064		

talis consultants

Figure 01

Document Path: T:\SECTIONS\Waste\PROJECTS\WMP2026\WMP26064 - 19 Wright Street, Highgate\GIS\Maps\WMP26064 - 19 Wright St, Highgate\WMP26064 - 19 Wright St, Highgate.aprx

Assets | Engineering | Environment | Noise | Spatial | Waste

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ABN 85 967 691 321

CITY OF VINCENT

ATTACHMENT 5

DEVELOPMENT ASSESSMENT PANEL MEETING

Transport Impact Statement

Aegis Lincoln Park Redevelopment, Highgate

Transport Impact Statement

PREPARED FOR:
Aegis Group

November 2026

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TABLE OF CONTENTS

1 INTRODUCTION 1

2 PROPOSED REDEVELOPMENT 3

3 VEHICLE ACCESS AND PARKING 5

3.1 ACCESS 5
3.2 PARKING 5
3.2.1 CAR PARKING 5
3.2.2 BICYCLE PARKING 5

4 PROVISION FOR SERVICE VEHICLES 6

5 HOURS OF OPERATION 7

6 DAILY TRAFFIC VOLUMES AND VEHICLE TYPES 8

6.1 TRIP GENERATION 8
6.2 TRIP DISTRIBUTION 8
6.3 IMPACT ON SURROUNDING ROADS 9

7 TRAFFIC MANAGEMENT ON THE FRONTAGE STREETS 11

7.1 SURROUNDING ROAD NETWORK 11
7.2 EXISTING TRAFFIC VOLUME ON ROADS 12
7.3 CRASH DATA 12

8 PUBLIC TRANSPORT ACCESS 13

9 PEDESTRIAN & CYCLIST ACCESS 14

10 SITE SPECIFIC ISSUES 15

11 SAFETY ISSUES 17

12 CONCLUSIONS 18

APPENDIX A: PROPOSED DEVELOPMENT PLANS

APPENDIX B: TURN PATH PLANS

REPORT FIGURES

Figure 1: Location of the subject site 1
Figure 2: Aegis Lincoln Park – Staging Plan 3
Figure 3. Estimated traffic movements for the proposed Stage 1 development – AM peak/PM peak . 9
Figure 4. Southbound view along Wright Street in vicinity of the site 11
Figure 5. Westbound view along Lincoln Street in vicinity of the site 11
Figure 6. View along existing service access corridor on Lincoln Street 12
Figure 7. Local public transport service map (source: Transperth Maps) 13
Figure 8: Perth Bike Map (source: Department of Transport) 14
Figure 9: Parking operations at 8-bay car park (reverse parking 1) 15
Figure 10: Parking operations at 8-bay car park (reverse parking 2) 16
Figure 11: Parking operations at 8-bay car park (egress) 16
Figure 12: Safe Sight Distance (SSD) Assessment 17

REPORT TABLES

Table 1: Peak hour trips for the development 8

1 Introduction

This Transport Impact Statement (TIS) has been prepared by Transcore on behalf of Aegis Group with regards to the proposed redevelopment of the existing Aegis Linkoln Park aged care facility located at 19 Wright Street in Highgate, City of Vincent. The subject site is situated at the southwest corner of the existing Lincoln Street/Wright Street intersection as shown in Figure 1.

The subject site is located about 1km northeast of the Perth CBD and a short distance north of HBF park stadium.

Figure 1: Location of the subject site

The Transport Impact Assessment Guidelines (WAPC, Vol 4 – Individual Developments, August 2016) states*: "A Transport Impact Statement is required for those developments that would be likely to generate moderate volumes of traffic*[1] *and therefore would have a moderate overall impact on the surrounding land uses and transport networks".*

[1] *Between 10 and 100 vehicular trips per hour*

Section 6.1 of Transcore's report provides details of the estimated trip generation for the proposed development.

Accordingly, as the total peak hour vehicular trips are estimated to be less than 100 trips, a *Transport Impact Statement (TIS)* is deemed appropriate for this development.

Key issues that will be addressed in this report include the traffic generation and distribution of the traffic associated with the proposed redevelopment, access and egress movement patterns and parking supply.

2 Proposed Redevelopment

The Aegis Lincoln Park Master Plan proposes redevelopment of the entire aged care facility at the subject site in three discrete stages. Once fully implemented, the Master Plan will deliver an integrated aged care precinct with a shared basement car parking facility. The indicative staging plan is illustrated in Figure 2.

Figure 2: Aegis Lincoln Park – Staging Plan

This assessment however focuses on Stage 1 of the redevelopment project, which occupies an area at the southern side of the site. The Stage 1 development application includes demolition of the existing four vacant brick and tile buildings and their replacement with a six-storey aged care building comprising 147 beds with ancillary facilities and parking.

Specifically, the proposed Stage 1 development comprises:

- A total of 147 single-bedroom units;
- Living areas including dining, lounge and sitting:
- Support facilities including therapy, office, servery and nurse station.

A total of 75 parking bays for staff and visitors will be provided across the site in form of 41-bay basement car park and 34 open-air parking. The basement car park is proposed to be accessed via a new Wright Street crossover which will be constructed to serve the development.

This car park will ultimately be expanded to integrate with the future Stage 2 and 3 basement car parks which will serve the entire aged care precinct.

Once fully redeveloped, the new Aegis Lincoln Park aged care facility will be serviced via a shared service/loading area located at the southeast corner of the site.

Principal pedestrian access into the Stage 1 will be facilitated from Wright Street frontage with secondary access via internal service yard connection.

The Stage 1 development plans are included in Appendix A.

3 Vehicle Access and Parking

3.1 Access

Access to the Stage 1 basement car park is proposed via a new 6.0m-wide two-way ramp connected to a full-movement crossover on Wright Street.

The new Wright Street crossover is proposed approximately 20m south of the existing ground-level car park access, around midway between the Lincoln Street and Bulwer Street intersections.

The visitor and additional staff parking areas will be accessible via existing crossovers on Wright Street (visitor parking) and Lincoln Street (additional staff parking).

Ultimately, once the Master Plan is fully in place the existing Wright Street car park crossover will be removed.

3.2 Parking

3.2.1 Car Parking

According to the advice provided to Transcore, there is no specific statutory car parking requirement set out for this type of development in the TPS (i.e., "aged care").

However, based on the advice provided to Transcore, the City has previously referred to a 1bay per 3 beds rationale for parking supply at these types of developments, which is generally consistent with the operator's own experience.

Accordingly, applying the same rationale, the proposed 75 car bay provision exceeds the 1bay per 3 beds strategy and is therefore considered adequate in this case.

3.2.2 Bicycle Parking

According to the advice provided to Transcore, there is no statutory bicycle parking requirement set out for this type of development.

No bike parking or associated end-of trip facilities are contemplated for Stage 1 of the development.

4 Provision for Service Vehicles

The Stage 1 of the development proposal is intended to be served by the service area provided as part of the Stage 1 works at the southwest corner of the site. This service area will ultimately be shared by all three stages of the Master Plan.

The planned shared service area is effectively a redesign of the existing facility that will retain its current access arrangement which comprises a 60m-long single-lane accessway along the western site boundary connecting to a full-movement crossover to Lincoln Street at the western end of the site. The accessway is approximately 4.0m wide and can accommodate only one-way traffic at any given time.

A turn path analysis was undertaken for a 10m-long waste collection vehicle, which is understood to be the largest vehicle accessing the site. The analysis confirms the internal service yard area is suitable to accommodate 10m-long MRV manoeuvring in and out of the service bay.

The relevant turn path plans are provided in Appendix B.

The proposed design of the service area and access system suggests that suitable traffic management measures will need to be implemented in this case to support operation of the facility in order to address the physical and operational constraints.

5 Hours of Operation

This is a residential type of development in nature and as such will be operational 24/7.

6 Daily Traffic Volumes and Vehicle Types

6.1 Trip Generation

The daily and peak hour trip rates for the proposed Stage 1 of the aged care redevelopment project were derived from the *New South Wales Guide to Transport Impact Assessment Ver 1.1* publication using the applicable *Housing for Seniors* trip rate based on number of dwellings. The trip rates provided in this publication are based on dwellings rather than beds or rooms; however, in order to ensure a robust assessment, the trip rates have been applied on per bed/room basis.

Accordingly, it is conservatively estimated that the proposed aged care facility would generate approximately **352** total daily trips with **34** trips (inbound and outbound) during both morning[2] and afternoon peak hours.

The traffic distribution detailed in Table 1 assumes AM and PM peak hour directional traffic split assumptions of 65% / 35% and 39% / 61%, respectively. The peak hour trip distribution is based on *ITE Trip Generation Manual 12th Edition* data.

It is assumed that the peak site traffic activity will be recorded during staff shift changes which are likely to occur between 7:00-8:00AM and 5:00-6:00PM.

Table 1: Peak hour trips for the development

Peak Period	Direction	Traffic Split	Total Peak Hour Trips
AM Peak	Inbound	22	34 trips
	Outbound	12	
PM Peak	Inbound	13	34 trips
	Outbound	21	

6.2 Trip Distribution

The subject site is located within a highly permeable local road network that connects to major district roads such as Lord Street (~20,300vpd), Bulwer Street (~10,600vpd) and Beaufort Street (~13,700vpd). The roads facilitate good distribution of traffic along the fringe of the subject locality.

[2] *The morning peak hour trip rates are not specified in the relevant publication hence the afternoon peak trip rate was applied in this case*

Accordingly, considering the location of the subject site, available access and egress routes to and from the site, the anticipated directional trip distribution of the development-generated traffic is assumed as follows:

- A total of 50% of traffic to/from the north direction along Wright Street;
- A total of 50% of traffic to/from the south direction along Wright Street;

Accordingly, the estimated directional distribution of development-generated trips is illustrated in Figure 3.

Figure 3. Estimated traffic movements for the proposed Stage 1 development – AM peak/PM peak

6.3 Impact on Surrounding Roads

The WAPC *Transport Impact Assessment Guidelines (2016)* provides guidance on the assessment of traffic impacts:

"As a general guide, an increase in traffic of less than 10 per cent of capacity would not normally be likely to have a material impact on any particular section of road but increases over 10 per cent may. All sections of road with an increase greater than 10 per cent of capacity should therefore be included in the analysis. For ease of assessment, an increase of 100 vehicles per hour for any lane can be considered as

equating to around 10 per cent of capacity. Therefore, any section of road where development traffic would increase flows by more than 100 vehicles per hour for any lane should be included in the analysis."

As detailed in Section 6.3, the proposed development will not increase traffic on any local road on the surrounding road network anywhere near the 100vph threshold, therefore it is concluded that the impact of the Stage 1 development traffic on the surrounding road network will not be significant.

7 Traffic Management on the Frontage Streets

7.1 Surrounding Road Network

Both **Wright Street** and **Lincoln Street**, in the vicinity of the subject site, are wide single carriageway, two-lane roads with pedestrian footpaths along both sides of the road. A 3-hour on-street parking limit is in place along both sides of the roads. Refer Figure 4 to Figure 6.

Figure 4. Southbound view along Wright Street in vicinity of the site

Figure 5. Westbound view along Lincoln Street in vicinity of the site

Both Wright Street and Lincoln Street are classified as Access Roads under the Main Roads WA *Perth Metropolitan Area – Functional Road Hierarchy* document. Both roads operate under the 40km/h town centre speed limit zone regime.

Figure 6. View along existing service access corridor on Lincoln Street

Immediately adjacent to the subject site, Wright Street and Lincoln Street form a four-way roundabout intersection.

7.2 Existing Traffic Volume on Roads

Based on the latest available traffic data sourced from City of Vincent, Lincoln Street (between Smith Street and Wright Street) carried approximately 1,042vpd on an average weekday in March 2025 with 4.2% participation of heavy vehicles in the total traffic mix.

Based on the latest available traffic data sourced from City of Vincent, Wright Street (between Broome Street and Lincoln Street) carried approximately 640vpd on an average weekday in March 2025 with 6.2% participation of heavy vehicles in the total traffic mix.

7.3 Crash Data

Information available on Main Roads WA *Crash Map* web tool provides crash statistics for roads and intersections during the five-year period ending in December 2025.

The latest available crash records indicate no crashes along the two site frontages including the constituent Wright Street/Lincoln Street intersection in the last five-year period.

8 Public Transport Access

The subject site has excellent coverage by a number of bus services which operate along Lord Street and Beaufort Street terminating at Elizabeth Quay Bus Station and Perth Busport with bus stops within comfortable walking distance from the subject site.

The subject site also has reasonably convenient access to the East Perth Train Station, which is also located within comfortable walking distance from the subject site. Refer Figure 7 for more details.

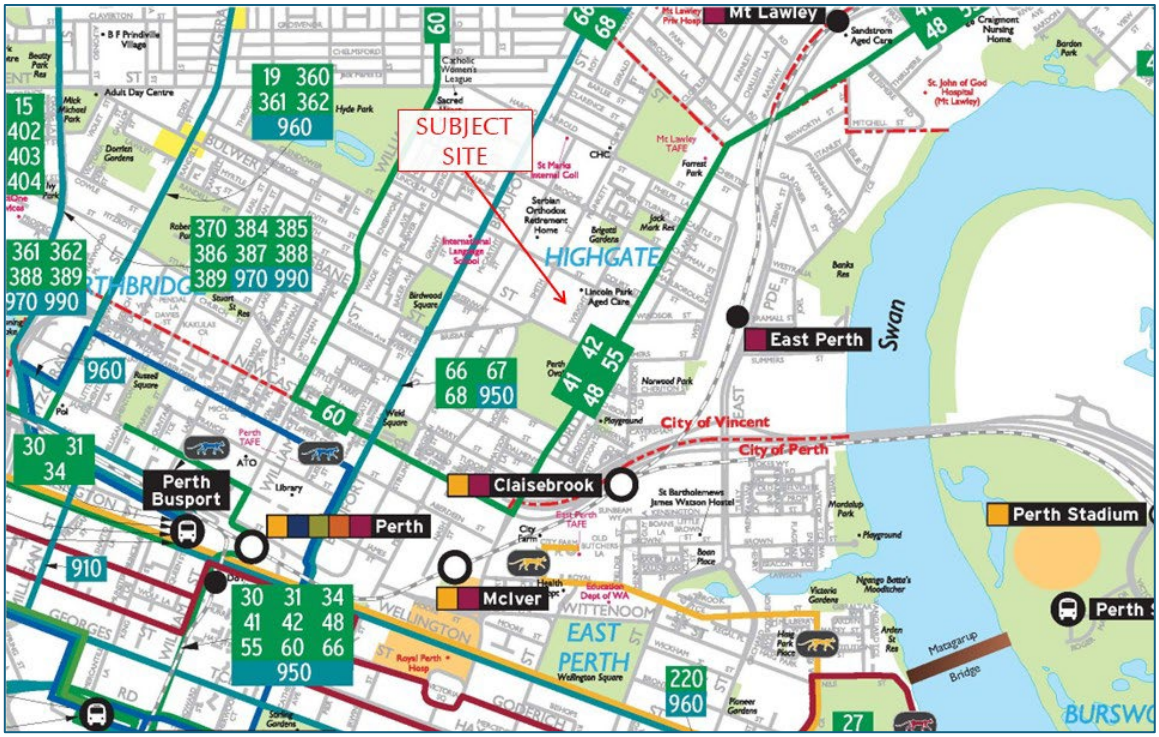


Figure 7. Local public transport service map (source: Transperth Maps)

9 Pedestrian & Cyclist Access

Pedestrian access to the subject site is provided directly from the existing footpaths along Lincoln Street and Wright Street. Pedestrian crossings are available at the adjacent Lincoln Street/Wright Street roundabout, supporting safe and convenient access between the site and nearby bus stops.

Lincoln Street is classified as a *"Good Road Riding Environment"* and connects to the local shared path and Continuous Cycling Path network. Bulwer Street also includes on-street cycle lanes. Refer Figure 8 for further details.

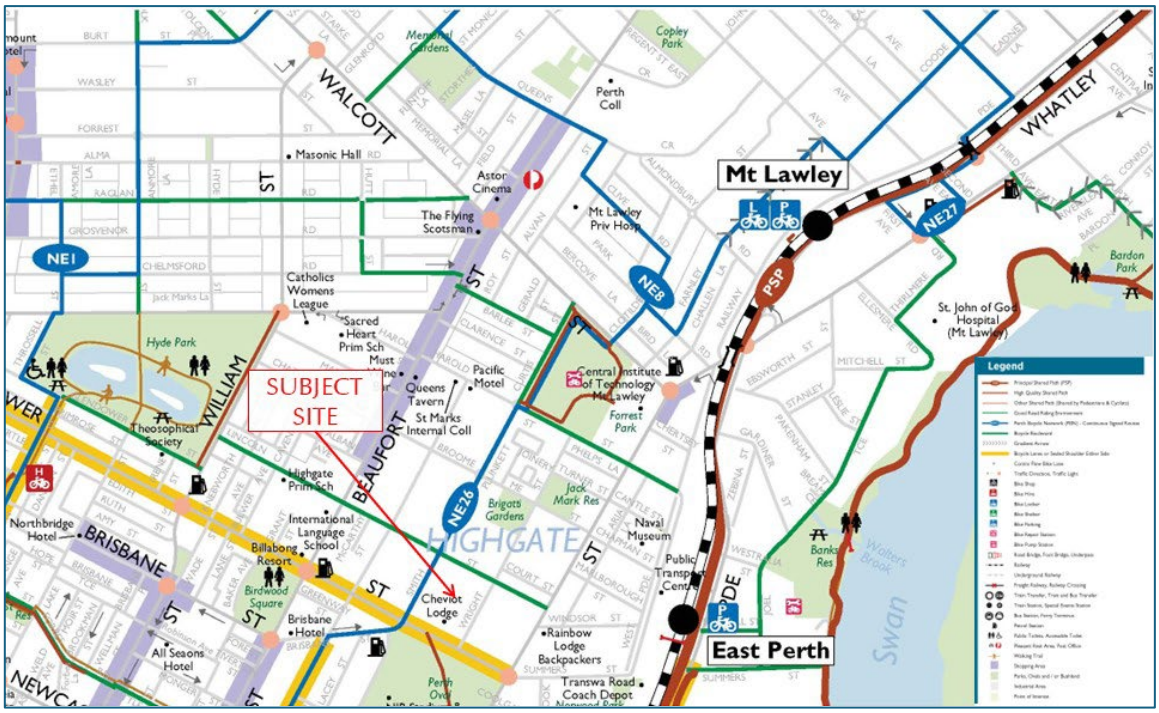


Figure 8: Perth Bike Map (source: Department of Transport)

10 Site Specific Issues

The on-site parking provision includes an 8-bay parking module off the accessway along the western site boundary, which connects to the Lincoln Street crossover.

The 4.2m-wide accessway is proposed to be widened to 6.0m near the car park to comply with *AS2890.1 – parking Facilities Part 1: Off-street car parking* standards. A turn path assessment of the proposed design confirmed that vehicles must reverse into the bays for safe parking operations, requiring appropriate pavement markings. Refer Figure 9 to Figure 11 for more details.

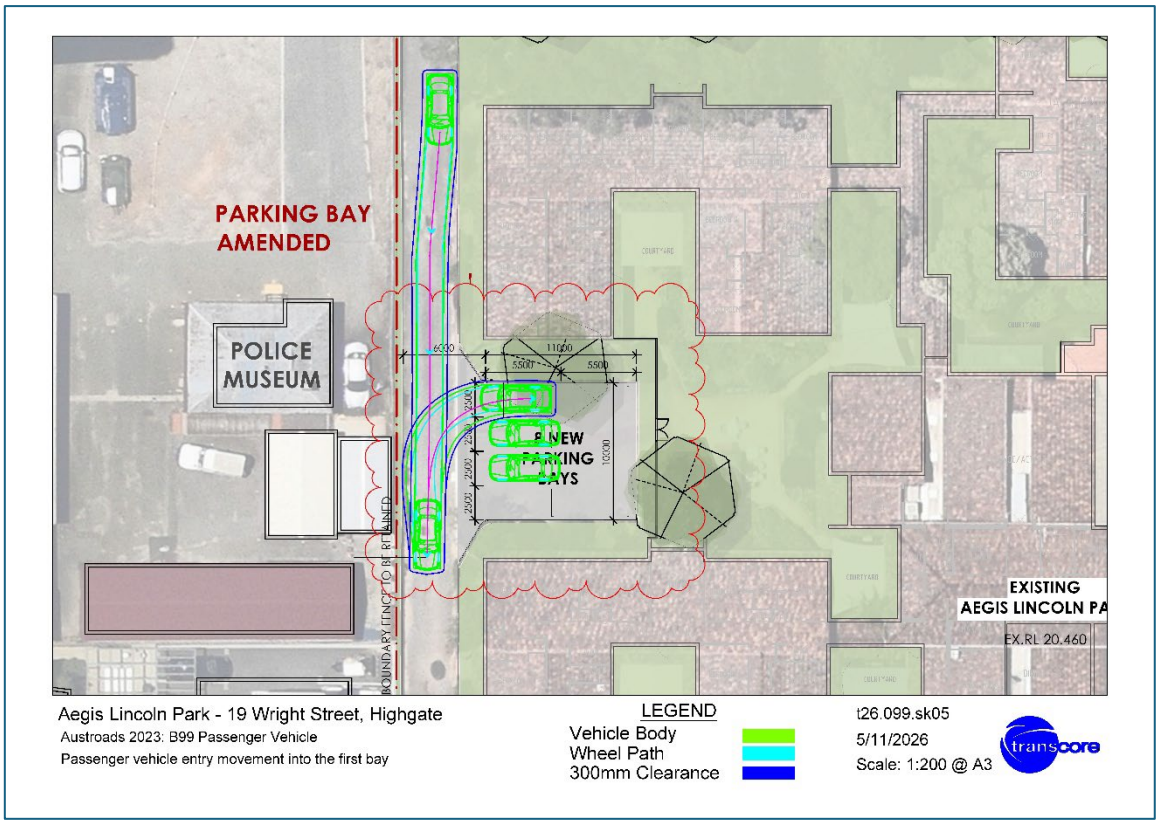


Figure 9: Parking operations at 8-bay car park (reverse parking 1)

No other site-specific issues have been identified with respect to the proposed Stage 1 development.

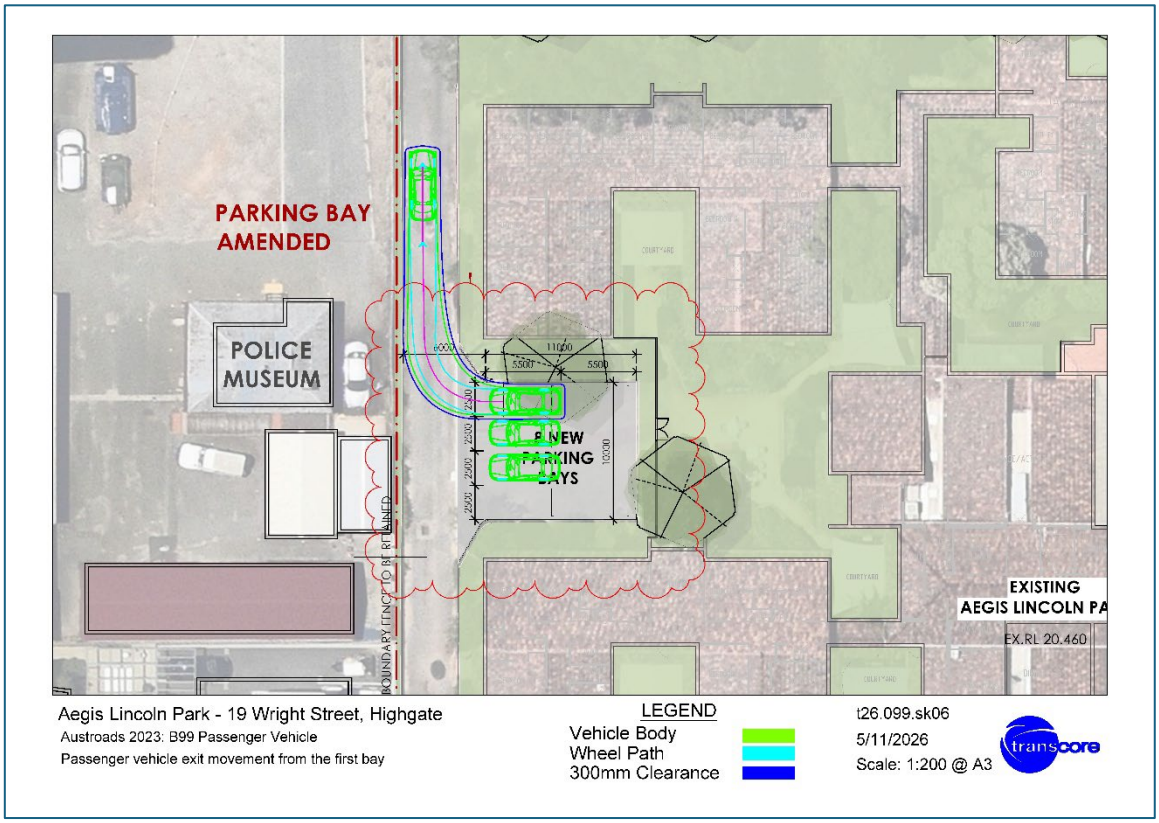


Figure 10: Parking operations at 8-bay car park (reverse parking 2)

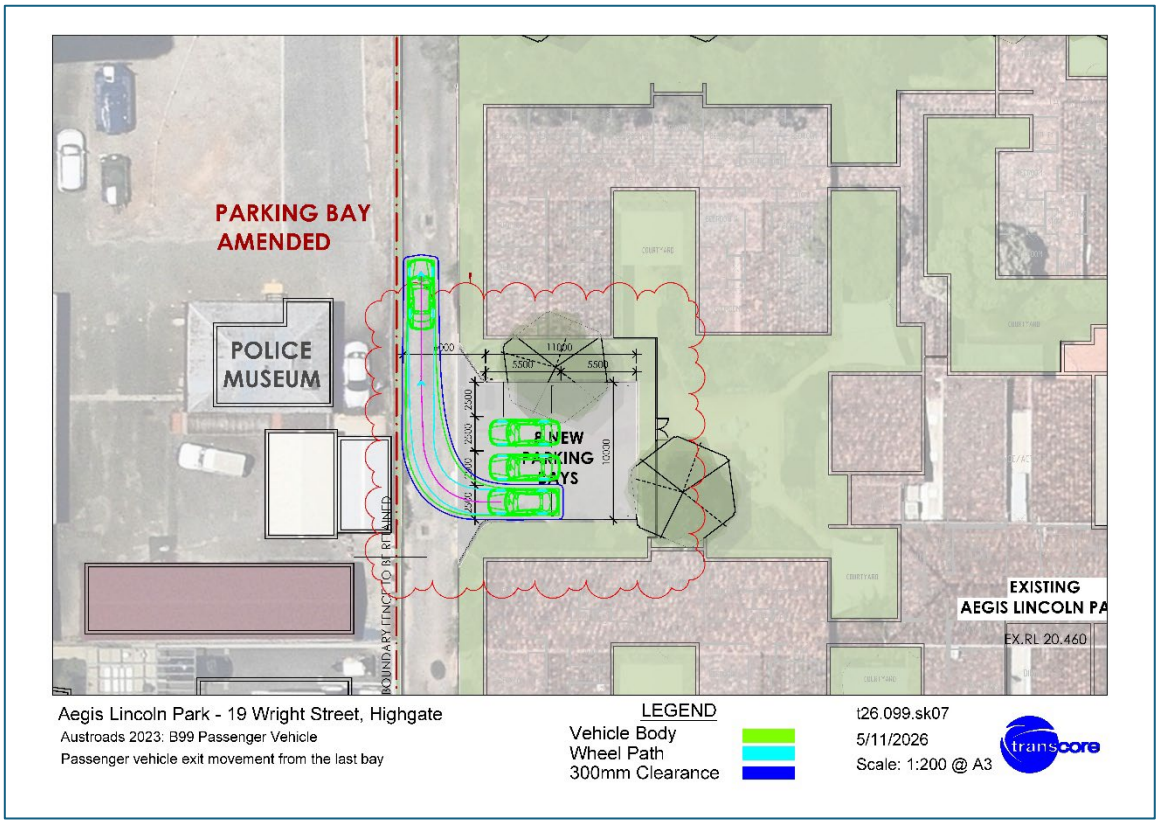


Figure 11: Parking operations at 8-bay car park (egress)

11 Safety Issues

A sightline assessment was undertaken in accordance with *AS2890.1 – parking Facilities Part 1: Off-street car parking* for the proposed Wright Street crossover serving the basement car park.

The relevant criteria require a minimum clear sightline distance (SSD) of 35m for the frontage road's 40km/h speed limit. Figure 12 illustrates the assessment undertaken in accordance with the relevant standards.

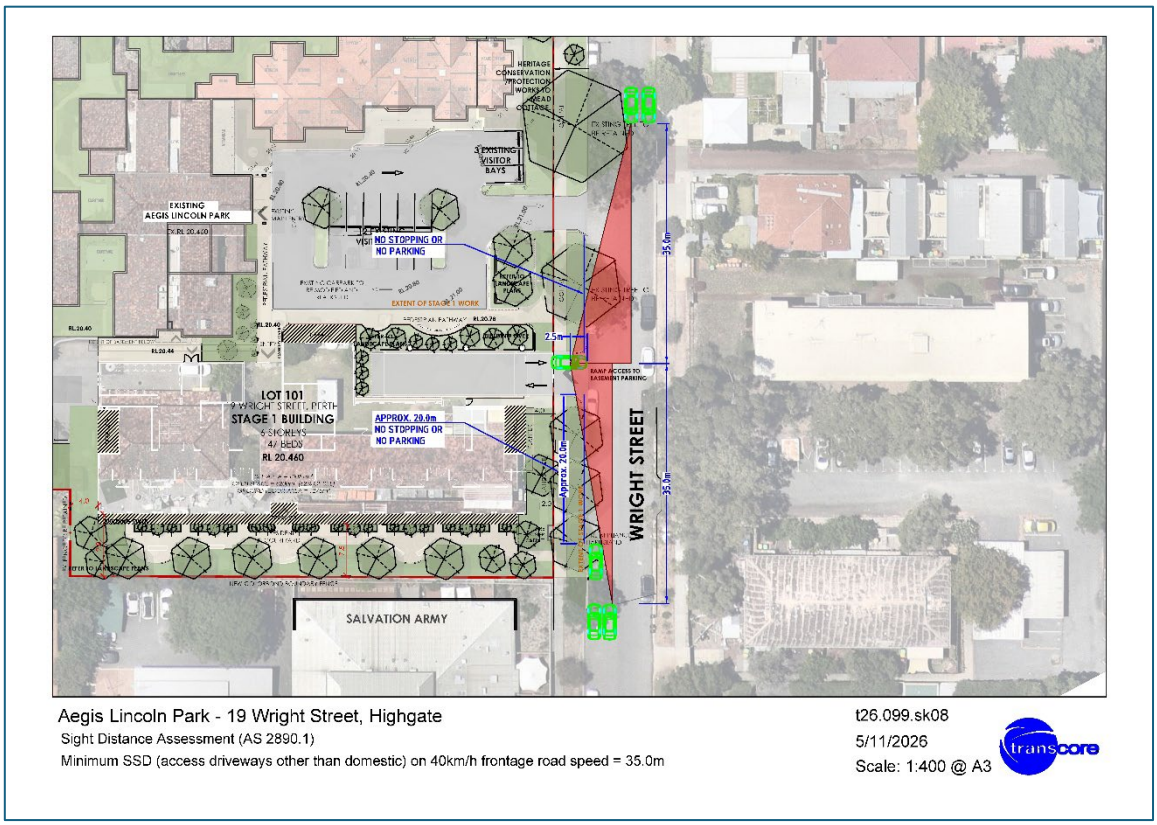


Figure 12: Safe Sight Distance (SSD) Assessment

The SSD assessment identified sections of Wright Street (western side) where existing on-street parking should be removed to meet the sight distance requirements. Accordingly, it is estimated that between 6-7 existing parking bays would be impacted by the proposal.

The assessment identified no additional safety issues within its scope.

12 Conclusions

This Transport Impact Statement (TIS) has been prepared by Transcore on behalf of Aegis Group with regards to the proposed redevelopment of the existing Aegis Linkoln Park aged care facility at 19 Wright Street in Highgate, City of Vincent.

The Aegis Lincoln Park Master Plan proposes redevelopment of the entire aged care facility occupying the subject site in three discrete stages. However, this TIS focuses on Stage 1 of the redevelopment project only, which occupies an area at the southern side of the site.

The Stage 1 development application includes demolition of the existing four vacant brick and tile buildings and their replacement with a six-storey aged care building comprising 147 beds with ancillary facilities.

A total of 75 parking bays for staff and visitors will be provided across the site combining 41-bay basement car park and 34 open-air parking. The basement car park is proposed to be accessed via a new Wright Street crossover.

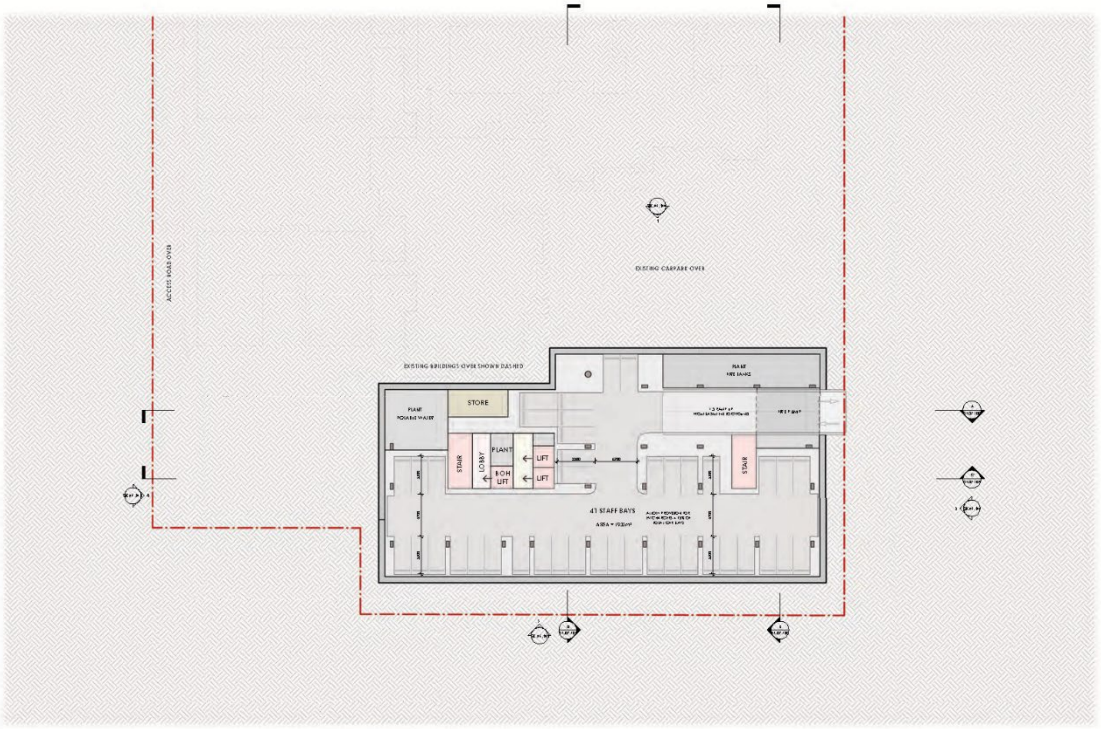
It is estimated that, Stage 1 of the Aegis Lincoln Park redevelopment would generate a maximum of about 352 total daily trips with up to 34 trips (inbound and outbound combined) during morning and afternoon peak hours. This level of traffic impact is estimated to be moderate and well below the critical impact threshold.

It is concluded that the findings of this Transport Impact Statement are supportive of the proposed Stage 1 Aegis Lincoln Park redevelopment.

Appendix A

PROPOSED DEVELOPMENT PLANS

transcore | 25 years anniversary



BASEMENT PLAN
AEGIS LINCOLN PARK

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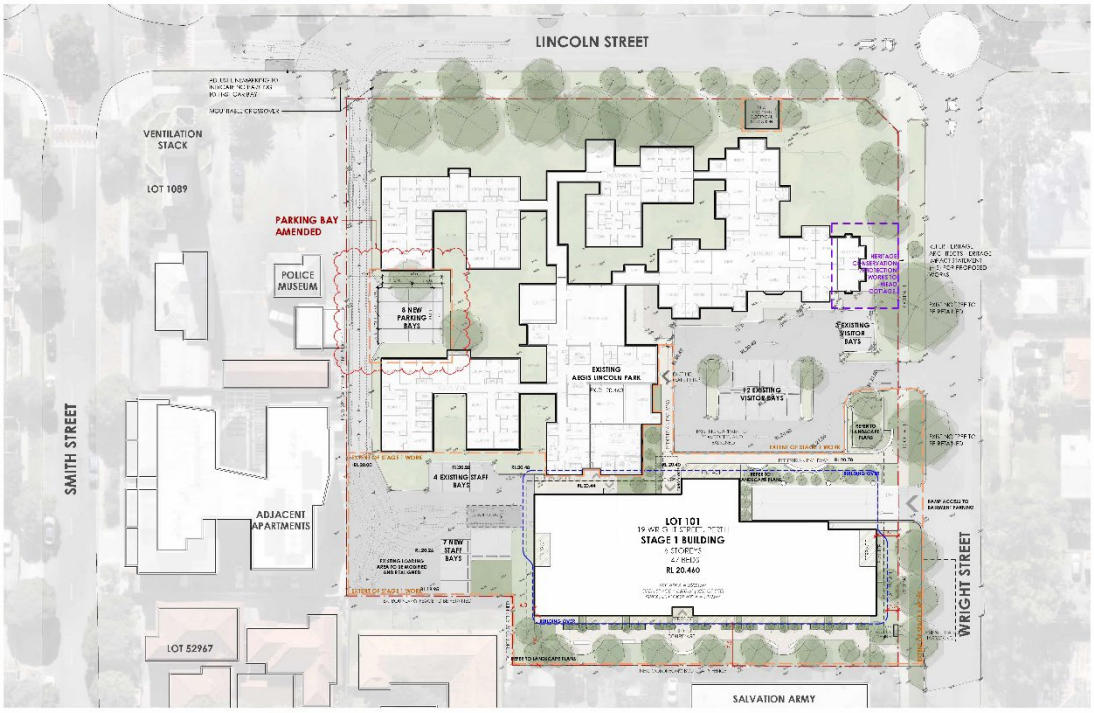

PROPOSED SITE PLAN
AEGIS LINCOLN PARK

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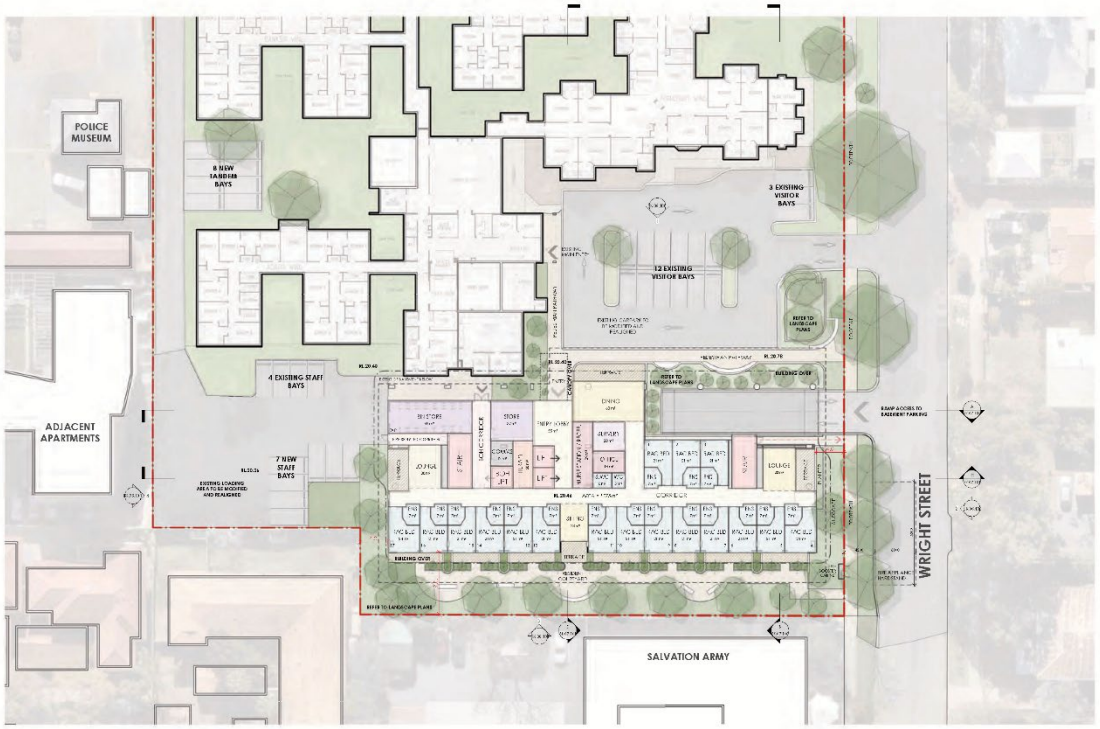

silver thomas hanley

GROUND FLOOR PLAN
AEGIS LINCOLN PARK

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silver thomas hanley

LEVEL 01 FLOOR PLAN
AEGIS LINCOLN PARK

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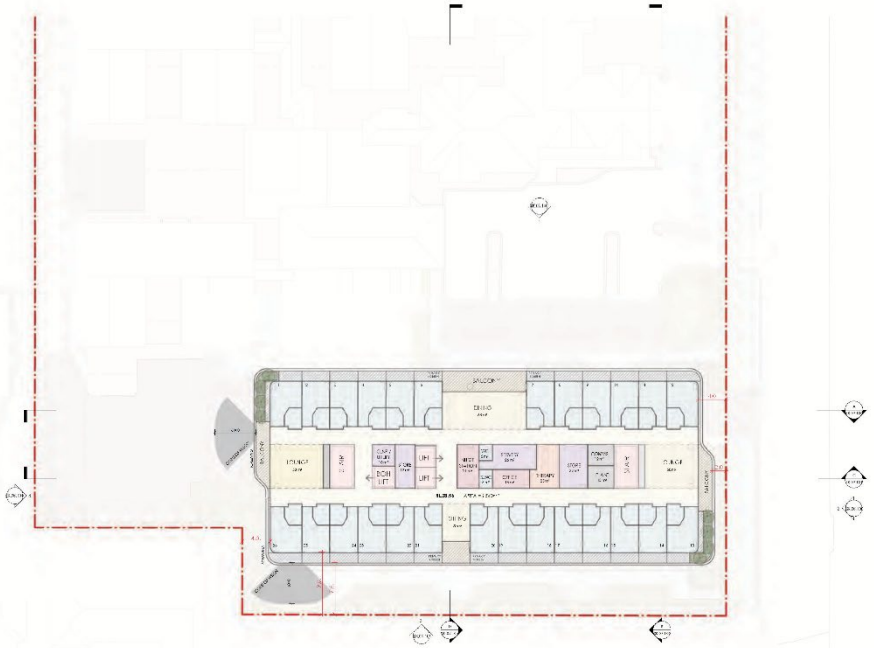

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LEVEL 02 FLOOR PLAN
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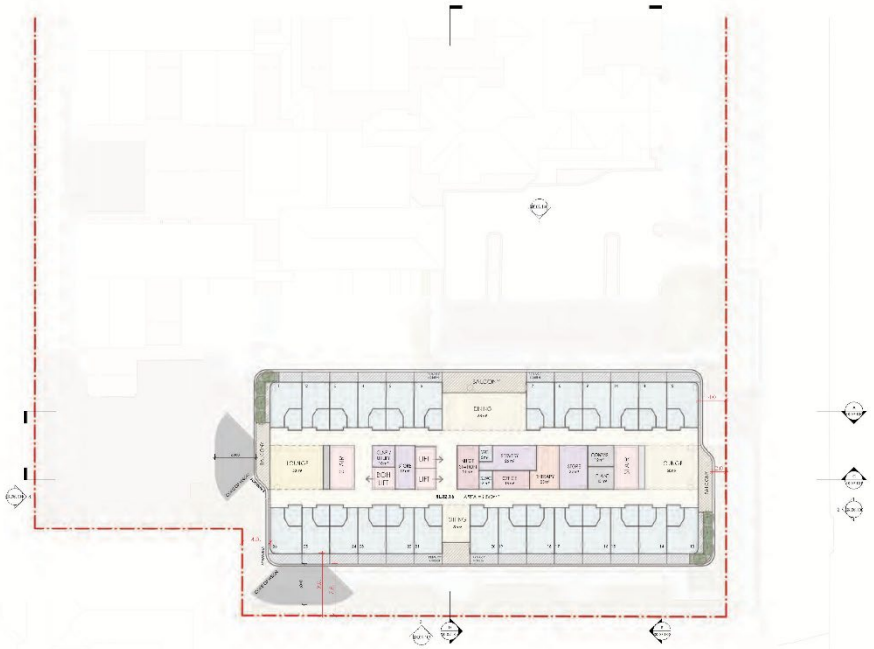

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AEGIS LINCOLN PARK

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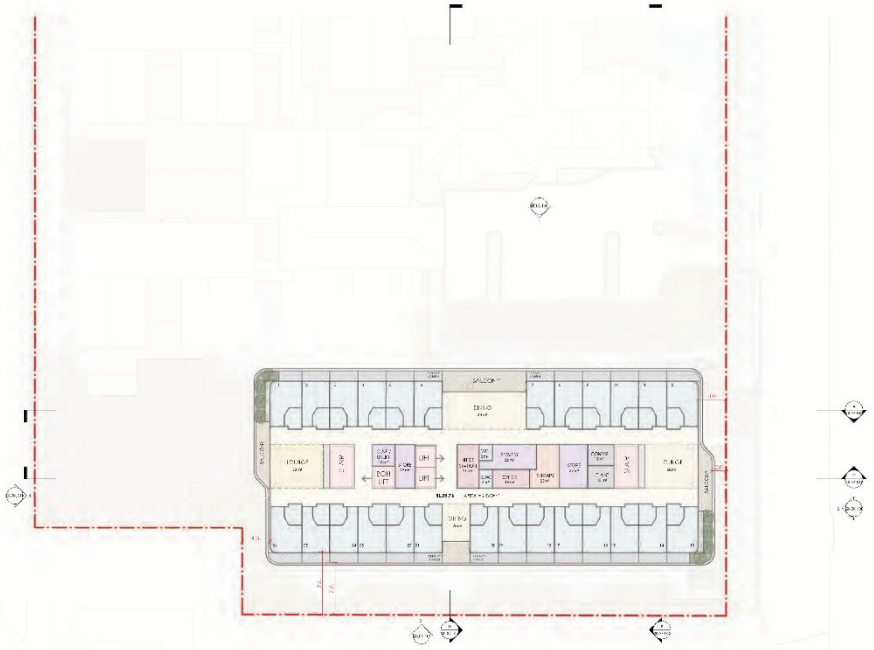

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LEVEL 04 FLOOR PLAN
AEGIS LINCOLN PARK

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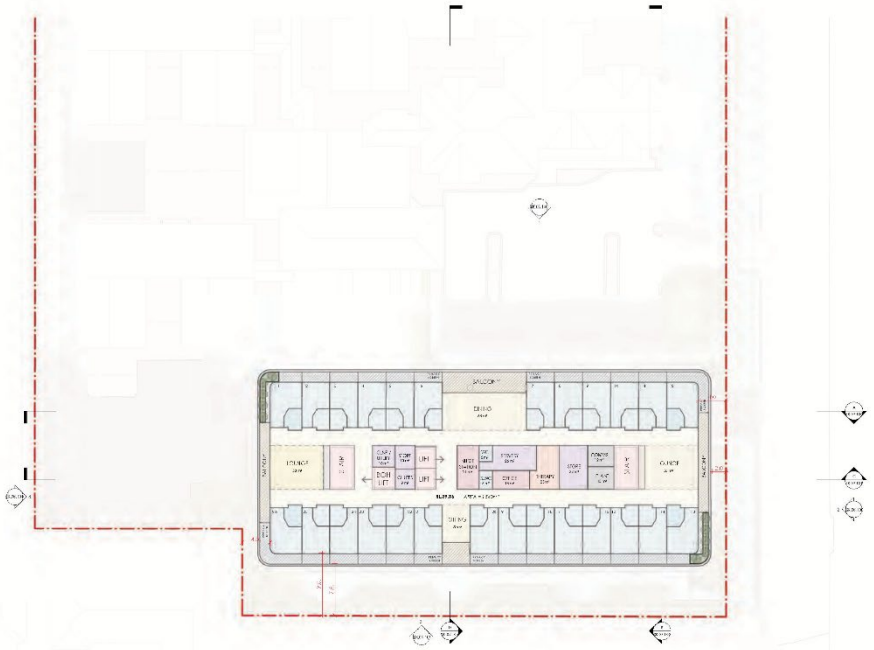

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LEVEL 05 FLOOR PLAN
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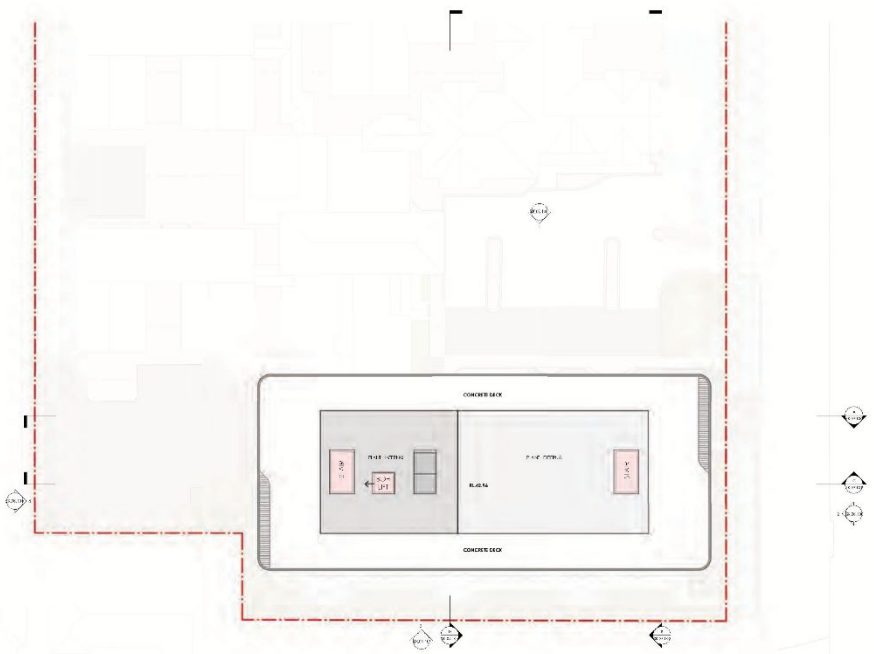

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ARCHITECTURE

LEVEL 06 FLOOR PLAN
AEGIS LINCOLN PARK

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Appendix B

TURN PATH PLANS

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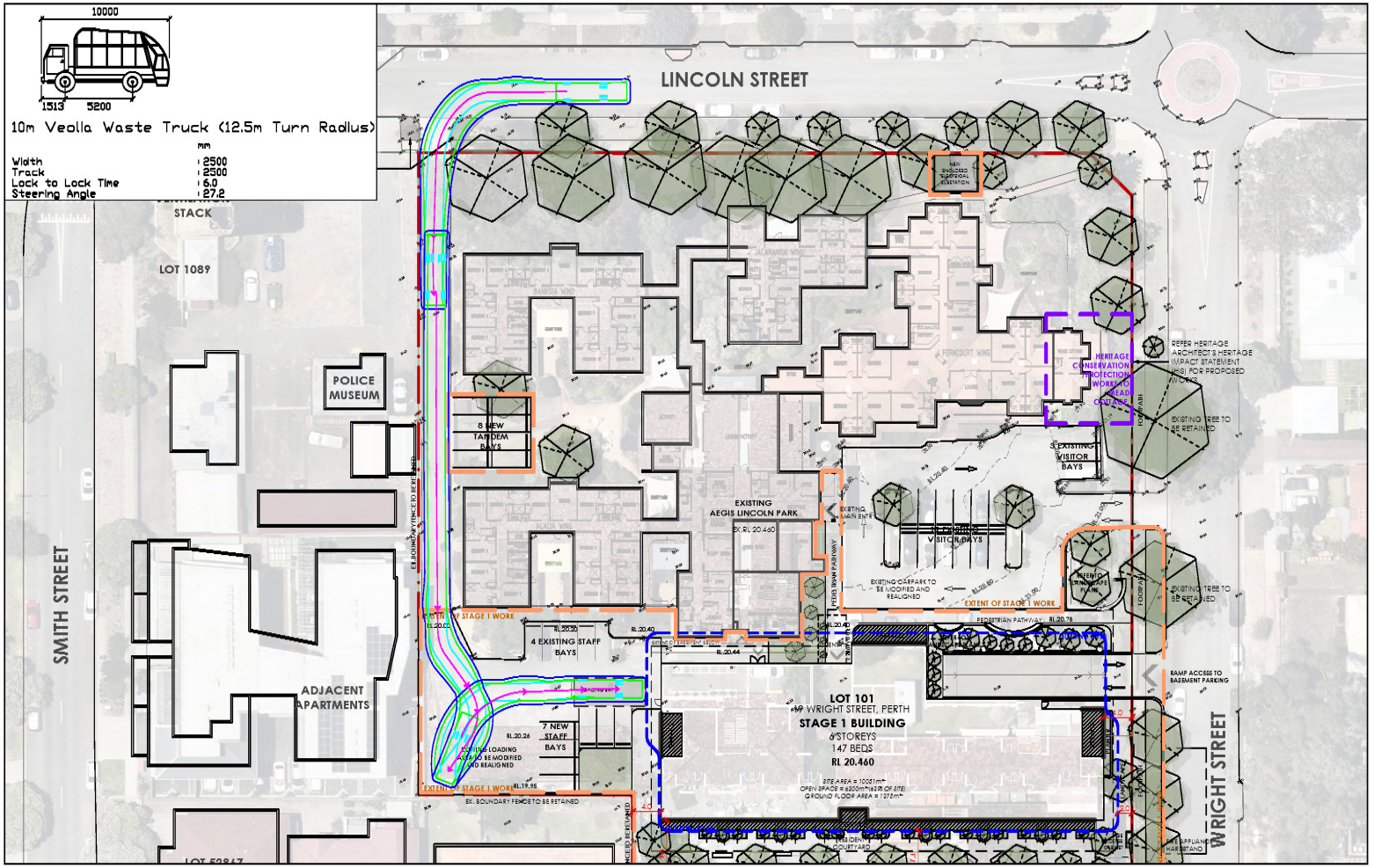
25 years anniversary



Aegis Lincoln Park - 19 Wright Street, Highgate

10.0m Veolia Waste Truck-12.5m Turn Radius

Waste Truck Entry

LEGEND

Vehicle Body

Wheel Path

500mm Clearance

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21/08/2026

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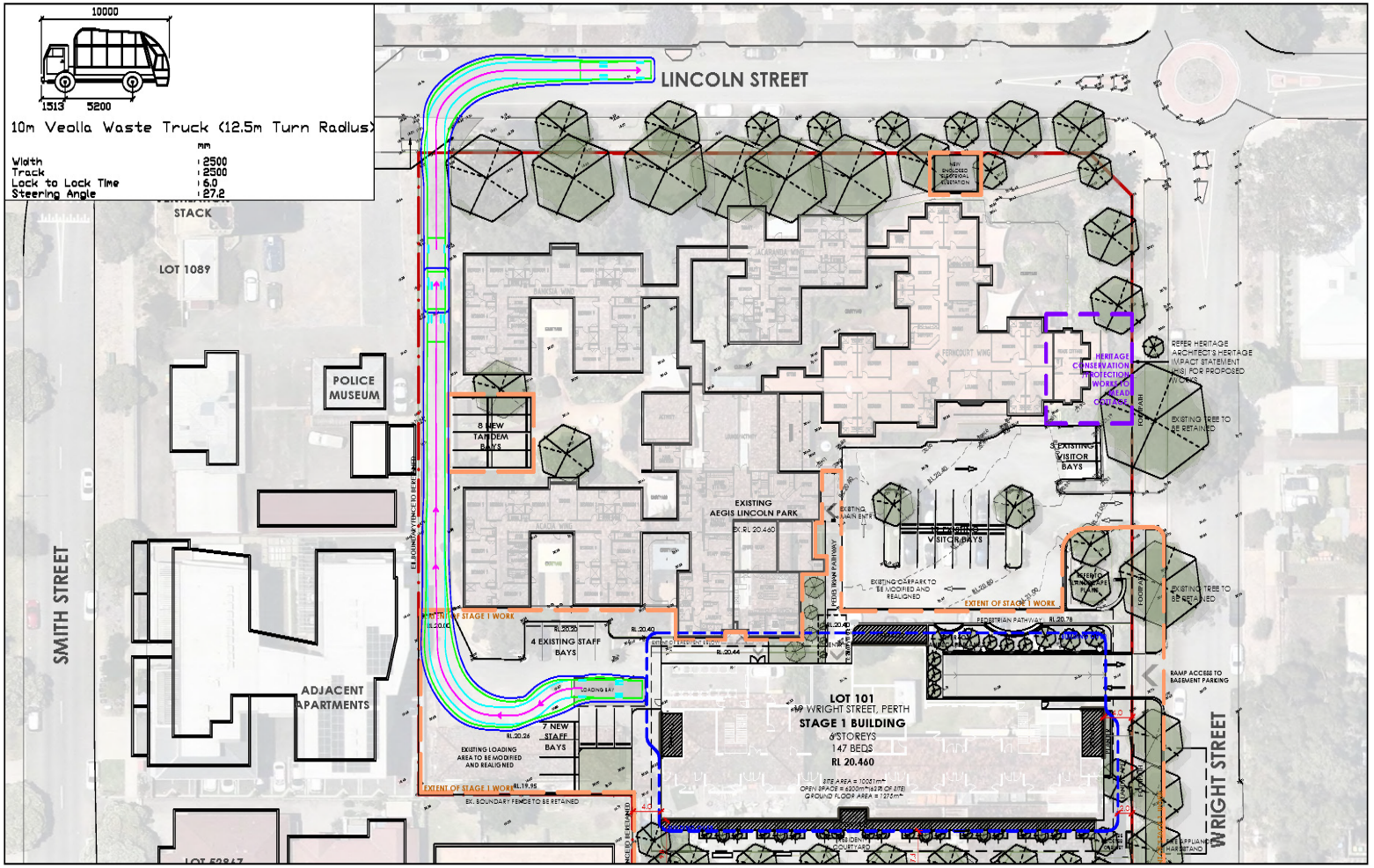
transcore



Aegis Lincoln Park - 19 Wright Street, Highgate

10.0m Veolia Waste Truck-12.5m Turn Radius

Waste Truck Exit

LEGEND

Vehicle Body

Wheel Path

500mm Clearance

t26.099.sk06

21/08/2026

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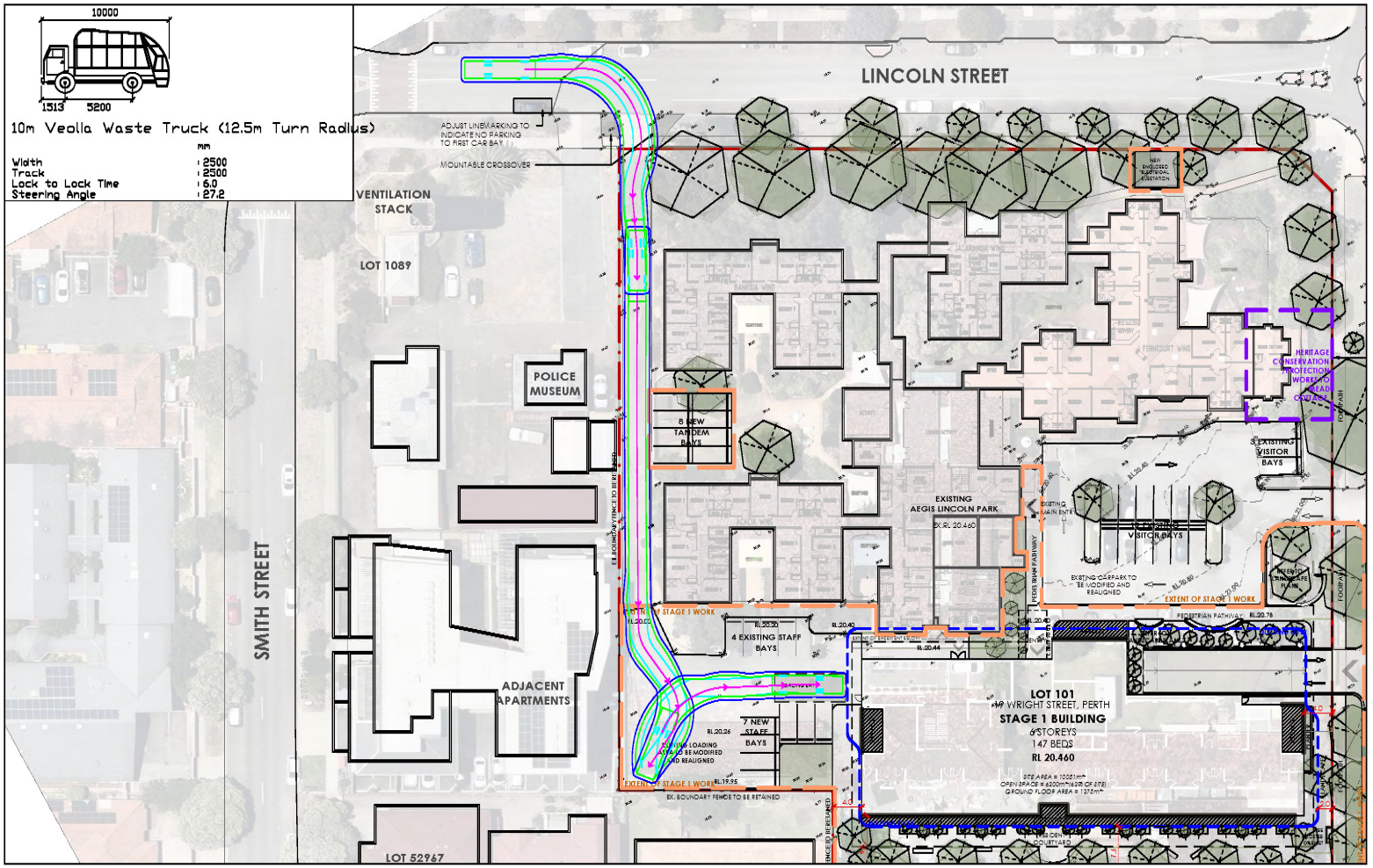
transcore



Aegis Lincoln Park - 19 Wright Street, Highgate

10.0m Veolia Waste Truck-12.5m Turn Radius

Waste Truck Entry

LEGEND

Vehicle Body

Wheel Path

500mm Clearance

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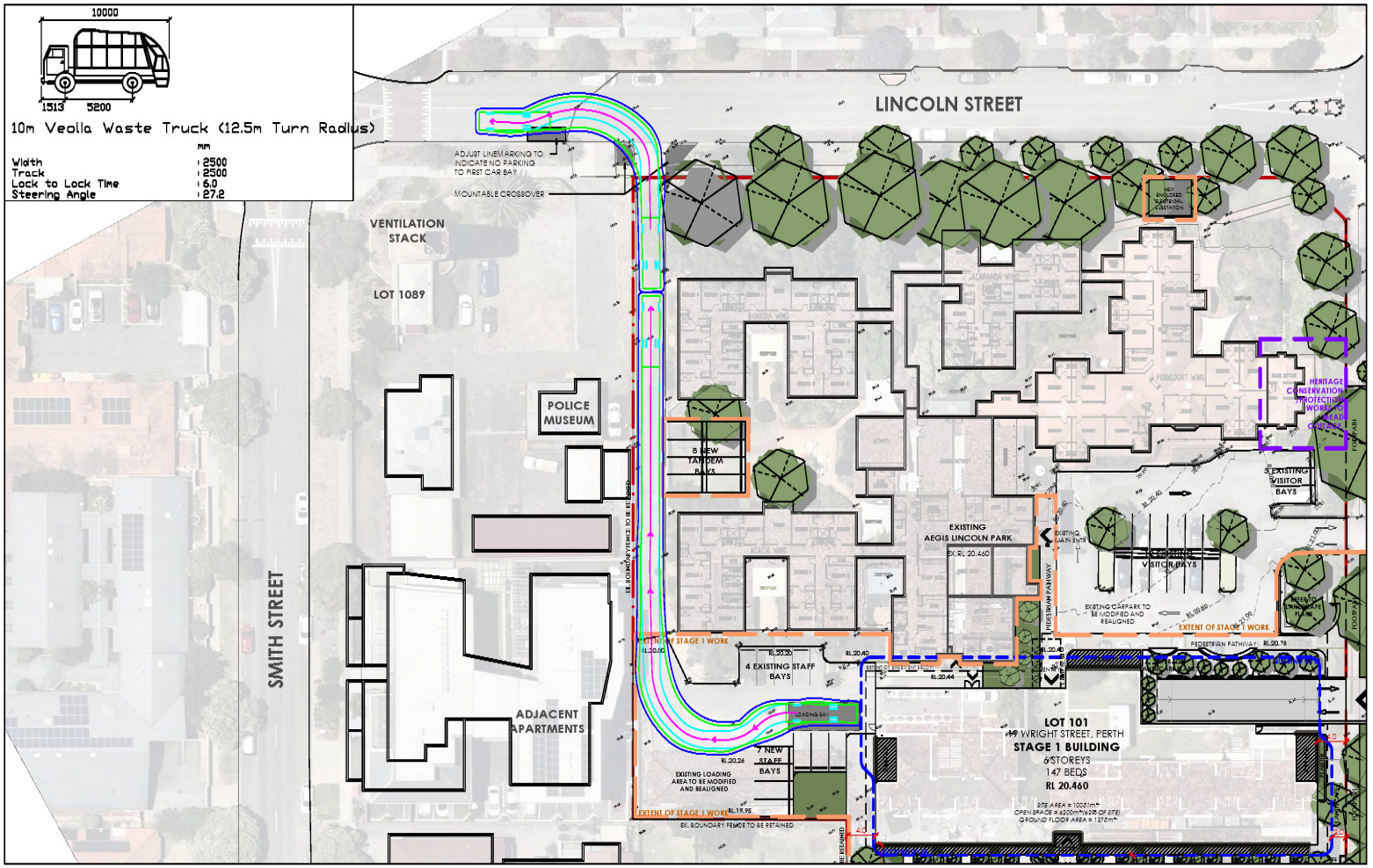
transcore



Aegis Lincoln Park - 19 Wright Street, Highgate

10.0m Veolia Waste Truck-12.5m Turn Radius

Waste Truck Entry

LEGEND

Vehicle Body

Wheel Path

500mm Clearance

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21/08/2026

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transcore

CITY OF VINCENT

ATTACHMENT 6

DEVELOPMENT ASSESSMENT PANEL MEETING

Landscaping Plan

Landscape - Schematic Design

AEGIS Lincoln Park

Architect

silver thomas hanley
HEALTH ARCHITECTURE

Landscape

CaPA

Acknowledgment of Country

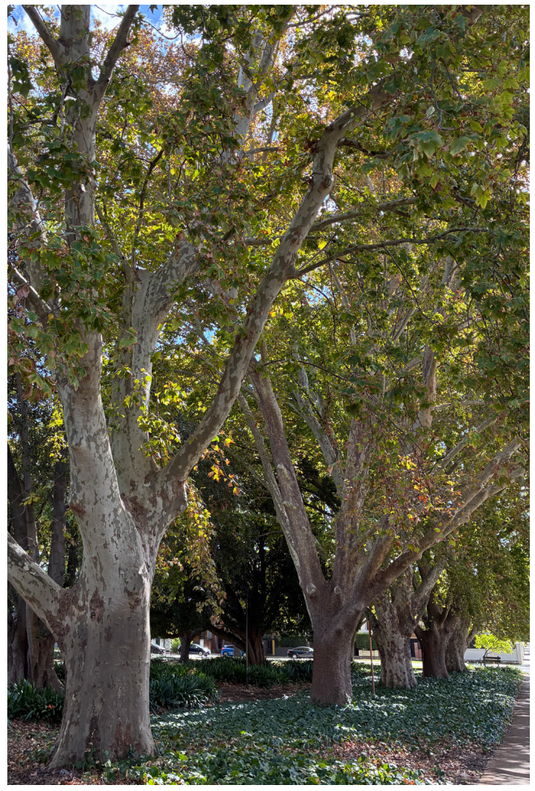
We wish to acknowledge the Traditional Custodians of the land, the Whadjuk people of the Noongar Nation, and pays its respects to elders past, present and emerging.

ISSUE DATE

260820_Issue for Development Application

Civic Presence (nearby Perth Oval)

Brick and Terracotta - Mead Cottage



Parks and gardens (nearby Brigatti Gardens)

The Aegis Lincoln Redevelopment presents an opportunity to provide a cohesive landscape environment for aged care, working with new and existing architectural propositions, fostering tree legacy environments, considering community, multiple staging and reducing abortive works.

The Stage 1 landscape design proposals envisage a landscape environment of clear legibility at street level. Native medium size trees are proposed at street; offering canopy area, scale and a elevation of differing height plantings.

Heritage red brick, echoing of the heritage cottage and local precedents, extends through the ground plane as a combination of landscape elements (walling, seating, planters) and building at the lower levels, to the breadth of the site's streetscape. Along with multiple layers of plantings and trees, this material quality will provide a welcome and considered street interface.

Episodic gardens concealed from the street, relate to the building's variety of new functions and scales. As a landscape for visitors and residents, the design caters for both generosity and the private intimate scale. These landscapes are designed as a series of layered vignettes in section. Landscape vistas from the resident's apartments and social spaces have been considered, along with internal courtyards and landscape vistas for future upper level podium amenities.

Additional scope will also include some restorative works to the garden surrounds of the heritage building, include removing trees too close to the building and the clearing of shrubs currently shrouding its street elevation.

Resilient plantings will be selected relevant to their siting including a combination of Australian natives and climate appropriate selections. Deciduous trees, offering summer shade and solar access in winter will feature to the project entry.

Tree plantings to deep soil areas designed where possible. Tree selections to consider low risk to shot-hole borer populations and the challenge of the southern boundary planting locations, with shade in winter and exposure in summer.

Lincoln Street
Wright Street
Existing AEGIS Aged Care
existing carparking modifed
new basement under
A
existing
Existing Modified Driveway
STAGE 1
B
B
Private Entry
A

Landscape Plan
Stage 1 Overall Plan

1. NEW ENTRY PLANTER 7 GARDEN
2. NEW PLANTERS
3. NEW ENTRY
4. NEW PATHWAYS
5. NEW PRIVATE TERRACES
6. NEW BOUNDARY & GARDEN PLANTING
7. NEW SHARED RESIDENT OUTDOOR SPACES
8. NEW GARDENS
9. RENOVATED GARDENS
10. EXISTING TREES RETAINED
11. EXISTING TREE REMOVED
12. NEW TREES & GROUND PLANTING TO STREET
13. NEW TERRACE GARDEN

Landscape Plan
Stage 1_Entry

1 ENTRY PODIUM

Integrated entry with 1.2m high raised planter, seating and signage. New evergreen trees (*Tristaniopsis laurina*). Plantings suited to planters and will provide longevity and resilience in an urban environments.

2 FEATURE GARDEN

Garden with lush planting, feature plants and sculptural elements offering visual interest for arrival filtered screening of carpark dive ramp.

3 TRELLIS SCREEN

Sculptural vertical trellis to provide support for climbing planting and a green outlook from internal dining spaces and resident rooms. Opportunity to develop as a balustrade for ease of maintenance.

4 ENTRY PLANTING

Selection of low plants with deciduous trees *Lagerstroemia* to create a formal entry point.

5 BRICK PLANTERS & SEATING ALCOVES

Brick planters (1m soil depth) with integrated seating alcoves for gathering and waiting.

6 MEAD COTTAGE

Remove existing tree (Elm) for building damage prevention.

Refer indicative plant selections for landscape planting character of respective landscape elements.

ENTRY PODIUM

Acacia cognata 'Limelight'

Dianella 'Tas Red'

Goodenia varia

Rhaphiolepis 'Snow Maiden'

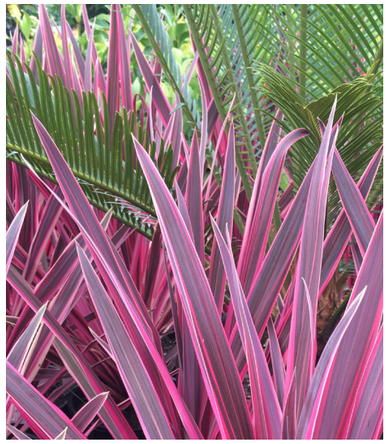
Ficinia nodosa

Tristaniopsis laurina 'Luscious'

FEATURE GARDEN

Acacia cognata 'Limelight'

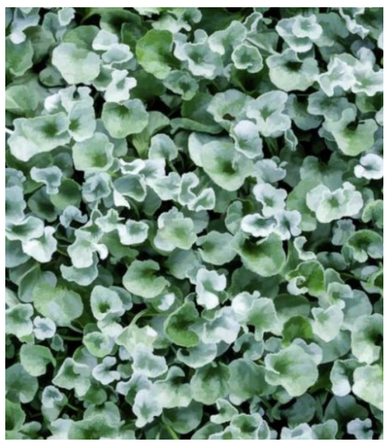
Banksia Nivea



Cordyline 'Pink Passion'

Myoporum parvifolium 'Broad Leaf'

Pittosporum 'Miss Muffet'



Dichondra argentea 'Silver Falls'

TRELLIS SCREEN & SHADE PLANTING

Billardiera heterophylla

Trachelospermum jasminoides

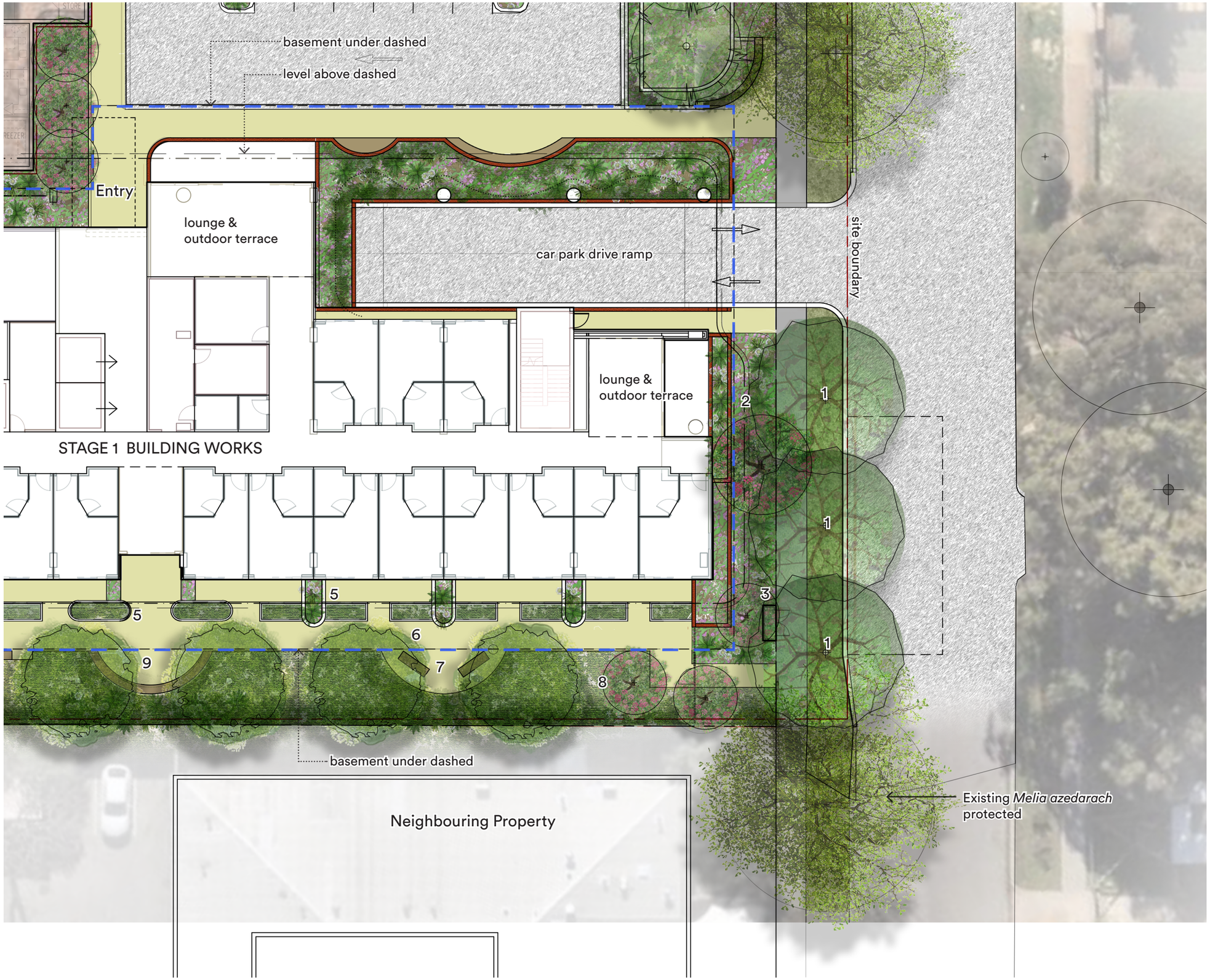
Philodendron 'Xanadu'

ENTRY PLANTING

Lagerstroemia indica x fauriei 'Tuscarora'

Dianella 'Tas Red'

Lomandra 'Tanika'



Landscape Plan
Stage 1_East

1 STREETSCAPE
Proposed new street trees to create increased canopy area for site and neighbourhood amenity as discussed with the City. Species and location to be confirmed with the City.

2 LOUNGE PLANTER
Informal gaden planting with opportunities to continue planting onto the adjacent verge to complement the streetscape.

3 PRIVATE ENTRY GARDEN
Low planting and flowering *Lagerstroemia* trees in deep soil to provide a filter green layer between public footpath and residential units. Planting is selected to celebrate seasonal variation.

4 RAISED PLANTERS
Shading planting in brickwork planting for resident vista.

5 PRIVATE DIVIDING ALCOVES
Shade tolerant specie mix with tall raised planters providing divisions between units and privacy. Feature plants for a green outlook.

6 INFORMAL PLANTERS
Grouping of raised planters for residents for seasonal/select plantings

7 INFORMAL SEATING
Alcove to provide opportunities for informal seating and gathering. Planting is shade resistant and layered with a variety of textures and fragrance to create a sensorial experience.

8 SHADE TREES
A mix of shade trees of differing sccales (*Magnolia grandiflora, Ficus longifolia and Waterhousia floribunda*) in deep soil garden beds, providing visual privacy and scale to the development.

9 COMMUNAL ALCOVES
Alcove to provide opportunities for fixed and loose furniture informal seating and gathering. A barbeque area is proposed to help build residential community.
Planting is shade resistant with opportunities for edibles and communal planting by residents.

Refer indicative plant selections for landscape planting character of respective landscape elements.

INDICATIVE TREE SELECTIONS

STREET TREES - *Eucalyptus spathulata*
10-12m h x 10m w

EAST ENTRY TREES -*Lagerstroemia indica x fauriei* 'Tuscarora'
3m h x 3m w

Magnolia grandiflora 'St Marys'
8m h x 5m w

Ficus longifolia
4-6m h x 3m w

Waterhousia floribunda
8m h x 4m w

LOUNGE GARDEN

Acacia cognata 'Limelight'

Dianella revoluta

Ficinia nodosa

Goodenia varia

Banksia Nivea

Calothamnus quadrifidus prostrate

PRIVATE ENTRY GARDEN

Poa labillardieri 'Eskdale'

Ozothamnus diosmifolius

Patersonia occidentalis

VERGE PLANTINGS

Banksia petiolaris

Lomandra sp.

Myoporum parvifolium prostrate

RESIDENT ALCOVE

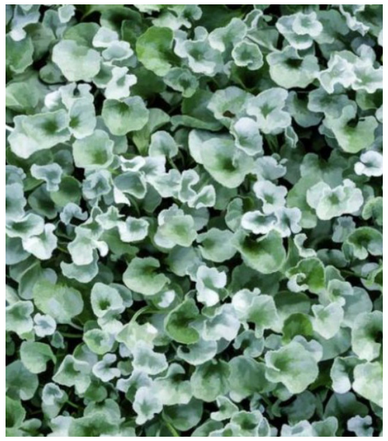
Acmena smithii

Liriope 'Munroe White'

Philodendron xanadu

COMMUNAL ALCOVES

Casurina glauca 'Cousin It'



Dichondra argentea 'Silver Falls'

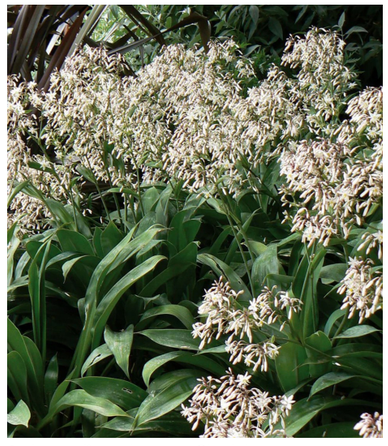
Liriope sp.

Murraya paniculata (hedging)

Ricinocarpos 'Pencil Form'

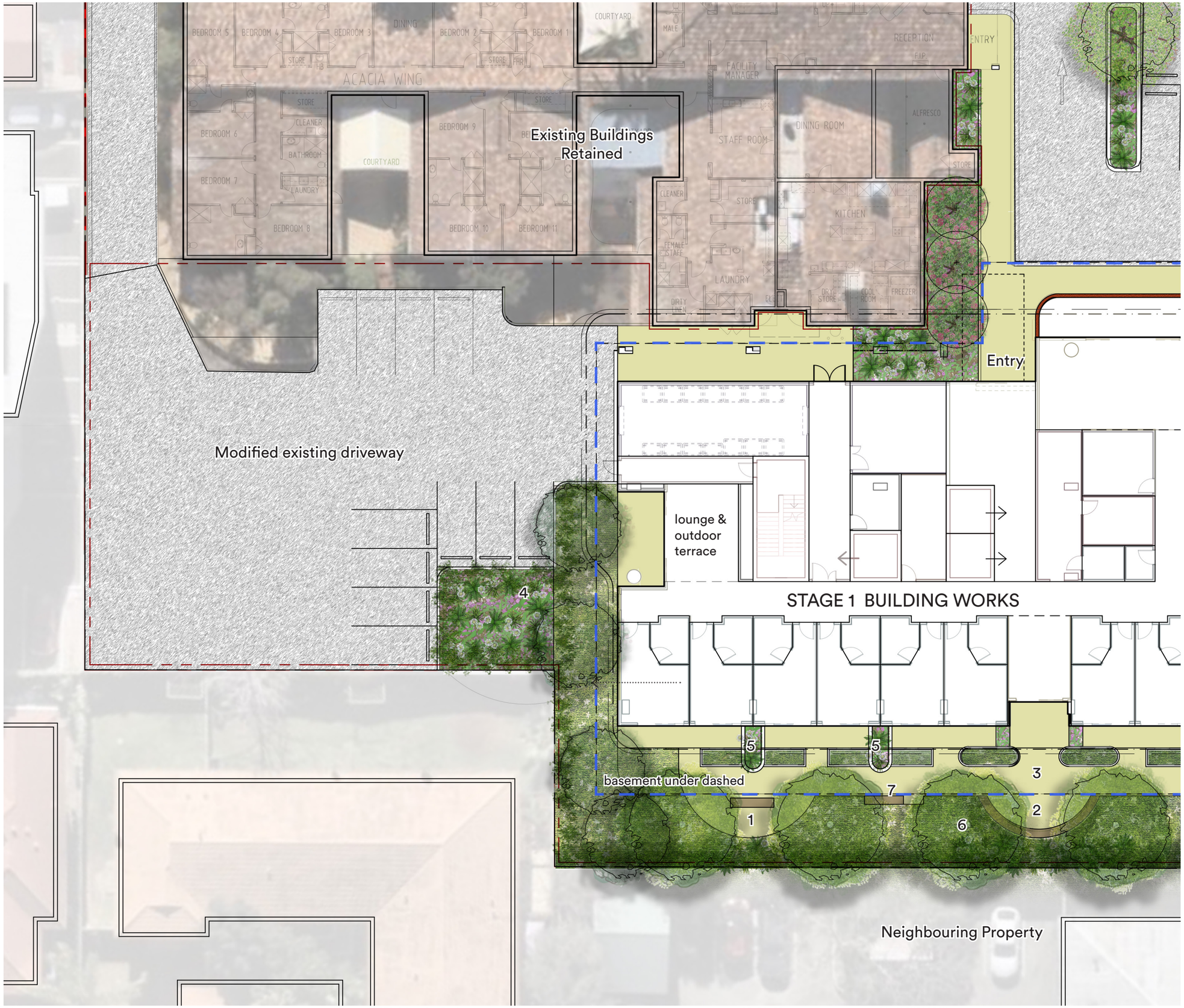
Rhaphiolepis 'Snow Maiden'

Phormium tenax



Arthropodium cirratum (Shade)

Landscape Plan
Stage 1_West



1 PRIVATE SHARED TERRACE
Communal area with bench, potential shared utility zone (e.g. potting bench) for residents to meet and gather.

2 COMMUNAL ALCOVES
Alcove to provide opportunities for fixed and loose furniture informal seating and gathering. Planting is shade resistant with opportunities for edibles and communal planting by residents.

3 PATHWAY CONNECTION
Public pathway connection between units above basement carpark deck.

4 GARDEN AND LOUNGE TERRACE
Planting is selected to be resilient against built conditions with a hedge of *Ricinocarpus* 'Pencil Form' and *Alogyne hakeifolia* to create a buffer zone between the driveway and resident's lounge. Screening to garden extents.

5 PRIVATE DIVIDING ALCOVES
Shade tolerant specie mix with tall raised planters providing divisions between units and privacy. Feature plants for a green outlook.

6 INFORMAL PLANTERS
Grouping of raised planters for residents for seasonal/select plantings

7 INFORMAL SEATING
Alcove to provide opportunities for informal seating and gathering. Planting is shade resistant and layered with a variety of textures and fragrance to create a sensorial experience.

8 SHADE TREES
A mix of shade trees of differing sccales (*Magnolia grandiflora, Ficus longifolia and Waterhousia floribunda*) in deep soil garden beds, providing visual privacy and scale to the development.

Refer indicative plant selections for landscape planting character of respective landscape elements.

INDICATIVE TREE SELECTIONS

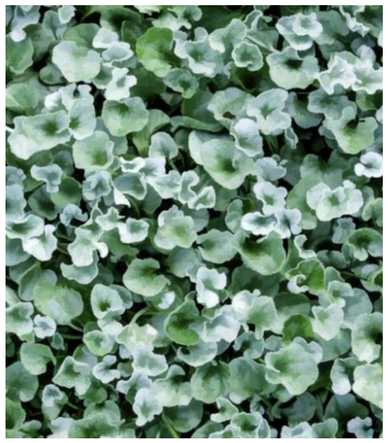
Magnolia grandiflora 'St Marys'
8m h x 5m w

Ficus longifolia
4-6m h x 3m w

Waterhousia floribunda
8m h x 4m w

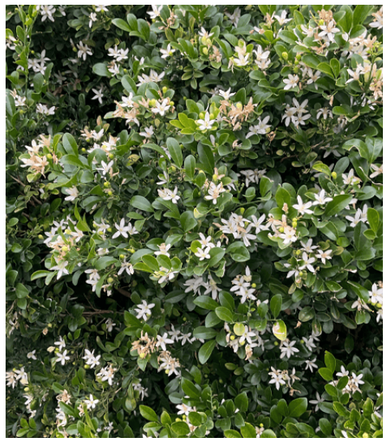
COMMUNAL ALCOVES

Casurina glauca 'Cousin It'



Dichondra argentea 'Silver Falls'

Liriope sp.



Murraya paniculata (hedging)

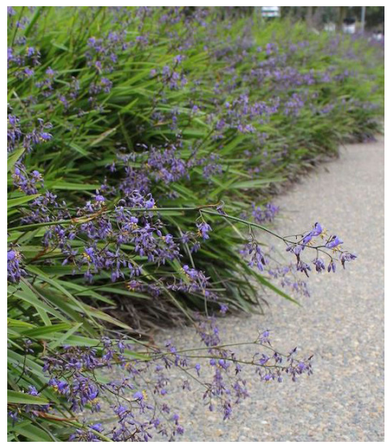
Ricinocarpos 'Pencil Form'

Rhaphiolepis 'Snow Maiden'

LOUNGE TERRACE

Opportunities for communal productive garden

Alyogyne hakeifolia 'Shelby Anne'

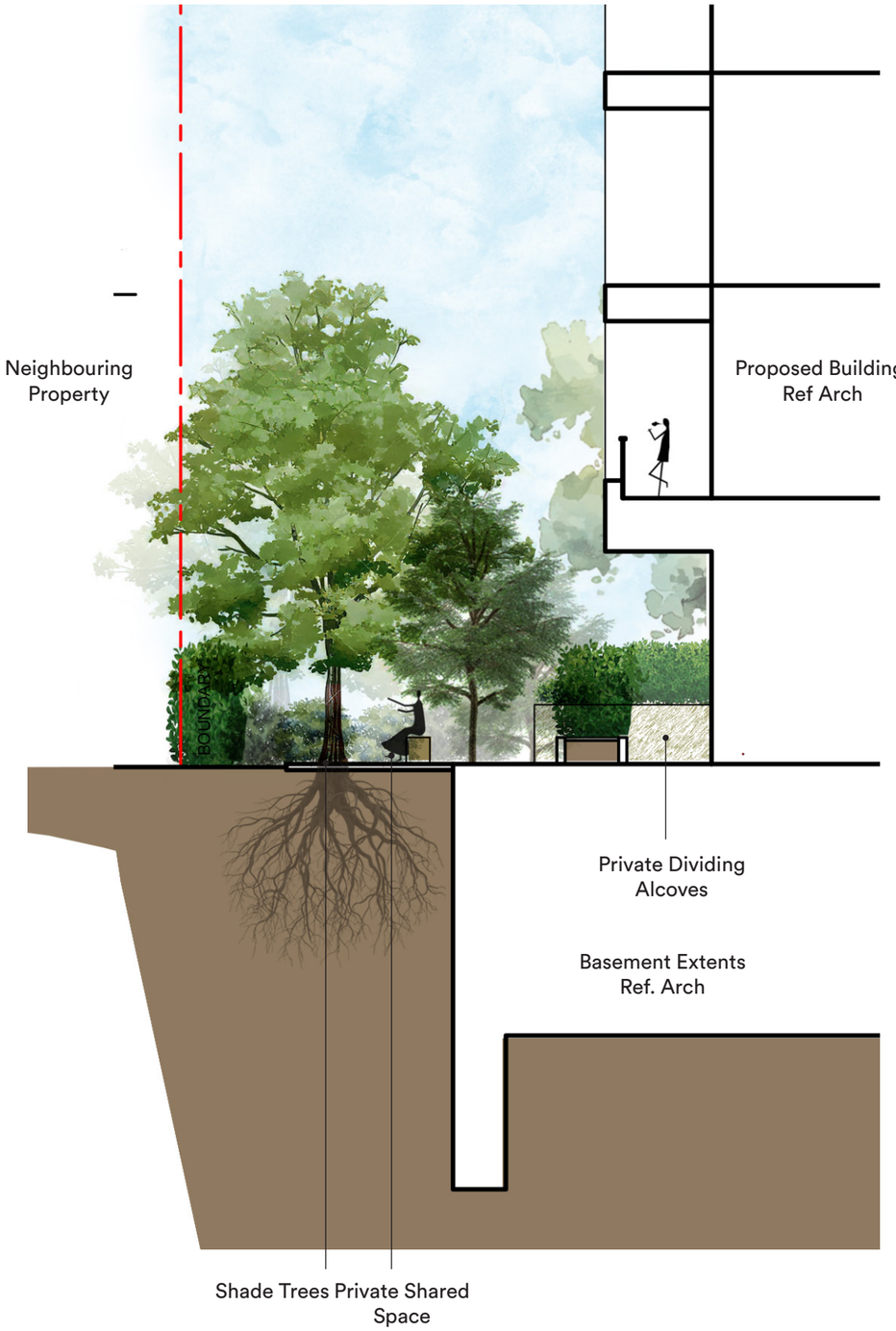


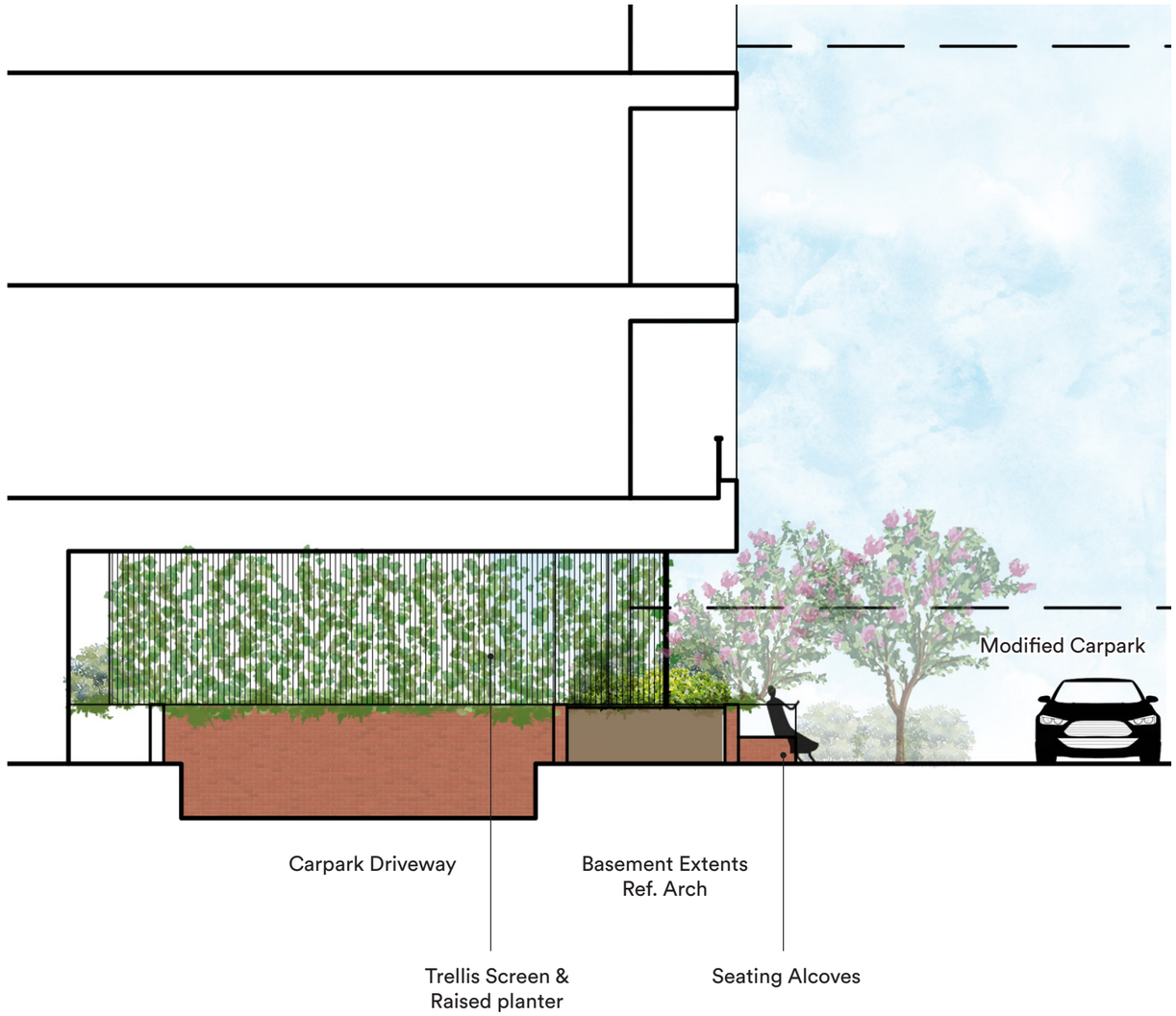
Dianella revoluta

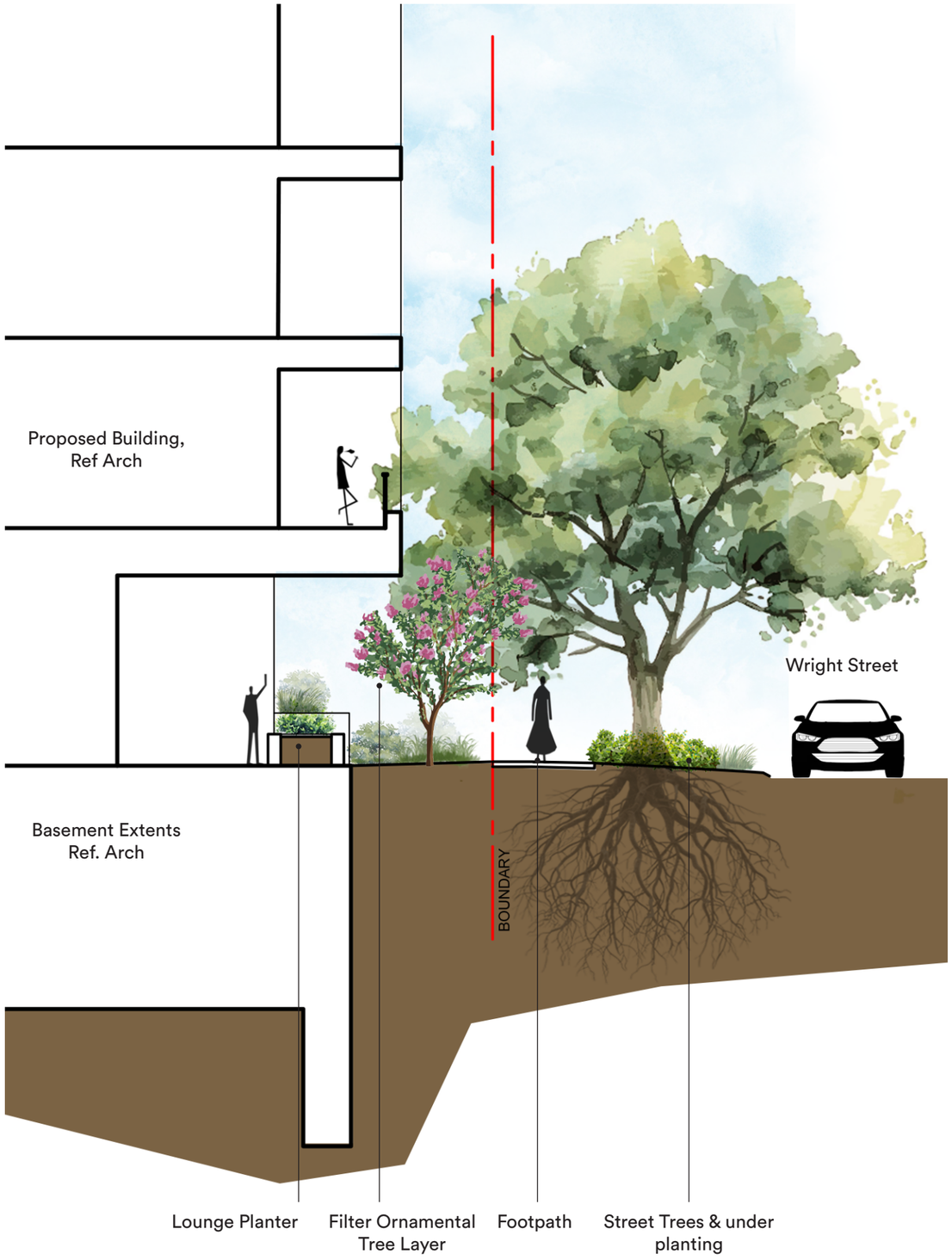
Ficinia nodosa

Olearia languinosa 'Ghost Town'

Landscape Section
Section A






Proposed Building,
Ref Arch
Wright Street
Basement Extents
Ref. Arch
BOUNDARY
Lounge Planter
Filter Ornamental
Tree Layer
Footpath
Street Trees & under
planting

1. BALCONY PLANTERS

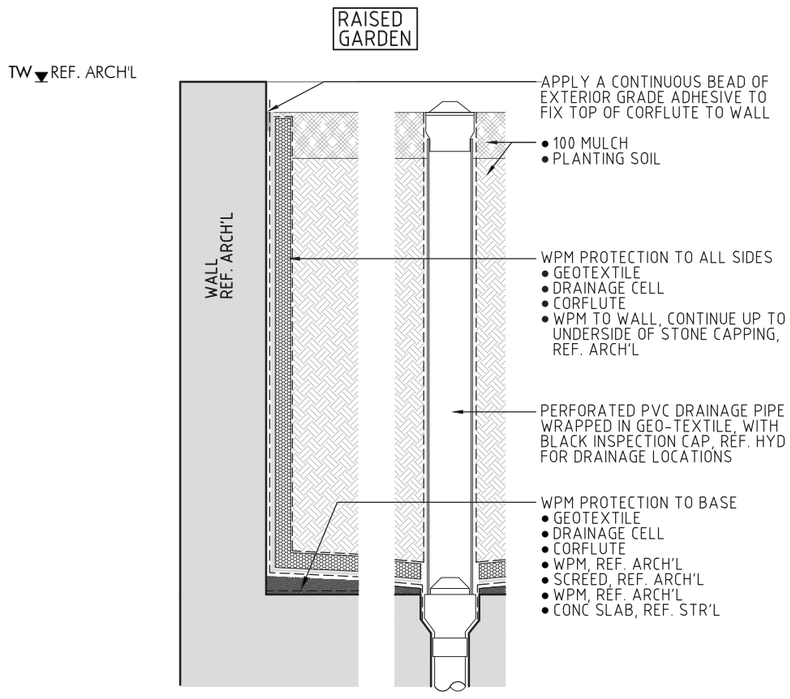
Balcony planters with cascading plants to suit north & south aspects and maintenance.

BALCONY PLANTERS

Adenenthous cuneatus

Myoporum parvifolium
'Broad Leaf'

Dianella 'Tas Red'



TYPICAL RAISED PLANTER DETAIL (ON PODIUM)
1:10

Landscape
Existing Trees

Stage 01 portion of the redevelopment features existing Triadica sebifera (Chinese Tallows) which will be retained and protected.

Protection strategies for existing trees along the verge will also be consulted with the arborist to ensure that redevelopment works have minimal impact on the their health and vigor.

1. Existing Triadica sebifera (Chinese Tallow) retained and protected.
2. Existing Eucalyptus sp. to be protected
3. Existing Lophestomon confertus (Queensland Brush Box) to be protected
4. Existing Melia azedarach (Cape Lilac) to be protected
5. Existing Triadica sebifera (Chinese Tallow) retained and protected

A. Existing tree to be removed for new building works.

B. Existing Elm proposed to be removed to protect Mead Cottage from damage.

Tree 01

Existing Chinese Tallow retained and protected

Landscape Plan_Stage 1
Tree Canopy Area Comparison

Existing tree canopy retained: ~85m²

Existing Trees removed: ~198m²

New Tree Canopy (at maturity): ~870m²

Net Tree Canopy Gain: ~672m²

Landscape Plan_Stage 1
Deep soil and Trees

Deep soil planted area - 651m² (14%)

Low planter (less than 600mm deep) - 57m²

Raised planter (1000 - 1200mm deep) - 157m²
Including upper floor balcony planters

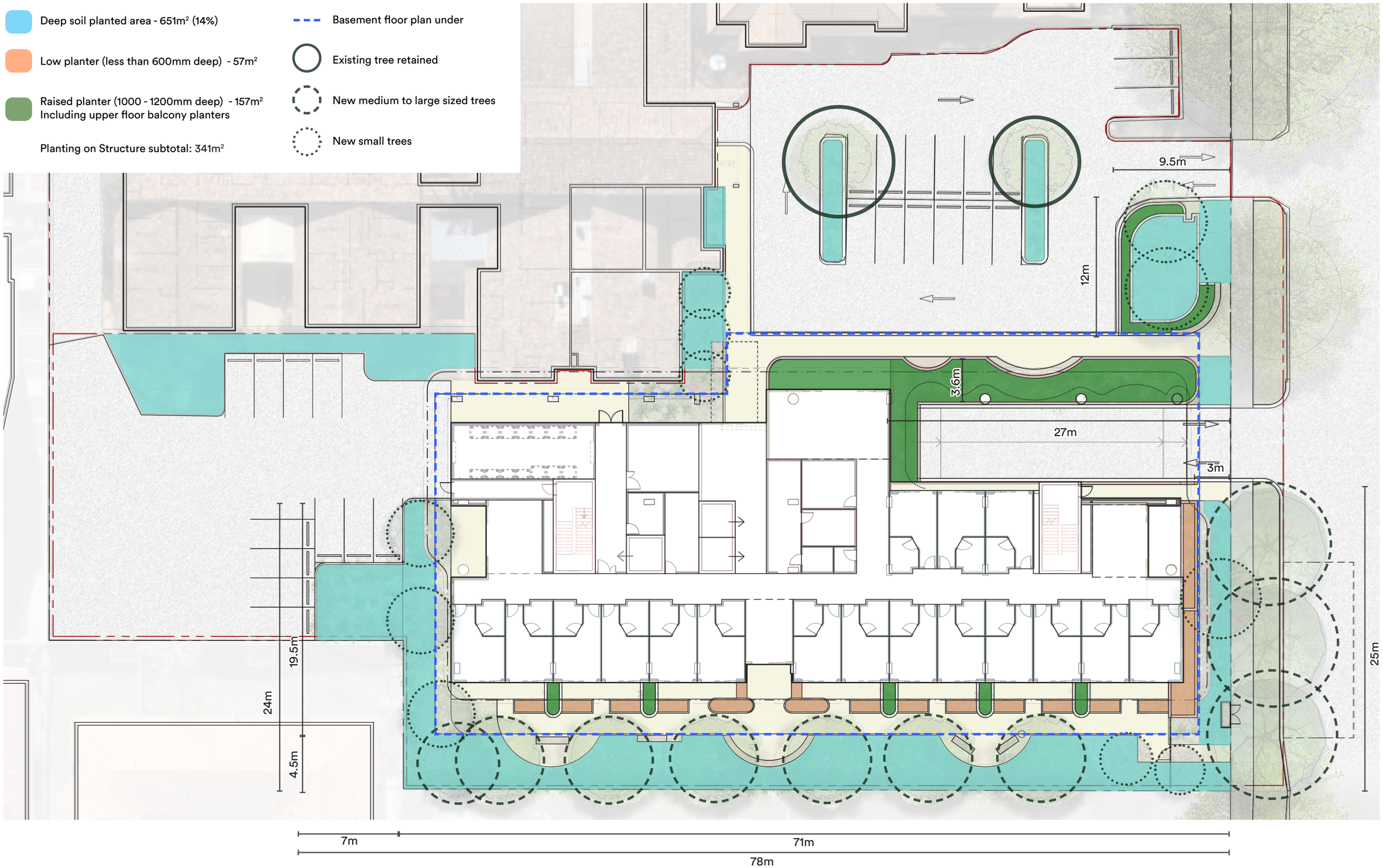
Planting on Structure subtotal: 341m²

Basement floor plan under

Existing tree retained

New medium to large sized trees

New small trees

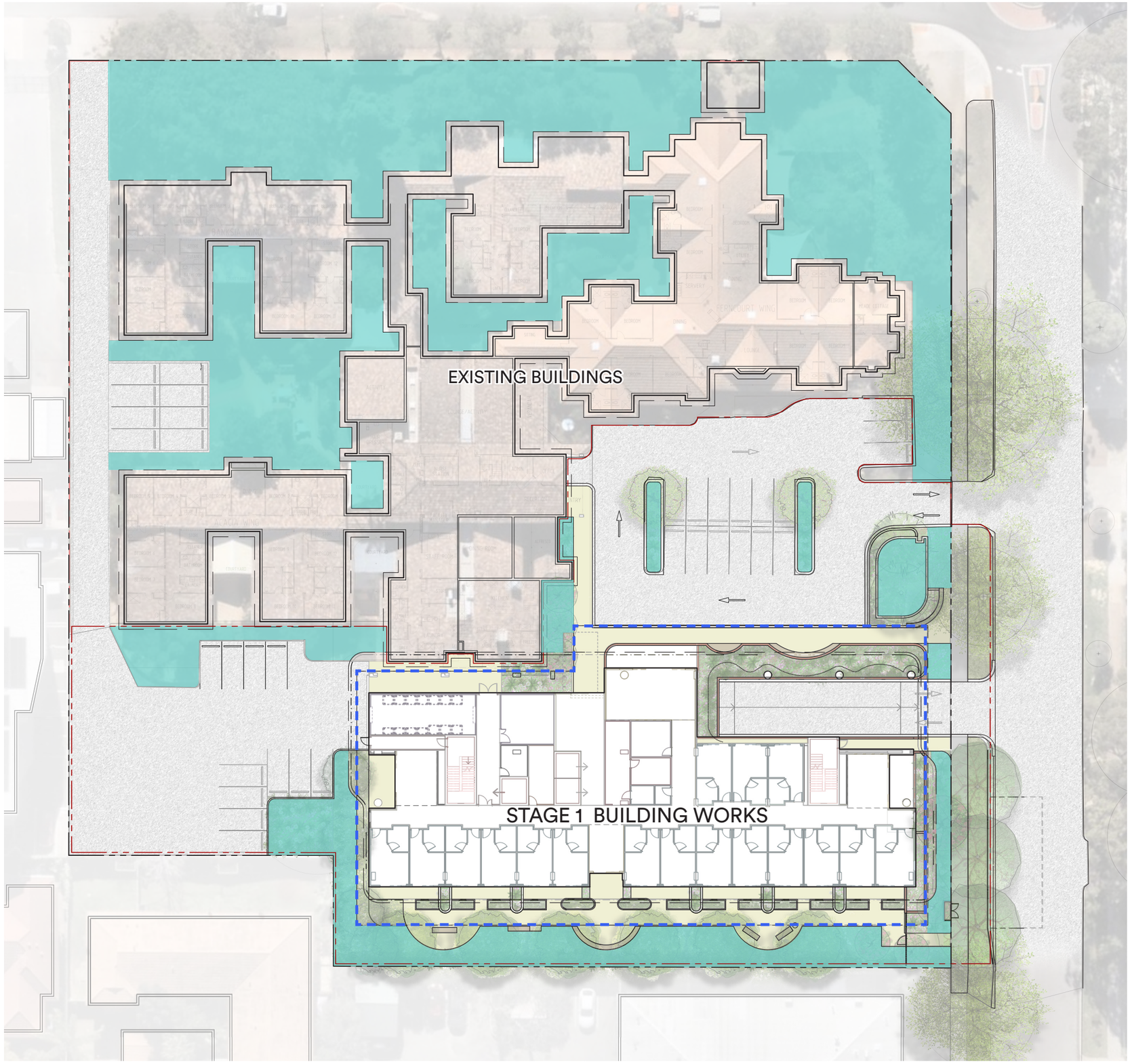


Landscape Plan_Overall
Deep Soil

Site Area: 10052m²

DSA Required: 1005m² (10%)

DSA Achieved: ~2608m² (26%)



Summer Solstice - 9:00am

Summer Solstice - 12:00pm

Summer Solstice - 03:00pm

Winter Solstice - 9:00am

Winter Solstice - 12:00pm

Winter Solstice - 03:00pm

Equinox - 9:00am

Equinox - 12:00pm

Equinox - 03:00pm

DRP 03 comments noted in blue, with CaPA responses below:

The applicant is encouraged to increase the primary street setback to Wright Street in order to introduce larger trees and denser landscaping in the setback in-front of the building to soften the streetscape interface.

In respect to the landscaping, planting to the primary street setback will be multi-layered and elevational in character. The street will have a layered elevation of tree canopies, with large trees and elevated canopies to street, a row of smaller street towards the building, with hedging below.

The proposal includes areas of asphalt where permeable paving could be implemented to encourage growth of on-site landscaping and trees such as in the parking bays. The applicant is encouraged to reduce the extent of asphalt within close proximity to planting areas where possible.

We agree in principle to the above recommendation, however we believe that this is not advantageous in this instance for the below reasons:

- Planting site area is going over basement.
- Planting to and adjacent to the carpark bays is in majority all in raised planters. Porous paving over basement has no benefit in this instance.
- Porous paving to parking adjacent to the site area would no benefit in this instance as the trees in the carpark will be moved into the future and making porous would require redoing the sub-strate and be cost prohibitive. This area is going to be demolished into the future for a future basement carpark extension.

The carpark area has deciduous trees which can result in higher maintenance requirements. The applicant is encouraged to consider larger evergreen tree species within the carpark area.

Evergreen trees have now been included in this area

The north side carpark area soil volume and width allocated for transplanted trees appears minimal. There appears to be an opportunity to increase soil volume and introduce additional tree planting in this area to screen / soften the carpark and maximise shading to the pedestrian entry.

The planters have been widened whilst keeping the current parking aisle arrangements

The provision of on-structure landscaping is supported however further details in relation to planter depths / volumes, drainage, reticulation and maintenance access are required to illustrate these areas will contribute to the development long term.

Details and reference images of planters on podium have been included in this DA Submission.

The edge condition / fence between the site and adjoining south property has not currently been shown. Given communal spaces are located on the south side of the building the applicant is encouraged to show this clearly and consider it as an opportunity for climbing planting to generate a soft boundary edge condition.

Noted in section.

Plant species selections will be critical as the shade modelling indicates many spaces will go from extremes of full sun to full shade. Consider species (deciduous and evergreen) and crown shape as well as height to ensure these spaces are as thermally comfortable as possible across the seasons.

Noted and can be achieved.

Within the communal informal seating areas ensure the proposed seating configurations support family gathering with people sitting directly opposite each other as well as accessible tables for larger gatherings such as birthdays.

Noted and included. A combination of fixed and loose seating have been included to achieve this amenity with flexibility.

CITY OF VINCENT

ATTACHMENT 7

DEVELOPMENT ASSESSMENT PANEL MEETING

Acoustic Report

SILVER THOMAS HANLEY

RESIDENTIAL AGED CARE
21 WRIGHT STREET
HIGHGATE

ACOUSTIC REPORT

JUNE 2026

OUR REFERENCE: 36641-2-26226

Rochdale Holdings Pty Ltd A.B.N. 85 009 049 067 trading as:
HERRING STORER ACOUSTICS
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DOCUMENT CONTROL PAGE

ACOUSTIC REPORT

RESIDENTIAL AGED CARE
21 WRIGHT STREET, HIGHGATE

Job No: 26226

Document Reference: 36641-2-26226

FOR

SILVER THOMAS HANLEY

DOCUMENT INFORMATION			
Author:	Aidan Strumpher	**Checked By:**	George Watts
Date of Issue:	18th June 2026		

REVISION HISTORY

Revision	Description	Date	Author	Checked
1	Updated drawings	17/07/26	AS	GW

DOCUMENT DISTRIBUTION

Version No.	Destination
2	Silver Thomas Hanley Attn: Adele Teh Email: adele@silverthomashanley.com

This report has been prepared in accordance with the scope of services and on the basis of information and documents provided to Herring Storer Acoustics by the client. To the extent that this report relies on data and measurements taken at or under the times and conditions specified within the report and any findings, conclusions or recommendations only apply to those circumstances and no greater reliance should be assumed. The client acknowledges and agrees that the reports or presentations are provided by Herring Storer Acoustics to assist the client to conduct its own independent assessment.

CONTENTS

1.0	INTRODUCTION		1
2.0	CRITERIA		1
	2.1	NCC PROVISIONS	1
	2.2	ENVIRONMENTAL PROTECTION (NOISE) REGULATIONS 1997	2
	2.3	ROAD AND RAIL NOISE	3
	2.4	TOWN OF VINCENT POLICY 7.5.21 - SOUND ATTENUATION	6
3.0	NCC REQUIREMENTS		7
	3.1	WALL CONSTRUCTION	7
	3.2	FLOOR CONSTRUCTION	7
	3.3	GENERAL BUILDING NOTES	7
4.0	NOISE EMISSIONS		7
	4.1	RECEIVERS	7
	4.2	NOISE EMISSIONS	8
5.0	NOISE INGRESS		9
	5.1	TRAFFIC NOISE	9
	5.2	CONSTRUCTION REQUIREMENTS	10

APPENDICES

A PLANS

B EXTRACT OF PART F7 OF NCC

1.0 INTRODUCTION

Herring Storer Acoustics was commissioned to undertake a review of the proposed residential aged care development at 21 Wright Street, Highgate, with regards to compliance with Part F7 of the *National Construction Code 2022* (NCC), the *Environmental Protection (Noise) Regulations 1997*, *State Planning Policy 5.4*, and the Town of Vincent's *Policy 7.5.21 - Sound Attenuation*.

Part F7 of the NCC details the requirements for sound transmission and insulation within residential type buildings. The *Environmental Protection (Noise) Regulations 1997* details requirements for noise emission from a premises. State Planning Policy 5.4 provides requirements regarding noise ingress from major transport routes. Town of Vincent's *Policy 7.5.21* provides a framework for managing noise impacts in an area of mixed land uses.

The proposed development is a six storey residential aged care development located on the site of the existing Aegis residential aged care facility.

The report is based upon drawings provided for the Design Review Panel, revision C, dated February 2026.

2.0 CRITERIA

2.1 NCC PROVISIONS

For Class 2 or 3 buildings, the appropriate sections of Part F7 "Sound transmission and insulation" relating to the acoustic criteria are attached in Appendix B for information. Table 2.1 summarises the deemed to satisfy requirements of Part F7.

TABLE 2.1 – SUMMARY OF NCC REQUIREMENTS

Space of separation	Acoustic Rating	Discontinuous Construction Required
WALLS		
Wet to wet	$R_W + C_{tr}$ not less than 50 dB	NO
Living to living	$R_W + C_{tr}$ not less than 50 dB	NO
Wet to living	$R_W + C_{tr}$ not less than 50 dB	YES
Kitchens to living	$R_W + C_{tr}$ not less than 50 dB	YES
Unit to plantroom, stairway Public corridor / lobby or alike	R_W not less than 50 dB.	NO
Unit to Lift shaft	R_W not less than 50 dB.	YES
Unit to part of a different classification	R_W not less than 50 dB.	NO
FLOORS		
Between Sole Occupancy Units	$R_W + C_{tr}$ not less than 50 dB.	N/A
	$L_{n,w}$ not more than 55 dB is recommended	N/A
Separating a Sole Occupancy Units and a plant room, stairway, corridor, lobby or part of a different classification.	$R_W + C_{tr}$ not less than 50 dB.	N/A
	$L_{n,w}$ not more than 55 dB is recommended	N/A
SERVICE RISERS / STORM WATER DOWN PIPES		
to Habitable Rooms	$R_W + C_{tr}$ not less than 40 dB.	NO
to Non-Habitable Rooms	$R_W + C_{tr}$ not less than 25 dB	NO
DOORS		
Doors to Sole Occupancy Units	R_W not less than 30 dB	NO

Notes:

1 Where kitchens are part of an open living area, kitchens are considered to be part of the living area and in these cases discontinuous construction is required. This also includes cases where kitchens are back-to-back, however, discontinuous construction is only required on one side.

2 Wet areas include bathrooms, ensuites, sanitary compartments/powder rooms, laundries and kitchens.

3 For the purposes of this Part, discontinuous construction means a wall having a minimum 20 mm cavity between 2 separate leaves, and—

(a) for masonry, where wall ties are required to connect leaves, the ties are of the resilient type; and
(b) for other than masonry, there is no mechanical linkage between leaves except at the periphery.

2.2 ENVIRONMENTAL PROTECTION (NOISE) REGULATIONS 1997

The *Environmental Protection (Noise) Regulations 1997* stipulate the allowable noise levels at any noise sensitive premises from other premises. The allowable or assigned noise levels for noise sensitive premises are determined by the calculation of an influencing factor, which is added to the baseline criteria set out in Table 1 of the Regulations. The baseline assigned noise levels are listed in Table 2.2. For commercial premises, the allowable or assigned noise levels are the same for all hours of the day. Table 2.2 also lists the assigned noise levels for commercial premises.

TABLE 2.2 – ASSIGNED NOISE LEVELS

Premises Receiving Noise	Time of Day	Assigned Level (dB)		
		$L_{A\ 10}$	$L_{A\ 1}$	$L_{A\ max}$
Noise sensitive premises within 15 metres of a dwelling	0700 - 1900 hours Monday to Saturday	45 + IF	55 + IF	65 + IF
	0900 - 1900 hours Sunday and Public Holidays	40 + IF	50 + IF	65 + IF
	1900 - 2200 hours all days	40 + IF	50 + IF	55 + IF
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and Public Holidays	35 + IF	45 + IF	55 + IF
Commercial premises	All hours	60	75	80

Note: The L_{A10} noise level is the noise that is exceeded for 10% of the time.
The L_{A1} noise level is the noise that is exceeded for 1% of the time.
The L_{Amax} noise level is the maximum noise level recorded.

It is a requirement that noise from the site be free of annoying characteristics (tonality, modulation and impulsiveness) at other premises, defined below as per Regulation 9.

"impulsiveness" means a variation in the emission of a noise where the difference between L_{Apeak} and $L_{Amax\ Slow}$ is more than 15dB when determined for a single representative event;

"modulation" means a variation in the emission of noise that –

(a) is more than 3dB $L_{A\ Fast}$ or is more than 3dB $L_{A\ Fast}$ in any one-third octave band;
(b) is present for more at least 10% of the representative assessment period; and
(c) is regular, cyclic and audible;

"tonality" means the presence in the noise emission of tonal characteristics where the difference between –

(a) the A-weighted sound pressure level in any one-third octave band; and
(b) the arithmetic average of the A-weighted sound pressure levels in the 2 adjacent one-third octave bands, is greater than 3 dB when the sound pressure levels are determined as $L_{Aeq,T}$ levels where the time period T is greater than 10% of the representative assessment period, or greater than 8 dB at any time when the sound pressure levels are determined as $L_{A\ Slow}$ levels.

Where the above characteristics are present and cannot be practicably removed, the following adjustments are made to the measured or predicted level at other premises.

TABLE 2.3 – ADJUSTMENTS FOR ANNOYING CHARACTERISTICS

Where tonality is present	Where modulation is present	Where impulsiveness is present
+ 5 dB	+ 5 dB	+ 10 dB

Where the noise emission is music, then any measured level is adjusted according to Table 2.4 below.

TABLE 2.4 – ADJUSTMENTS TO MEASURED MUSIC NOISE LEVELS

Where **impulsiveness** is not present	Where **impulsiveness** is present
+10 dB(A)	+15 dB(A)

2.3 ROAD AND RAIL NOISE

The Western Australian Planning Commission (WAPC) released on 6th September 2019 State Planning Policy 5.4 *"Road and Rail Noise".* The requirements of State Planning Policy 5.4 are outlined below.

POLICY APPLICATION (Section 4)

When and where it applies (Section 4.1)

SPP 5.4 applies to the preparation and assessment of planning instruments, including region and local planning schemes; planning strategies, structure plans; subdivision and development proposals in Western Australia, where there is proposed:

a) *noise-sensitive land-use within the policy's trigger distance of a transport corridor as specified in **Table 1**;*

b) *New or major upgrades of roads as specified in **Table 1** and maps **(Schedule 1,2 and 3);** or*

c) *New railways or major upgrades of railways as specified in maps (**Schedule 1, 2 and 3);** or any other works that increase capacity for rail vehicle storage or movement and will result in an increased level of noise.*

Policy trigger distances (Section 4.1.2)

***Table 1** identifies the State's transport corridors and the trigger distances to which the policy applies.*

*The designation of land within the trigger distances outlined in **Table 1** should not be interpreted to imply that land is affected by noise and/or that areas outside the trigger distances are un-affected by noise.*

*Where any part of the lot is within the specified trigger distance, an assessment against the policy is required to determine the likely level of transport noise and management/ mitigation required. An initial screening assessment (**guidelines: Table 2: noise exposure forecast**) will determine if the lot is affected and to what extent."*

TABLE 1: TRANSPORT CORRIDOR CLASSIFICATION AND TRIGGER DISTANCES

Transport corridor classification	***Trigger distance***	***Distance measured from***
Roads		
Strategic freight and major traffic routes *Roads as defined by Perth and Peel Planning Frameworks and/or roads with either 500 or more Class 7 to 12 Austroads vehicles per day, and/or 50,000 per day traffic volume*	*300 metres*	*Road carriageway edge*
Other significant freight/traffic routes *These are generally any State administered road and/or local government road identified as being a future State administered road (red road) and other roads that meet the criteria of either >=23,000 daily traffic count (averaged equivalent to 25,000 vehicles passenger car units under region schemes)*	*200 metres*	*Road carriageway edge*
Passenger railways		
	100 metres	*Centreline of the closest track*
Freight railways		
	200 metres	*Centreline of the closest track*

Proponents are advised to consult with the decision making authority as site specific conditions (significant differences in ground levels, extreme noise levels) may influence the noise mitigation measures required, that may extend beyond the trigger distance.

POLICY MEASURES (Section 6)

The policy applies a performance-based approach to the management and mitigation of transport noise. The policy measures and resultant noise mitigation will be influenced by the function of the transport corridor and the type and intensity of the land-use proposed. Where there is risk of future land-use conflict in close proximity to strategic freight routes, a precautionary approach should be applied. Planning should also consider other broader planning policies. This is to ensure a balanced approach takes into consideration reasonable and practical considerations.

Noise Targets (Section 6.1)

***Table 2** sets out noise targets that are to be achieved by proposals under which the policy applies. Where exceeded, an assessment is required to determine the likely level of transport noise and management/mitigation required.*

In the application of the noise targets the objective is to achieve:

- *indoor noise levels as specified in **Table 2** in noise sensitive areas (for example, bedrooms and living rooms of houses, and school classrooms); and*
- *a reasonable degree of acoustic amenity for outdoor living areas on each residential lot. For non-residential noise-sensitive developments, for example schools and child care centres the design of outdoor areas should take into consideration the noise target.*

It is recognised that in some instances, it may not be reasonable and/or practicable to meet the outdoor noise targets. Where transport noise is above the noise targets, measures are expected to be implemented that balance reasonable and practicable considerations with the need to achieve acceptable noise protection outcomes.

TABLE 2: NOISE TARGETS

Proposals	***New/Upgrade***	***Noise Targets***		
		Outdoor		***Indoor***
		Day (L_{Aeq}(Day) dB) (6 am-10 pm)	***Night (L_{Aeq}(Night)dB) (10 pm-6 am)***	***(L_{Aeq} dB)***
Noise-sensitive land-use and/or development	*New noise sensitive land use and/or development within the trigger distance of an existing/proposed transport corridor*	*55*	*50*	*L_{Aeq} (Day) 40(Living and work areas) L_{Aeq} (Night) 35 (bedrooms)*
Roads	*New*	*55*	*50*	*N/A*
	Upgrade	*60*	*55*	*N/A*
Railways	*New*	*55*	*50*	*N/A*
	Upgrade	*60*	*55*	*N/A*

Notes:

- *The noise target is to be measured at one metre from the most exposed, habitable façade of the proposed building, which has the greatest exposure to the noise-source. A habitable room has the same meaning as defined in State Planning Policy 3.1 Residential Design Codes.*
- *For all noise-sensitive land-use and/or development, indoor noise targets for other room usages may be reasonably drawn from Table 1 of Australian Standard/New Zealand Standard AS/NZS 2107:2016 Acoustics – Recommended design sound levels and reverberation times for building interiors (as amended) for each relevant time period.*
- *The 5dB difference in the criteria between new and upgrade infrastructure proposals acknowledges the challenges in achieving noise level reduction where existing infrastructure is surrounded by existing noise-sensitive development.*
- *Outdoor targets are to be met at all outdoor areas as far as is reasonable and practical to do so using the various noise mitigation measures outlined in the guidelines. For example, it is likely unreasonable for a transport infrastructure provider to achieve the outdoor targets at more than 1 or 2 floors of an adjacent development with direct line of sight to the traffic.*

Noise Exposure Forecast (Section 6.2)

When it is determined that SPP 5.4 applies to a planning proposal as outlined in Section 4, proponents and/or decision makers are required to undertake a preliminary assessment using ***Table 2****: noise exposure forecast in the guidelines. This will provide an estimate of the potential noise impacts on noise-sensitive land-use and/ or development within the trigger distance of a specified transport corridor. The outcomes of the initial assessment will determine whether:*

- *no further measures is required;*
- *noise-sensitive land-use and/or development is acceptable subject to deemed-to- comply mitigation measures; or*
- *noise-sensitive land-use and/or development is not recommended. Any noise-sensitive land-use and/ or development is subject to mitigation measures outlined in a noise management plan."*

2.4 TOWN OF VINCENT POLICY 7.5.21 - SOUND ATTENUATION

The following minimum standards shall be applied as the relevant reference criteria upon which the Acoustic Report is to be prepared.

a) Inbound Noise (Residential Development)
   i) Residential buildings are to be designed to achieve the following sound levels:
   - L_{eq} 35 dB(A) in sleeping areas (bedrooms); and
   - L_{eq} 40 dB(A) in living/work areas and other habitable rooms.

IMPORTANT NOTE: The L_{eq} level should not be unduly biased toward the lower frequencies of the octave band spectrum. If lower frequencies are dominant in sound levels taken during the sampling phase of reporting (between 31.50-125Hz), the Acoustic Consultant/Engineer shall discuss the findings with the City's Senior Environmental Health Officer or Manager Health Services in developing solutions.

   ii) Residential developments are to be constructed to meet the requirements of the National Construction Code Series 2012 Building Code of Australia Part F5 *[Superseded by the NCC 2022 Part F7]*.
   iii) For all other developments, noise intrusion is to be controlled to achieve the indoor design sound levels for buildings as set out in Australian Standard AS/NZS2107: Acoustics - Recommended Design Sound Levels and Reverberation Times for Building Interiors.

b) Outbound Noise (All Developments)
   i) Noise emissions from all developments are to comply with the 'assigned levels' detailed in the Environmental Protection (Noise) Regulations 1997.

3.0 NCC REQUIREMENTS

3.1 WALL CONSTRUCTION

Acoustic requirements per the NCC for walls are summarised in Section 2.1.

3.2 FLOOR CONSTRUCTION

Floors separating apartments require an R_w+C_{tr} of not less than 50 dB and an $L_{n,w}$ of not more than 55 dB is recommended.

3.3 GENERAL BUILDING NOTES

S28C3 of the NCC (included in Appendix B) lists details regarding the installation of building elements separating SOUs.

4.0 NOISE EMISSIONS

Noise emissions from the development include noise from mechanical plant and from delivery vehicles.

4.1 RECEIVERS

The development is located in a residential area at the corner of Lincoln and Wright Streets. An illustration of the surrounding area is included in Figure 4.1.

FIGURE 4.1 – SURROUNDING AREA

Nearby noise sensitive receivers are identified in Table 4.1 and illustrated in Figure 4.2. Where multiple premises are grouped together the highest noise levels received by any premises in a group are reported.

TABLE 4.1 – NOISE SENSITIVE RECEIVERS

Receiver	Description
R1	Apartments at 12 Smith Street
R2	Apartments at 34 Bulwer Street
R3	Residences across Wright Street
R4	Residences across Lincoln Street

FIGURE 4.2 – NOISE SENSITIVE RECEIVERS

The influencing factor for these nearby residences is calculated as follows:

TABLE 4.2 – INFLUENCING FACTOR CALCULATION

Component	Contribution	Influencing Factor (dB)
Commercial within 450m	20%	1
Major Road within 450m	Lord Street (20,300 vpd)	2
Total (rounded)		**3**

As such the assigned levels for these receivers is summarised in Table 4.3.

TABLE 4.3 - ASSIGNED OUTDOOR NOISE LEVEL

Premises Receiving Noise	Time of Day	Assigned Level (dB)		
		L_{A10}	L_{A1}	L_{Amax}
Noise sensitive premises within 15 metres of a dwelling	0700 - 1900 hours Monday to Saturday	48	58	68
	0900 - 1900 hours Sunday and Public Holidays	43	53	68
	1900 - 2200 hours all days	43	53	58
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and Public Holidays	38	48	58

Note: L_{A10} is the noise level exceeded for 10% of the time.
L_{A1} is the noise level exceeded for 1% of the time.
L_{Amax} is the maximum noise level.

4.2 NOISE EMISSIONS

The main source of noise associated with the apartments within the development is the mechanical services including air conditioners and car park exhaust ventilation as

well as noise from deliveries. Emissions from these sources will be required to comply with the requirements of the *Environmental Protection (Noise) Regulations 1997*.

As mechanical services can operate during the night period the critical assigned level is the night time period L_{A10} of 38 dB(A). These emissions are typically tonal in nature and hence carry a +5 adjustment to their assessable level. The design level for mechanical plant selections is therefore 33 dB(A) at the nearest residences. As mechanical plant is to be located on the roofs of the buildings within plant enclosures this criteria is not considered difficult to meet. A detailed assessment of mechanical plant noise should be undertaken once plant selections and locations are known.

The development features a loading dock on the western corner of the lot with access from Lincoln Street, overlooked by a multi-story residential building at 12 Smith Street. Noise emissions from truck movements within this space are assessed in Table 4.4, based on a truck sound power level of 85 dB(A), representing a medium sized delivery truck travelling slowly. Delivery truck movements are assessed against the L_{A1} assigned level.

TABLE 4.4 – LOADING BAY TRUCK MOVEMENT ASSESSMENT

Receiver	Assessable Level dB(A)	Period	L_{A1} Assigned Level dB(A)	Exceedance
R1	58	Day	58	Complies
		Evening/Sunday/PH	53	+5
		Night	48	+10
R2	46	Day	58	Complies
		Evening/Sunday/PH	53	Complies
		Night	48	Complies
R3	25	Day	58	Complies
		Evening/Sunday/PH	53	Complies
		Night	48	Complies
R4	46	Day	58	Complies
		Evening/Sunday/PH	53	Complies
		Night	48	Complies

Truck movements within the loading bay comply with the criteria during the day period from 7:00 am to 7:00 pm Monday through Saturday. Noise emissions from delivery trucks can be managed by limiting deliveries to the hours during which they comply.

5.0 NOISE INGRESS

Per State Planning Policy 5.4 and the Town of Vincent Policy the design levels for rooms in residences are 35 and 40 dB(A) for sleeping areas and living/working areas respectively.

5.1 TRAFFIC NOISE

The development is within the State Planning Policy 5.4 trigger distance of Lord Street. Traffic noise on Lord Street was measured on the 10th of June 2026 near Lincoln Street for approximately 15 minutes at 4:00 pm. This time period corresponds with peak traffic time. This measurement and the estimated night time LAeq,8h based on the DEFRA *Method For Converting The Uk Road Traffic Noise Index $L_{a10,18h}$ To The EU Noise Indices For Road Noise Mapping* is summarised in Table 5.1.

TABLE 5.1 – ROAD NOISE MEASUREMENT dB(A)

L_{Aeq}	L_{A10}	$L_{Aeq,8h\ (night)}$
72.1	75.5	64.2

5.2 CONSTRUCTION REQUIREMENTS

The façade design of the building is yet to be confirmed. Based on the above measurements a preliminary assessment of the noise received at the development has been undertaken. Table 5.2 summarises the modelling inputs.

TABLE 5.2 - NOISE MODELLING INPUT DATA

Parameter	Lord Street (Current) 2025	Lord Street (Future) 2045
Traffic Volumes	22,000 vpd*	32,700 vpd**
Percentage traffic 0600 – 2400 hours (Assumed)	94%	94%
Heavy Vehicles (%) (Assumed)	5.5%	5.5%
Speed (km/hr)	60 km/hr	60 km/hr
Road Surface	No change	

* Based on an assumed 2% per year growth in traffic from most recent MRWA traffic map observations

Predicted noise levels received at the façade of the development for future traffic volumes, including a +2.5 dB adjustment for façade reflection, are summarised in Table 5.4 below.

TABLE 5.3 – NOISE LEVELS RECEIVED dB(A)

	Façade			
Level	**NW**	**SW**	**SE**	**NE**
GF	35	52	53	49
1F	36	56	55	50
2F	37	57	57	51
3F	40	59	59	52
4F	43	60	61	53
5F	48	61	62	54

In order to meet the requirements of State Planning Policy 5.4 external walls must meet R_w+C_{tr} requirements as indicated in Table 5.4.

TABLE 5.4 – WALL R_w+C_{tr} REQUIREMENTS

Façade	Level	R_w+C_{tr} Requirement
Southeast	1 – 2	45
	3 – 5	50
Southwest	1 – 2	45

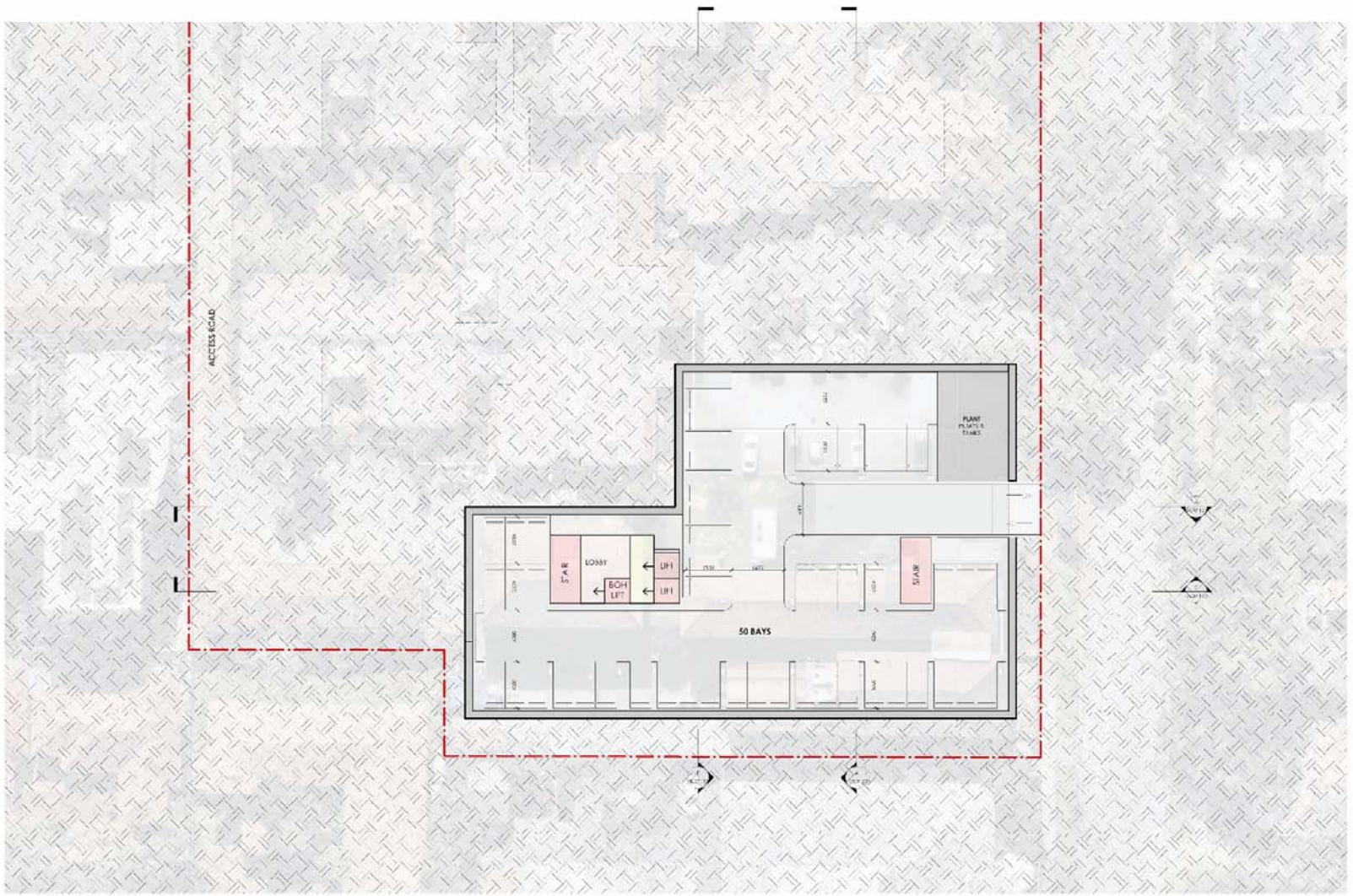
Glazing requirements to meet the target internal noise levels for bedrooms are listed in Table 5.5. R_w+C_{tr} 24 can be met with a 6.38mm – 6mm air gap – 5mm double glazing system or equivalent. Unlisted elements will meet the requirements with standard construction.

TABLE 5.5 – GLAZING R_w+C_{tr} REQUIREMENTS

Façade	Level	R_w+C_{tr} Requirement
Southwest	4 – 5	24

APPENDIX A

Drawings



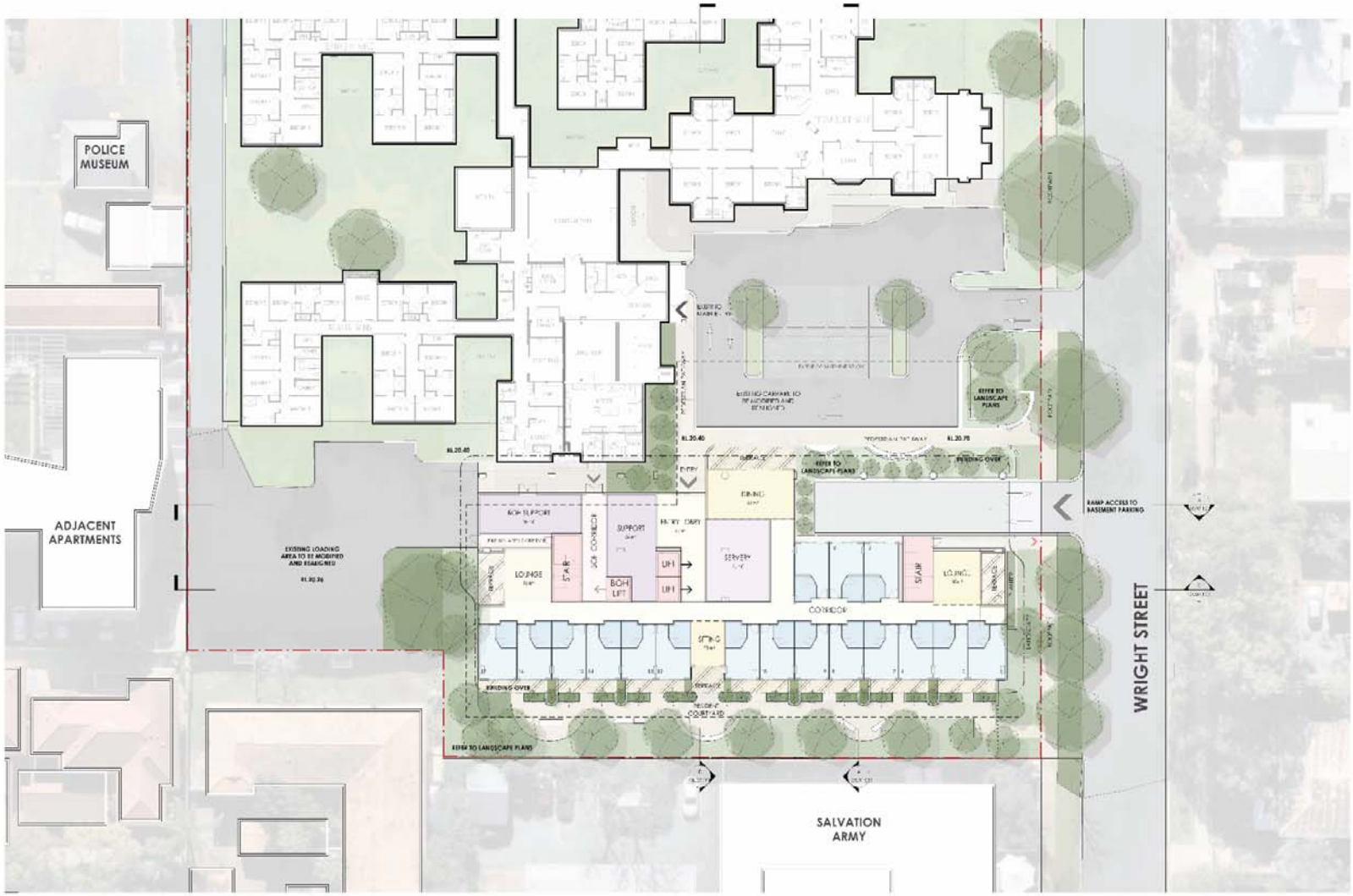
silver thomas hanley

BASEMENT PLAN
AEGIS LINCOLN PARK

DRAFT
DEVELOPMENT APPLICATION
WORK IN PROGRESS

Scale 1:200 @ A1 / 1:400 @ A3 Date

Project No.	Sheet No.	Revision	Revision Date
3426	SK.03.001	B	08/05/2026



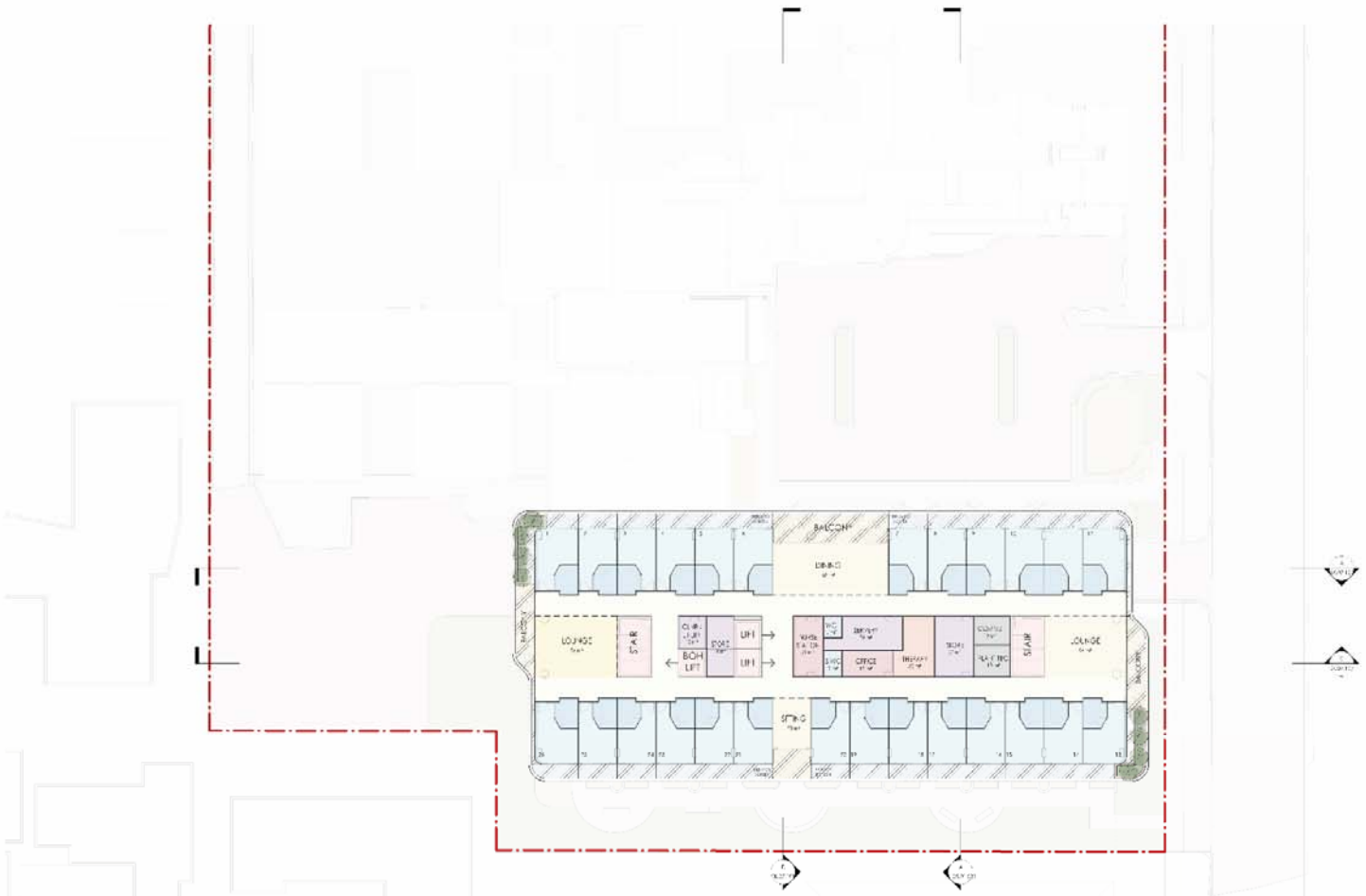
silver thomas hanley

GROUND FLOOR PLAN
AEGIS LINCOLN PARK

DRAFT
DEVELOPMENT APPLICATION
WORK IN PROGRESS

Scale 1:200 @ A1 / 1:400 @ A3 Date 08/05/2026

Project No.	Sheet No.	Revision	Revision Date
3426	SK.03.100	B	08/05/2026



silver thomas hanley
ARCHITECTURE

LEVEL 01 FLOOR PLAN
AEGIS LINCOLN PARK

DRAFT
DEVELOPMENT APPLICATION
WORK IN PROGRESS

Scale 1:200 @ A1 / 1:400 @ A3 Date 08/05/2026

Project No.	Sheet No.	Revision	Revision Date
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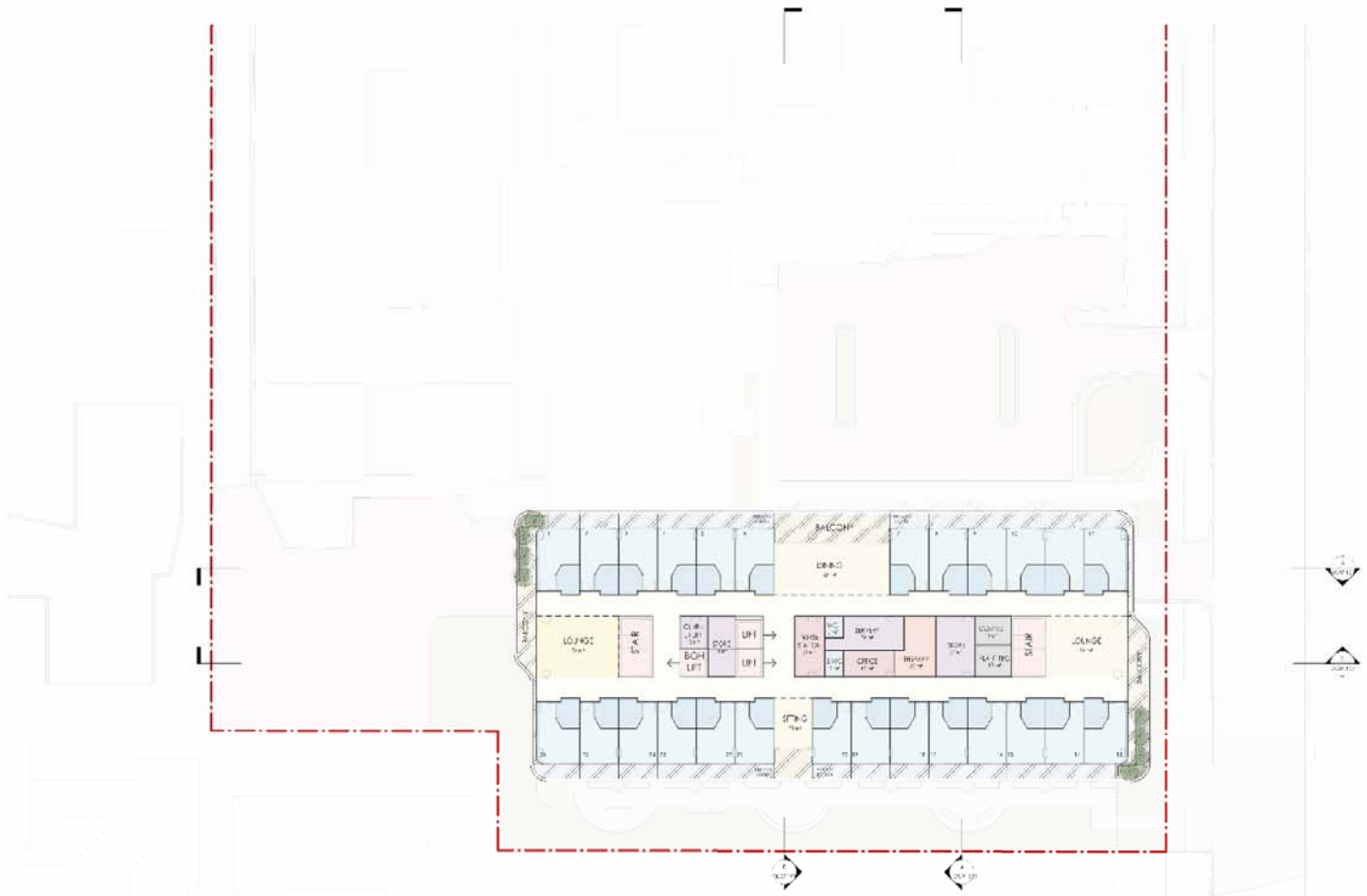

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ARCHITECTURE

LEVEL 02 FLOOR PLAN
AEGIS LINCOLN PARK

DRAFT
DEVELOPMENT APPLICATION
WORK IN PROGRESS

Scale 1:200 @ A1 / 1:400 @ A3 Date 08/05/2026

Project No.	Sheet No.	Revision	Revision Date
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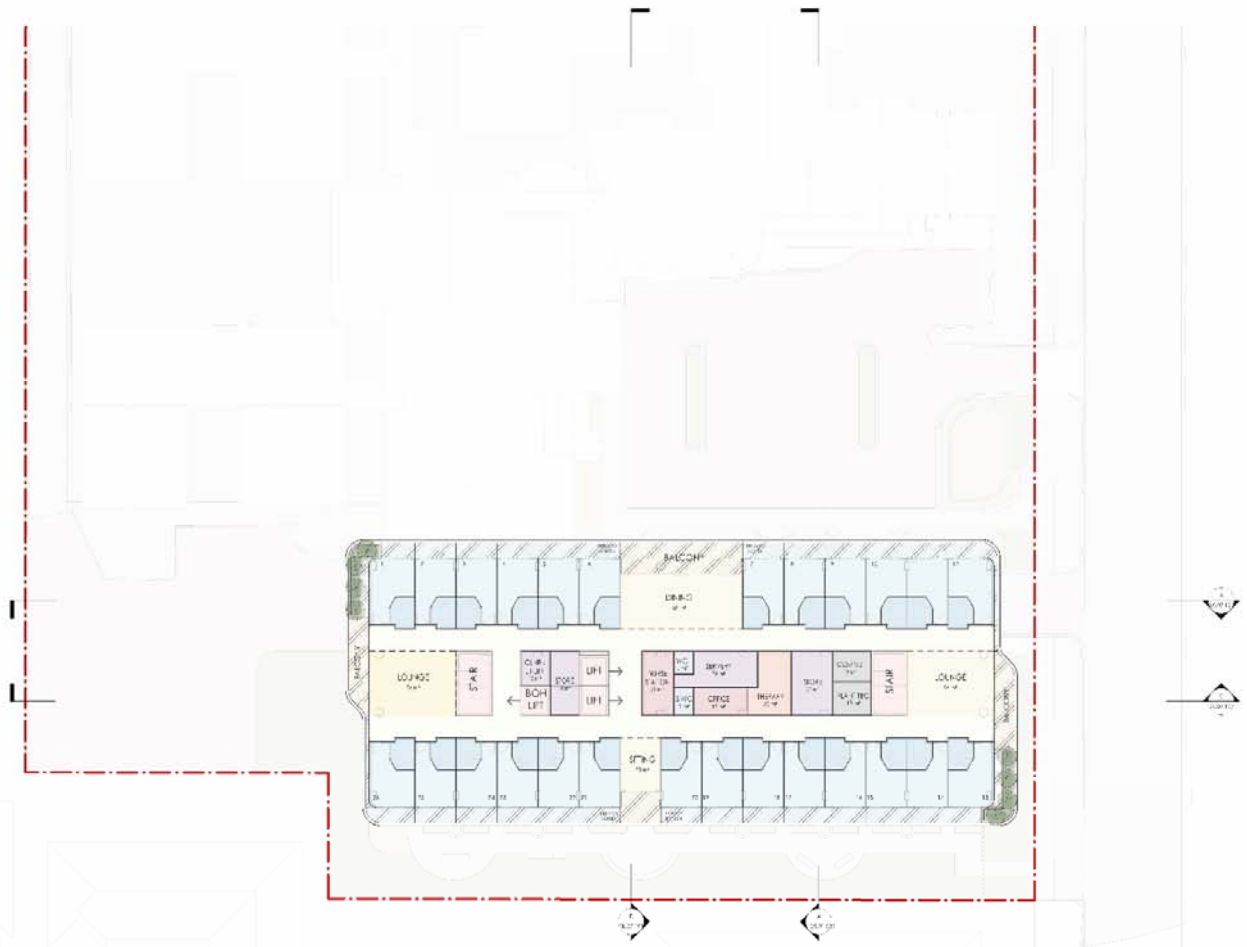

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ARCHITECTURE

LEVEL 03 FLOOR PLAN
AEGIS LINCOLN PARK

DRAFT
DEVELOPMENT APPLICATION
WORK IN PROGRESS

Scale 1:200 @ A1 / 1:400 @ A3 Date 08/05/2026

Project No.	Sheet No.	Revision	Revision Date
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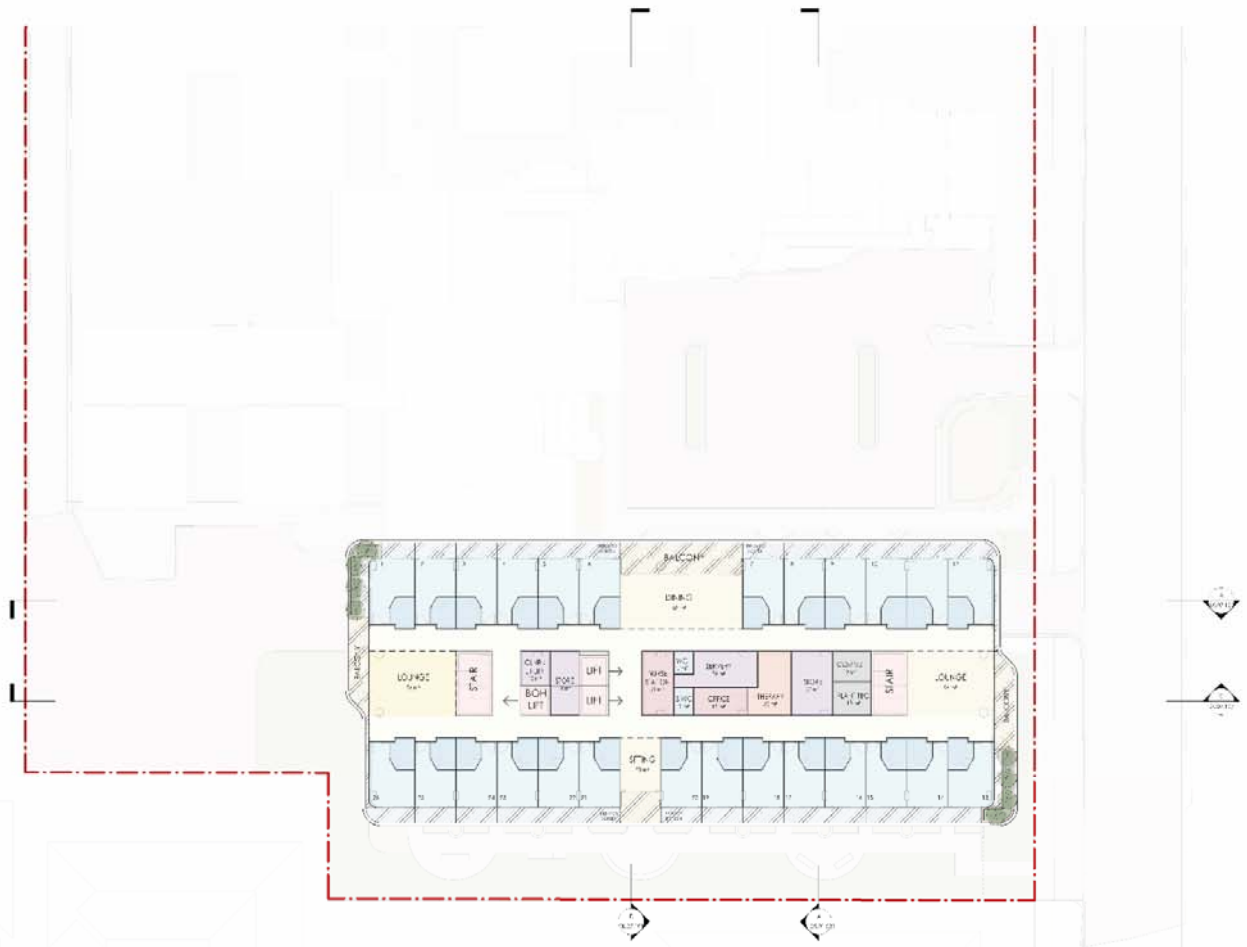

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LEVEL 04 FLOOR PLAN
AEGIS LINCOLN PARK

DRAFT
DEVELOPMENT APPLICATION
WORK IN PROGRESS

Scale 1:200 @ A1 / 1:400 @ A3 Date 08/05/2026

Project No.	Sheet No.	Revision	Revision Date
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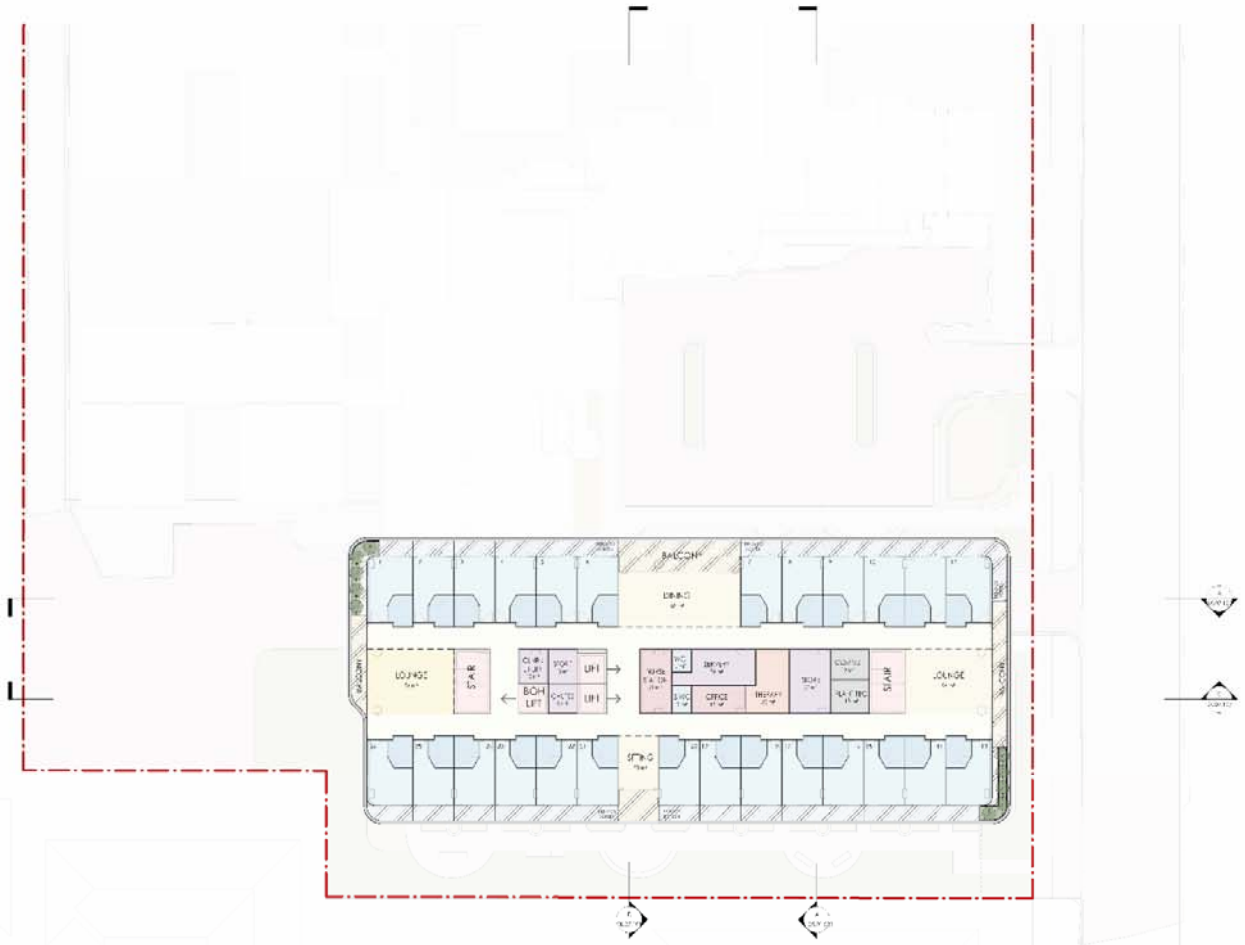

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ARCHITECTURE

LEVEL 05 FLOOR PLAN
AEGIS LINCOLN PARK

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DEVELOPMENT APPLICATION
WORK IN PROGRESS

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Project No.	Sheet No.	Revision	Revision Date
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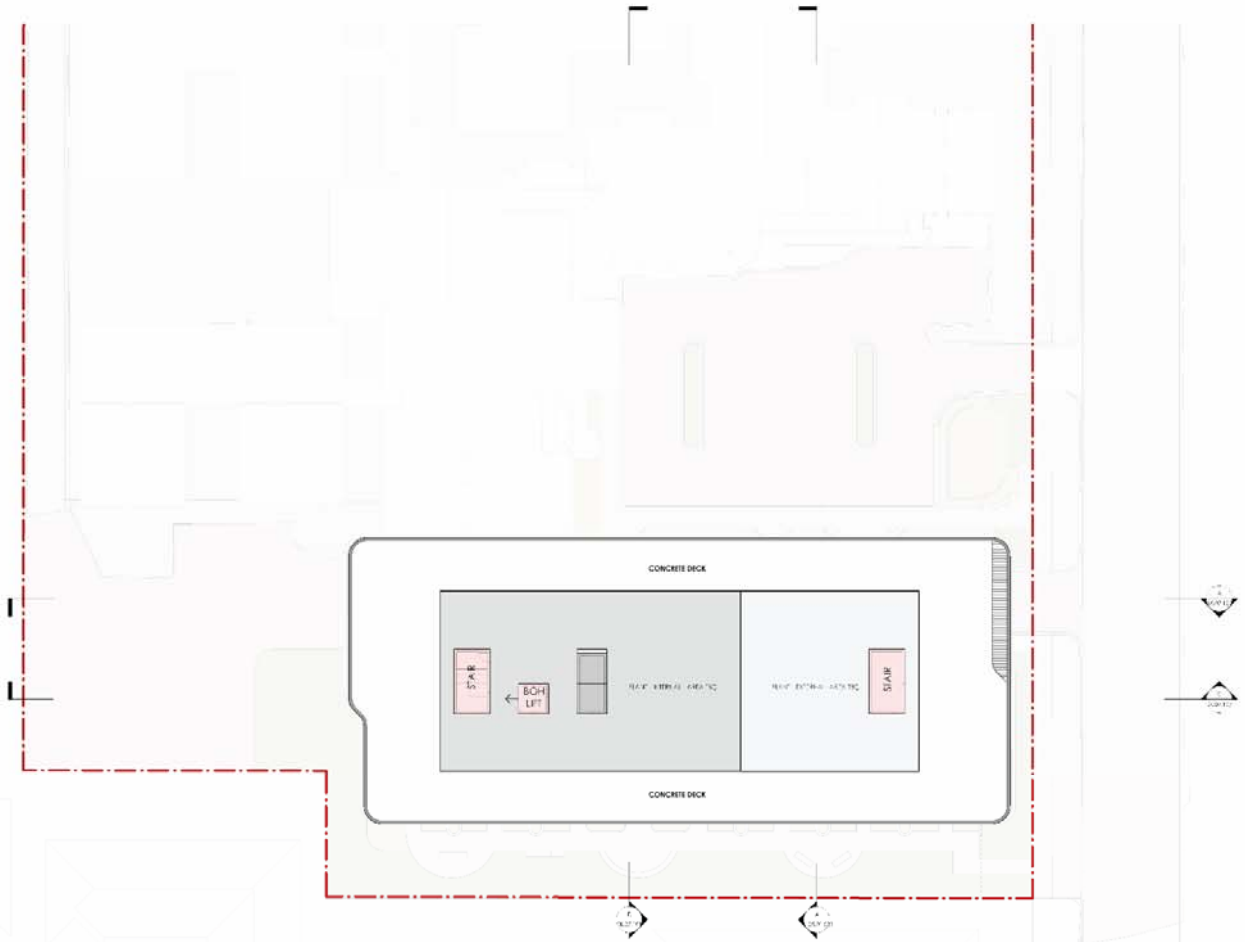

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ARCHITECTURE

LEVEL 06 FLOOR PLAN
AEGIS LINCOLN PARK

DRAFT
DEVELOPMENT APPLICATION
WORK IN PROGRESS

Scale 1:200 @ A1 / 1:400 @ A3 Date 08/05/2026

Project No.	Sheet No.	Revision	Revision Date
3426	SK.03.106	B	08/05/2026

APPENDIX B

Extract of Part F7 of NCC

WALLS

F7D6 Sound insulation rating of walls

(1) A wall in a Class 2 or 3 building must—(a)have an $R_w + C_{tr}$ (airborne) not less than 50, if it separates sole-occupancy units; and

(a) have an R_w (airborne) not less than 50, if it separates a sole-occupancy unit from a plant room, lift shaft, stairway, public corridor, public lobby or the like, or parts of a different classification; and

(b) comply with F7D4(2) if it separates—

(i) a bathroom, sanitary compartment, laundry or kitchen in one sole-occupancy unit from a habitable room (other than a kitchen) in an adjoining unit; or

(ii) a sole-occupancy unit from a plant room or lift shaft.

(2) A door may be incorporated in a wall in a Class 2 or 3 building that separates a sole-occupancy unit from a stairway,public corridor, public lobby or the like, provided the door assembly has an R_w not less than 30.

(3) A wall in a Class 9c building must have an R_w not less than 45 if it separates—

(a) sole-occupancy units; or
(b) a sole-occupancy unit from a kitchen, bathroom, sanitary compartment (not being an associated ensuite), laundry, plant room or utilities room.

(4) In addition to (3), a wall separating a sole-occupancy unit in a Class 9c building from a kitchen or laundry must comply with F7D4(2).

(5) Where a wall required to have sound insulation has a floor above, the wall must continue to—

(a) the underside of the floor above; or
(b) a ceiling that provides the sound insulation required for the wall.

(6) Where a wall required to have sound insulation has a roof above, the wall must continue to—

(a) the underside of the roof above; or
(b) a ceiling that provides the sound insulation required for the wall.

F7D4 Determination of impact sound insulation ratings

(1) A floor in a building required to have an impact sound insulation rating must—

(a) have the required value for weighted normalised impact sound pressure level ($L_{n,w}$) determined in accordance with AS ISO 717.2 using results from laboratory measurements; or
(b) comply with Specification 28.

(2) A wall in a building required to have an impact sound insulation rating must—

(a) for a Class 2 or 3 building be of discontinuous construction and
(b) for a Class 9c building, must—
(i) for other than masonry, be two or more separate leaves without rigid mechanical connection except at the periphery; or
(ii) be identical with a prototype that is no less resistant to the transmission of impact sound when tested in accordance with Specification 29 than a wall listed in S28C4 to S28C7.

(3) For the purposes of this Part, discontinuous construction means a wall having a minimum 20 mm cavity between 2separate leaves, and—

(a) for masonry, where wall ties are required to connect leaves, the ties are of the resilient type; and
(b) for other than masonry, there is no mechanical linkage between leaves except at the periphery.

FLOORS

F7D5 Sound insulation rating of floors

(1) A floor in a Class 2 or 3 building must have an $R_w + C_{tr}$ (airborne) not less than 50 and an $L_{n,w}$ (impact) not more than62 if it separates—

(a) sole-occupancy units; or
(b) a sole-occupancy unit from a plant room, lift shaft, stairway, public corridor, public lobby or the like, or parts of a different classification.

As recommended by the Association of Australian Acoustical Consultants, the design objective of an $L_{n,w}$ of 55 is recommended to be utilised for impact isolation between floors of apartments.

SOIL & WASTE PIPES

F7D7 Sound insulation rating of internal services

(1) If a duct or soil, waste or water supply pipe, including a duct or pipe that is located in a wall or floor cavity, serves or passes through more than one sole-occupancy unit, the duct or pipe must be separated from the rooms of any sole-occupancy unit by construction with an R_w + Ctr (airborne) not less than—

(a) 40 if the adjacent room is a habitable room (other than a kitchen); or
(b) 25 if the adjacent room is a kitchen or non-habitable room.

(2) If a stormwater pipe passes through a sole-occupancy unit, it must be separated in accordance with (1)(a) and (b)

PUMPS

F7D8 Sound isolation of pumps

A flexible coupling must be used at the point of connection between the service pipes in a building and any circulating or other pump.

SOUND INSULATION FOR BUILDING ELEMENTS

S28C3 Construction Deemed-to-Satisfy

The forms of construction referred to in (1) [Acceptable forms for walls and floors - S28C4 through S28C10] must be installed as follows:

a. Masonry units must be laid with all joints filled solid, including those between the masonry and any adjoining construction.

b. Joints between concrete slabs or panels and any adjoining construction must be filled solid.

c. For sheeting materials—

i. if one layer is required on both sides of a wall, it must be fastened to the studs with joints staggered on opposite sides; and

ii. if two layers are required, the second layer must be fastened over the first layer so that the joints do not coincide with those of the first layer; and

iii. joints between sheets or between sheets and any adjoining construction must be taped and filled solid.

d. Timber or steel-framed construction — perimeter framing members must be securely fixed to the adjoining structure and—

i. bedded in resilient compound; or

ii. the joints must be caulked so that there are no voids between the framing members and the adjoining structure.

e. Services must not be chased into concrete or masonry elements.

f. A door or panel required to have a certain $R_w + C_{tr}$ that provides access to a duct, pipe or other service must—

i. not open into any habitable room (other than a kitchen); and

ii. be firmly fixed so as to overlap the frame or rebate of the frame by not less than 10 mm, be fitted with a sealing gasket along all edges and be constructed of—

1. wood, particleboard or blockboard not less than 33 mm thick; or

2. compressed fibre-reinforced cement sheeting not less than 9 mm thick; or

3. other suitable material with a mass per unit area not less than 24.4 kg/m^2.

g. A water supply pipe must—

i. only be installed in the cavity of discontinuous construction; and

ii. in the case of a pipe that serves only one sole-occupancy unit, not be fixed to the wall leaf on the side adjoining any other sole-occupancy unit and have a clearance not less than 10 mm to the other wall leaf.

h. Electrical outlets must be offset from each other—

i. in masonry walling, not less than 100 mm; and

ii. in timber or steel-framed walling, not less than 300 mm.

APPENDIX C

TRAFFIC DATA

mainroads WESTERN AUSTRALIA

SITE 4404

Hourly Volume

Lord St (1300276)

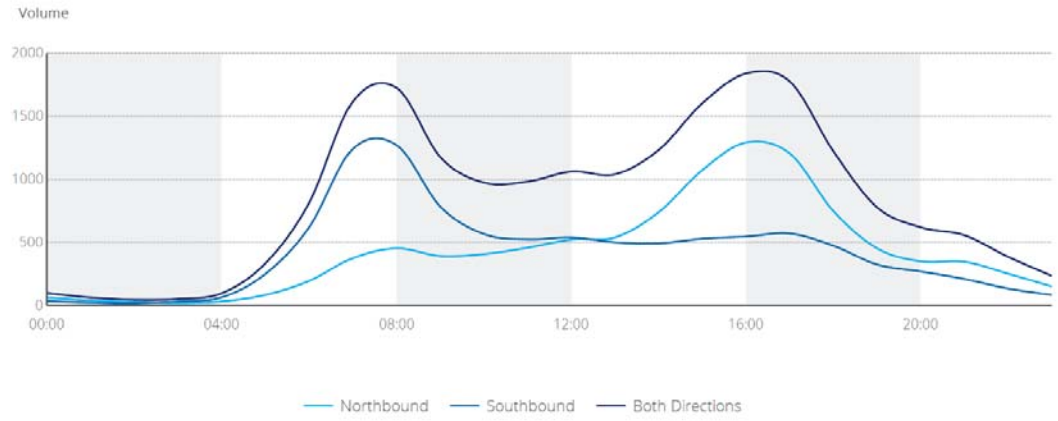
North of Bulwer St (SLK 0.66)

2021/22
Monday to Friday

	All Vehicles			Heavy Vehicles			
	NB	SB	Both	NB	SB	Both	%
00:00	64	35	99	1	0	1	1.0
01:00	40	23	63	2	1	3	4.8
02:00	28	18	46	2	2	4	8.7
03:00	20	32	52	3	4	7	13.5
04:00	32	65	97	3	6	9	9.3
05:00	84	250	334	8	19	27	8.1
06:00	194	619	813	20	34	54	6.6
07:00	376	1243	1619	33	50	83	5.1
08:00	454	1270	1724	38	69	107	6.2
09:00	392	783	1175	36	50	86	7.3
10:00	408	566	974	39	40	79	8.1
11:00	459	524	983	38	42	80	8.1
12:00	523	540	1063	34	39	73	6.9
13:00	540	501	1041	40	36	76	7.3
14:00	741	493	1234	52	35	87	7.1
15:00	1075	530	1605	56	33	89	5.5
16:00	1293	547	1840	51	26	77	4.2
17:00	1205	571	1776	47	19	66	3.7
18:00	748	474	1222	27	15	42	3.4
19:00	453	325	778	11	11	22	2.8
20:00	350	270	620	12	6	18	2.9
21:00	347	210	557	9	6	15	2.7
22:00	252	134	386	7	3	10	2.6
23:00	151	84	235	6	2	8	3.4
TOTAL	10229	10107	20336	575	548	1123	5.5

Peak Statistics

AM	TIME	11:45	07:30	07:30	09:30	08:00	08:00
	VOL	511	1416	1851	42	69	107
PM	TIME	16:30	17:00	16:30	15:15	12:00	14:45
	VOL	1333	571	1889	58	39	94



CITY OF VINCENT

ATTACHMENT 8

DEVELOPMENT ASSESSMENT PANEL MEETING

Heritage Impact Statement

Job No. 26141

AEGIS LINCOLN PARK STAGE 1 SILVER CHAIN NURSING LEAGUE BUILDING

19 Wright Street, Perth

Heritage Impact Statement DRAFT

For

Silver Thomas Hanley Architects

April 2024

Griffiths Architects

Griffiths Architects

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Griffiths Architects is a leading architectural firm in Perth, Western Australia. *Griffiths Architects* was born out of a practice of which Philip Griffiths was a co-director for over 20 years.

The new company emerged from a desire to diversify the range of work covered by the practice, and to take a fresh approach to design.

The practice undertakes commissions in architecture, heritage, urban, interior design, interpretation, and heritage assessments. *Griffiths Architects* provides professional advice on a range of issues related to these areas of our discipline.

The practice has won architectural, planning, and heritage awards for a wide range of projects located throughout the state.

Griffiths Architects has a great depth of experience across numerous project types and delivers innovative solutions that embrace environmental responsibility with elegant and simple solutions. The projects are the product of working closely with clients, carefully assessing their expectations, and delivering high quality results.

Cover: East façade of former Silver Chain Nursing Leage Building, Perth

Revision History

Date of this revision: 07 April 2026

Document	Version	Author	Status	Date	Distribution
HIS	A	GA	DRAFT	07/04/2026	STH

Contents

Contents	i
Introduction	2
Location	3
Heritage Listings	4
Background	5
Statement of Significance	9
Brief Description	10
Proposals	10
Development Policy	12
Impacts and Mitigation	15
Conclusion	17
References	18

Introduction

This Heritage Impact Assessment (HIA) was prepared to evaluate the impact of Stage 1 of a proposal for Aged Care development at the Aegis Lincoln Park site in Highgate on the *Silver Chain Nursing League Building* located on the lot. The property, located on a portion of Lot 101 on Diagram 69483 being part of the land contained in Certificate of Title Volume 1731 Folio 241, is a State Registered heritage place (Heritage Place no. 11451), and is also included in the City Vincent's Heritage List and Local Heritage Survey.

The proposed work for Stage 1 includes the construction of a new 6 storey, 150 bed aged care building with basement parking, new link connections to the existing main entry & BOH areas and a realigned loading dock.

This HIA was prepared to evaluate the potential impact on the State Heritage values associated with the place that are reflected in the Statement of significance. The assessment evaluates the proposal's impacts in relation to the significance of the place, considers whether mitigation is required, and concludes on the overall acceptability of the development based on those impacts.

This HIS was prepared to satisfy requirements for a development application and assess the impacts of the proposed work on the place, measured against the statement of significance.

Summary

The State Heritage Registered building is situated on the eastern edge of Lot 101, near the corner of Wright and Lincoln Streets. The lot once formed part of the larger Wright Street cottage homes complex, which has been largely demolished. The remaining 1920 building is now incorporated within the Aegis Lincoln Park aged care facility, although it is currently unused. The overall site has undergone several phases of redevelopment, with the 1920 structure representing the earliest surviving element of the original complex. Surrounding buildings date from the 1950s, 1980s, and 1995–2000 and are not included within the place's heritage curtilage.

When assessed against the heritage values of the place, the proposal results in no adverse impacts. The conservation works represent a positive heritage outcome and will help maintain the condition of the place ahead of future stages, which will involve more extensive refurbishment to the cottage and a return to use.

Location

Silver Chain Nursing League Building, Perth (1920) is located on the eastern edge of Lot 101, near the corner of Wright and Lincoln Streets.

The registered building fronts Wright Street, with the surrounding context to the east and north predominantly comprising low-density single residential houses. The remainder of the lot is currently occupied by Aegis To the west of the site's western boundary are two State Heritage registered places: the *Lincoln Street Ventilation Stack (1941)* (Place No. 3137) and *Highgate Hill Police Station, Lockup & Quarters (fmr)* (1897, 1906, 1916) (Place No. 4282). There is also a row of former Police Cottages on the north side of Lincoln Street that are on Heritage Councils assessment list and the City of Vincents Heritage List as a Category A.

Figure 1 Location Plan. The subject building on the lot is highlighted in blue. Google Maps accessed 2026.

Heritage Listings

The place is listed on the following heritage lists.

- State Register of Heritage Places, Silver Chain Nursing League Building, Perth (1920) (Place No. 11451) – Registered 18 August 2025.
- City of Vincent Heritage List – Adopted 22 November 2025.

Background

The following historic background is taken from the *Silver Chain Nursing League Building* Assessment documentation for the place which was prepared by the Department of Planning, Lands and Heritage, with amendments and/or additions by the Heritage Council.

The Silver Chain Nursing League (Silver Chain) originated as a club run by Muriel Chase through the children's column in the Western Mail newspaper, under the pseudonym Aunt Mary. Children from across the state subscribed annually for one shilling with the funds used to aid other children in need. Silver Chain officially launched on 3 June 1905. The name represented the shillings contributed by its subscribers, who were called the 'links'. From this charitable beginning, the organisation shifted its focus to nursing, launching a campaign with Dr Gertrude Mead to bring a district nursing scheme to WA, inspired by the District Trained Nursing Society in South Australia.

In 1907 the first district nurse, Sister Copley, was employed by Silver Chain to provide healthcare to children and mothers in central Perth. Sister Copley was followed by Nurse Cherry (Frances Drew) in 1908, who later became the nursing superintendent. In 1910, the organisation employed a maternity nurse. Another district nurse was added in Fremantle in 1913. By 1919, Silver Chain had district nurses based in Fremantle, Leederville, North Perth, Cottesloe, and its original base in Perth. Silver Chain nurses did not charge for their services. Silver Chain's secretarial office was based in the basement of the West Australian Chambers on St George's Terrace, Perth at this time which was owned by the West Australian Newspapers.

The organisation considered opening a residential facility for expectant mothers in 1913. However, the residential concept did not come to fruition until 1916, and by then the focus had shifted to elderly patients (both single and married couples) who required fulltime care and could no longer live independently. While some residential facilities were available for elderly people, such as the Home of Peace in Subiaco, this was often full. The first cottage home, chosen by Dr Mead, was a leased c.1903 building on Wright Street, Highgate. Both Dr Mead and Mrs Chase were involved in the furnishing and maintenance of this home, and providing updates to Silver Chain's committee. This building is no longer extant.

In 1919, the Government granted Silver Chain additional land on the corner of Wright and Lincoln Streets, Highgate which allowed for an expansion of the existing complex. Five new buildings were officially opened in October 1920 as the first cottage homes built for aged people in WA. The central cottage was named after Dr Mead in recognition of her contribution to the organisation, following her death in 1919. This may have been the current extant building, which is all that remains of this first phase of development. Designed by architect A.B. Rieusset, the complex was described as:

> *a group of five separate buildings with spacious verandahs back and front, back verandahs really forming one continuous promenade, and a convenient means of communication between the matron's residence and the other cottages. Of these latter there are four each of two rooms.*

By 1924, Silver Chain was managing the cottage homes, district nursing services (including nursing in conjunction with the Children's Hospital), a baby clinic held in the North Perth town hall, and the

Bush Nursing Society. The latter was established in 1921 to provide health care in regional areas using funds donated from the British Red Cross. Their first maternity hostel opened in Wyalkatchem the following year under this initiative.

The cottage homes complex further expanded in the 1920s, with new wings opened in August 1925 and July 1926. Nurse Cherry was later employed as the resident nurse to support the increase in patients, and she remained with Silver Chain until her death in 1941. A wing was dedicated to Nurse Cherry in 1946.

Despite financial struggles in the early 1930s, the complex continued to expand in this decade. Additional land was purchased to build another wing in 1937. Named after Muriel Chase, this accommodated four more residents. Various alterations were also undertaken to the existing buildings including new bathrooms and kitchens, and the former dining room was converted into a social area for residents.

The 1940s appear to be when the cottage homes complex became the unofficial Silver Chain headquarters, as most metropolitan district nurses were stationed there during the day. By 1944, there were 40 residents, many married couples. Silver Chain had also amalgamated with the Bush Nursing Society by this time. Wartime shortages meant there was little development of the cottage homes complex during this period, though a new dining room and two additional cottages were built in 1945. The complex also received donations of food, flowers, gifts to residents, entertainment, and assistance with raising funds.

Another home was added to the complex in 1952 which accommodated six additional residents and staff. By 1954, the complex accommodated 38 residents and was always full. Staff included a matron, nursing assistants, a senior relieving nurse, cook, maids, a handy man, and gardener. Another cottage funded by the Claremont Myola Club was built the following year, which increased patient numbers to 40.

A 1955 sewerage plan shows the layout of the cottage home complex at that time. The current extant building likely served as the entrance building to the wider complex, with two separate cottage homes flanking both sides. A larger, central building was connected via an extension of the rear gable roof. The building was also connected to the adjacent cottage homes through rear verandahs that were continuations of the roofs.

In 1955, new Commonwealth legislation allowed Silver Chain to claim a subsidy of 50% off its costs in constructing accommodation. This resulted in additional expansion to the complex in 1956-57, with resident numbers rising to 50, and the provision of a new room for domestic and nursing staff. The Silver Chain headquarters and administrative team moved into a new building within the cottage homes complex in 1957. Prior to this subsidy, Silver Chain relied heavily on donations. Provisions were left in wills for Silver Chain in some cases, including from cottage homes residents who had passed away.

The organisation further developed in the 1960s and 1970s, establishing their home help program in 1961 to provide domestic assistance, and they began providing additional education for their nurses. Two hospitals were established, one in Claremont (The Alfred Carson Hospital [1945] named after Silver Chain's first president) and the other in Hilton (1974, in collaboration with Fremantle

Hospital). In 1982, Silver Chain began a joint venture with the Cancer Council for a hospice program and also began employing male care aids for the first time.

The existing buildings at the Wright Street complex were deemed no longer adequate following this increase in activities, and in 1978 it was decided to demolish the majority of the buildings within the complex. The current extant building was retained, with the rear verandah, but the building it was connected to was demolished and replaced with a carpark. New facilities were built adjoining Lincoln Street and opened in December 1981. In 1985, Silver Chain relocated its headquarters to a new location on Sundercombe Street, Osborne Park, but the Wright Street complex was still in use.

The complex saw further development in the 1990s, with a new wing built adjoining the extant 1920 building and a portion of the southern wing demolished by 2000. Silver Chain occupied the complex until 2009, when it was purchased by Aegis Aged Care. The wider lot is Aegis Lincoln Park and offers accommodation for 46 residents. The 1920 building is currently (2025) vacant. In 2011, Silverchain Group merged with the South Australian Royal District Nursing Society. The organisation remains active and provides in home aged care services throughout Australia.

Figure 2 View of Silver Chain Nursing League Building. *Image retrieved 2026 https://silverchain.org.au/news/gertrude-mead-shaping-early-home-care*

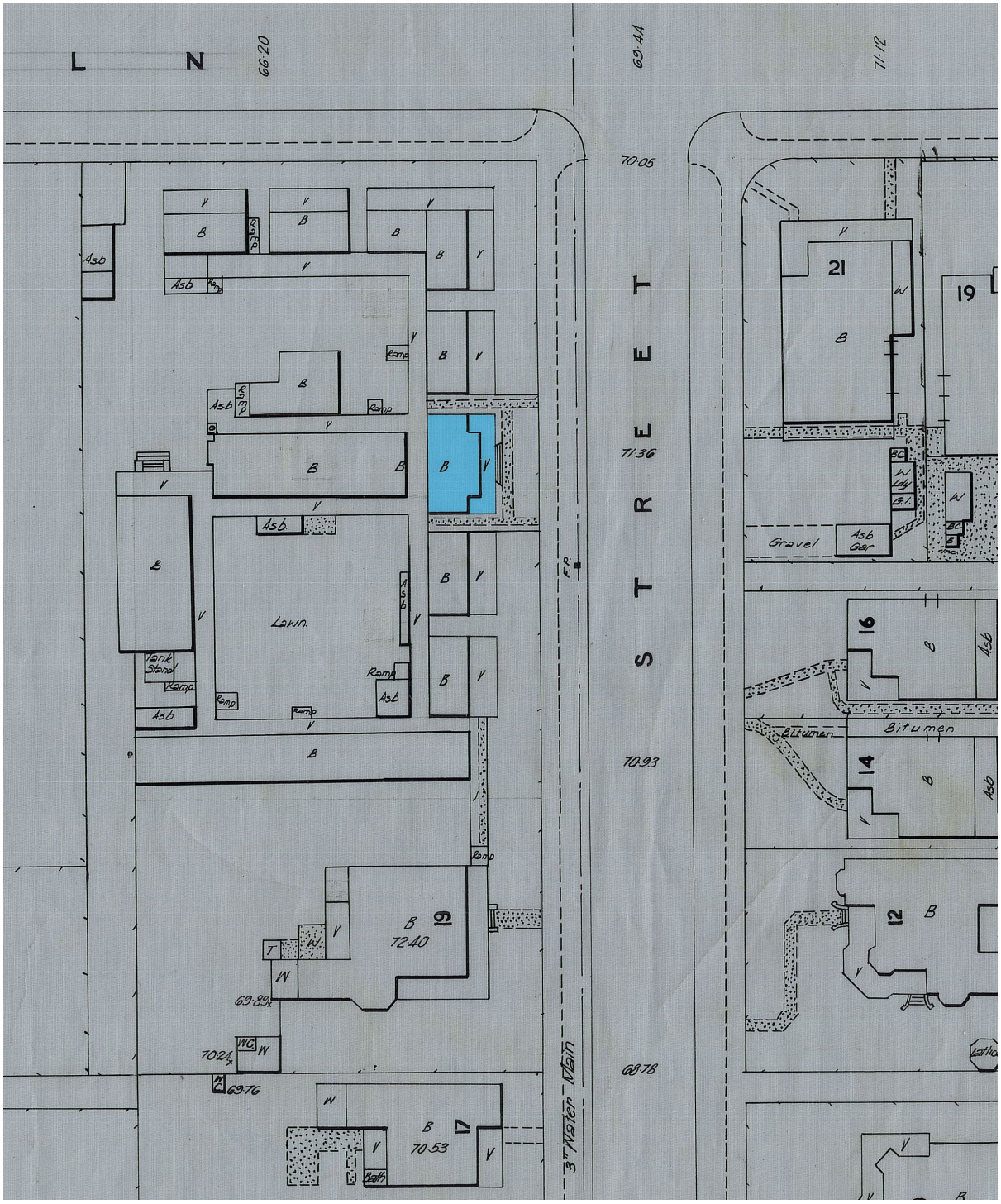


Figure 3 1955 Sewer plan with extant *Silver Chain Nursing League Building* highlighted in blue. *SROWA series634 cons4156 item0102*

Statement of Significance

The following statement of significance is taken from the State Register of Heritage Places assessment documentation.

> *Silver Chain Nursing League Building, Perth* is a single-storey brick and tile building with elements of the Federation Queen Anne style constructed in 1920. The place has cultural heritage significance for the following reasons:
>
> > The place is closely linked to the services provided by Silver Chain, a private organisation established in WA in 1905 to support less fortunate families, providing nursing services from 1907. It was one of the earliest structures built for Silver Chain's cottage home complex, established at this location in 1916 to accommodate elderly patients who could no longer live independently (Factor A).
> >
> > The place is an example of the type of facilities provided by Silver Chain, demonstrating the rise and growth of the organisation from its early beginnings in child health and maternity nursing, to its expansion into aged care. It is the only structure remaining from Silver Chain's previously expansive cottage homes complex (Factors B & D).
> >
> > Representing an organisation primarily pioneered by, and employing, substantial numbers of women, the place is an important reminder of the contribution of women to the health and care system in Western Australia. Notable women associated with the establishment and growth of the organisation include Muriel Chase, Dr Gertrude Mead, and Frances Drew (Nurse Cherry) (Factors A & G).
> >
> > The place is highly valued by the WA community for its strong association with the work of Silver Chain. From its charitable beginnings, Silver Chain provided a range of nursing services and facilities throughout the state since 1907 and remains a prominent organisation throughout Australia (Factor E).

Brief Description

The proposed work for Stage 1 includes the construction of a new 6 storey, 150 bed aged care building with basement parking, new link connections to the existing main entry & BOH areas and a realigned loading dock.

Proposals

The following work is based on the design review panel 2 drawing set prepared by Silver Thomas Hanley, Revision C February 2026.

A) Demolition.

- Demolition of 1957 & 1981 brick buildings to south of lot.

B) Construction.

- Construct new 6 storey, 150 bed aged care building with basement parking and new link connections to the existing main entry & BOH areas. (south of lot outside of registered curtilage)
- Construct realigned loading dock. (outside of registered curtilage)

C) Conservation.

- Removal of 'Elm' tree adjacent to south wall of Silver Chain Nursing League Building.
- Lower the ground level around the building so that the ground level is at least 200mm below the damp proof course, extending this clearance for a minimum width of 500 mm to the perimeter.
- Remove or relocate all reticulation away from building to ensure that no water spray impacts the fabric.
- Either reroof- replace tiles and rainwater goods or defer this to the next stage and undertake essential roof maintenance to ensure the roof is performing adequately and not letting water in. Inspect and replace damaged tiles, refix slipped tiles. Replace broken ridge tiles and repoint.
- Replace gutters.
- Ensure gutters are regularly cleaned and kept clear of leaves and debris to prevent water ingress and overflow;
- Ensure downpipes are connected and all water is discharged away from the building.
- Inspect that all flashings are performing adequately.
- Trim overhanging branches
- Attend to the roof leak over the WC area.

- Engage Structural engineer to advise on temporary propping and long-term stabilisation options. Undertake chimney stabilisation prior to works commencing on site.
- Reset loose bricks and repoint brick pointing where eroded. Ensure a lime-based mix to match the original composition. Tuckpointing repairs can be deferred to the future stages.
- Maintain joinery- Inspect and ensure that timber is not exposed to moisture- repaint to protect timbers, repair or replace cracked or loose putty around glass panes.
- Maintain pest treatment.
- Maintain security.
- Check & maintain weather seals to windows/doors.

Figure 4 South façade of *Silver Chain Nursing League Building* will not be impacted by the Stage 1 development, but conservation work including ground level reduction and tree removal will assist in maintaining the place. *Griffiths Architects March 2026*

Figure 5 East façade of *Silver Chain Nursing League Building* will not be impacted by the Stage 1 development, but conservation work will assist in maintaining the place. *Griffiths Architects March 2026*

Development Policy

The proposal has been assessed against the following relevant Policies outlined in the City of Vincent Local Planning Policy: Guidelines for Heritage Places

O5.1.1 *Development maintains and enhances existing views and vistas to the principal facade(s) of the adjoining heritage listed place from the public realm.*

The proposed Stage 1 development is located approximately 30 metres south of the *Silver Chain Nursing League Building*, a sufficient distance from the *Silver Chain Nursing League Building*, to have no meaningful impact on existing views and vistas to its principal façade.

From Wright Street the new six storey building replaces an existing two-storey built form. The current building at street level, does not provide views to *Lincoln Street Ventilation Stack.* As such, the new development does not introduce any additional visual impacts on the registered places and does not adversely affect the setting of the place.

The Stage 1 building replaces existing double story buildings at the site and the existing views to the *Silver Chain Nursing League Building* and *Lincoln Street Ventilation Stack* will be maintained.

The reduction of ground levels, together with the removal of a small tree located too close to the southern façade, will assist in protecting the significant fabric and enhance the view toward the *Silver Chain Nursing League Building* and the immediate setting of the place

Figure 6 View from Wright Street, East Elevation. *Drawings by STH Architects.*

Figure 7 Current view from Wright Street, East Elevation. *Google Streetview.*

O5.1.2. *Development is of a scale and mass that respects the adjoining heritage listed place.*

The proposed Stage 1 development replaces three existing double-storey buildings and one single-storey building on the southern portion of the site, an area currently characterised by bulk c1950/80's-built form and a service yard.

From Wright Street the new six storey building replaces an existing two-storey built form which, at street level, does not provide views to *Lincoln Street Ventilation Stack.* As such, the new development does not introduce any additional visual impacts on the registered places and does not adversely affect the setting of the place. The new development also sits below the height of the stack ensuring that stack remains the tallest structure, maintaining the landmark quality.

Figure 8 View from Wright Street, Northeast view of buildings to be removed and replaced. *Google Streetview.*

O5.1.3. *New developments reinforce existing spatial and visual characteristics of the streetscape in which they are located.*

The proposed building maintains the existing front setback condition from the street and mostly covers the existing footprints of the southern buildings to be demolished, with an increased setback at ground level from the south.

O5.1.4. *Development on larger lots are designed to respect the traditional urban grain and rhythm of the streetscape character of the area including breaking up large frontages vertically, so they read as separate buildings and reflect the width of adjoining heritage places.*

The proposed Stage 1 building retains the existing front setback to the street and largely occupies the footprint of the southern buildings to be removed, while increasing the ground level setback to the south to provide a resident courtyard.

The development responds to the established pattern of the streetscape by maintaining the prevailing front setback and consistent spacing relative to adjacent built form, thereby supporting the existing spatial and visual character.

The proposal adopts a contemporary architectural expression and does not imitate or replicate historic styles. It remains clearly distinguishable from *Silver Chain Nursing League Building* and from nearby heritage places within the broader context.

Impacts and Mitigation

In this section, the proposed works are assessed against the heritage values identified in the Statement of Significance for *Silver Chain Nursing League Building* to consider the impact that these works will have on the existing site and its heritage values.

Heritage values from Statement of Significance	Potential Impact Analysis	Mitigation
The place is closely linked to the services provided by Silver Chain, a private organisation established in WA in 1905 to support less fortunate families, providing nursing services from 1907. It was one of the earliest structures built for Silver Chain's cottage home complex, established at this location in 1916 to accommodate elderly patients who could no longer live independently. (Factor A).	The building has been vacant for some time. Future stages propose to return the Silver Chain Nursing League Building to active use, which will require more extensive refurbishment. The current conservation works are limited to maintaining the building's condition, improving ground-level conditions, and ensuring the building is watertight. These works will have minimal impact on the identified heritage value, as no substantive changes to the building are proposed. Instead, the maintenance and essential conservation measures will help prevent further deterioration, ensuring the building is preserved until a time when more substantial occupation happens.	Positive Impact.
The place is an example of the type of facilities provided by Silver Chain, demonstrating the rise and growth of the organisation from its early beginnings in child health and maternity nursing, to its expansion into aged care. It is the only structure remaining from Silver Chain's previously expansive cottage homes complex (Factors B & D).	The cottages that once formed the broader complex have long since been demolished, diminishing the ability to understand the place in its original context. The registered building is the only surviving early structure and will be retained. Its conservation supports the heritage value of the place by preserving the sole remaining physical evidence of Silver Chain's former cottage homes complex. Retaining this building enables the site's historical development to be understood	No mitigation required.

Heritage values from Statement of Significance	Potential Impact Analysis	Mitigation
	in a physical context. The former arrangement of the complex could also be communicated through on-site heritage interpretation.	
Representing an organisation primarily pioneered by, and employing, substantial numbers of women, the place is an important reminder of the contribution of women to the health and care system in Western Australia. Notable women associated with the establishment and growth of the organisation include Muriel Chase, Dr Gertrude Mead, and Frances Drew (Nurse Cherry) (Factors A & G).	This is a social value, and the works do not impact this value. This value would be better communicated through interpretation on site.	No impact.
The place is highly valued by the WA community for its strong association with the work of Silver Chain. From its charitable beginnings, Silver Chain provided a range of nursing services and facilities throughout the state since 1907 and remains a prominent organisation throughout Australia (Factor E).	This is a social value, and the works do not impact this value.	No impact.

Conclusion

When assessed against the heritage values of the place, the impacts are minimal.

The proposed landscaping and Stage 1 building form and setbacks ensure that the significance of the cottage is not adversely affected, and that it remains a significant feature within the northern portion of the site. The view toward the *Lincoln Street Ventilation Stack* is not impacted and the southern buildings to be removed date from c1957-1980's and are not within the Heritage curtilage, their removal has no impact on the heritage value of the site.

The proposed conservation works represent a positive outcome, maintaining the building fabric, preventing further deterioration, and preserving the place until it is returned to active use.

References

Heritage Advice No19 Wright Street, Highgate, July 2016, TPG

City of Vincent, Heritage List, 2025.

Heritage Council of Western Australia, Assessment Documentation for *Silver Chain Nursing League Building* August 2025.

Aegis Lincoln Park Design Review Panel. Drawing set dated Revision C 29 February 2026

End of Heritage Impact Statement

CITY OF VINCENT

ATTACHMENT 9

DEVELOPMENT ASSESSMENT PANEL MEETING

Sustainability Report

SUMMATION
ENERGY · RENEWABLES · SUSTAINABILITY

PREPARED FOR
Aegis Aged Care Pty Ltd
C/O Silver Thomas Hanley

SUSTAINABLE DESIGN ASSESSMENT REPORT

Aegis Highgate

Environmentally Sustainable Design Strategy — Stage 1

21 Wright Street, Highgate WA 6003

Artist's impression — indicative only.

REVISION	DATE	PROJECT REF	PREPARED BY
002	20/07/2026	SUPER26014	Megan Ang

Executive summary

This document has been prepared for Aegis Aged Care to outline the sustainability initiatives being considered for inclusion within Stage 1 of the project, located at 21 Wright Street, Highgate WA 6003.

The sustainability commitment for the project is to target a **5-Star Green Star Equivalency** outcome against the new Green Star Buildings Version 1.1 tool.

The following guidelines are acknowledged as applicable to the site, and this strategy incorporates the sustainability requirements outlined therein:

- City of Vincent Local Planning Scheme No. 2
- City of Vincent Policy No. 7.1.1 (Built Form)
- WA State Planning Policy 7.0 — Design of the Built Environment

Summation Pty Ltd has been engaged as the sustainability consultant for the project and will be responsible for the delivery of the sustainability objectives. The sustainability team is led by **Prasanna Suraweera**, a Director with Summation and a Green Star Accredited Professional (GSAP) with over 21 years of experience delivering sustainable developments. Summation has been engaged prior to concept planning stage and will contribute through to project completion.

A preliminary assessment of the project's potential to achieve a 5-Star Green Star rating has been undertaken. Preliminary findings indicate that approximately 35 points are achievable, which meets the minimum 35 points required for the 5-Star standard. This includes the mandatory compliance requirements within Green Star.

> "Good design optimises the sustainability of the built environment, delivering positive environmental, social and economic outcomes."

Key sustainability initiatives

- 10% reduction of upfront carbon emissions through good design (design efficiency) and material selection.
- Electrification of building services, including space heating and domestic hot water.
- High-efficiency façade exceeding Section J, including double glazing — with design to, and testing of, building air tightness.
- 50% increase in the minimum mechanical ventilation fresh-air requirement.
- Solar PV (estimated 70–100 kW given the scale of building) to be targeted, pending further spatial coordination.
- At least 90% of construction and demolition waste diverted from landfill.
- Extensive metering and monitoring to facilitate performance tracking and assist in fault finding.
- A healthy building focused on air quality, light quality and acoustic comfort, with reduced VOCs to maximise staff and resident comfort and wellbeing.
- Climate Resilience Assessment to future-proof the building and reduce heat island effect through light-coloured roof and landscaping selections.
- Sustainable Transport Plan, including provision for EV transition through appropriate enabling infrastructure.

Passive design & efficiency 20% energy reduction target	**Water efficiency** WELS-rated fittings	**Solar PV** 70–100 kW targeted
Electrification All-electric services	**Upfront carbon** 10% reduction target	**Indoor environment** +50% fresh air
Waste recycling ≥90% diverted	**Climate resilience** Two-timeline assessment	**EV transition** 15% bays + provision

Contents

1 Introduction 1
- 1.1 Project background 1
- 1.2 Disclaimer 1

2 Green Star strategy 2
- 2.1 Green Star overview 2
- 2.2 Green Star performance 3

3 Summary of initiatives 3
- 3.1 Passive design & efficiency 3
- 3.2 Water efficiency 4
- 3.3 Provision for solar PV 4
- 3.4 Electrification 4
- 3.5 Reducing refrigerant impacts 5
- 3.6 Upfront carbon & lifecycle 5
- 3.7 Responsible product selections 6
- 3.8 Indoor environmental quality 6
- 3.9 Stormwater management 6
- 3.10 Climate resilience 6
- 3.11 Heat island mitigation 6
- 3.12 Construction & waste recycling 7
- 3.13 Waste management plan 7
- 3.14 Metering & monitoring 7
- 3.15 Commissioning & verification 8
- 3.16 EV transition 8

Appendix A Green Star score card 9

Revision history

Revision	Date	Notes	Prepared by	Approved by
001	23/04/2026	Report issued for comment	MA	PDS
002	20/07/2026	Issued for DA	MA	PDS

Abbreviations & glossary

CO_2-e	Carbon dioxide equivalent
DA	Development Application
ESD	Environmentally sustainable design
EV	Electric vehicle
FOGO	Food organics and garden organics
GBCA	Green Building Council of Australia
GSAP	Green Star Accredited Professional
HVAC	Heating, ventilation & air conditioning
ICA	Independent Commissioning Agent
LCA	Life Cycle Assessment
LED	Light-emitting diode
NCC	National Construction Code
PV	Photovoltaic
SWIS	South-West Interconnected System
VLT	Visual light transmittance
VOC	Volatile organic compound
WELS	Water Efficiency Labelling & Standards

DISCLAIMER

This report provides high-level guidance on the sustainability commitments targeted for this project and the preliminary strategies to be adopted. The specific strategies are indicative and may evolve through later design stages; the commitment to the overall project target will be maintained.

CHECKED & APPROVED BY

Name

Prasanna Suraweera

Signature

1 Introduction

1.1 Project background

The proposed Aegis Lincoln Park development is located at 21 Wright Street, Highgate WA 6003. It consists of a six-storey aged care development. A summary of the expected project yields is as follows:

- Approximately 150 beds — Class 9c NCC classification.
- Communal spaces, including lounge and support space.
- Lobby and staff station.
- Approximately 50 basement car parking spaces.
- New link connection to the existing main entry and back-of-house areas.

Figure 1: Site location and context.

1.2 Disclaimer

This report provides high-level guidance on the sustainability commitments targeted for this project and the preliminary strategies and initiatives to be adopted.

The purpose of this assessment is to provide confidence that the sustainability commitments targeted are achievable. Due care has been taken to ensure the initiatives are coordinated and achievable; however, the specific strategies mentioned in this report are indicative and may evolve throughout future stages of design. The commitment to the overall project target will be maintained.

2 Green Star strategy

This project is a standalone development and will target a 5-Star Green Star Equivalency using the Green Star Buildings Version 1.1 tool.

2.1 Green Star overview

Green Star is a holistic tool that extends beyond the environment to address the issues that will define the next decade of the built environment. The tool's eight categories enable owners and developers to act on the areas of sustainability that matter most, future-proofing a building for the long term. It is administered by the Green Building Council of Australia (GBCA) to assess the level of environmentally sustainable design incorporated into a building.

Under the tool, the following ratings can be achieved:

- 15–34 points = 4 Star rating ("Australian Best Practice")
- 35–69 points = 5 Star rating ("Australian Excellence")
- 70+ points = 6 Star rating ("World Leader")

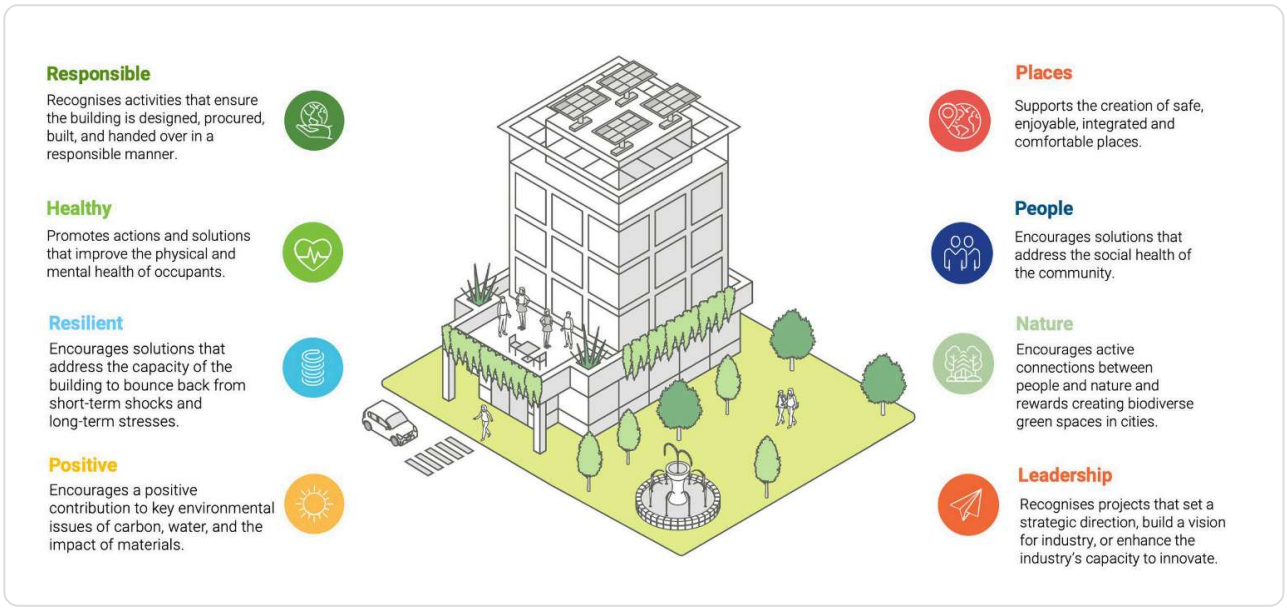


Figure 2: Overview of Green Star categories.

2.2 Green Star performance

A Green Star feasibility study was undertaken for the project. This is an indicative pathway, pending further design detail and evolution. The expected performance against each category in the Green Star tool is outlined below.

Category	Points available	Points targeted
Responsible	17 + 2	**11**
Healthy	14	**7**
Resilient	7	**4**
Positive	32 + 8	**7**
Places	7	**6**
People	9	**3**
Nature	14	**2**
Leadership	10	**1**
Total	**110 + 10 innovations**	**41**

Table 1: Green Star category points and summary.

Refer to Appendix A — Green Star Score Card for further details.

3 Summary of initiatives

A summary of the key strategies targeting this level of performance is set out below. These align with a compliant 5-Star Green Star Equivalency pathway; the initiatives selected are preliminary and subject to change. All targets are as outlined and calculated within the Green Star tool methodology.

3.1 Passive design & efficiency

The project is targeting a minimum 20% reduction in energy use compared with the Green Star reference case. The following fundamental concepts will contribute:

- Passive design elements, including window-to-wall ratio, shading and massing.
- High-performance envelope, including high-performance double-glazed systems.
- LED lighting throughout for light quality and efficiency — targeting a 20% reduction in light-fitting power compared with the NCC.
- Electric heat-pump hot water systems.
- Lifts with standby or regenerative mode.

20%
energy use reduction

20%
lower lighting power vs NCC

3.2 Water efficiency

Water efficiency will be targeted through the selection of suitable fittings and fixtures:

- 5 Star WELS — taps.
- 5 Star WELS — urinals and dishwashers (if applicable).
- 4 Star WELS — toilets.
- 3 Star WELS — showers (flow rate < 7.5 L/min).

3.3 Provision for solar PV

Provision of renewables is critical to the sustainability performance of buildings. It is a key initiative for reducing carbon emissions and will also provide operating-cost benefits.

Given the extent of the project, an area of between 490 m² and 700 m² has been nominated for solar PV. The target is a grid-integrated array with a capacity of 70–100 kW, with an expected yield of approximately 89,600–128,000 kWh per annum. Expected Scope 2 carbon savings are approximately 45,700–65,300 kg CO_2-e per annum.

70–100 kW	~128 MWh	~65 t
PV array capacity	peak annual yield	CO_2-e saved / annum

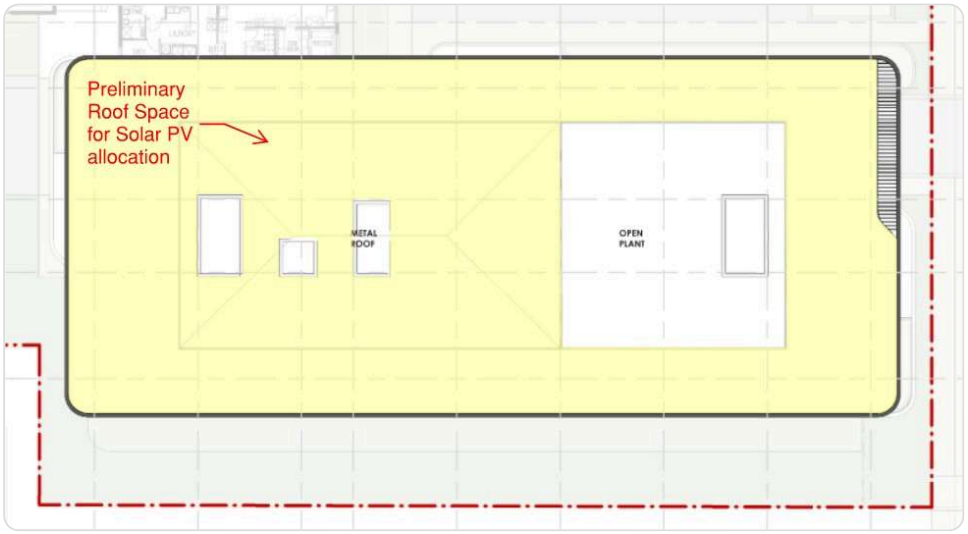


Figure 3: Roof space for preliminary solar PV allocation.

3.4 Electrification — hot water, space heating & cooking

Electrification is a key strategy for ongoing emissions improvement as the electricity grid continues to reduce its carbon intensity. This reflects the ongoing "greening" of the grid as additional renewables capacity is realised. Over the past 15 years, grid emissions on the South-West Interconnected System (SWIS) have improved by approximately 40–50%, and this trend is expected to continue with further renewable investment planned for the SWIS.

By having all services and energy demands electrified, this project is well placed to achieve ongoing carbon savings alongside the grid.

3.5 Reducing refrigerant impacts

Fugitive emissions from HVAC refrigerants are another key operational carbon impact in buildings. The project's refrigerant carbon impact will be reduced through:

- Prioritising systems with lower global warming potential where possible.
- Offsetting the remaining carbon emissions.

3.6 Upfront carbon & lifecycle impacts

Upfront carbon emissions are the embodied carbon for the material creation and construction of the building, falling under modules A1–A5 as defined by EN 15978. This project will target a minimum 10% reduction of upfront carbon, achieved through a combination of:

- Structural design efficiency and responsible material selection.
- Low-carbon concrete products, considered for all concrete mixes on the project.
- Carbon-neutral certified products.

Additionally, the project will target a 30% reduction in lifecycle impacts compared with standard practice. This will be demonstrated through a whole-of-building, whole-of-life (cradle-to-grave) comparative Life Cycle Assessment (LCA), as defined by EN 15978 — see modules A to D below.

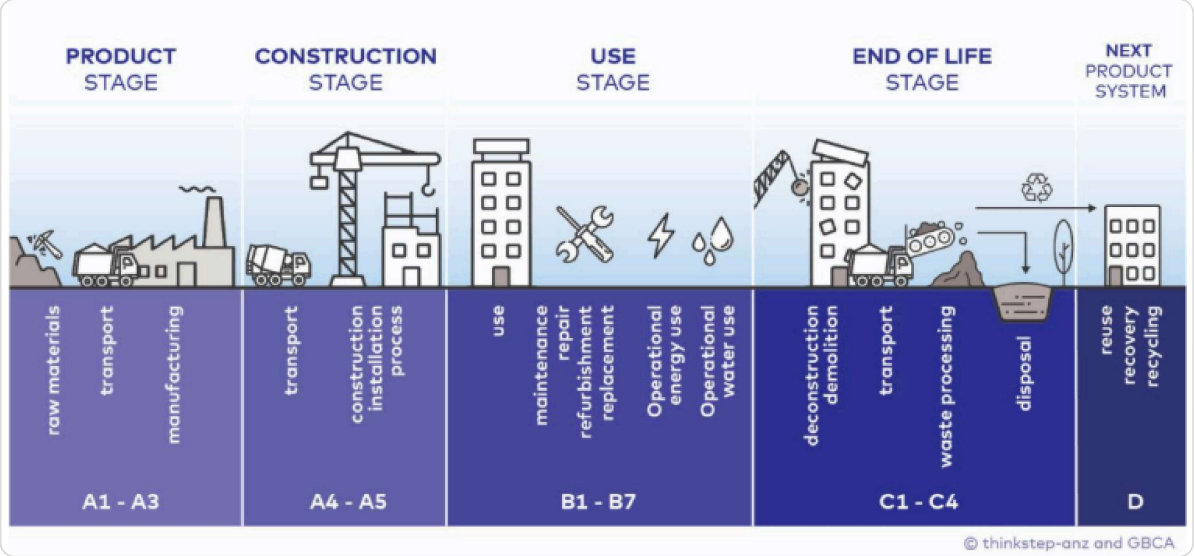


Figure 4: Life cycle impact categories — EN 15978.

3.7 Responsible product selections

Responsible product selections will be procured for the structure and internal finishes. These credits reward materials with sustainability certifications for:

- Structural elements such as concrete and reinforcing steel.
- Internal finishes such as paints, floor finishes, plasterboard and joinery.

3.8 Improved indoor environmental quality

Improved indoor environmental quality has significant benefits for residents' wellbeing and comfort. The following initiatives have been targeted to provide a healthy environment:

- 50% increase in the minimum mechanical ventilation fresh-air requirement.
- Lighting selections with consideration for visual comfort.
- High levels of daylight access through glazing with a visual light transmittance (VLT) > 0.5.
- Reduced glare from windows through blinds with a maximum VLT of 10% (or blackout blinds).
- Acoustic comfort strategy addressing maximum internal noise levels, acoustic separation and impact-noise transfer.
- Better air quality through material selections with credible sustainability certifications and limits on toxins.
- On-site testing for volatile organic compounds and formaldehyde.

3.9 Effective stormwater management

Stormwater management will be completed with due consideration for reducing pollution runoff from the development.

3.10 Climate resilience

A Climate Change Assessment will be undertaken over two timelines to identify risks and work through design responses with the design team. All High and Very High-risk items will have specific responses aligned with the Green Star requirements.

3.11 Heat island mitigation

The external colour of roof and landscape elements plays a significant role in the local microclimate, particularly ambient temperature. Dark surfaces absorb and retain heat, which can increase surrounding temperatures by more than 5 °C. Light-coloured roofs and surfaces, combined with landscaped areas, help reflect heat and minimise this effect.

This project will adopt these strategies to minimise heat gain and reduce its impact on the local microclimate.

3.12 Responsible construction & waste recycling

A minimum 80% of all construction waste will be diverted from landfill, including ongoing monthly reporting. This will be specified in the Head Contractor obligations, in line with current industry best practice.

The Head Contractor will also be required to have an Environmental Management Plan and system in place throughout construction.

3.13 Waste management plan

An Operational Waste Management Plan will be developed to maximise operational waste recycling. Appropriate waste-sorting areas have been determined based on the expected throughput of each waste stream. Specific streams targeted include:

- General waste.
- Comingled recycling.
- One additional stream, such as Food Organics and Garden Organics (FOGO) and/or e-waste.

Note: The waste storage area forms part of the Stage 2 development, which is outside the direct scope of this report. As it is a shared amenity that impacts Stage 1, the project will ensure any relevant Stage 1 requirements are incorporated into the Stage 2 development.

Figure 5: Ground floor waste storage area allocation.

3.14 Energy & water metering and monitoring

Effective metering and monitoring are essential to ensure facility performance is optimised during operation. Extensive metering and monitoring systems will be provided for all major end uses of energy and water. Data collected will be made available to staff as a learning opportunity, and will facilitate performance tracking, identification of anomalies, and fault finding and tuning.

This is in keeping with the requirements of NCC Section J.

3.15 Building commissioning & verification

The building will be commissioned to a higher standard under the guidance of an Independent Commissioning Agent (ICA) to ensure systems operate efficiently. The ICA will oversee:

- A services and maintainability review addressing commissionability, controllability, maintainability, ease of operation and safety.
- Commissioning beyond typical NCC requirements.
- A 12-month tuning process with quarterly checks and adjustments.

The project will target a higher level of airtightness for a more comfortable environment. An airtightness test will be completed at practical completion, providing reassurance of build quality.

3.16 EV transition — future EV charging infrastructure

The electric vehicle transition is a key strategy for reducing global emissions. Facilitating this transition involves provision of nominated charging bays so residents have easy access to charging infrastructure should they choose to adopt EVs. The project commitment includes:

- Provision for 15% of bays (total across all three stages) to include EV chargers.
- Future provision for an additional 5% of charging bays — namely switchboard spatial capacity and conduits.
- Chargers installed based on demand from staff and visitors, including load-management software.

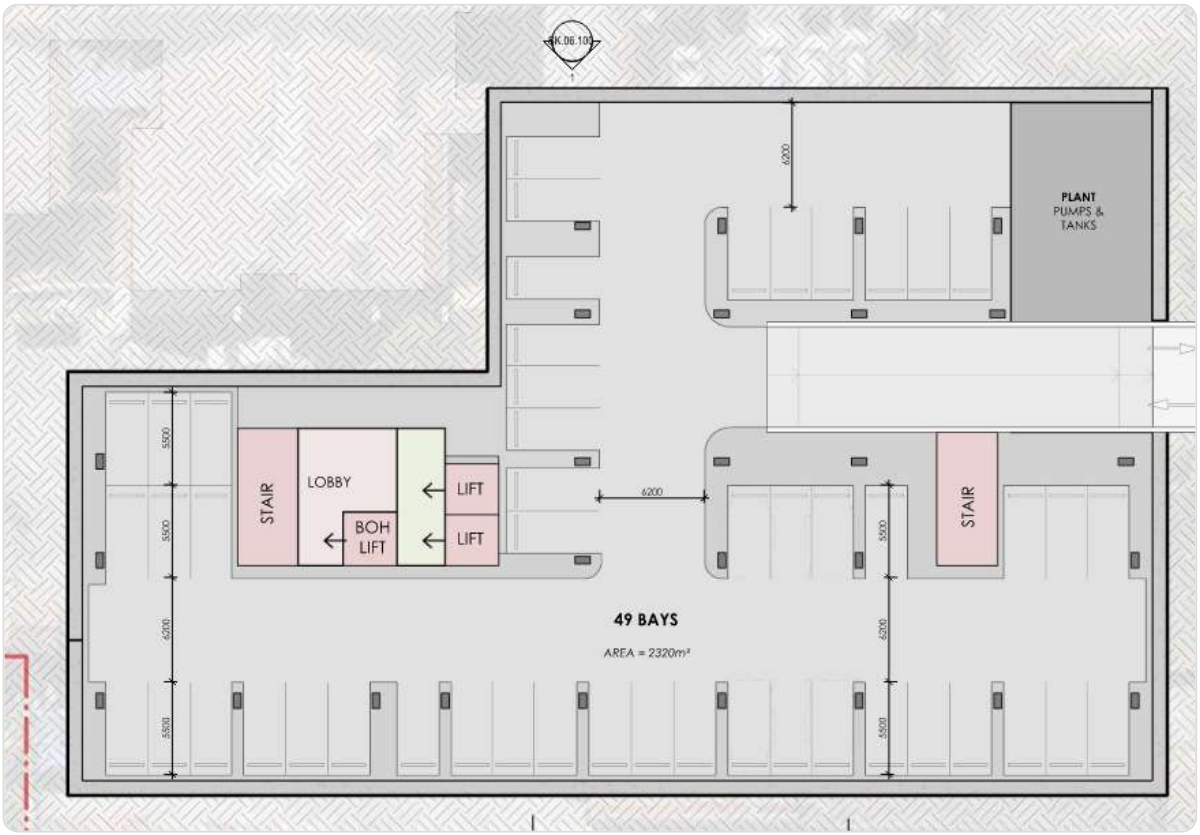


Figure 6: Basement parking allocation.

A Appendix A — Green Star score card

ATTACHMENT

Green Star Score Card

The detailed Green Star Buildings v1.1 score card is provided as a separate attachment to this report.

Preliminary Submission planner V1.1 - Aegis Highgate

Summary

Rating information

Registering from	2025 onwards	Desired Green Star rating	5 Star

Scoring

Core points targeted	40	Minimum expectations met	Yes
Leadership points targeted	1	Climate Positive Pathway targeted for desired rating (5 Star)	Yes
Sector specific credit points targeted	0		
Total points targeted	41	Nature Positive Pathway targeted for desired rating (5 Star)	Not Required
Targeted rating based on points	5 Star		

Low	19
Medium	17
High	1
TBA	4
Total	**41**

Credit	Minimum Expectation	Credit Achievement	Exceptional Performance	Total points available	Targeted performance level	Risk	Total points targeted	Comments
Responsible				**17 + 2**				
Industry Development		1		**1**	Credit Achievement	**Low**	**1**	Summation to provide GSAP
Responsible Construction	•	1		**1**	Credit Achievement	**High**	**1**	90% Construction and Demolition Waste diversion from landfill. High Risk - Demo contractors typically not compliant, Demo Waste proportion may jeopardise the 90% cutoff (pending con phase waste proportion). Worse case will comply with minimum expectations.
Verification and Handover	•	1		**1**	Credit Achievement	**Medium**	**1**	Extensive metering and monitoring, all meters to be connected to single EMS. Airtightness consultant to be engaged for input in DD, Contractor to then test at PC. ICA to be engaged for DD to complete ICA
Responsible Resource Management	•			**0**	Minimum Expectation	**Medium**	•	-Collection of Waste Streams -Dedicated Waste Storage Area -Safe and Efficient Access to Waste Storage
Responsible Procurement		1		**1**		**TBA**	**1**	TBA, pending selection of builder
Responsible Structure		2	2	**4**	Exceptional Performance (4 point)	**Medium**	**4**	Green Concrete and Lower Carbon reinforcing steel. Boral, Holcim and Infrabuild will achieve CA and EP criteria.
Responsible Envelope		2	2	**4**			**0**	
Responsible Systems		1	1	**2**			**0**	
Responsible Finishes		1	1	**2**	Exceptional Performance	**Medium**	**2**	Selection of finishes with EPD, GreenTag, GECA certifications.
Impacts Disclosure		1		**1**	Credit Achievement	**Low**	**1**	-Life Cycle Impacts Disclosure -Pollution and Resource Use Metrics Disclosure
Collaborative Leasing		1	1	**2**		**N/A**	**0**	Not applicable
= Sector specific credit					**Total**		**11**	
Healthy				**14**				
Clean Air	•	2		**2**	Minimum Expectation	**Low**	•	Outside Air - Min 50% increase in outside air requirements for mech vent spaces with CO2 control. Minimum Separation Distances is critical. Ductwork remains clean through construction. Exhaust Pollutants to facade or roof. Printers to meet emissions standards.
Light Quality	•	2	2	**4**	Credit Achievement	**Low**	**2**	Lighting Comfort: Lighting within the building meets minimum comfort requirements. -Glare from Light Sources -Daylight Strategy: The building aims to maximise access to daylight. -Best Practice Artificial Lighting Daylight (EP) not achievable for this building
Acoustic Comfort	•	2		**2**	Minimum Expectation	**Low**	•	Typical Acoustic report will satisfy this criteria. Additional requirements to be tested with Acoustics
Exposure to Toxins	•	2		**2**	Credit Achievement	**Low**	**2**	Low toxicity material selections. Onsite testing for TVOC and Formaldehydes to occur at PC
Amenity and Comfort		2		**2**		**TBA**	**2**	Pending further assessment on appropraite amenities for site
Connection to Nature		1	1	**2**		**TBA**	**1**	TBA, Indoor plant, Nature inspired design. Pending further assessment.
					Total		**7**	
Resilient				**7**				
Climate Resilience	•	1		**1**	Credit Achievement	**Low**	**1**	Resilience and adaptations for effects of climate change - Summation to complete
Operations Resilience		2		**2**	Credit Achievement	**Medium**	**2**	Likely to comply based on backup power and typical health/aged care procedures. TBA pending further discussion with client.
Community Resilience		1		**1**		**TBA**	**0**	
Heat Resilience		1		**1**	Credit Achievement	**Low**	**1**	Minimise heat island effects through light coloured roof and landscaping hardscapes.
Grid Resilience		2		**2**			**0**	Will require extensive battery storage, not recommended for this type of building
					Total		**4**	
Positive				**32 + 8**				
Energy Source	•	2	2	**4**	Credit Achievement	**Medium**	**2**	To be fully electrified - no gas 100% renewable electricity for base building loads/ BMS ready to shift to electricity consumption to grid
Energy Use - Pathway A: Reference building pathway	•	3	3	**6**	Credit Achievement (3 points)	**Medium**	**3**	**<u>Minimum 20% saving in energy efficiency compared to benchmark</u>** - VRV AC systems -High efficiency façade design, including high performance glazing, double glazing -High efficiency HWS systems, central heat pumps with COP>4 -Lifts to have standby mode and be regenerative -Consider consolidating roof plant to maximise solar PV (70kW to 100kW)
Upfront Carbon Reduction - Pathway B: Reference building	•	3	3	**6**	Minimum Expectation	**Medium**	•	**<u>Reduce upfront carbon by 10% (embodied emissions).</u>** Linked to 6, 25, 28 and SS -Ensure structural efficiency -Will require green concrete across 40% concrete mixes -Requirement for Green Reinforcing steel Consider lower carbon Aluminium, Plasterboard Demolition of existing buildings less than 50 years old are to be offset.

Upfront Carbon Compensation		1	2	**3**	Credit Achievement	**Low**	**1**	30% of remaining upfront emissions are compensated. Climate Active Certified concrete, plasterboard, aluminium?
Refrigerant Systems Impacts	•	1	2	**3**	Minimum Expectation	**Medium**	•	-Future-ready Buildings: The building considers future-proofing the building for equipment that uses ultra-low GWP refrigerants. -Weighted GWP Limit: The refrigerants in the building do not exceed a weighted average GWP limit. -Leak Detection
Low-Emissions Transport		1		**1**	Credit Achievement	**Low**	**1**	Will require 15% of bays to have chargers i.e. 8 bays based on total of 50 car bays
Design for Circularity		2	1	**3**			**0**	Linked to 24, based on measurement of circularity of materials used.
Water Use	•	3	3	**6**	Minimum Expectation	**Low**	•	Target WELS fittings and fixtures efficiency
Upfront Fit out Emissions		1	2	**3**		**N/A**	**0**	Not applicable
= Sector specific credit					**Total**		**7**	**Climate Positive Pathway met**

= Climate Positive Pathway

e: The industrial Sector Specific Credits are currently undergoing review for Green Star Buildings v1.1 and therefore are currently unavailable.

Places				**7**				
Movement and Place	•	2		**2**	Credit Achievement	**Low**	**2**	Changing Facilities: The building includes showers and changing facilities for building occupants. - Minimum 2 off Showers, 7 Lockers based on 50 staff - Safe Ingress: Access to changing facilities is a safe and protected. - Sustainable Transport Plan - Active Transport Facilities (bike parking and electric bike/scooter charging)
Enjoyable Places		2		**2**	Credit Achievement	**Low**	**2**	Intent of the credit can be achieved for building occupants - will require activation strategy.
Contribution to Place		2		**2**	Credit Achievement	**Low**	**2**	Intent of the credit can be achieved base on DRP reviews.
Culture, Heritage and Identity		1		**1**			**0**	Not achieved - Pending further assessment
					Total		**6**	

People				**9**				
Inclusive Construction Practices	•	1		**1**	Credit Achievement	**Low**	**1**	Ensure construction practices and inclusive and responsible
First Nations Inclusion		2		**2**		**TBA**	**0**	TBA, pending selection of builder
Procurement and Workforce Inclusion		2	1	**3**		**TBA**	**0**	TBA, pending selection of builder
Design for Equity		2	1	**3**	Credit Achievement	**Low**	**2**	To engage DDA consultant to complete "Design for Inclusion" report
					Total		**3**	

Nature				**14**				
Impacts to Nature	•	2		**2**	Minimum Expectation	**Low**	•	Minimise negative impacts to nature from the development
Biodiversity Enhancement - Prescriptive method		3	3	**6**			**0**	Pending further assessment
Nature Connectivity		2		**2**			**0**	Pending further assessment
Nature Stewardship		2		**2**			**0**	Pending further assessment
Waterway Protection		2		**2**	Credit Achievement	**Medium**	**2**	Civil to review flow and pollution reduction targets.
= Nature Positive Pathway					**Total**		**2**	**Nature Positive Pathway not required for 2025 registrations**

Leadership				**2**				
Market Transformation				**0**			**0**	
Leadership Challenges				**2**		**Medium**	**1**	+ 1 climate positive pathway
					Total		**1**	

CITY OF VINCENT

ATTACHMENT 10

DEVELOPMENT ASSESSMENT PANEL MEETING

HCWA Referral

Department of **Planning, Lands and Heritage**

GOVERNMENT OF WESTERN AUSTRALIA

Addressee's ref: N/A
Our ref: P11451-53946
Enquiries: Chris Dobson (08) 6551 7972

Chief Executive Officer
City of Vincent
mail@vincent.wa.gov.au

Attention: Callum Radecki

Dear Sir

SILVER CHAIN NURSING LEAGUE BUILDING, PERTH

Thank you for referring the below proposal to the Heritage Council under the provisions of Section 73 of the *Heritage Act 2018*, due to its proximity to a State Registered Heritage Place.

Place Number	P11451
Place Name	*Silver Chain Nursing League Building, Perth*
Street Address	19 Wright Street, Perth
Referral date	15 September 2026
Proposal Description	Adjacent Multi-Storey Development

We received the following information:

Heritage Impact Statement – Griffiths Architects – April 2024

Drawings prepared by Silver Thomas Hanley:

- Site Survey – SK.00.100
- Perspectives – SK.00.101
- Perspectives – SK.00.102
- Perspectives – SK.00.103
- Existing Context Plan – SK.01.100
- Existing Site Plan – SK.01.101
- Proposed Site Plan – SK.01.200
- Overshadowing Diagram – SK.01.300
- Demolition Site Plan – SK.02.100
- Basement Plan – SK.03.001
- Ground Floor Plan – SK.03.100
- Level 01 Floor Plan – SK.03.101
- Level 02 Floor Plan – SK.03.102
- Level 03 Floor Plan – SK.03.103
- Level 04 Floor Plan – SK.03.104
- Level 05 Floor Plan – SK.03.105
- Level 06 Floor Plan – SK.03.106
- Roof Plan – SK.04.100
- Elevations – SK.06.100
- Elevations – SK.06.101
- Sections – SK.07.100
- Sections – SK.07.101

The proposal has been considered in the context of the identified cultural heritage significance of *Silver Chain Nursing League Building, Perth,* and the following advice is given:

Findings

- *Silver Chain Nursing League Building, Perth* has cultural heritage significance as the only remaining structure of the previously expansive cottage homes complex linked to the services provided by the Silver Chain organisation.

- This referral is for the construction of a multi-storey aged-care building at 19 Wright Street, Perth which falls adjacent to the curtilage of the *Silver Chain Nursing League Building, Perth*.
- The proposed six-storey building would be substantially taller than the prevailing-built form along Wright Street and would visually dominate the adjacent heritage building, whose modest scale and presence would be diminished, resulting in an adverse impact on the setting of the place.
- The existing buildings proposed to be demolished are vacant and do not contribute to the cultural heritage significance of the adjacent place. However, the proximity of the proposed demolition and excavation works raises concerns regarding potential vibrational impacts on the significant built fabric.
- The *Lincoln Street Ventilation Stack* is a distinctive and prominent element of the local townscape that contributes to the area's character. Whilst it will remain visible from Wright Street, further development of the site may reduce its visual prominence and adversely affect the setting of the place.
- The proposal will have a minor adverse impact on the cultural heritage significance of *Silver Chain Nursing League Building, Perth*.

Advice

The proposal, in accordance with the plans submitted, is supported subject to the following condition:

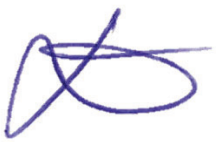
1. A program of monitoring any structural movement and potential vibration impacts on *Silver Chain Nursing League Building, Perth* is to be implemented at the commencement of works. The Heritage Council is to be notified immediately if any impact occurs and advised on a recommended course of action by a suitably qualified structural engineer.

Please note that this advice considers State heritage matters only and does not replace the need for consideration of local heritage matters and Local Planning Policies.

Please be reminded that you are required under r.42(3) of the *Heritage Regulations 2019* to provide us with a copy of your determination within 10 days after making the decision.

If you have any queries about this advice please contact Chris Dobson at chris.dobson@dplh.wa.gov.au or on 6551 7972.

Yours faithfully



Liza Mathews
Assistant Manager
Historic Heritage Conservation

22 October 2026

cc: callum.radecki@vincent.wa.gov.au

CITY OF VINCENT

ATTACHMENT 11

DEVELOPMENT ASSESSMENT PANEL MEETING

Applicants Response to Submissions

Summary of Submissions:

The tables below summarise the comments received during the advertising period of the proposal, together with the Applicant's response to each comment.

Comments Received in Support:	Applicant Comment:
• Support for the provision of additional aged care accommodation within the locality. • The proposal would increase housing and accommodation diversity within the area. • The development would provide additional accommodation options for older residents and enable ageing within the community.	Noted.

Comments Received in Objection:	Applicant Comment:
Building Height, Scale and Bulk • The proposed six-storey building exceeds the height contemplated under the City's planning framework. • The building is incompatible with the predominantly one to three-storey character of Wright Street and surrounding residential areas. • The proposal represents an overdevelopment of the site. • The building is visually dominant when viewed from nearby properties and the streetscape. • The development should be reduced to three or four storeys. • Rooftop plant, lift overruns and associated structures increase the perceived building height beyond six storeys. • Approval of the proposed height would establish a precedent for future developments of a similar scale within the locality.	The site is zoned 'Residential' under the LPS2, with a density code of **R80**. The site is also subject to Improvement Plan No. 65 – Station Precincts (**IP65**) and the City's Policy No. 7.1.1 - Built Form (**LPP7.1.1**). LPP7.1.1 seeks a building height of 3 storeys. This conflicts with the R-codes which permits 4 storeys, and with IP65 which sets clear strategic direction for increased future residential development opportunities. We also note that the Draft Station Precincts Improvement Scheme No. 1 has been released for public consultation, which proposes the site to be coded R160. This allows for building heights up to 8 storeys, consistent with the expectation that the subject site will support higher density residential development associated with its proximity to Claisebrook and East Perth railway stations. The proposal is for a 6-storey building, which is considered appropriate in the context of the above and consistent with the desired future character for the area. The assertion that the area is predominately one to three storeys is incorrect. There are a variety of building heights including a 4-storey building abutting the site and a 10-storey building at 4 Bulwer Street opposite the site, behind a 3-storey block of apartments. Notwithstanding, a high level of built form articulation is used to reduce the perception of bulk and scale associated with the proposed height. This includes varied setbacks, building depth modulation, vertical shading elements, balcony design, complementary materials, varied textures, and a contrasting colour palette. These elements collectively break up the building into 4 distinct components, reducing perceived scale and creating a cohesive and visually appealing outcome. Lift overruns, plant equipment and associated structures are significantly setback from the overall building envelope, substantially limiting their visibility from the public realm and adjoining properties. As a result, these elements do not materially increase the perceived height or visual prominence of the development.

Summary of Submissions:

Comments Received in Objection:	Applicant Comment:
	The proposal is not considered to represent an overdevelopment of the site. Rather, the existing buildings within the Aegis Lincoln Park Residential Aged Care Facility are approaching the end of their operational life, presenting a clear opportunity for redevelopment to meet contemporary aged care standards and community needs. The redevelopment will deliver contemporary, fit-for-purpose facilities that respond to current operational standards for such use. While concerns have been raised regarding precedent, each development application must be assessed on its own merits against the applicable planning framework and site-specific circumstances. Approval of the proposed development would not set a precedent for future developments in the locality, noting the site is unique in its context as it is 1ha in area.
Neighbourhood Character and Streetscape • The proposal is inconsistent with the established character of Highgate and Wright Street. • Increasing building heights are eroding neighbourhood character. • The development is more appropriately located on a major road rather than a local residential street. • The proposal contributes to the cumulative impacts of recent and future redevelopment in the area.	As per responses to **Building Height, Scale and Bulk**. The existing streetscape and character of this section of Wright Street contains a mix of buildings of differing typologies, setbacks and architectural styles. The proposed development will add to this diversity. It will also set a new standard of development, representing a high-quality example of the future amenity of the area as it progressively redevelops. It is also noted HBF Stadium is also located at the end of the street which is a significant piece of infrastructure (and built form) in the area.
Traffic, Parking and Servicing • Parking provision is inadequate relative to the proposed increase in accommodation capacity. • Future stages of redevelopment and cumulative redevelopment outcomes have not been fully assessed. • Additional traffic generation and parking demand will occur within surrounding streets. • Increased redevelopment within the precinct will place additional pressure on local infrastructure and services.	The City's Local Planning Policy - Non-Residential Parking does not prescribe a specific parking rate for a Residential Aged Care Facility or similar use. The City's previous policy prescribed 1 bay per 3 beds. For a site ultimately accommodating 193 beds this equates to a requirement of 65 car bays to service the facility. The proposed car parking arrangements have been guided by this rate. The proposal includes 75 car parking bays representing an excess of 10 bays having regard to the requirements as per the former policy rate. It is also noted that the subject site benefits from a highly accessible and central location, with strong public transport connectivity, including a range of train and high frequency bus services. This level of accessibility reduces reliance on private vehicles for visitors and staff. The development application was also supported by a Transport Impact Statement, which concluded that the impact of the development traffic on the surrounding road network will not be significant and that it will not increase traffic on any local road on the surrounding road network anywhere near the 100vph threshold.
Residential Amenity • The proposal will reduce outlook and views of the sky from neighbouring properties.	The proposed development has been designed to appropriately balance the delivery of higher-density residential aged care accommodation with the amenity expectations of surrounding properties.

Summary of Submissions:

Comments Received in Objection:	Applicant Comment:
• The proposal will reduce access to natural light. • Increased noise, lighting and activity will affect surrounding properties. • The development will increase overshadowing of neighbouring properties. • Excavation and basement construction will impact adjoining residents during the construction phase.	In relation to overshadowing, there is no prescribed maximum percentage of shadowing to adjoining properties coded R80 or higher. Notwithstanding, the development has been designed with generous setbacks to ensure overshadowing impacts are minimised. Shadow diagrams submitted as part of the development application also demonstrate that at 12pm on 21 June, overshadowing impacts are minimal and only affect the property directly to the south. However, with the proposed development set back 7.5m from the boundary in addition to the approximately 2.5m existing setback of the development to the south from the shared boundary. Additionally, the majority of the property remains unimpacted. With respect to overlooking and access to natural light to adjoining residential properties, the design has been refined to minimise amenity impacts to the apartment development at 34 Bulwer Street. Importantly, the northern aspect of the adjoining apartments has been maintained, preserving access to sunlight and outlook opportunities for residents, with only minimal impacts to external courtyard areas. Further design measures have been incorporated to address privacy considerations, including: • Strategic placement of windows and visual screening to minimise direct overlooking; • A solid wall at the closest point to the shared boundary; • Removal of balconies from the corner of the building closest to the shared boundary; • Additional screening to balconies closer to the shared boundary; and • Landscape buffers and tree planting adjacent to windows along the western and southern boundaries. It is also noted that the northern outlook of 34 Bulwer Street is maintained, as no built form that would interrupt their northern aspect is proposed. An Acoustic Report was submitted as part of the application. The use is expected to operate in a manner comparable to other residential developments and is not anticipated to generate unreasonable amenity impacts. The main source of noise associated with the development is the mechanical services including air conditioners and car park exhaust ventilation as well as noise from deliveries. Emissions from these sources will be required to comply with the requirements of the *Environmental Protection (Noise) Regulations 1997*. The Acoustic Report provides recommendations to ensure compliance, and further noise assessment and modelling may need to be undertaken as the detailed design progresses to confirm compliance, as outlined in the report. Temporary impacts associated with excavation and construction can be appropriately managed through the preparation and implementation of a Construction Management Plan, which may be imposed as a condition of approval.

Summary of Submissions:

Comments Received in Objection:	Applicant Comment:
Heritage • The scale of the development will dominate the heritage building on the site and surrounding heritage places. • Greater conservation, restoration and protection of the heritage asset is required. • The redevelopment does not adequately reflect the heritage significance of the site.	A Heritage Impact Assessment was submitted as part of the development application, which concludes that, when assessed against the heritage values of the place, the proposal results in no adverse heritage impacts. We also note that the application was referred to the Heritage Council of Western Australia who raised no objection to nor comments on the proposal.
Landscaping • Increased landscaping and setbacks should be provided. • Greater use of local native species should be incorporated into the landscape design. • The landscape outcome should place greater emphasis on biodiversity and urban greening.	As detailed in the submitted Landscape Report, native medium-sized trees are proposed within the street, providing enhanced canopy cover, visual amenity and a layered landscape character through planting of varying heights. Plant species have been selected to be resilient and appropriate to their location, incorporating a mix of Australian native and climate-appropriate species. The landscape strategy includes: • A total deep soil area of 26% of the overall site; • Some targeted on-structure planting; • Retention of 2 trees and an additional 18 trees planted on site; and • An increase of 672sqm of mature tree canopy due to additional tree planting. Accordingly, the landscape proposal will enhance the site's visual amenity and contribute positively to the streetscape, biodiversity outcomes and urban canopy.
Aged Care Operations • The proposal prioritises an increase in bed numbers over resident wellbeing. • The scale and height of the building are not considered appropriate for aged care residents.	The assertion that the development prioritises bed numbers over resident wellbeing is baseless and without evidence. Aegis is an experienced and highly regarded provider of Residential Aged Care services with a proven track record. Further detail as per responses to **Building Height, Scale and Bulk**.
Other Matters • The proposal will contribute to broader impacts associated with an increasing aged population in the area.	Not a relevant planning consideration.

Note: Submissions are considered and assessed by issue rather than by individual submitter.

CITY OF VINCENT

ATTACHMENT 12

DEVELOPMENT ASSESSMENT PANEL MEETING

City's Response to Submissions

Summary of Submissions:

The tables below summarise the comments received during the advertising period of the proposal, together with the City's response to each comment.

Comments Received in Support:	City Comment:
• Support for the provision of additional aged care accommodation within the locality. • The proposal would increase housing and accommodation diversity within the area. • The development would provide additional accommodation options for older residents and enable ageing within the community.	Comments for support acknowledged.

Comments Received in Objection:	City Comment:
Building Height, Scale and Bulk • The proposed six-storey building exceeds the height contemplated under the City's planning framework. • The building is incompatible with the predominantly one to three-storey character of Wright Street and surrounding residential areas. • The proposal represents an overdevelopment of the site. • The building is visually dominant when viewed from nearby properties and the streetscape. • The development should be reduced to three or four storeys. • Rooftop plant, lift overruns and associated structures increase the perceived building height beyond six storeys. • Approval of the proposed height would establish a precedent for future developments of a similar scale within the locality.	The proposed building height, scale and bulk have been assessed against the objectives of the Built Form Policy, having regard to the size and context of the site, the development within the surrounding area, and the overall design of the proposal. While the proposed six-storey development does exceed the height identified under the Built Form Policy, the site is approximately one hectare in area and capable of accommodating a larger built form compared to the smaller residential lots surrounding it. The development incorporates setbacks, articulation, changes in materials and landscaping to reduce its visual bulk and provide separation from adjoining properties and the street. The existing character of Wright Street is varied, comprising a mix of development typologies, building heights, setbacks and architectural styles. This includes lower-scale development together with multiple dwelling developments of a greater scale, and there is no single prevailing built form or architectural character along this section of Wright Street. The proposed development would contribute to this varied built form while providing a contemporary redevelopment of an existing aged care site. The rooftop plant, lift overruns and associated structures are setback from the main building line, reducing their visibility when viewed from the street. The assessment of the subject application is specific to the site. The approval of the application would not automatically establish a precedent, as any future proposal would be required to be assessed against its individual site context, applicable planning framework and potential amenity impacts.

Summary of Submissions:

Comments Received in Objection:	City Comment:
Neighbourhood Character and Streetscape • The proposal is inconsistent with the established character of Highgate and Wright Street. • Increasing building heights are eroding neighbourhood character. • The development is more appropriately located on a major road rather than a local residential street. • The proposal contributes to the cumulative impacts of recent and future redevelopment in the area.	Wright Street contains a mix of residential and commercial development typologies, with varying lot sizes, setbacks, building forms and architectural styles. The existing aged care facility, heritage building, and adjoining commercial property already assist in distinguishing the character of the area amongst the residential properties surrounding it. The proposal introduces a contemporary building form, while retaining the northern portion of the site, including the heritage building. The proposal has incorporated setbacks, landscaping, and façade articulation to ensure its interaction with Wright Street is positive. The cumulative effect of redevelopment within the wider area has been considered having regard to the City's Local Planning Strategy that establish the anticipated future development of the area. Nonetheless, each future development must be considered on its individual planning merits.
Traffic, Parking and Servicing • Parking provision is inadequate relative to the proposed increase in accommodation capacity. • Future stages of redevelopment and cumulative redevelopment outcomes have not been fully assessed. • Additional traffic generation and parking demand will occur within surrounding streets. • Increased redevelopment within the precinct will place additional pressure on local infrastructure and services.	As part of the application, a traffic and parking assessment was submitted addressing the anticipated vehicle movements and parking demand associated with the development. The proposed parking provision has been assessed having regard to the operational requirements of the aged care facility, including staff, visitors and service vehicles. Based on the information submitted, the proposed on-site parking provision is considered sufficient to accommodate the anticipated parking demand, with minimal impact on the surrounding road and parking network. Servicing, deliveries and waste collection are to occur within designated areas on the site. Any future redevelopment stage would be subject to a separate development application and further assessment of its traffic, parking, servicing and infrastructure implications.
Residential Amenity • The proposal will reduce outlook and views of the sky from neighbouring properties. • The proposal will reduce access to natural light.	The development has been proposed with setbacks from the street and all lot boundaries to provide building separation from adjoining properties. These setbacks assist in reducing potential amenity impacts associated with building bulk, privacy,

Summary of Submissions:

Comments Received in Objection:	City Comment:
• Increased noise, lighting and activity will affect surrounding properties. • The development will increase overshadowing of neighbouring properties. • Excavation and basement construction will impact adjoining residents during the construction phase.	natural light and ventilation. Building bulk is further reduced through the use of varied materials, colours and building articulation, including balconies. While the proposed development may alter the outlook from some adjoining properties, the planning framework does not protect views of the sky. Overshadowing is not required to be assessed in relation to the southern adjoining R80 coded property due to the existing non-residential use operating there. Potential impacts associate with noise can be managed through the design of the development, the acoustic recommendations outlined in the submitted Acoustic Report, and compliance with conditions relating to noise. Construction impacts, including excavation, vibration, dust, noise and vehicle movements would be managed through an approval construction management plan prior to works commencing, which is recommended as a condition of approval.
Heritage • The scale of the development will dominate the heritage building on the site and surrounding heritage places. • Greater conservation, restoration and protection of the heritage asset is required. • The redevelopment does not adequately reflect the heritage significance of the site.	The proposal retains the state listed heritage building on the site and provides physical separation between it and the proposed development. The separation distance assists in maintaining the legibility of the heritage building and reduces the dominance of the proposed development on this building. The application has also been referred to the State Heritage Council WA (HCWA), and the heritage impacts have been considered as part of this application. The HCWA is supportive of the proposed development, subject to a condition being imposed to protect the heritage building during construction.
Landscaping • Increased landscaping and setbacks should be provided. • Greater use of local native species should be incorporated into the landscape design. • The landscape outcome should place greater emphasis on biodiversity and urban greening.	The proposal includes deep soil areas, landscaping and tree planting within the Wright Street setback and verge, and throughout the site. Landscaping is also proposed around the building and adjoining boundaries to soften the built form, provide screening and improve the site's contribution to the streetscape. The final species selection, including the use of appropriate local native and waterwise species, has been addressed through the detailed landscape plan. A condition has been recommended which requires the landscaping to be installed before occupation and maintained for the life of the development.

Summary of Submissions:

Comments Received in Objection:	City Comment:
Aged Care Operations • The proposal prioritises an increase in bed numbers over resident wellbeing. • The scale and height of the building are not considered appropriate for aged care residents.	The proposed increase in accommodation capacity responds to the ongoing use of the site as an aged care facility. The suitability of the development for residents is assessed through matters including access to natural light and ventilation, landscaping, accessibility, and privacy. The height of the building does not, in itself, make it unsuitable for aged care residents. The proposal includes lifts, accessible pathways and universal access arrangements to support residents, visitors and staff with varying mobility requirements. Operational and resident-care matters that fall outside the planning framework are regulated through the relevant aged care and building requirements.
Other Matters • The proposal will contribute to broader impacts associated with an increasing aged population in the area.	The provision of high quality aged care accommodation is consistent with the City's strategic direction to respond to an ageing population and support a range of accommodation options within the local area.

Note: Submissions are considered and assessed by issue rather than by individual submitter.

CITY OF VINCENT

ATTACHMENT 13

DEVELOPMENT ASSESSMENT PANEL MEETING

Clause 67 Assessment

Clause 67 – Relevant Matters to be Considered by Local Government Assessment

Clause 67 – Matters to be Considered	
Matter	**City Comment**
a) The aims and provisions of this Scheme and any other local planning scheme operating within the Scheme area.	The proposal is the continuation of the existing aged care use of the site and is consistent with the objectives of the Residential zone for the reasons outlined in the Comments section of this report.
b) The requirements of orderly and proper planning including any proposed local planning scheme or amendment to this Scheme that has been advertised under the *Planning and Development (Local Planning Schemes) Regulations 2015* or any other proposed planning instrument that the local government is seriously considering adopting or approving.	There are no seriously entertained planning instruments relevant to this application. Public consultation on the City's Draft Local Planning Strategy has concluded. Limited weight can be given to the Draft Local Planning Strategy as it will not be a 'seriously entertained' planning instrument until Council has considered submissions and adopted a final version. The draft Strategy supports a diverse range of housing and care options, including accommodation to meet the needs of the City's ageing population. The proposal, which would increase the capacity of an existing aged care facility, is consistent with that strategic direction.
c) any approved State planning policy	Relevant State planning policies have been considered and commentary provided in the body of the City's RAR.
fa) any local planning strategy for this Scheme endorsed by the Commission.	The City of Vincent Local Planning Strategy has been considered. The Strategy supports a diversity of housing and care options to meet the needs of the community, including an ageing population. The proposed expansion of the existing aged care facility is consistent with this strategic direction. Commentary is provided in the body of the City's RAR.
g) Any local planning policy for the Scheme area.	An assessment of the proposal has been undertaken against the City's relevant local planning policies, including the Built Form Policy, Sound Attenuation Policy, Percent for Art Policy, Construction Management Policy, Development Guidelines for Heritage Places, and the Non-Residential Parking Policy.
k) the built heritage conservation of any place that is of cultural significance	The subject site contains the Silver Chain Nursing League Building, which is included on the State Register of Heritage Places and the City's Heritage List. The building is located on the eastern portion of the lot, approximately 50 metres from the Stage 1 development area. The application was referred to the Heritage Council of WA, who supports the proposal subject to a condition requiring a program of monitoring structural movement and vibration impacts on the Silver Chain Nursing League Building. This condition is recommended. The City's DRP also supported the developments relationship with the heritage building, following the applicant submitting the Heritage Impact Statement included in **Attachment 8.** Further commentary is provided in the body of the City's RAR.
l) the effect of the proposal on the cultural heritage significance of the area in which the development is located	The proposal is located adjacent to the curtilage of the State registered Silver Chain Nursing League Building. The Heritage Council of WA advised that the six-storey building would be substantially taller than the prevailing built form along Wright

Clause 67 – Matters to be Considered	
Matter	**City Comment**
	Street and would visually dominate the heritage building, whose modest scale would be diminished, resulting in an adverse impact on its setting. The existing buildings proposed to be demolished are vacant and do not contribute to the cultural heritage significance of the adjacent place. The Heritage Council considers the proposal would have a minor adverse impact on the cultural heritage significance of the place, and supports the proposal subject to the vibration monitoring condition. Having regard to the Heritage Council's advice and the separation of approximately 50 metres, the impact is considered acceptable subject to the inclusion of the recommended condition.
m) The compatibility of the development with its setting including – (i) The compatibility of the development with the desired future character of its setting. (ii) The relationship of the development on adjoining land or on other land in the locality including, but not limited to, the likely effect of the height, bulk, scale, orientation and appearance of the development.	The proposed development is compatible with its setting. The proposed building height and primary street setback to Wright Street meet the relevant objectives and are supported. These departures are addressed in the City's RAR. The site is zoned Residential R80 and is within the Residential Built Form Area, where a three-storey building height is contemplated. The surrounding area has a mixture of built form and development outcomes, including multiple dwelling developments to the west, a single-storey rehabilitation centre to the south, and two to three storey development opposite on Wright Street. The Stage 1 building is set back 9 metres from the southern boundary, 4 metres from the western boundary and 4 metres from Wright Street (to the main building line), with the rooftop plant set back 11.2 metres from Wright Street. The building incorporates varied materials, articulation, balconies, screening and landscaping to reduce its bulk, and the City's DRP supported the proposal in relation to context and character and built form and scale. The proposal is considered compatible with the mixed character of the locality and its proximity to higher density development along Smith Street and Lord Street.
n) The amenity of the locality including the following – (i) environmental impacts of the development; (ii) the character of the locality; (iii) social impacts of the development.	The proposed development would not result in an adverse impact on the amenity of the locality, subject to the recommended conditions. The Acoustic Report provided with the application demonstrates that noise emissions from the development, including mechanical plant and deliveries, can be managed to comply with the *Environmental Protection (Noise) Regulations 1997* and the City's Sound Attenuation Policy. A condition is recommended requiring an updated acoustic report prior to the issue of a building permit, to consider final mechanical plant selection and other noise sources. The key amenity considerations are building height, bulk and scale, setbacks, visual privacy, traffic, parking, waste collection, acoustic impacts, landscaping, heritage and construction management. These matters have been assessed in the City's RAR. The site is in an inner-city location, in a mixed context close to higher density development along Smith Street and Lord Street. The

Clause 67 – Matters to be Considered	
Matter	**City Comment**
	design and recommended conditions are considered to appropriately manage potential impacts on adjoining and nearby residential properties, including the multiple dwelling developments to the west and the rehabilitation centre to the south.
p) whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved	As part of the application, a landscaping plan was submitted outlining the location and species of the proposed landscaping. The proposed landscaping assists in providing amenity for users of the building, improving the development's interaction with the street and softening the bulk of the development. This is discussed further in the RAR. A condition is recommended requiring the landscaping to be provided prior to occupation and maintained thereafter for the duration of the use.
s) The adequacy of — (i) the proposed means of access to and egress from the site; and (ii) arrangements for the loading, unloading, manoeuvring and parking of vehicles;	The proposed access, loading, manoeuvring and parking arrangements are acceptable. The City's Engineering Team has reviewed the proposal and is satisfied that the proposed vehicle access arrangement can operate safely.
t) The amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety;	The applicant has provided a Transport Impact Assessment (TIA) that demonstrates the traffic generated by the development is within the capacity of the road systems in the locality and would not have an adverse effect on traffic flow and safety in the area. Further commentary on the traffic impacts of the development is provided within the body of the City's RAR.
u) The availability and adequacy for the development of the following — (i) public transport services; (ii) public utility services; (iii) storage, management and collection of waste; (iv) access for pedestrians and cyclists (including end of trip storage, toilet and shower facilities); (v) access by older people and people with disability;	The subject site is located within a walkable distance to the Lord Street Local Centre, East Perth Train Station, high frequency bus routes and cycle network connections. This supports access by alternative modes of transport for staff and visitors. The applicant's TIA addresses the availability of public transport and cyclist accessibility in the locality. Waste storage, management and collection have been assessed through the submitted Waste Management Plan prepared by Talis, dated 13 July 2026. A condition is recommended requiring the Waste Management Plan to be implemented and complied with at all times for the duration of the development. The facility is purpose built for residents with limited mobility. Lifts service all levels, with level access to communal areas and outdoor terraces, and corridors, resident rooms and bathrooms are designed to accommodate mobility aids. Compliance with the accessibility requirements of the National Construction Code would be addressed at the building permit stage. The DRP noted the main pedestrian entrance is orientated towards the car park rather than Wright Street.

Clause 67 – Matters to be Considered	
Matter	**City Comment**
	On balance, the proposal provides adequate access to transport, services, waste management and pedestrian/cyclist infrastructure, subject to the recommended conditions.
w) the history of the site where the development is to be located	The history of the site has been detailed within the City's RAR.
x) the impact of the development on the community as a whole notwithstanding the impact of the development on particular individuals	The proposal would have a positive impact on the community as a whole by increasing the capacity of the existing aged care facility from 46 to 193 beds (147 additional beds). The facility would provide transitional care for elderly people discharged from hospital and awaiting placement in permanent aged care, supporting the broader health system and the strategic direction to provide for an ageing population. The potential adverse impacts, including building height and scale, street setback, the setting of the adjacent heritage building, traffic, parking, removal of a street tree and construction impacts, have been assessed in the City's RAR and are considered to meet the applicable objectives subject to the recommended conditions. On balance, the proposal would not result in an adverse impact on the community as a whole.
y) any submissions received on the application	The application was advertised for 28 days, from 25 September to 23 October 2026. A total of 22 submissions were received, comprising 10 in support, 11 objections and 1 comment. The primary concerns raised related to building height and scale, traffic and parking impacts, and landscaping. A summary of the submissions and the Administration's response included in **Attachment 12**.
za) the comments or submissions received from any authority consulted under clause 66	The City referred the application to the Heritage Council of WA due to its proximity to the State registered Silver Chain Nursing League Building. The Heritage Council supports the proposal subject to a condition requiring monitoring of structural movement and vibration impacts, which is recommended. The Heritage Council's advice is addressed in the body of the City's RAR.
zb) any other planning consideration the local government considers appropriate	The proposal was presented to the City's DRP on three occasions prior to lodgement (18 December 2025, 11 March 2026 and 29 April 2026) and was referred to the DRP Chair following lodgement. The DRP supported the proposal, noting it progressively improved throughout the DRP process. The DRP identified further attention was required in relation to legibility. This has been addressed in the Design Review Panel Advice section of the RAR. The Design Review Panels commentary on the proposal is included in **Attachment 14**.

CITY OF VINCENT

ATTACHMENT 14

DEVELOPMENT ASSESSMENT PANEL MEETING

DRP Minutes

MINUTES

CITY OF VINCENT

DESIGN REVIEW PANEL ASSESSMENT – 23/10/26

Design Review Panel Members	• Simon Venturi – Chairperson • Caine Holdsworth
City of Vincent Officer	• Callum Radecki
Proponent Team	• Planning Solutions • Silver Thomas Hanley • Griffiths Architects • CAPA

1.0	Address: 19 Wright Street, Highgate Proposal: Commercial Development (Aged Care Facility) Applicant: Planning Solutions

DRP Comments 21 October 2026		
Overall	The applicant has responded to the vast majority of the DRP's previous comments and the proposal has progressively improved throughout the DRP process. The DRP supports the proposal.	
Summary	The only remaining DRP recommendation relates to increasing the legibility of the main pedestrian entrance to the building from the streetscape, as it is currently located quite deep in the site and oriented towards the carpark as well as existing entrance to the site. Refer comments in the Legibility Principle.	
Design quality evaluation		
		Supported
		Pending further attention – refer to detailed comments provided
		Not supported
		Insufficient information for comments to be able to be provided.
Strengths of the Proposal (based on changes)		
• The primary street setback has been increased from 1.6m to 2m (to the balconies) • Modifications to the façade, the removal of some balconies and the introduction of screening have addressed visual privacy issues in the south west corner of the site • Various landscaping items have been refined and resolved		
Design Principles		
Principle 1 - **Context and character**		***Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.***
	• No further development comments. Supported.	
Principle 2 - **Landscape**		***Good design recognises that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context.***

quality		• The edge condition / fence between the site and adjoining south property has not been shown but noted as a Colorbond fence. Given communal spaces are located on the south side of the proposed building the applicant is encouraged to consider this interface as an opportunity for climbing planting to generate a soft boundary edge condition. • In earlier versions of the proposal a 'legacy tree' was proposed on the north side of the Stage 1 building works which was supported. The current scheme has removed this and left the garden bed as low planting and hedges. The applicant is encouraged to re-instate this or provide rationale for its removal. • The Landscape Plan shows a number of black areas which are not defined on the legend. Confirm if these are an error or the intention for these. • The crossovers are currently shown as bitumen. Footpath materiality should extend through the crossovers indicating pedestrian movement as a priority over vehicle movement. The applicant may also consider lowering wall heights near the crossover to footpath intersections to improve pedestrian visibility and safety.
Principle 3 - **Built form and scale**		***Good design ensures that the massing and height of development is appropriate to its setting and successfully negotiates between existing built form and the intended future character of the local area.***
		• No further development comments. Supported.
Principle 4 - **Functionality and build quality**		***Good design meets the needs of users efficiently and effectively, balancing functional requirements to perform well and deliver optimum benefit over the full life-cycle.***
		• No further development comments. Supported.
Principle 5 - **Sustainability**		***Good design optimises the sustainability of the built environment, delivering positive environmental, social and economic outcomes.***
		• The proposed ESD strategy and commitments are supported. The ESD Report notes the roof area may not be sufficient to house the proposed 70 - 100kW PV solar system. The applicant is encouraged to co-ordinate the ESD initiatives with the drawings. Show the PV solar panels on the roof to illustrate the proposed system size is feasible. • The applicant is also encouraged to show other ESD initiatives such as EV chargers on the drawings.
Principle 6 - **Amenity**		***Good design optimises internal and external amenity for occupants, visitors and neighbours, providing environments that are comfortable, productive and healthy.***
		• No further development comments. Supported.
Principle 7 - **Legibility**		***Good design results in buildings and places that are legible, with clear connections and easily identifiable elements to help people find their way around.***
		• The primary pedestrian entry to building is orientated to the carpark rather than the streetscape and is recessed deep in the site, requiring people to walk down a long pathway and make a dog-leg turn to enter the building. This limits its legibility from the streetscape. The relationship with the existing main entry on the site is acknowledged however it is hard to fully support in its current form. To mitigate this issue the applicant is encouraged to include further architectural cues on the corner of the building at the start of the pedestrian pathway to the entry, such as adjusting the architectural form / language of the building on the corner and / or including an entry canopy on the corner to increase the legibility of the entrance pathway from the streetscape.
Principle 8 - **Safety**		***Good design optimises safety and security, minimising the risk of personal harm and supporting safe behaviour and use.***
		• No further development comments. Supported.
Principle 9 - **Community**		***Principle*** ***Good design responds to local community needs as well as the wider social context, providing environments that support a diverse range of people and facilitate social interaction.***
		• No further development comments. Supported.
Principle 10 - **Aesthetics**		***Principle*** ***Good design is the product of a skilled, judicious design process that results in attractive and inviting buildings and places that engage the senses.***
		• No further development comments. Supported.

MINUTES

CITY OF VINCENT

DESIGN REVIEW PANEL MINUTES

Wednesday 29 April 2026 at 2:30pm
Venue: Committee Room
City of Vincent
Administration and Civic Centre
244 Vincent Street Leederville

Meeting Attendees	
Design Review Panel Members	• Simon Venturi – Chairperson • Dominic Snellgrove • Caine Holdsworth • Marc Beattie – comments provided by email
City of Vincent Officers	• Michael Hancock – Manager Development and Design • Jade-Lee Phung – Urban Planner
Proponent Team	Item 3.1 • Tayne Evershed – Planning Solutions (applicant) • Tony Di Leo – Silver Thomas Hanley (architect) • Christopher Brynjulfsen – Silver Thomas Hanley (architect) • Marilyn Howden – Griffiths Architects (heritage architect) • Prasanna Suraweera – Summation (sustainability) • CAPA

Meeting Minutes	
1	**Welcome and Declaration of Meeting Opening** Simon Venturi declared the meeting open at 2:30pm
2	**Apologies** Marc Beattie - Panel Member Michael Cross - Aegis Group Health and Aged Care (proponent)
3	**Meeting Business**
3.1	**Item 3.1** Address: 19 Wright Street, Highgate Proposal: Commercial Development (Aged Care Facility) Applicant: Planning Solutions Reason for Referral: Pre-lodgement Application – Previously Referred To consider amendments to the proposal made in response to the comments of the DRP at its meeting on 11 March 2026.

DRP Comments 29 April 2026	
Overall	The applicant has responded to a large portion of the DRP's previous comments and the proposal has progressively improved throughout the DRP process, however there are some further amendments, design development and detail required in order to achieve full DRP support for the proposal.
Further review	The proposal will be required to return to a DRP Meeting to assess the changes made in response to the below comments in a number of Principles.

Summary:	The applicant is encouraged to further develop and resolve issues in the following key areas; • Increase the primary street setback on Wright Street significantly and introduce larger trees / denser landscaping in the front setback area to soften the streetscape interface • Improve the legibility of the main pedestrian entrance to the building from the streetscape • Undertaking further design development and providing further detail in relation to the landscaping aspect • Include the Meade Cottage maintenance works noted in the Heritage Impact Statement in this stage of works • Resolve the visual privacy non-compliances from the rooms on the south west corner of the building The DRP's role is to provide design advice to the City of Vincent to inform the City's assessment and determination of planning applications. The DRP's advice is not planning advice and the DRP's support for the above principles will not fetter the final recommendation of the City made in respect to the application for planning approval. Planning matters should be discussed separately with the City following the receipt of the DRP minutes.

Design quality evaluation

		Supported
		Pending further attention – refer to detailed comments provided
		Not supported
		Insufficient information for comments to be able to be provided.

Strengths of the Proposal (based on changes)

- A Heritage Architect has been engaged who has provided a Heritage Impact Statement
- The Heritage Impact Statement notes conservation works to Meade Cottage as a positive and the impact of the new development on Meade Cottage to be minimal
- The interface to Wright Street at ground level is more open and interactive than the previous version
- The setback at the rear of the site (near the kink in the boundary) has increased to 4m
- Fire pumps and tanks are located in the basement
- Sections have been included which are helpful in understanding building
- The Landscape Plan has been developed further from the previous sketch drawings provided
- Landscaping metrics (deep soil area, soft planting and trees) on the site are generally supported
- An Arborist has been engaged and relocation of existing trees on the site is supported
- Landscaping has been extended in the front setback to screen the new parking area
- Landscaping of the verge is supported
- An ESD professional has been engaged who has provided a strong ESD strategy / framework and the proposal is targeting a 5 star Greenstar outcome
- ESD initiatives include a 70kW minimum PV solar system, all electric development (no gas), EV charging, central heat pump HWS, double glazing, low carbon materials and a light colour roof
- Involvement of the ESD professional throughout the construction stage of the project is supported
- HVAC plant is shown on the roof screened
- Further information has been provided in the form of elevations and in relation to external materiality
- Face brick materiality at ground level, a white screened middle section and darker colours with more open balconies / corners on the upper levels plays a role in breaking down the proposal's visual bulk and scale
- The renders illustrate a complimentary relationship between the proposed building and heritage listed vent stack within the surrounding context

Design Principles

Principle 1 - **Context and**		***Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.***

character		• As noted in the Built form and scale Principle the minimal 1.6m upper level setback to Wright Street is not supported as this generates an abrupt interface to the streetscape adjoining low scale single residential properties. Refer recommendations in the Built form and scale Principle to address this issue. • The Heritage Impact Statement identifies a number of high level maintenance actions that should be undertaken regardless of the development proposal. These should be undertaken and could be achieved through a heritage agreement with the City or via Heritage Council processes. • The applicant is encouraged to extend the proposed works to include the area in front of Mead Cottage. This has not been addressed in either the Heritage Impact Statement or the Landscape Plan.
Principle 2 - **Landscape quality**		***Good design recognises that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context.***
		• The applicant is encouraged to increase the primary street setback to Wright Street in order to introduce larger trees and denser landscaping in the setback in-front of the building to soften the streetscape interface. • The proposal includes areas of asphalt where permeable paving could be implemented to encourage growth of on-site landscaping and trees such as in the parking bays. The applicant is encouraged to reduce the extent of asphalt within close proximity to planting areas where possible. • The carpark area has deciduous trees which can result in higher maintenance requirements. The applicant is encouraged to consider larger evergreen tree species within the carpark area. • The north side carpark area soil volume and width allocated for transplanted trees appears minimal. There appears to be an opportunity to increase soil volume and introduce additional tree planting in this area to screen / soften the carpark and maximise shading to the pedestrian entry. • The provision of on-structure landscaping is supported however further details in relation to planter depths / volumes, drainage, reticulation and maintenance access are required to illustrate these areas will contribute to the development long term. • The edge condition / fence between the site and adjoining south property has not currently been shown. Given communal spaces are located on the south side of the building the applicant is encouraged to show this clearly and consider it as an opportunity for climbing planting to generate a soft boundary edge condition. • Plant species selections will be critical as the shade modelling indicates many spaces will go from extremes of full sun to full shade. Consider species (deciduous and evergreen) and crown shape as well as height to ensure these spaces are as thermally comfortable as possible across the seasons. • Within the communal informal seating areas ensure the proposed seating configurations support family gathering with people sitting directly opposite each other as well as accessible tables for larger gatherings such as birthdays.
Principle 3 - **Built form and scale**		***Good design ensures that the massing and height of development is appropriate to its setting and successfully negotiates between existing built form and the intended future character of the local area.***
		• Given the height discretion being sought on the site the current minimal 1.6m upper level setback to Wright Street is not supported. The proposed height which is not consistent with the surrounding context or policy framework for the site requires a sensitive response on the streetscape interface to soften the proposal and mitigate its visual bulk and scale. The applicant is encouraged to increase the primary street setback significantly which would also present an opportunity for larger trees and denser planting in the area in-front of the building which would assist in softening the streetscape interface. • The DRP is supportive of the 4m rear setback (near the kink in the boundary) however the applicant is encouraged to address the visual privacy non-compliances from the rooms on the south west corner of the building, either through increased setbacks, removal of the balconies to these rooms or screening.
Principle 4 - **Functionality and build quality**		***Good design meets the needs of users efficiently and effectively, balancing functional requirements to perform well and deliver optimum benefit over the full life-cycle.***
		• No further development comments. Supported.

Principle 5 - **Sustainability**		***Good design optimises the sustainability of the built environment, delivering positive environmental, social and economic outcomes.***
		• The proposed ESD strategy and commitments are supported. The ESD Report notes the roof area may not be sufficient to house the proposed 70 - 100kW PV solar system. The applicant is encouraged to co-ordinate the ESD initiatives with the drawings. Show the PV solar panels on the roof to illustrate the proposed system size is feasible. • The applicant is also encouraged to show other ESD initiatives such as EV chargers on the drawings.
Principle 6 - **Amenity**		***Good design optimises internal and external amenity for occupants, visitors and neighbours, providing environments that are comfortable, productive and healthy.***
		• Consider roof skylights over the upper level south side communal sitting rooms and solar tubes to the upper level in-board bathrooms.
Principle 7 - **Legibility**		***Good design results in buildings and places that are legible, with clear connections and easily identifiable elements to help people find their way around.***
		• The primary pedestrian entry to building is orientated to the carpark rather than the streetscape and is recessed deep in the site, requiring people to walk down a long pathway and make a dog-leg turn to enter the building, which limits its legibility. To fully address this issue the applicant is encouraged to relocate the main entry closer to the street. Alternatively to partially mitigate this issue the applicant is encouraged to include some architectural cues on the corner of the building at the start of the pathway to the entry such as adjusting the architectural form / language of the building on the corner and / or including an entry canopy on the corner to increase the legibility of the entrance pathway from the streetscape.
Principle 8 - **Safety**		***Good design optimises safety and security, minimising the risk of personal harm and supporting safe behaviour and use.***
		• No further development comments. Supported.
Principle 9 - **Community**		***Principle*** ***Good design responds to local community needs as well as the wider social context, providing environments that support a diverse range of people and facilitate social interaction.***
		• No further development comments. Supported.
Principle 10 - **Aesthetics**		***Principle*** ***Good design is the product of a skilled, judicious design process that results in attractive and inviting buildings and places that engage the senses.***
		• No further development comments. Supported.
Other comments provided by City Officers		
No comments provided at this stage. The City looks forward to receiving an application and remain available to meet ahead of lodgement to discuss any planning matters.		

DRP Comments 11 March 2026	
Overall	*The proposal has improved, responded to previous DRP Minutes by addressing a number of key issues however some further detail and design development is required to achieve DRP support for the proposal.*
Further review	*The proposal will be required to return to a DRP meeting to address comments / recommendations in a number of Design Principles.*
Summary:	*The applicant is generally working towards a supportable outcome however some further design development and refinement is required in the following key areas;* • *Engagement of a Heritage Architect / consultant to input in relation to the relationship established with Meade Cottage* • *Further detail and design development in relation to the proposal's landscaping aspect* • *Increasing primary street and rear interface setbacks for the stage 1 building* • *Engagement of a ESD professional, provision of a detailed ESD Report and the integration of ESD initiative commitments*

	• *Improving the legibility and experiential quality of the stage 1 pedestrian entrance* • *Implementing further architectural language, form and materiality strategies to reduce the visual bulk and scale of the stage 1 building* *The DRP's role is to provide design advice to the City of Vincent to inform the City's assessment and determination of planning applications.* *The DRP's advice is not planning advice and the DRP's support for the above principles will not fetter the final recommendation of the City made in respect to the application for planning approval. Planning matters should be discussed separately with the City following the receipt of the DRP minutes.*

Design quality evaluation

		Supported
		Pending further attention – refer to detailed comments provided
		Not supported
		Insufficient information for comments to be able to be provided.

Strengths of the Proposal

- *Additional layers of information have been provided in the presentation including contextual and built form character analysis*
- *The surrounding heritage sites / buildings have been clearly identified in the presentation*
- *Further information has been provided in relation to the staging of the development*
- *The masterplan for the entire site has been further developed even though the DA will only relate to stage 1*
- *3D massing visualisations taken from key locations within the surrounding context have been included*
- *A Landscape Architect has been engaged on the project*
- *The intent to use landscaping as a buffer on the south and west interfaces to adjoining properties is generally supported*
- *The stage 1 south boundary setback has increased to 7.5m and now appears supportable*
- *Upper level setbacks introduced around Mead Cottage provide more 'breathing' space and generate a more sensitive response to the heritage listed building*
- *Consolidating the vehicle ramps and separating it from the pedestrian entry is positive*
- *The atrium / void over the lower level drop off area works well*
- *Living and dining rooms are located on the ends and in the centre of the building blocks potentially generating interactive and articulated facades (refer further comments in relation to this in the Aesthetics Principle)*
- *Sections have been included showing generous floor to floor heights*
- *HVAC plant is located on the roof fully screened*
- *A diversity of high quality materiality has been integrated including face brick at ground level*
- *Darker recessive materials / colours have been used on upper levels to assist in mitigating the proposal's visual bulk and scale*

Design Principles

Principle 1 - ***Context and character***		***Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.***
		• *Maximising opportunities for Mead Cottage to be seen from as many angles as possible is encouraged. Visibility from Lincoln Street should be a focus. Further detail is required regarding the interface between the proposed stage 3 building and the northern elevation of Mead Cottage. Mead Cottage should be celebrated as the site's greatest asset.* • *Consideration should also be given to how Mead Cottage may be incorporated within the Stage 1 works in terms of maintenance and general improvements to the building as well as its immediate surrounding setting.* • *A Heritage Architect / consultant should be involved prior to the Stage 3 DA application to guide improvements to setting and maintenance of Mead Cottage as well as providing input into how the stage 1 proposal impacts on / relates to Meade Cottage.*
Principle 2 - ***Landscape quality***		***Good design recognises that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context.***
		• *Whilst there is an overall landscape approach it's not clear how it connects to the site, surrounding context, heritage or functional uses of each area. For example how do the plant selections relate to this heritage site?*

		• *The landscaping is currently shown in sketch form. Basement locations should be indicated on landscape plans with a clear indication of what is true deep soil area and what is on-structure planting. Dimensions including widths of garden beds should be shown on the plans.* • *The site will have large buildings that dominate a predominately single level heritage streetscape. The applicant should consider ameliorating the size and bulk of the development by the use of large / tall trees in appropriate locations supported by suitable soil volumes. Trees should be also be located to maximise the thermal performance of buildings and provide green views.* • *The introduction of larger canopy trees along the southern boundary, street frontages and verges would assist in softening the visual impact of the development, particularly given the surrounding context is largely single residential properties.* • *There are a high number of existing trees on the site. Arborist input should be obtained to assist with the site planning and identify which trees are suitable to retain, transplant or remove. An Arborist's Report should also provide input on the location and setbacks required for proposed built form adjacent existing retained trees. A tree retention and removal plan should be included in the submission.* • *A large percentage of planting and trees on the site are positioned on-structure. Soil zones should be well designed and designed to support trees (width, length and depth). Confirm adequate soil volumes are provided to support proposed trees species and obtain input from a structural engineer to ensure soil weights can be accommodated.* • *Plants should be selected specific to the environmental conditions, soil volume and ongoing access to water rather than simply noted as exotic or native.* • *If the desire of the project is to increase tree canopy coverage on the site, existing canopy should be measured alongside proposed canopy to demonstrate improvement across the site. Providing this as a percentage is a useful method to articulate this.* • *The stage 1 car park is visible from the streetscape. The south side has landscaping to screen the carpark from the public realm. Landscape screening extend to cover the entire length of the car park along the streetscape interface.* • *Consider referring to John Viska's 'A guide to Conserving and interpreting gardens in Western Australia'. This has good information on suitable species for different heritage periods which may be relevant to the proposal.*
Principle 3 - ***Built form and scale***		***Good design ensures that the massing and height of development is appropriate to its setting and successfully negotiates between existing built form and the intended future character of the local area.***
		• *Given the height proposed on the site the stage 1 building's 1.6m primary street setback to Wright Street is minimal and doesn't align with the dominant condition on the existing streetscape. The lack of visual permeability of the ground level face brick wall on the streetscape (which generates limited streetscape interactivity) is also indicative the setback on this interface is not adequate. Increase the primary street setback on this interface significantly and increase the visual permeability of the ground level face brick wall facing Wright Street.* • *The west side rear boundary setback (near the kink in the boundary) is also very tight. The bulk and scale of a tall building would dominate the adjacent property. Increase this setback significantly to generate a more sensitive interface to the adjoining property.*
Principle 4 - ***Functionality and build quality***		***Good design meets the needs of users efficiently and effectively, balancing functional requirements to perform well and deliver optimum benefit over the full life-cycle.***
		• *Provide further information in the form of a Waste Management Plan for the stage 1 site.* • *Provide a roof plan for the building showing items like PV solar panels.*
Principle 5 - ***Sustainability***		***Good design optimises the sustainability of the built environment, delivering positive environmental, social and economic outcomes.***
		• *The ESD aspect requires development. Given the significant height discretion sought on the site a high level ESD response should form part of the justification for the planning framework concession's being sought.* • *Engage an ESD professional to provide a detailed ESD strategy / report for the proposal prior to the next DRP presentation. The City's policy requirement requires the applicant to illustrate a 5 star Greenstar outcome can be achieved.* • *ESD initiatives such as a PV solar system with battery storage, all-electric development (no gas), EV charging, energy monitoring, water capture / re-use, double glazing, heat pump*

		HWS's, light coloured roof should all be considered for the development.
Principle 6 - ***Amenity***		***Good design optimises internal and external amenity for occupants, visitors and neighbours, providing environments that are comfortable, productive and healthy.***
	•	*No further development comments. Supported.*
Principle 7 - ***Legibility***		***Good design results in buildings and places that are legible, with clear connections and easily identifiable elements to help people find their way around.***
	•	*The legibility of the stage 2 and 3 building entrances has improved however the legibility of the stage 1 building entrance is as not clear and potentially not as good. The stage 1 building is currently accessed from the streetscape along a narrow pathway between the building and carpark then turning the corner to access the building. Illustrate the legibility and experiential quality of the stage 1 entrance pathway, the architectural language / form of the entrance and consider moving the entrance closer to the streetscape.*
Principle 8 - ***Safety***		***Good design optimises safety and security, minimising the risk of personal harm and supporting safe behaviour and use.***
	•	*No further development comments. Supported.*
Principle 9 - ***Community***		***Principle*** ***Good design responds to local community needs as well as the wider social context, providing environments that support a diverse range of people and facilitate social interaction.***
	•	*No further development comments. Supported based on the use.*
Principle 10 - ***Aesthetics***		***Principle*** ***Good design is the product of a skilled, judicious design process that results in attractive and inviting buildings and places that engage the senses.***
	•	*Screening is shown on the stage 1 balconies wrapping around the corners. This is not required for visual privacy compliance and accentuates the visual bulk and scale of a large building. Consider removing the screening on the corners to generate 'open' corners which will assist in reducing the visual bulk and scale of the building.* • *As noted in the Strengths living and dining rooms are located on the ends and in the centre of the building blocks potentially generating interactive and articulated facades however this has not been capitalised on in terms of the building's external façades. Consider removing or pairing back the stage 1 building balconies in these locations, where they are not essential in a functional sense, to create greater articulation on the facades and increase the visibility of large windows in these locations to strengthen interactivity, especially on the east end facing the streetscape.* • *Introduce additional diversity of materiality which specifically relates to the area's surrounding local built form character. The stage 1 building's architectural language is progressing but still appears a little generic lacking a strong connection to the area's specific local sense of 'place'.*
Other comments provided by City Officers		
• *No comments to provide at this stage. The City looks forward to receiving an application and remain available to meet ahead of lodgement to discuss any planning matters.*		

4	**Meeting Close** Simon Venturi closed the meeting at 4:00pm.

MINUTES

CITY OF VINCENT

DESIGN REVIEW PANEL MINUTES

Wednesday 17 December 2025 at 2:30pm
Venue: Committee Room
City of Vincent
Administration and Civic Centre
244 Vincent Street Leederville

Meeting Attendees	
Design Review Panel Members	• Simon Venturi – Chair • Dominic Snellgrove • Marc Beattie • Caine Holdsworth
City of Vincent Officers	• Aviva Micevski – Coordinator Development & Design • Haydn Ruse – Senior Urban Planner
Proponent Team	• Tayne Evershed – Planning Solutions • Michael Cross – Owner of Aegis Care • Christopher & Tony – Silver Thomas Hanley Architects

Meeting Minutes	
1	**Welcome and Declaration of Meeting Opening** Simon Venturi declared the meeting open at 2:50pm
2	**Apologies** N/A
3	**Meeting Business**
3.1	**Item 3.1** **Address**: 19 Wright Street, Highgate **Proposal**: Commercial Development (Aged Care Facility) **Applicant**: Planning Solutions **Reason for Referral**: The proposal would benefit from pre-lodgement advice.

DRP Comments 17 December 2025	
Overall	As the applicant has engaged with the DRP at an early stage (which is appreciated) limited information has been provided in relation to some aspects of the proposal. The DRP have therefore provided high level feedback on the proposal's general built form organisation and massing to inform the proposal's design development moving forward. The Panel notes some additional information was included in the meeting that was not included in the documents originally submitted to the DRP for review. The DRP have based their commentary on the documents originally submitted for review. The DRP is fully supportive of the Aged Care use which provides a genuine benefit for the surrounding community. The proposal appears to have been generated by arranging a building footprint that was successful on another site to this site. As such the level of functionality and amenity for future residents is generally supported however the proposed built form will need to be more responsive to the limitations / opportunities presented by this specific site and context. The DRP is of the opinion the proposed height is potentially supportable if the applicant generates a high quality outcome which is more sensitive and responsive to the surrounding context which will require changes in approach in relation to some aspects. The key areas that require further consideration and resolution are as follows; • Provide further analysis relating to the site's surrounding context in the form of local built form character analysis, information in relation to the heritage listed properties on site as well as within the immediately surrounding area and provide overshadowing analysis to support the proposed massing on the site. • The DRP recommends an Arborist be engaged to inform the existing mature trees on the site that should be retained, trees that can be removed as well as smaller trees on the site that are suitable for transplanting. • The abrupt and in-sensitive relationship between the proposed built form and Heritage Listed Meade Cottage on the site is not supported in its current form. This building requires greater breathing space around it. • The minimal setback to the stage 1 building from the south boundary would generate significant overshadowing impact on the adjacent south side property and is unlikely to be supported in its current form. • Ensure the level of streetscape interactivity on Wright Street is adequate which currently appears quite low. • Ensure the development has a legible main pedestrian entrance. The DRP have some concerns in relation to the legibility and experiential quality of the main entrance which is currently located deep in the site. • Ensure the building's external elevations integrate a high level of articulation and diversity of materiality to break down the visual bulk and scale of the development. The applicant is also encouraged to gain input from a Heritage Architect, Landscape Architect, and ESD professional to provide further information in the form of Heritage Assessments, a Landscape Plan and ESD Strategy. A Public Art Strategy, Waste Management Plan, external elevations, roof plans and 3d renders should also accompany the proposal when next presented to the DRP.
Further review	The proposal will be required to return to the DRP once it has been further developed and additional supporting information has been obtained as well as integrated.
Summary:	The DRP's role is to provide design and architectural advice to the City of Vincent to inform the City's assessment and determination of planning applications. The DRP's advice is not planning advice and the DRP's support for the above principles will not fetter the final recommendation of the City made in respect to the application for planning approval. Planning matters should be discussed separately with the City following the receipt of the DRP Minutes.

Design quality evaluation		
		Supported
		Pending further attention – refer to detailed comments provided
		Not supported
		Insufficient information for comments to be able to be provided.

Strengths of the Proposal		
• The applicant has engaged with the DRP at an early stage which is appreciated. • A masterplan for the entire site has been provided even though the Stage 1 building will likely form the Development Approval application for the proposal • The Panel is supportive of the Aged Care use as a genuine community benefit. • Retention of the Heritage Listed Meade Cottage is supported. • Parking has been located in the basement concealed from view from the public realm. • Service vehicle access is separated from staff / visitor vehicle access and its location acts as a buffer to the adjoining west side property. • Lincoln Street has a generous setback and retention of existing mature trees is shown on this interface. • Internal planning is generally efficient, functional, generous and consistent with a high quality aged care outcome. • The provision of private outdoor spaces in the form of balconies for each room is supported. • Floor to floor heights are generous. • Communal corridors have windows providing natural light to those spaces. • The majority of communal lounge and dining rooms are located with a north aspect. • Service spaces such as the bins, laundry, kitchen and plant areas are located in the basement.		
Design Principles		
Principle 1 - **Context and character**		***Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.***
		• The retention of the Heritage Listed Mead Cottage is supported however the proposed new built form currently generates an abrupt response dominating and dwarfing the domestic scale cottage. The stage 3 building butts up hard against the rear wall of the cottage and built form is proposed built over the cottage which would also require columns around the cottage. It's unlikely the relationship between the retained cottage and new built form would be supported in its current form. The Panel is of the opinion the retained Heritage Listed Mead Cottage requires far greater breathing space around it. • The applicant is encouraged to consider the adaptive re-use of Mead Cottage as a Café or using it as a focal point in the form of the main entry to the development or one of the buildings on the site. • The applicant is also encouraged to engage a Heritage Architect to input into the project at an early stage providing further information in relation to the significance of the Heritage Listed building on the site as well as Heritage Listed buildings in close proximity within the surrounding context. • Early engagement with DPLH / Heritage Council of WA is strongly recommended. • The level of streetscape interactivity on Lincoln Street is generally supported with built form addressing the streetscape however the level of streetscape interactivity on Wright Street is lower and less successful. • The applicant is encouraged to undertake local built form character analysis to identify common high quality forms, details, materials, colours and textures allowing these to inform the proposal's architectural language in order to establish a strong connection to the surrounding area's unique sense of 'place'. • The ends of a number of building blocks face streetscapes. Ensure these integrate a high level or articulation, diversity of materiality and interactivity to ensure they respond sensitively to streetscape interfaces. This will require the end room layouts to be different with items like windows and balconies orientated towards streetscapes.
Principle 2 - **Landscape**		***Good design recognises that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context.***

quality		• A Landscape Architect is required to generate a detailed Landscape Plan for the proposal. • There are a large number of existing mature trees on the site that present as both constraints and opportunities. Gaining input from an Arborist at an early stage is strongly recommended to ascertain the quality, significance and health of the existing trees on the site in order to inform which trees should be removed, retained and transplanted. There appear to be a lot of smaller trees on that site that would be suitable for transplanting. Arborist input should also be obtained to inform the viability of building in close proximity to the root zones of retained trees on the site as well as the City's verge trees. • The trees in the Lincoln Streetscape setback (north-west corner of the site) are shown as retained however the service vehicle ramp and stage 2 basement is currently shown in the structural root zones of those trees. • Ensure sufficient soil volumes are provided where new large trees are proposed in on-structure planter areas. • Consider integrating arbors, vertical planting elements, balcony planters and climbers to soften the proposal as the design develops. Many of the landscaped areas on the site appear suitable for use as communal spaces. These should be designed to accommodate a diversity of gatherings as well as uses including spaces for children and staff / carers.
Principle 3 - **Built form and scale**		***Good design ensures that the massing and height of development is appropriate to its setting and successfully negotiates between existing built form and the intended future character of the local area.***
		• The proposal's massing is somewhat counter-intuitive. You would typically expect to see the majority of the massing on the corner and in the centre of the site however the existing Heritage Listed building will make it hard to position significant bulk on the corner (as currently shown) and the remainder of the height / bulk is currently proposed on the periphery of the site which impacts negatively on adjoining properties. • The height of the stage 1 building with a minimal setback currently generates an abrupt interface to the south side adjoining property which is the most sensitive interface on the site. Detailed overshadowing analysis is required and should be used to inform the organisation of the height / massing on the site to ensure a sensitive response to the surrounding context is generated. • Given the proposal is seeking significant height discretion providing 3d renders illustrating the proposal's visibility from prominent locations, view corridors and sensitive heritage areas / buildings within the surrounding context would assist in assessing the proposal's impact on its context. This should be used as a tool to inform the positioning of height and bulk on the site.
Principle 4 - **Functionality and build quality**		***Good design meets the needs of users efficiently and effectively, balancing functional requirements to perform well and deliver optimum benefit over the full life-cycle.***
		• The functionality of the internal layouts generally appears positive however further information is required in relation to servicing including the provision of roof plans in the drawing package to allow this aspect to be fully assessed. • A Waste Management Plan is required to support the proposal.
Principle 5 - **Sustainability**		***Good design optimises the sustainability of the built environment, delivering positive environmental, social and economic outcomes.***
		• Due to the proposal's early design stage limited information has currently been provided in relation to the ESD aspect. The applicant is encouraged to engage an ESD professional to illustrate sustainability is being approached in a holistic as well as co-ordinated way and provide a detailed ESD report with active ESD initiative commitments such as PV solar systems, an all-electric development (no gas), EV charging, heat pump HWSs, energy monitoring, rain water capture / re-use, double glazing, light coloured roofs etc. • The City's policy requirement is to demonstrate the proposal can achieve a 5 star Greenstar outcome.
Principle 6 - **Amenity**		***Good design optimises internal and external amenity for occupants, visitors and neighbours, providing environments that are comfortable, productive and healthy.***

		• The proposed building separation between the Stage 2 and 3 buildings is minimal resulting in resident balconies in close proximity to adjacent built form. The applicant is encouraged to establish greater separation between proposed built form on the site to maintain suitable natural light access, outlook and privacy for residents. • The minimal stage 1 building setback to the south boundary would result in limited separation if the adjoining south side site was developed with a similar setback impacting on resident amenity and also generate significant overshadowing for adjacent neighbours. The applicant is encouraged to relocate the stage 1 building or increase the south side setback to this building significantly.
Principle 7 - **Legibility**		***Good design results in buildings and places that are legible, with clear connections and easily identifiable elements to help people find their way around.***
		• The main entrance to the complex is positioned deep in the site a long distance from the streetscape interface and may therefore lack suitable legibility. • The entrance forecourt is sloped and surrounding on-structure landscaping in this area will require a significant planter / soil depth to support viable planting meaning the entrance journey will have significant planter walls on each side potentially further reducing the legibility, openess and experiential quality of the main entrance to the complex. Further information and refinement is required in relation to the legibility and experiential quality of the main pedestrian entrance. • Given the aged care use external circulation on the site should be designed with particular attention on accessibility as well as equity with clear and easily identifiable entries and high levels of lighting. The architectural form and materiality of the entrances and surrounding landscaping can play a role in establishing high levels of legibility.
Principle 8 - **Safety**		***Good design optimises safety and security, minimising the risk of personal harm and supporting safe behaviour and use.***
		• As noted in the Context & Character Principle minimal built form addressing Wright Street and the positioning of the main pedestrian entrance deep in the site generates limited ground level streetscape interactivity and passive surveillance of Wright Street. The applicant is encouraged to look at options to bring built form closer to Wright Street or look at options to increase the level of streetscape interactivity and passive surveillance of the Wright Street interface. • Two staff / visitor vehicle access ramps are proposed on either side of the Wright Street main pedestrian entrance isolating the entrance pathway. Consider utilising the service vehicle ramp on the west side of the site for all vehicle access or consolidating the two ramps into one ramp to reduce crossovers within the public domain and open up the main pedestrian entrance pathway to the development.
Principle 9 - **Community**		***Good design responds to local community needs as well as the wider social context, providing environments that support a diverse range of people and facilitate social interaction.***
		• Supported based on the aged care use as a genuine community benefit. • The proposal will have a Percent for Art requirement. The applicant is encouraged to develop a Public Art Strategy for the site to identify locations and forms of public art that will meaningfully contribute to the development and surrounding local community.
Principle 10 - **Aesthetics**		***<u>Principle</u>*** ***Good design is the product of a skilled, judicious design process that results in attractive and inviting buildings and places that engage the senses.***
		• Due to the proposal's early design stage limited information has currently been provided in relation to the architectural language and aesthetics aspect. The DRP look forward to seeing elevations and 3d renders to illustrate the proposal's architectural language as the proposal develops. • Given the height proposed and size / length of the building blocks the applicant is encouraged to consider facades that are highly articulated, with recesses to break down their visual bulk and scale as well as employing a diversity of materiality to establish high levels of visual interest.
Other comments provided by City Officers		
• No additional comments		

	Meeting Close Simon Venturi closed the meeting at 4:00pm.

PART C – CITY OF NEDLANDS

1. Declarations of Due Consideration

2. Disclosure of Interests

3. Form 1 DAP Applications

Nil

4. Form 2 DAP Applications

4.1 Lot 381 (No.6) Alexander Road, Dalkeith – Amendments to approved multiple dwelling development – DAP/24/02820

5. Section 31 SAT Reconsiderations

Nil

Part C – Item No.4.1
LOT 381 (NO. 6) ALEXANDER ROAD, DALKEITH – AMENDMENTS TO APPROVED MULTIPLE DWELLING DEVELOPMENT(DAP/24/02820)

RESPONSIBLE AUTHORITY REPORT – FORM 2	
DAP File No:	DAP/24/02820
LG Reference:	DA26-115871
Approved Development	Five Multiple Dwellings
Proposed Amendments:	Amendments to approved development of Five Multiple Dwellings
Owner:	Universal United Investments Pty Ltd
Applicant:	Daniel Hollingworth - Lateral Planning
Local Government Area:	City of Nedlands
Responsible Authority:	City of Nedlands
Authorising Officer:	Bruce Thompson – Director City Development and Regulatory Services
Date of Original DAP decision:	26 March 2026
Date(s) of previous amendments:	N/A
Application Acceptance Date:	13 August 2026

LOCATION PLAN

Figure 1 – Location Plan

Figure 2 - Scheme Map Excerpt

RESPONSIBLE AUTHORITY RECOMMENDATION

That the Metro Inner Development Assessment Panel resolves to:

A. **Accept** that the DAP Application reference DAP/24/02820 as detailed on the DAP Form 2 dated 13 August 2026 is appropriate for consideration in accordance with regulation 17 of the *Planning and Development (Development Assessment Panels) Regulations 2011*; and

B. **Approve** to amend DAP Application reference DAP/24/02820 for Five Multiple Dwellings at 6 Alexander Road, Dalkeith in accordance with regulation 17 of the *Planning and Development (Development Assessment Panels) Regulations 2011*, by way of:

The following condition being deleted

5. Prior to the commencement of excavation works, a Dilapidation Report shall be submitted to the City of Nedlands and the owners of the adjoining properties listed below detailing the current condition and status of all buildings (both internal and external together with surrounding paved areas and rights of ways), including ancillary structures located upon these properties:
    a. Lot 90 (No. 4B) Alexander Road, Dalkeith
    b. Lot 888 (No. 8A) Alexander Road, Dalkeith
    c. Lot 378 (No. 24) Philip Road, Dalkeith

    In the event that access for undertaking the dilapidation survey is denied by an adjoining owner, the applicant must demonstrate in writing to the satisfaction of the City of Nedlands that all reasonable steps have been taken to obtain access and advise the affected property owner of the reason for the survey and that these steps have failed.

All other conditions renumbered accordingly.

New Advice Notes

1. In relation to Condition 18, the Acoustic Report is required to assess the amended communal ping pong room design, including the proposed operable openings, and identify any acoustic mitigation measures necessary to maintain compliance with the *Environmental Protection (Noise) Regulations 1997*.

All other conditions and requirements detailed on the previous approval dated 26 March 2026 shall remain unless altered by this application.

Amended Advice Notes

vii. In relation to Condition 7, the following amendments are requested:
    a. Clearly delineate a pedestrian path from the lobby to the entrance of G02.
    b. Landscaping plans to be consistent with amended plans dated 13 October 2026.

ix. In relation to Condition 21, the Waste Management Plan is to incorporate the following additional information:
    a. 10 x 240L bins on the verge at one time (5 waste and 5 recycling). Update Waste Management Plan image accordingly.

PROPOSAL:

The application is seeking amendments to the approved development of five (5) Multiple Dwellings (apartments) at 6 Alexander Road, Dalkeith. The following amendments are reflected in the amended plans dated 13 October 2026 (**Attachment 1**):

External Changes (based on order of plans)

- Removal of the basement level and a fire booster cabinet added to the street frontage.
- Terrace to Unit G02 setback reduced by 0.3m to the eastern boundary.
- Reorientation of the G01 dining room and terrace
- Level 1 northern articulation between 'living' and 'pantry' widened from 1.9m to 2.5m and setback decreased from 3.3m to 2.7m, no change to the minimum setback.
- Level 2 northern articulation between 'living' and 'pantry' widened from 1.9m to 2.5m, no change to setbacks.
- Level 2 southern articulation between 'ensuite' and 'powder room' reduced in width from 2.6m to 2.3m, no change setbacks.
- Level 2 northern setback to terrace balustrades increased from 6.2m to 6.4m.
- Screening to the southern terrace on Level 2 extended along the western elevation.
- Services/pool plant enclosure added along the southern elevation on Level 3 (crawl space).
- Additional openings and screening incorporated within the Level 3 'communal recreation area'.
- Roof plan amended, including a 2.2m^2 eave extension to the southern boundary and the addition of a vergola over the communal dining/kitchen area.
- Plot ratio increased to 1,015.2m² (increase of 6.2m² or 0.6%).
- Floor-to-floor level adjustments with no change to the approved overall building height.

Internal Layout and Ancillary Changes (based on order of plans)

- Internal layout amendments to Units G01, 101, 102 and 201.
- Reconfiguration of residential waste and bulk waste storage areas.
- Amendments to resident storage areas.
- Reduction in the number of bedrooms and bathrooms within Units 101 and 102.
- Alterations to the internal stair and lobby configuration.
- Addition of a sauna within the communal facilities.

SUBJECT SITE AND SURROUNDS:

The site is located within the street block bound by Philip Road to the north and Waratah Avenue to the south (Figure 1 above refers).

The site is 1,012m^2 in area and is orientated east-west. The site is regular in shape with a 20m frontage to Alexander Road. The site has a 0.5m-0.6m slope down from the north to the south

A permit for the demolition of the original dwelling was granted on 13 April 2026, following which the land had been cleared.

Streetscape Character

The locality surrounding the subject site is defined as the stretch of Alexander Road bound by Philip Road to the north and Waratah Avenue to the south. This identification of the locality was made in WASAT 41 (Previous SAT Appeal). There are 17 properties that have direct street frontage onto Alexander Road. The eastern side of Alexander Road is coded Residential 'R80', with the exception of the southern property at 99-105A Waratah Avenue which is coded R-AC3. The western side of the street however, is coded Residential 'R40'.

Of the 17 properties within the street, eight properties consist of newly constructed double storey single dwellings constructed between 2008 and 2015. Of these eight properties, five are located on the eastern side of the road (R80) and three are located on the western side of the road (R40).

Figure 3 – New development along Alexander Street

The following sites have received development approval and associated building permits, with construction occurring presently:

- 9A and 9B Alexander Road – two, two-storey dwellings. This configuration is a side-by-side design.
- 5A and 5B Alexander Road - two-storey building comprising four multiple dwellings.
- 3 Alexander Road - two, two-storey grouped dwellings. This configuration is a front and back design.

Of the 16 other properties on the street, three consist of older dwelling stock that is likely in near future to be re-developed (two on the eastern side and one on the western side).

The site is surrounded by two-storey single houses on three properties to the north (28 Philip, 4A and 4B Alexander Road), the south (8A and 8B Alexander Road) and one to the east (24 Philip Road).

It is assumed that the existing buildings and future two storey developments (approved at 9A and 9B, 5A and 5B and 3 Alexander Road) are unlikely to change soon given the recent nature of construction or intention of construction.

BACKGROUND:

The subject site has undergone several iterations and a vast history over the last 6 years:

- On 15 October 2019, a development application (DA19-40779) was lodged for a five-storey multiple dwelling development and was subsequently amended to a four-storey, four multiple dwelling development following public consultation.

- On 28 April 2020, Council resolved to refuse the application due to concerns relating to bulk and scale, overshadowing of the adjoining southern property, and compatibility with the streetscape and locality. The applicant subsequently sought review of the decision through the State Administrative Tribunal (SAT).

- On 17 March 2021, SAT dismissed the application for review, finding that the proposal did not adequately address objectives relating to building height, plot ratio, orientation, streetscape compatibility and impacts on the amenity of the adjoining southern property.

- On 15 October 2021, a three-storey, four grouped dwelling development was approved under delegated authority.

- On 7 May 2025, the Metro Inner DAP resolved to refuse an application for a five multiple dwelling development due to concerns relating to streetscape compatibility, building height, setbacks, bulk and scale, overshadowing impacts, parking provision and dwelling design.

- On 3 June 2025, the applicant lodged an application with SAT seeking review of the DAP's decision.

- On 18 November 2025, the Metro Inner DAP reconsidered the application pursuant to section 31(1) of the State Administrative Tribunal Act 2004 and again resolved to refuse the application due to concerns relating to streetscape compatibility, building height and overshadowing impacts on the adjoining southern property.

- On 26 March 2026, following further design amendments and SAT proceedings, the Metro Inner DAP approved the application via a further section 31 reconsideration process.

ACCEPTANCE AS A FORM 2 APPLICATION

The application has been submitted under regulation 17(1)(c) of the Planning and Development (Development Assessment Panels) Regulations 2011, which permits the amendment of an aspect of a DAP-approved development where the amendment would not substantially change the development approved. Accordingly, the DAP must determine whether the proposal remains essentially and materially the same development when assessed both qualitatively and quantitatively.

The discussion below compares the original approval and proposed amendment application, having regard to the nature and extent of the changes and whether they substantially change the development approved, with regard to the matters set out in Practice Note 3 of the DAP Practice Notes.

Whether the development remains essentially or materially the same

The proposed amendment retains the essential characteristics and planning outcome of the original approval, including:

- Same residential land use;
- Five multiple dwellings, with no change in residential yield;
- Consistent general building location, footprint and orientation;
- Consistent ground to fourth floor arrangement, with no additional storey or overall height;
- Consistent provision of eight residential parking bays and 2 visitor parking bays; and
- Consistent vehicle access arrangement.

The principal changes are as follows:

- Removal of basement level and introduction of fire booster;
- Minor increase to plot ratio to 1015.2m^2 (increase of 6.2m² or 0.6%);
- Addition of a services/pool plant enclosure to Level 3 along the southern elevation;
- Minor roof plan amendments;
- Floor to floor level adjustments (no change to overall building height); and
- Changes to communal area openings.

Qualitative and quantitative assessment

Quantitatively, the most notable amendment is the increase in plot ratio to 1,015.2m². The increase in plot ratio does not create additional dwellings, increases to overall building height or reduction in setbacks. From an external appearance perspective, the increase is not noticeable, with the 6.2m^2 increase resulting from minor changes to widths and setbacks of articulations, re-orientations of rooms and other internal amendments. In the context of a 1015.2m^2 plot ratio, the 6.2m^2 increase represents approximately 0.06% of the total plot ratio area and does not fundamentally alter the building's scale or overall composition.

Qualitatively, the amendments do not introduce a new land use, alter the approved dwelling yield, increase overall bulk and scale, or fundamentally alter the architectural form of the building. The façade changes are considered minor, most notably changes to the Level 3 outward appearance through additional glazing to the northern and southern elevations and roof form alterations with the addition of a vergola.

The remaining proposed amendments comprise minor modifications to dwelling layouts, storage areas, communal facilities, setback articulation, terraces, screening and landscaping. While some alterations result in minor changes to building presentation, they do not materially alter the approved development or its overall planning outcomes.

Essence of the approved design and outcome

The 'essence' of the approval is a residential building with apartments provided on the first three floors and associated communal facilities on the fourth floor. That outcome remains unchanged.

The proposal retains the approved residential land use, dwelling yield, building height, parking provision, access arrangements, general building footprint and overall built form composition. The relationship of the development to Alexander Road and adjoining properties remains substantially unchanged.

While the amendments comprise a number of individual changes, they have also been considered cumulatively. When viewed collectively, the amendments do not alter the approved residential use, dwelling yield, building height, access arrangements, parking provision or overall built form outcome.

While a combination of minor amendments are proposed to internal layouts, communal facilities, landscaping and elements of the building façade, the proposal continues to present as the same development that was approved on 26 March 2026.

Having regard to the amendments both individually and collectively, the proposal remains essentially and materially the same development as that approved. The changes therefore do not alter the essence of the approved development.

Conclusion

On balance, the proposed development is essentially and materially the same as the development originally approved.. Accordingly, the City is satisfied that the application can be accepted as an application made under Regulation 17(1)(c) of the DAP Regulations.

PLANNING ASSESSMENT:

PLANNING FRAMEWORK	
Region Scheme	Metropolitan Region Scheme
Region Scheme - Zone/Reserve	Urban
Local Planning Scheme	City of Nedlands Local Planning Scheme No.3
Local Planning Scheme - Zone/Reserve	Residential (R80)
Structure Plan/Precinct Plan	N/A
Lot Size:	1012m^2
Existing Land Use:	Vacant site
Heritage Status	☒ N/A ☐ State Register of Heritage Places ☐ Heritage List ☐ Heritage Area
Bushfire Prone Area	No

Local Planning Policy 3.4 Tree Retention

The City adopted Local Planning Policy 3.4 Tree Retention on 27 May 2025, which provides a planning mechanism for the protection of regulated trees on residentially zoned land coded R25 to R80.

Since the original approval was granted, the City has undertaken an inspection of the vegetation proposed to be removed and confirmed that no regulated trees, as defined by Local Planning Policy 3.4, are located on the site. As part of this assessment, the *Arbutus unedo* (Strawberry Tree) situated at the rear of the property was also inspected and determined not to meet the criteria of a 'regulated' tree. Consequently, the tree was removed without requiring approval under the Policy.

Notwithstanding this, the approved landscaping plan depicts a tree in this location. As the tree has since been removed, a replacement tree is required to be planted prior to occupation in accordance with the existing condition of approval.

Local Planning Policy 5.14 Precincts

Local Planning Policy 5.14 Precincts (LPP 5.14) applies to residential zoned land coded R40 to R80 within the Waratah Precinct. LPP 5.14 has been developed ensure new development enhances streetscapes, respectfully responds to the context and character of the area, promotes sustainable building design and effectively manages transition between high and medium densities.

The proposed amendments are limited in scope and primarily relate to the removal of the basement, minor modifications to the building articulation, alterations to the roof form and Level 3 communal space. The amendments do not alter the approved number of dwellings, the development's interface with the street, or the key design features that informed the original assessment against LPP 5.14.

Accordingly, the City's assessment of the proposal against the desired future character statement for the Waratah Precinct remains unchanged. The development continues to contribute to housing diversity within the precinct, incorporates landscaping and tree planting, provides a high-quality architectural outcome, and maintains a built form that responds appropriately to the established streetscape character of Alexander Road. As such, the City is satisfied that the proposal remains consistent with the objectives and desired future character outcomes of Local Planning Policy 5.14 Precincts.

State Planning Policy 7.3 – Residential Design Codes Volume 2 – Apartments

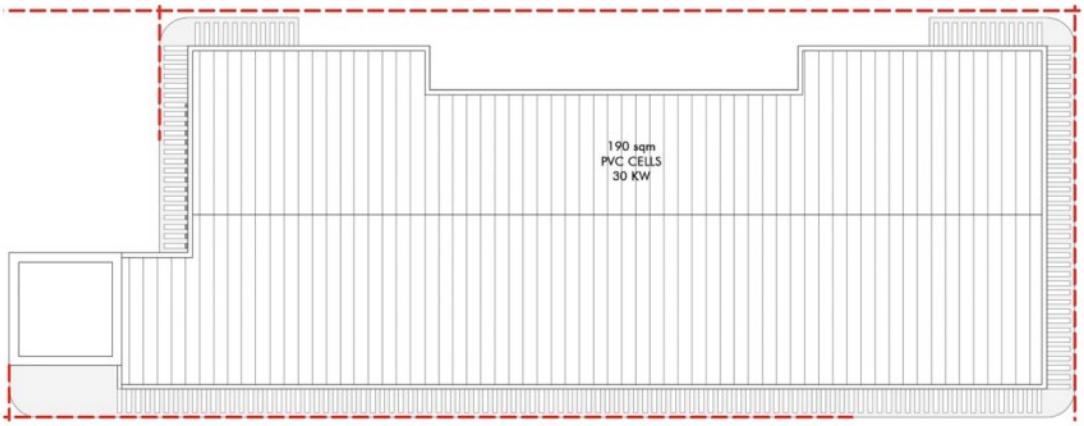
The amended proposal has been assessed against all relevant Design Elements of the Residential Design Codes Volume 2 – Apartments (R-Codes) which provides a comprehensive basis for the control of residential development. A full R-Code assessment is provided in **Attachment 3.**

The below elements of the proposal are considered to achieve the Element Objectives:

Element 2.2 Building Height

The Acceptable Outcome for building height is set out in the City's Local Planning Policy 5.14: Precincts (LPP 5.14). As specified in the policy, the primary height control for multiple dwellings is a maximum of 3 storeys with an additional storey being considered where it is demonstrated that the proposal allows for 2 hours per day solar access on 21 June for existing solar panels and primary garden areas on neighbouring properties.

The amended design does not propose any increase to the overall building height that was approved. The proposal remains four storeys with a maximum height of 12.3m (rear). The amendments are limited to minor alterations to portions of the roof form, most notably a 2.2m^2 overhang towards the south (refer Figure 4 below) and a negligible 1cm increase in height to the third floor.



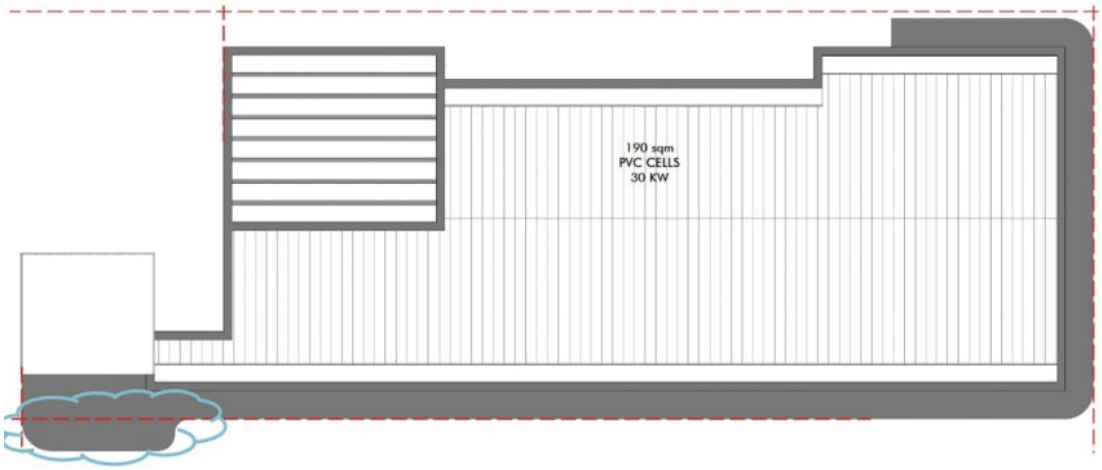


Figure 4: Approved roof design and amended roof design.

In accordance with Local Planning Policy 5.14: Precincts, the amended roof form has been assessed to determine whether the proposal continues to satisfy the criteria for consideration of a fourth storey. The amended plans demonstrate that the existing solar panels will continue to receive a minimum of two hours of uninterrupted sunlight on 21 June (refer Figure 5), between 11:00am and 1:00pm. While this represents a reduction from the five hours achieved under the original approval, the decrease is attributable to a minor increase in roof area (approximately 2.2m²) extending a further 0.7m toward the southern boundary. Given the central location and extent of the solar panels, the additional 2.2m2 roof form (refer Figure 6) will fall onto a small portion of the solar panels outside the hours mentioned above. This is considered negligible as it still achieves the minimum two hours required under LPP 5.14 and only impacts a limited number of solar panels. Furthermore, portions of the dwelling's primary garden area, located toward the rear of the site, remain unaffected by the amended development. As such, the proposal continues to satisfy the policy provisions and supports consideration of four storeys.

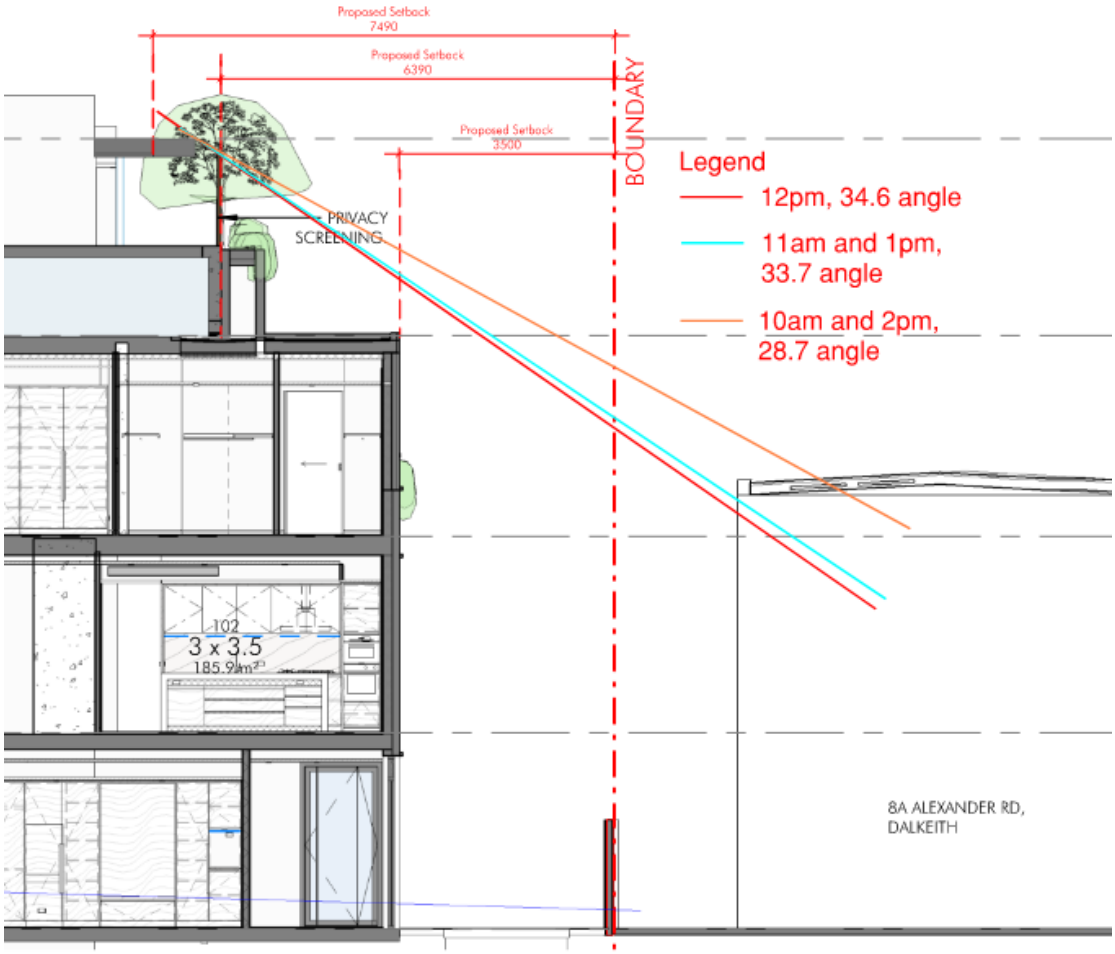


Figure 5: Sun angles from the subject site to 8A Alexander Road on 21 June, 10am to 2pm

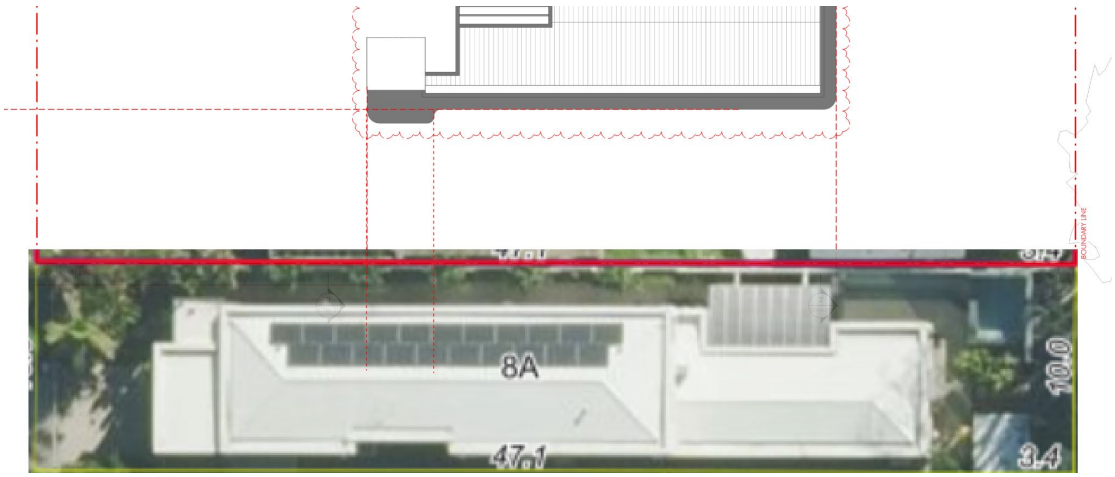


Figure 6: Approximate line of shadow from roof extension onto neighbouring solar panels

In relation to Element Objective O2.2.4, the proposed amendment is limited to a minor increase in the approved roof form, as discussed above and a 1cm increase in height to Level 2. The proposed amendments do not result in a material change to the relationship between the development and adjoining properties. While the extent of overshadowing to the southern adjoining property is marginally altered, the overall overshadowing outcome remains substantially consistent with that previously approved.

The proposal must also be considered within the context of the site's R80 zoning, where an increased building scale and intensity are anticipated. In this regard, the amendment does not give rise to any significant additional amenity impacts, and the development continues to achieve an appropriate balance between building height, site constraints and neighbouring amenity. Accordingly, the original assessment remains applicable, and the proposal continues to satisfy Element Objective O2.2.4.

Element 2.5 Plot Ratio

The Acceptable Outcome under Table 2.1 of the R-Codes for an R80 site is a plot ratio of 1.0.

The amended development plans (**Attachment 1**) propose a plot ratio of 1.003 (1015.2m2), representing a marginal increase of approximately 6.2m2 from the approved proposal. This increase arises from minor articulation changes to portions of G01, 101, 102 and 201 and does not materially alter the overall building envelope. The plot ratio aligns with the intended medium-density character of the R80 coding and provides an adequate transition to adjoining lower-scale developments.

The amended development maintains the same overall building height, setbacks, bulk and scale as previously assessed and approved. The increase is negligible in the context of the overall development and does not result in any discernible increase in visual bulk, building mass, or impact on adjoining properties.

The proposal continues to incorporate the design measures that contribute to reducing the apparent scale of the development, including the substantial upper-floor setbacks, articulated façades and central break within the street elevation. As a result, the amendment does not alter the manner in which the building is perceived from the public realm or neighbouring properties.

Given the absence of any meaningful change to the building's-built form outcomes, the proposal continues to align with the intended medium-density character of the R80 coding and provides an adequate transition to adjoining lower-scale developments. Accordingly, the amended development is considered to satisfy the intent of Element Objective O2.5.1.

Element 3.2 Orientation

The proposed amendments comprise minor roof form alterations, including the addition of a vergola, a 2.2m^2 increase in roof form area and a 0.01m increase to the height of Level 3. Having regard to the limited nature of these changes, they do not materially alter the extent of overshadowing previously assessed and approved. The amended development retains the same overall built form outcome and relationship with adjoining properties in relation to shadow cast.

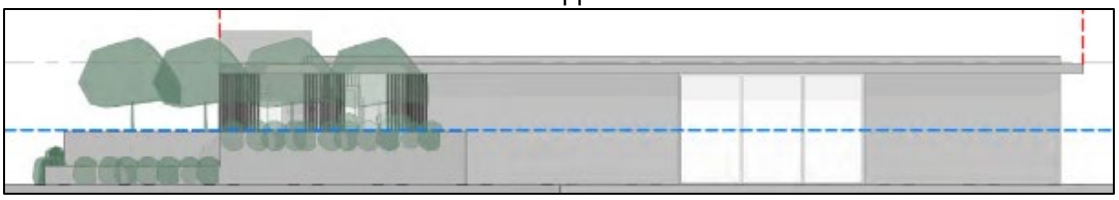
The proposed 'Services/pool' plant enclosure (crawl space) added as an extension to the existing planter box along the southern elevation on Level 3 also does not present any additional overshadowing implications.

On balance, having regard to the minor nature of the proposed amendments and the unchanged overshadowing outcome, the proposal remains consistent with the intent of Element Objective O3.2.2. The proposal is therefore capable of being supported.

Element 3.4 Communal Open Space

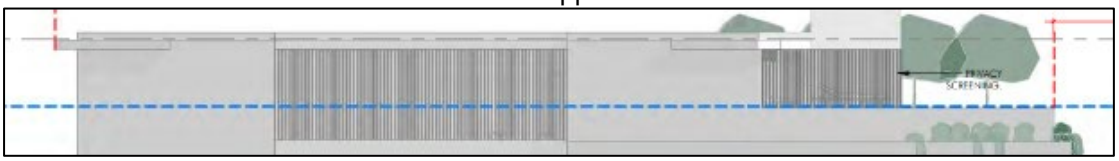
The amendment includes modifications to the fourth storey communal ping pong room. Specifically, the proposal replaces sections of solid wall along the northern and southern elevations with openings and introduces extensive glazed stacking openings along the north, eastern and southern elevations.

South - Approved



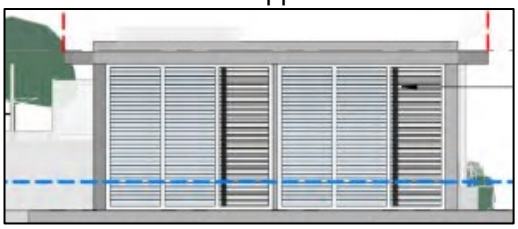
South - Amendment

North - Approved



North - Amendment

East – Approved



East - Amendment

Figure 7: Approved vs amendment elevations

In relation to Element Objective O3.4.3, consideration is required as to whether the amended design appropriately minimises noise impacts on neighbouring properties. Whilst the communal space itself remains unchanged in function or size, the increase in the number and extent of openings has the potential to increase the transmission of noise generated within the communal space to nearby residential properties. Unlike the approved design, which incorporated predominantly solid wall construction, the stacking window arrangement enables substantial portions of the room to be opened, effectively reducing the degree of separation between activities occurring within the communal space and adjoining residential properties. As a result, the proposal has the potential to increase amenity impacts on adjoining properties, particularly in relation to noise affecting neighbouring habitable rooms and private open spaces.

The approved development is subject to a condition requiring the submission of an Acoustic Report prior to the issue of a building permit, demonstrating compliance with the *Environmental Protection (Noise) Regulations 1997*. Notwithstanding this requirement, no acoustic assessment has been submitted in support of the proposed amendment. On this basis, the City has not established that the amended design will result in unacceptable noise impacts. Nevertheless, the acoustic implications of the proposed changes remain to be demonstrated.

Accordingly, the City is not satisfied that sufficient information has been provided to demonstrate consistency with the intent of Element Objective O3.4.3. An advice note is recommended to clarify that the Acoustic Report required under the existing condition must assess the amended design and demonstrate compliance, at all times, with the *Environmental Protection (Noise) Regulations 1997*. Should the Acoustic Report identify that the proposed arrangement of openings is unable to achieve the required acoustic outcomes, modifications to the design, including the extent or configuration of openings along the northern, eastern and southern elevations, may be necessary prior to the issue of a Building Permit. This may include reverting to the currently approved arrangement where satisfactory acoustic outcomes cannot otherwise be achieved.

Element 3.6 Public Domain Interface

The amendment proposes the removal of the basement level, including the fire tank, and the introduction of a fire services booster within the primary street setback. The location and orientation of the booster are dictated by the operational requirements of the Department of Fire and Emergency Services and AS 2419.1:2021. Notwithstanding these requirements, the booster has been integrated into the front fence to minimise its visual prominence and maintain a cohesive streetscape presentation. The amendment does not materially alter the approved building presentation, landscape interface or relationship with Alexander Road, with the development continuing to provide an appropriate transition between the public and private realms. Accordingly, the City is satisfied that the fire services booster has been appropriately integrated into the public domain interface and remains consistent with the objectives of Element 3.6, maintaining streetscape quality and pedestrian amenity while accommodating essential service infrastructure.

Dilapidation Report

The required Dilapidation Report under Condition 5 is proposed to be removed as part of this amendment. The condition was initially imposed having regard to the extent of excavation associated with the previously approved basement.

Given the removal of the basement level, significant excavation works are no longer proposed. Accordingly, a Dilapidation Report is not necessary.

CONSULTATION:

PUBLIC CONSULTATION

In accordance with Objective 3.3 of the City's Local Planning Policy 7.3 Consultation of Planning Proposals (LPP 7.3), discretion was applied to the complex advertising requirements due to the level of significance of the proposed amendments. The application was advertised for a period of 14 days, from 28 August 2026 to 11 September 2026 via letters posted to owners and occupiers of the Alexander Road locality as identified by WASAT 41. The advertising letter included a summary of the proposed amendments and listed all notable changes of the approved development. At the close of the advertising period, the City received 15 submissions, 14 objections and 1 non-objection.

All submissions can be found in **Attachment 2** and the applicant responses to submissions can be found in **Attachment 4**.

Amended plans were submitted to the City on 13 October 2026 (**Attachment 1**) which made the following changes:

- Removal of proposed trees (2) on Level 2 southern terrace.

The amended plans were not recirculated to the submitters, as the changes proposed were considered minor in nature and were not considered to warrant further consultation.

The table below provides a summary of issues raised during the consultation period and the City's response to the matter.

Issue Raised	**Officer's comments**
Proposed changes do not constitute a Regulation 17 Form 2 application	Regulation 17(1)(c) permits amendments to a DAP-approved development where the amendment would not substantially change the development approved. This has been discussed in detail above in the 'Acceptance as a Form 2 Application' section.
Existing development approval was approved with possible errors in law	The validity of the Metro Inner DAP's decision of 26 March 2026 is not a matter for consideration as part of the current Form 2 application.
4 storey height not appropriate	There is no change to the storeys proposed (4) as part of this amendment, nor any increase to the approved

	maximum building height. This remains consistent with the approved development.
Amendments to Level 3 communal space alter the character and intensity of the approved storey	The proposed amendments include modifications to the approved communal recreation level, including changes to communal facilities, screening, glazing, roof form and service areas. Notwithstanding these amendments, the communal recreation function of Level 3 remains substantially unchanged. The proposal does not result in an additional storey, increased building height, increased dwelling yield or a materially different built form outcome. Level 3 continues to perform the same function and remains consistent with the approved development.
Overshadowing and addition of trees on Level 2 terrace	Amended plans received on 13 October 2026 (**Attachment 1**) remove the proposed additional two trees on Level 2 terrace. The proposal has been assessed against the applicable provisions of R-Codes Volume 2, with the resulting impacts not considered materially different from those previously approved. Refer *Orientation* section of the RAR above.
Concerns that amendments may result in additional overlooking and reduced amenity to adjoining properties	Where amendments have been proposed to habitable rooms and openings, they have been assessed the Visual Privacy provisions of the R-Codes Volume 2 Assessment and satisfy the Acceptable Outcomes.
Waste	The amendment proposes changes to the bin storeroom and bulk store dimensions. The provided dimensions are in accordance with the City's Waste Management Guidelines.
Noise generation and services	This matter is noted. The amendments to the communal space and impacts on noise generation have been discussed in detail above, see *Element 3.4 Communal Space.* An Acoustic Report will remain as a condition of approval to ensure an assessment of noise impacts associated with plant, equipment and communal facilities will be undertaken.
Light spill	An existing condition of approval remains requiring any light spill onto adjoining properties to comply with the Australian Standard 4282 – Control of Obtrusive Effects of Outdoor Lighting.
Parking and Traffic	There are no changes proposed as part of this amendment to the number of dwellings, the amount of

	parking bays provided, vehicle access arrangements or traffic likely to be generated.

All submissions on this proposal have been given due regard in this assessment in accordance with Clause 67(y) of the *Planning and Development (Local Planning Schemes Regulations) 2015.*

REFERRALS/CONSULTATION WITH GOVERNMENT/SERVICE AGENCIES

No other referrals required.

DESIGN REVIEW PANEL ADVICE

Referral of the amendment to the City's Design Review Panel is not considered necessary given the limited nature of the amendments and the design-review history of the development.

CONCLUSION:

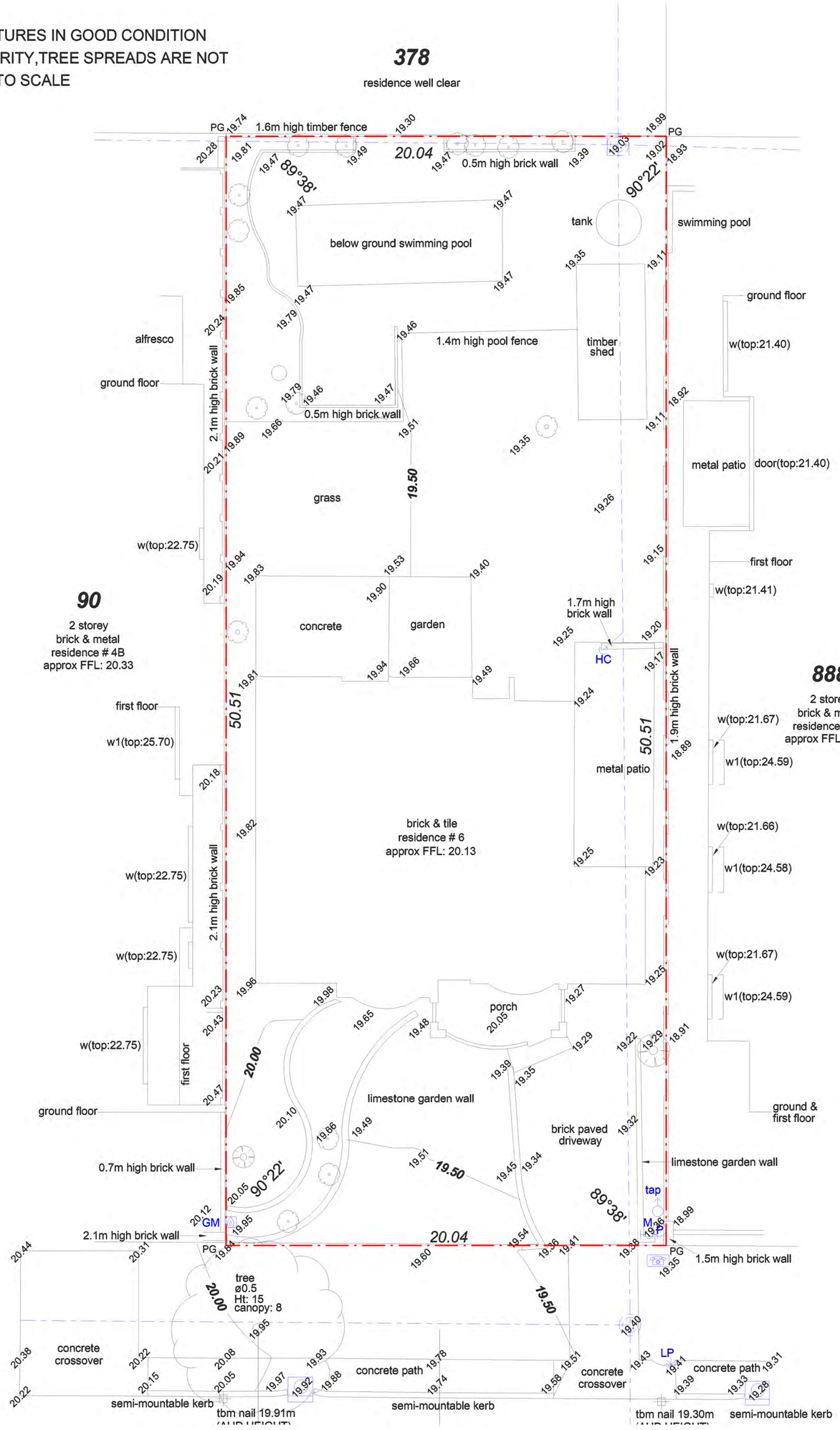
The application for amendments to the previously approved four-storey, five multiple dwelling development is consistent with the City's current planning framework. The proposal maintains the approved four-storey built form and building height, with amendments primarily relating to the removal of the basement, minor amendments to roof form and the communal space and articulation changes.

While the amended design results in a negligible reduction in sunlight access to the adjoining property, the proposal continues to achieve the relevant Element Objectives of SPP 7.3 Residential Design Codes Volume 2 and maintains an acceptable built form outcome within the surrounding context. The matter of noise can be addressed as part of the detailed design considerations, prior to the issue of a building permit. For these reasons, the amended application is recommended for approval.

Attachments

1. Amended Development Plans received 13 October 2026
2. Schedule of Submissions
3. R-Code Volume 2 Assessment
4. Applicants Request for Further Information requested received 13 October 2026

NOTES
(1) ALL FEATURES IN GOOD CONDITION
(2) FOR CLARITY,TREE SPREADS ARE NOT SHOWN TO SCALE

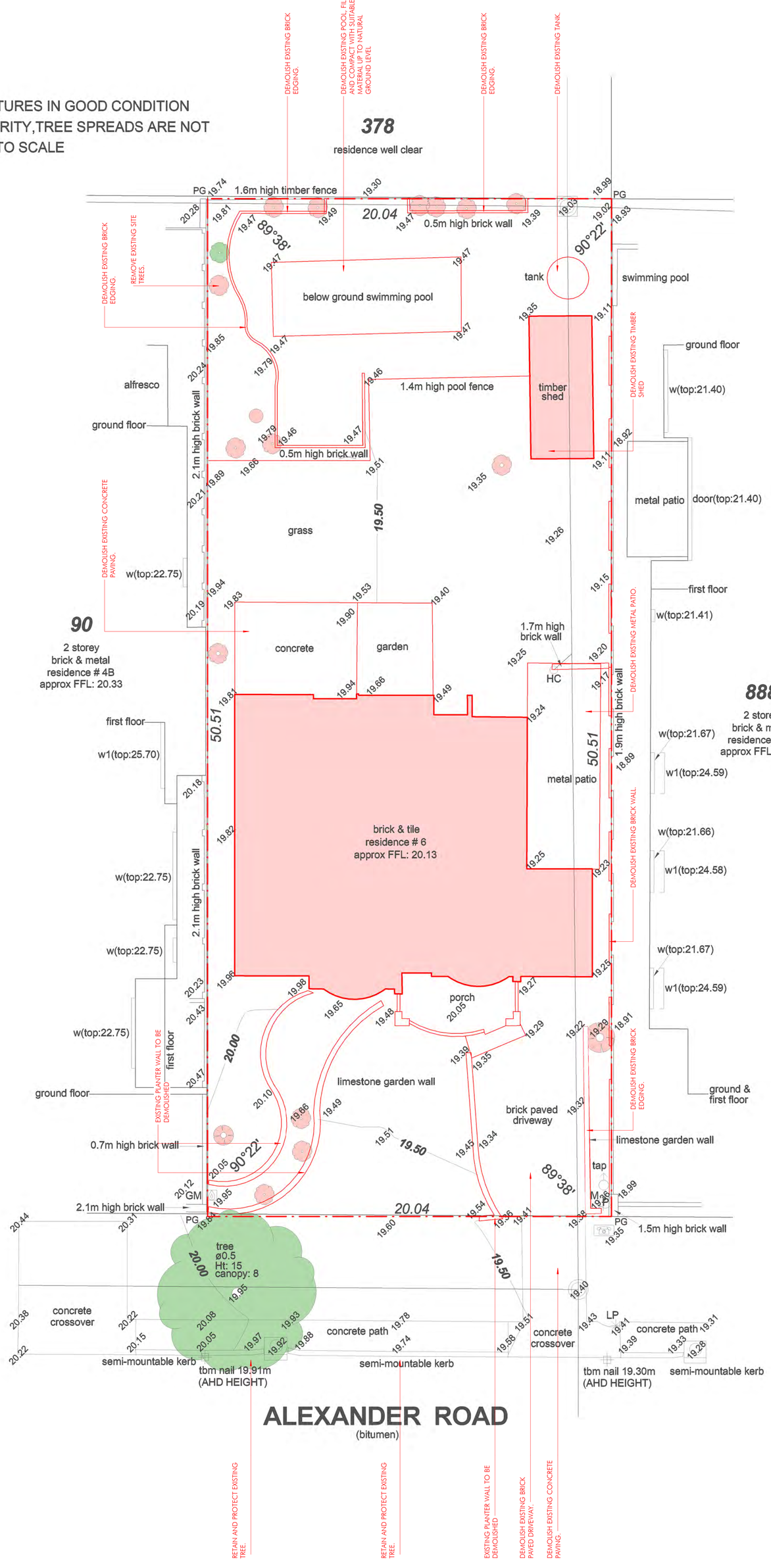


City of Nedlands
Amended Plans Received
13 October 2026

REV B
22.07.2026
DRAWING No. SD1-00
DRAWING NAME SURVEY PLAN
PROJECT PHASE AMENDED DA APPLICATION
SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DALKEITH MULTI RESIDENTIAL
6 ALEXANDER ROAD DALKEITH
space collective architects

:S
.L FEATURES IN GOOD CONDITION
)R CLARITY,TREE SPREADS ARE NOT
IOWN TO SCALE



City of Nedlands
Amended Plans Received
13 October 2026

REV B
22.07.2026
DRAWING No. SD1-01
DRAWING NAME DEMOLITION PLAN
PROJECT PHASE AMENDED DA APPLICATION
SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DALKEITH MULTI RESIDENTIAL
6 ALEXANDER ROAD DALKEITH
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City of Nedlands
Amended Plans Received
13 October 2026

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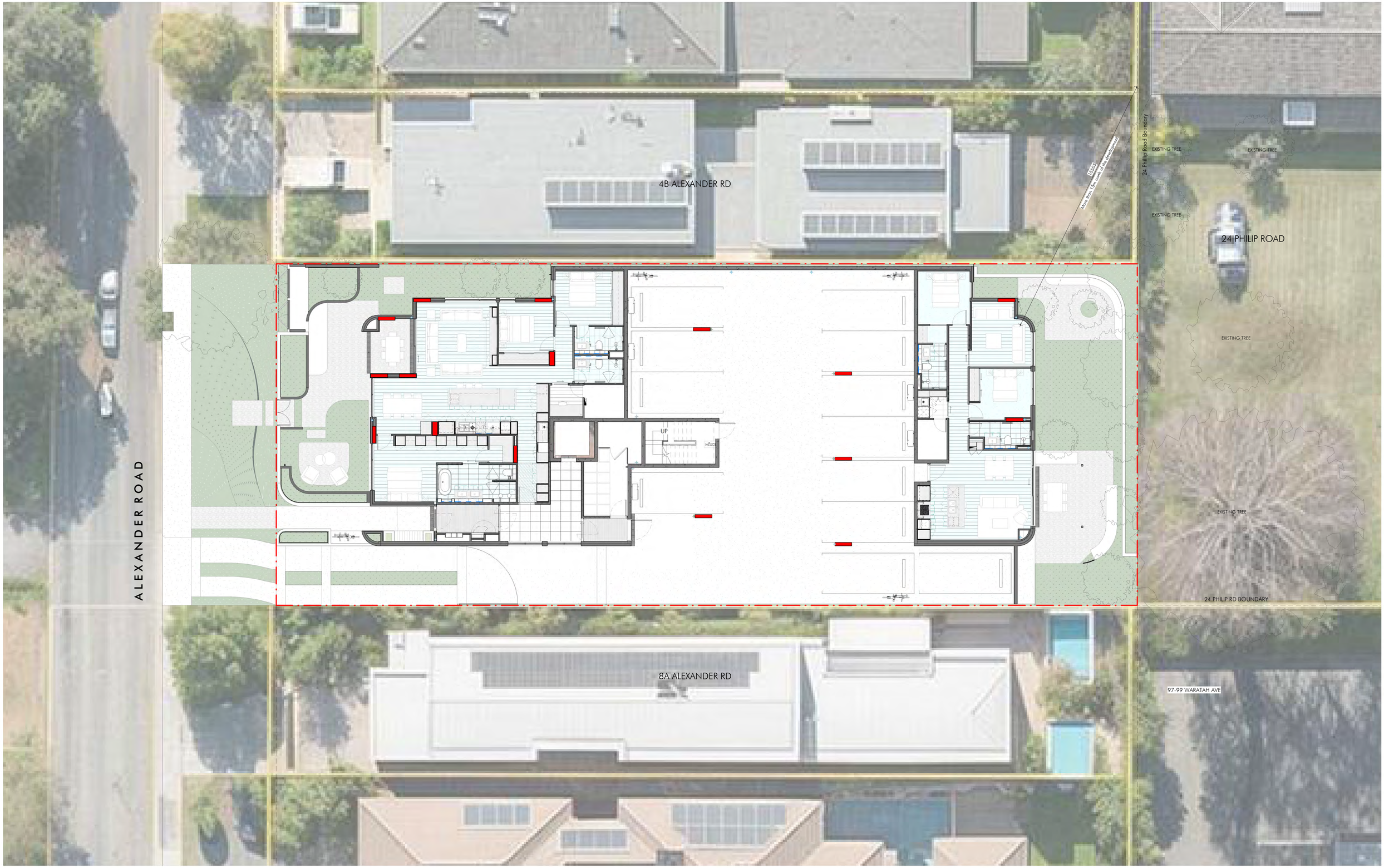

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DALKEITH MULTI RESIDENTIAL

6 ALEXANDER ROAD DALKEITH

SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DRAWING NAME
SITE PLAN - A

PROJECT PHASE
AMENDED DA APPLICATION

DRAWING No.
SD1A-02

REV
B

22.07.2026

City of Nedlands
Amended Plans Received
13 October 2026

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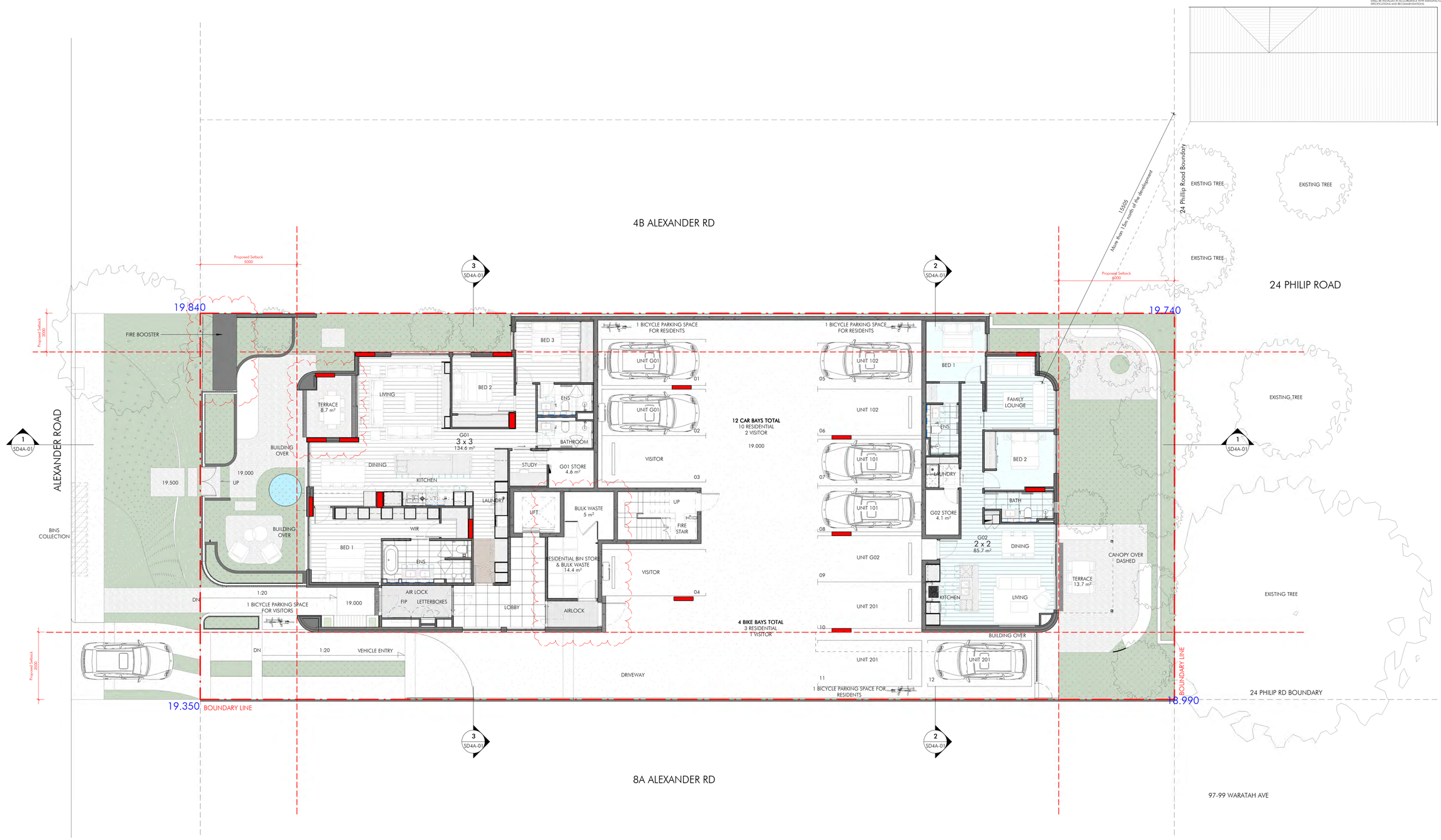

Parking Schedule

Type Comments	Count
Car Bay - 2400 x 5400	10
Car Bay - 2400 x 5400 - Visitors	2

Apartment Area Schedule

Unit Number	Level	Layout	Internal Area
G01	Ground Floor (0c)	3 x 3	134.6 m²
G02	Ground Floor (0c)	2 x 2	85.7 m²
101	Level 1 (53c)	3 x 3.5	197.2 m²
102	Level 1 (53c)	3 x 3.5	185.9 m²
201	Level 2 (106c)	5 x 5.5	287.4 m²
Total Units: 5			890.8 m²

space collective architects

DALKEITH MULTI RESIDENTIAL

6 ALEXANDER ROAD DALKEITH

SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DRAWING NAME
GROUND FLOOR PLAN - A

PROJECT PHASE
AMENDED DA APPLICATION

DRAWING No.
SD2A-02

REV
F

22.07.2026

City of Nedlands
Amended Plans Received
13 October 2026

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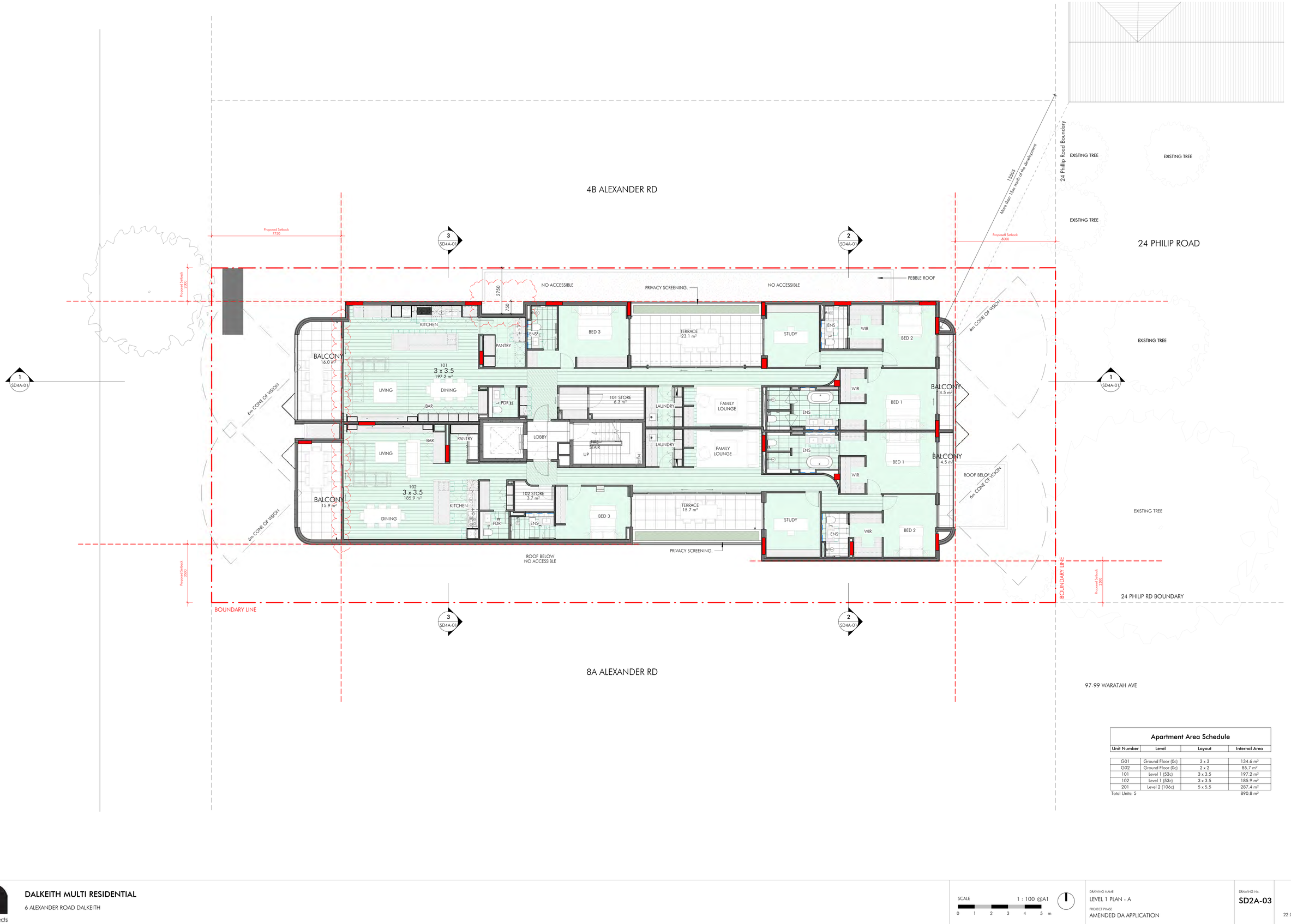

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Total Units: 5			890.8 m²

space collective architects

DALKEITH MULTI RESIDENTIAL

6 ALEXANDER ROAD DALKEITH

SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DRAWING NAME
LEVEL 1 PLAN - A

PROJECT PHASE
AMENDED DA APPLICATION

DRAWING No.
SD2A-03

REV
F

22.07.2026

City of Nedlands
Amended Plans Received
13 October 2026

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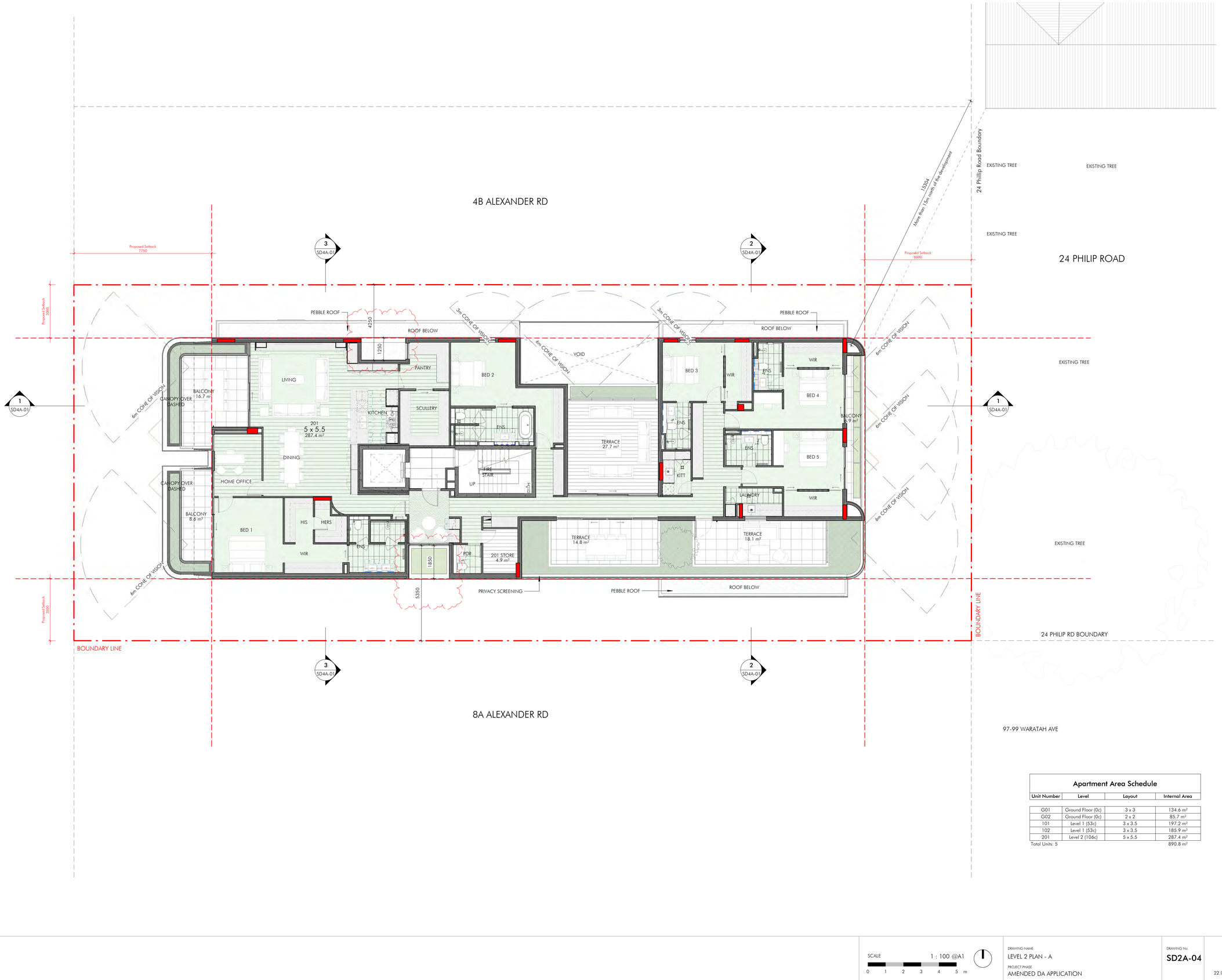

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DALKEITH MULTI RESIDENTIAL
6 ALEXANDER ROAD DALKEITH

SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DRAWING NAME
LEVEL 2 PLAN - A

PROJECT PHASE
AMENDED DA APPLICATION

DRAWING No.
SD2A-04

REV
F

22.07.2026

City of Nedlands
Amended Plans Received
13 October 2026

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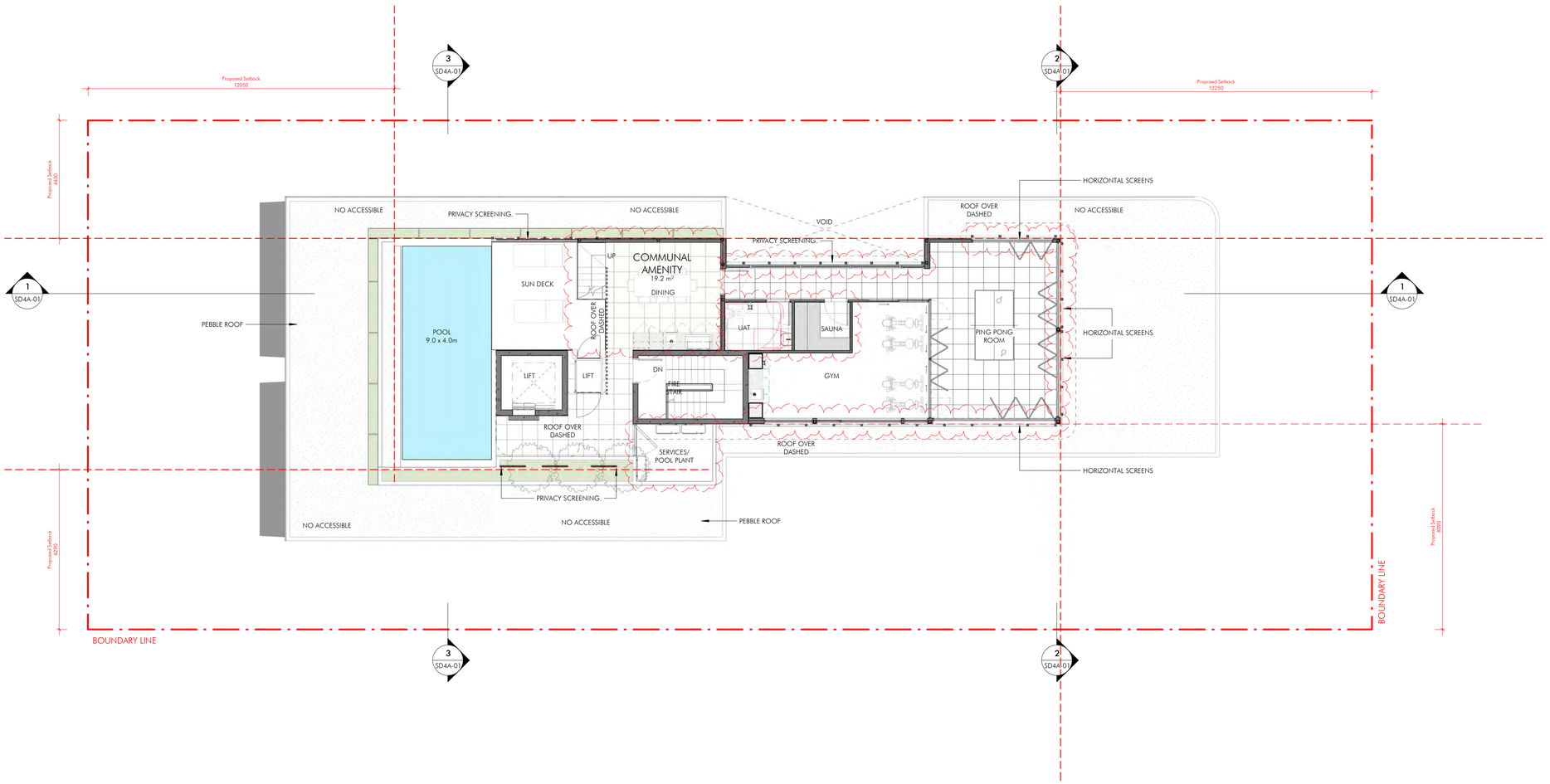

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Total Units: 5			890.8 m²

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DALKEITH MULTI RESIDENTIAL

6 ALEXANDER ROAD DALKEITH

SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DRAWING NAME
LEVEL 3 PLAN - A

PROJECT PHASE
AMENDED DA APPLICATION

DRAWING No.
SD2A-05

REV
F

22.07.2026

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13 October 2026

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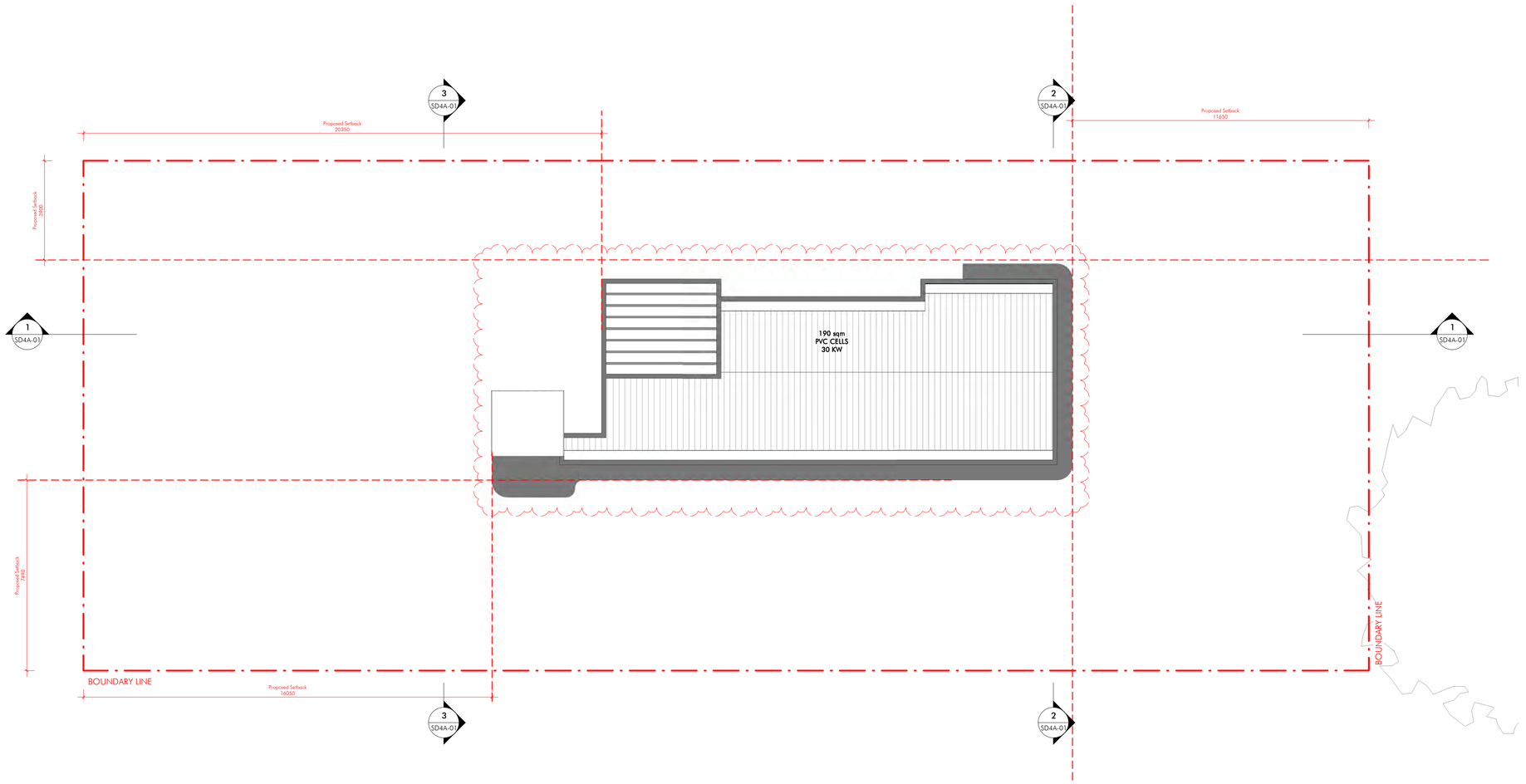

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DALKEITH MULTI RESIDENTIAL

6 ALEXANDER ROAD DALKEITH

SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DRAWING NAME
ROOF PLAN - A

PROJECT PHASE
AMENDED DA APPLICATION

DRAWING No.
SD2A-06

REV
F

22.07.2026

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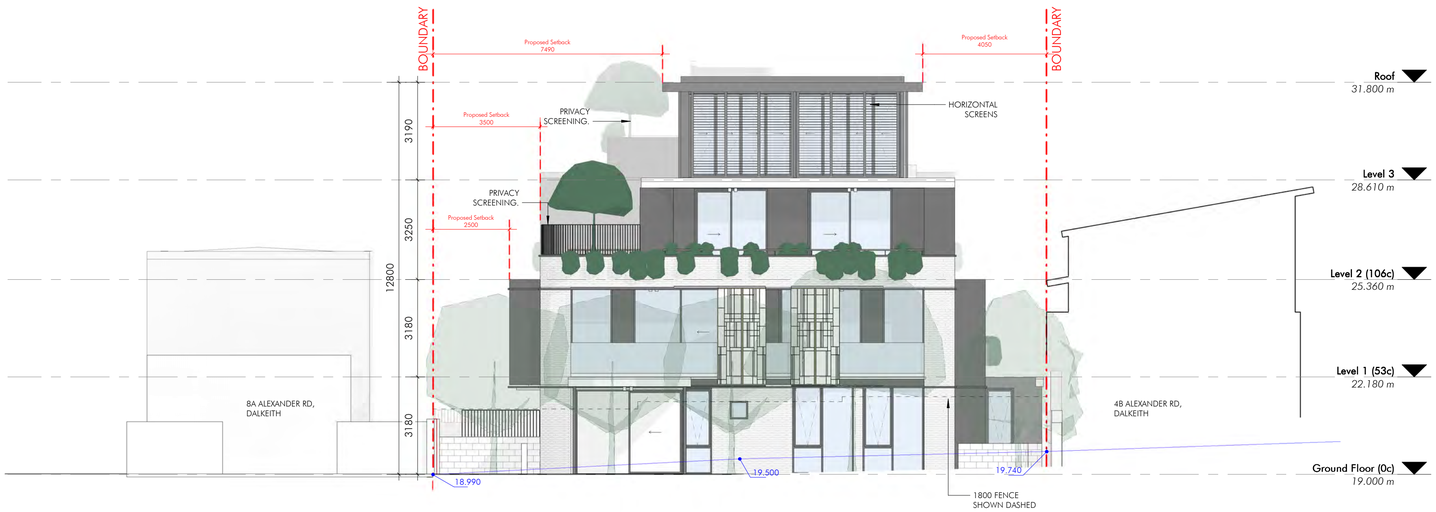
1 West Elevation - A
1 : 100

DTC ENVELOPE SHOWN DASHED



2 East Elevation - A
1 : 100

DTC ENVELOPE SHOWN DASHED

space collective architects

DALKEITH MULTI RESIDENTIAL

6 ALEXANDER ROAD DALKEITH

SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DRAWING NAME
ELEVATIONS 01 - A

PROJECT PHASE
AMENDED DA APPLICATION

DRAWING No.
SD3A-01

REV
F

22.07.2026

City of Nedlands
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13 October 2026

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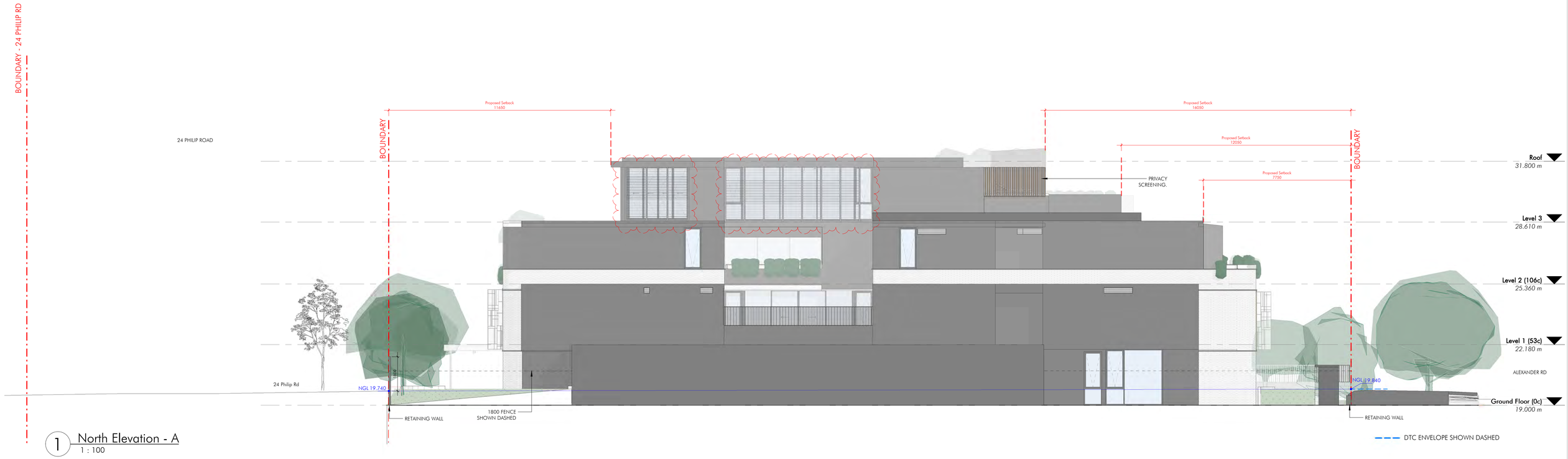

1 North Elevation - A
1 : 100

2 South Elevation - A
1 : 100

space collective architects

DALKEITH MULTI RESIDENTIAL

6 ALEXANDER ROAD DALKEITH

SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DRAWING NAME
ELEVATIONS 02 - A

PROJECT PHASE
AMENDED DA APPLICATION

DRAWING No.
SD3A-02

REV
F

22.07.2026

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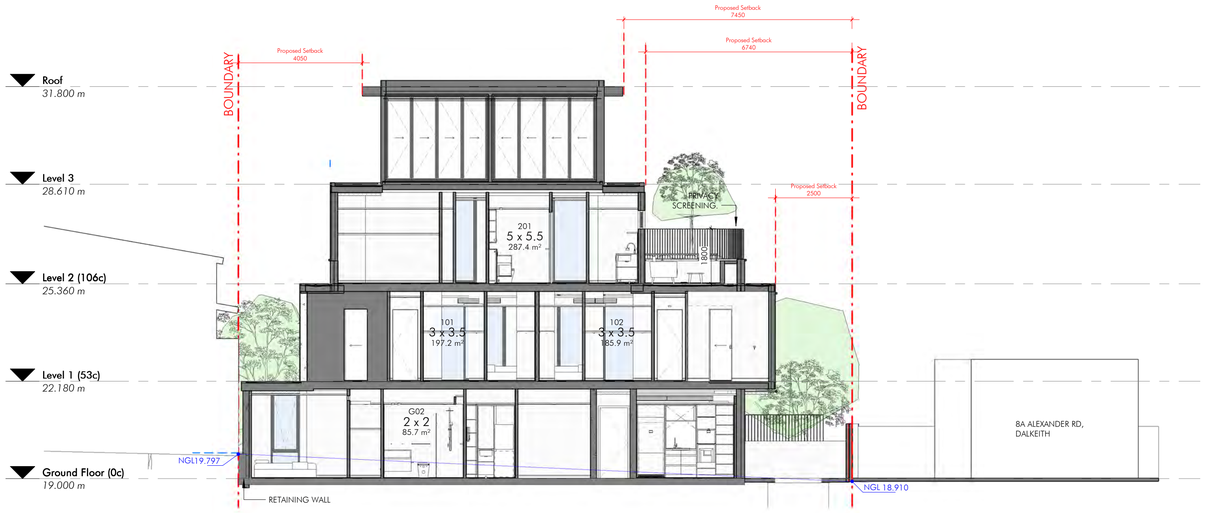

2 SD2-01 **Section 2 - A**
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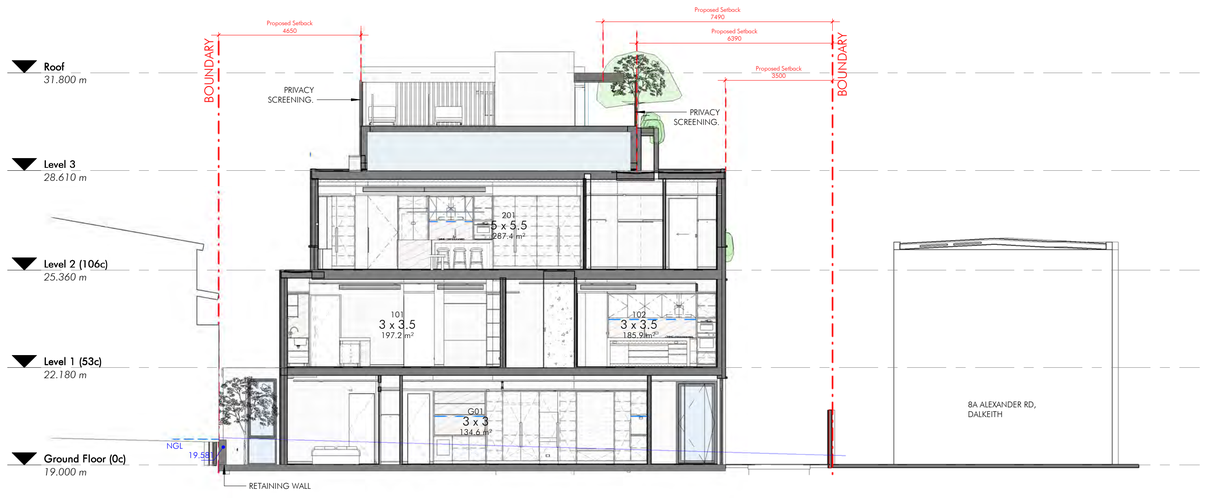

3 SD2-03 **Section 3 - A**
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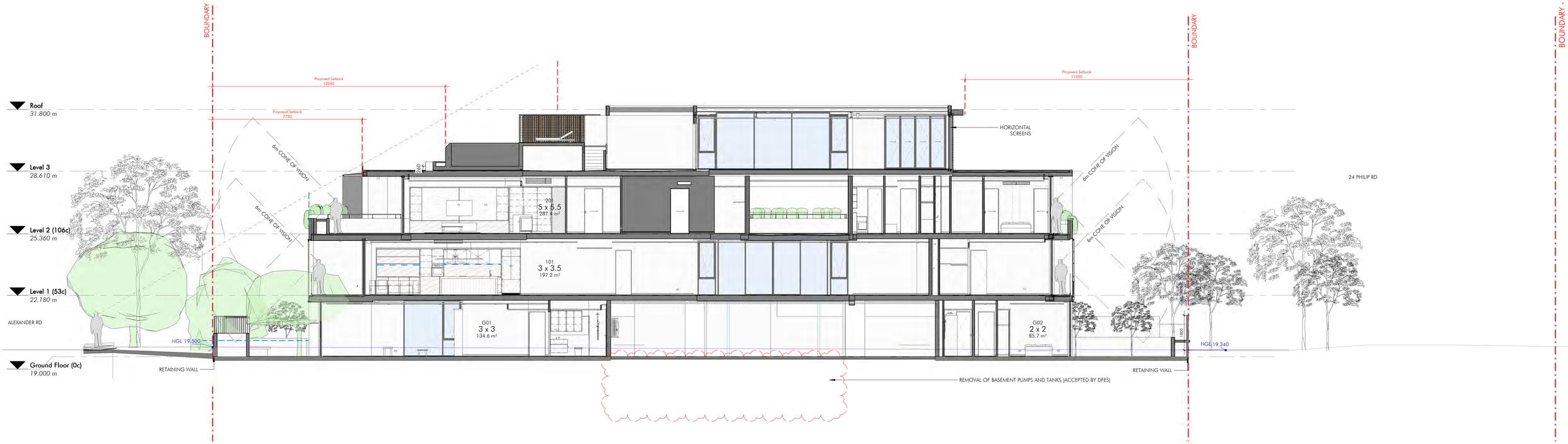


1 SD2-01 **Section 1 - A**
1 : 100

space collective architects

DALKEITH MULTI RESIDENTIAL

6 ALEXANDER ROAD DALKEITH

SCALE 1 : 100 @A1
0 1 2 3 4 5 m

DRAWING NAME
SECTIONS - A

PROJECT PHASE
AMENDED DA APPLICATION

DRAWING No.
SD4A-01

REV
F

22.07.2026

City of Nedlands
Amended Plans Received
13 October 2026

6 ALEXANDER ROAD, DALKEITH

RESIDENTIAL DEVELOPMENT

OVERSHADOWING COMPARISON

space collective architects

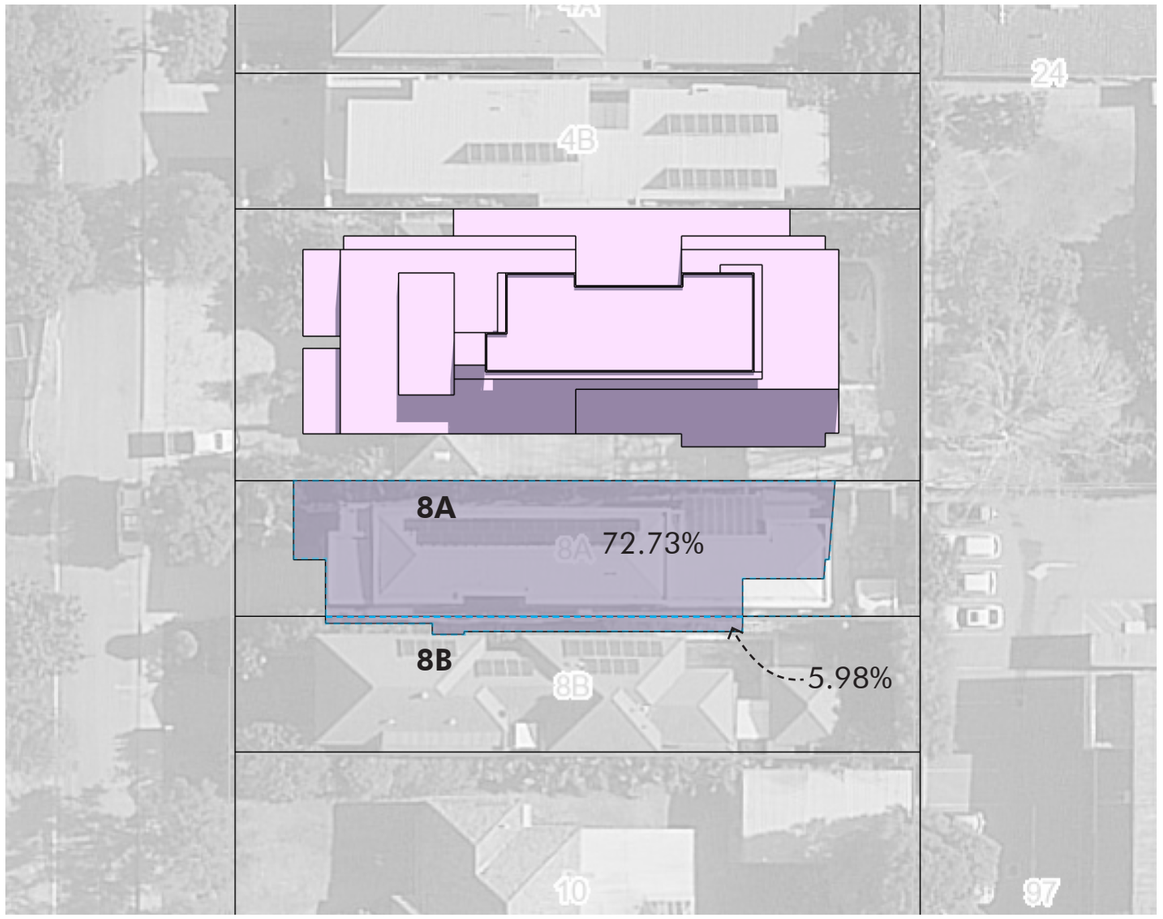
OCT 2026

City of Nedlands
Amended Plans Received
13 October 2026

Overshadowing – Vacant Site Scenario

Winter Solstice

Jun 21st -12pm



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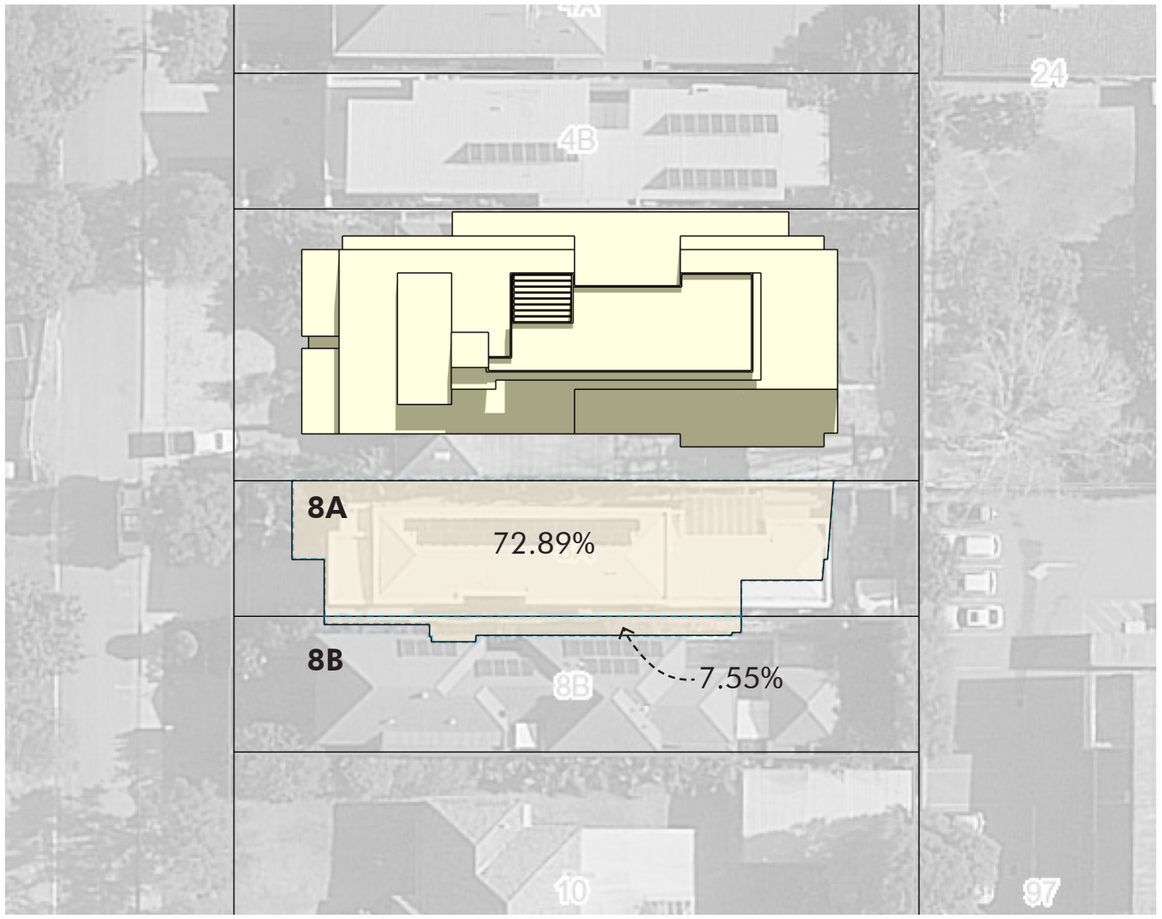


Current Version

N

City of Nedlands
Amended Plans Received
13 October 2026

6 ALEXANDER ROAD, DALKEITH

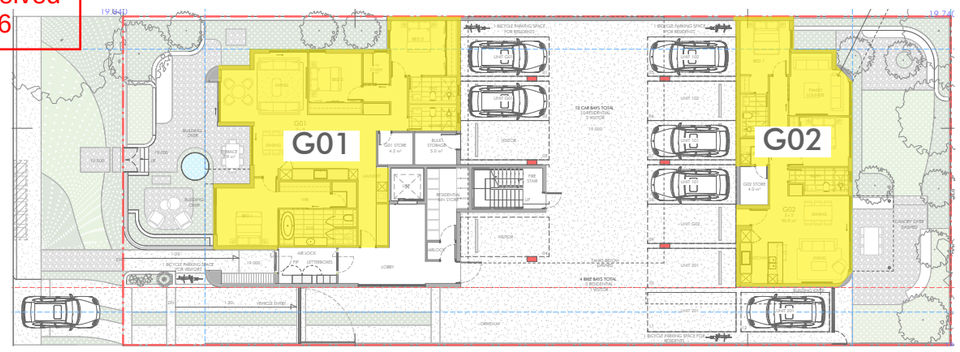
RESIDENTIAL DEVELOPMENT

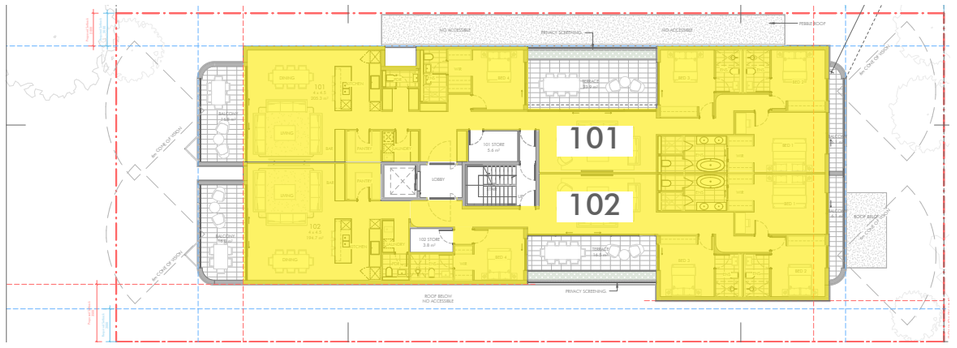
space collective architects

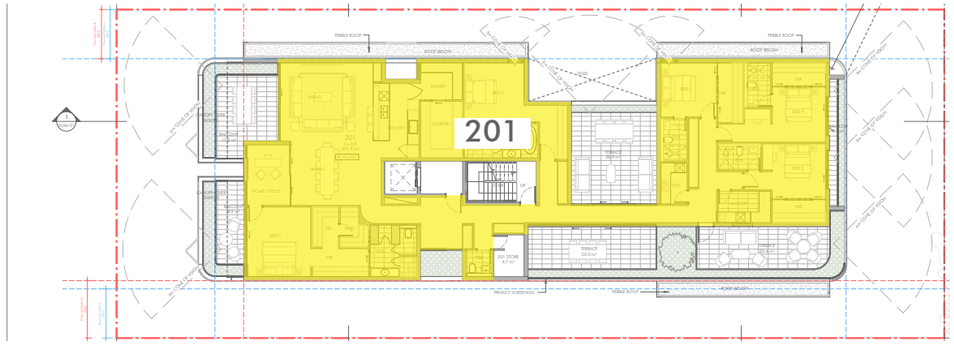
SEP 2026

PLOT RATIO COMPARISON

City of Nedlands
Amended Plans Received
13 October 2026



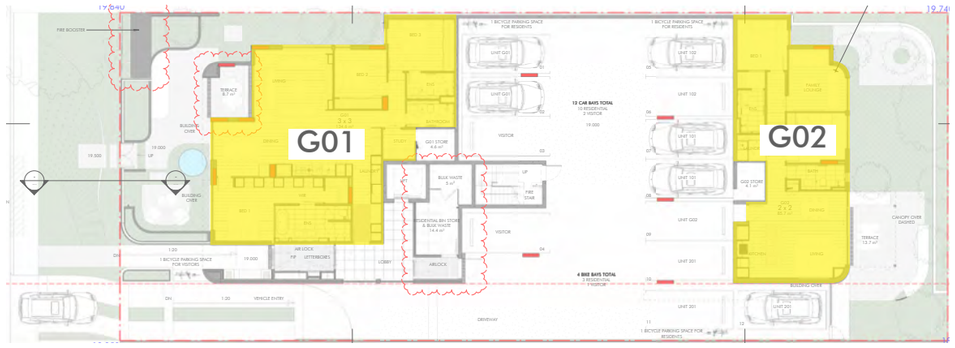


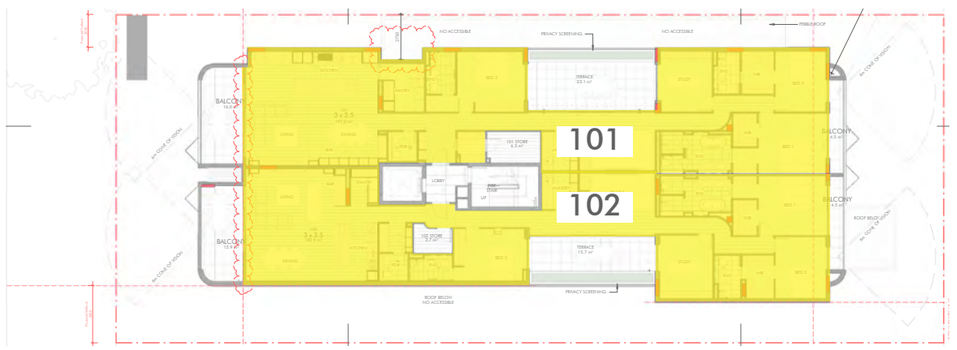


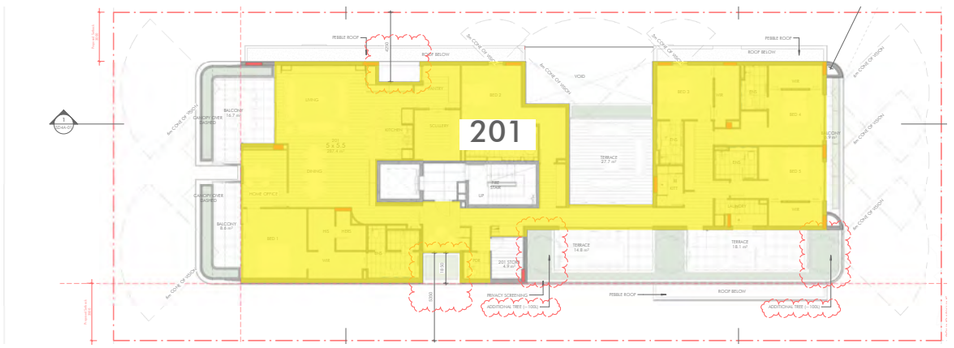
UNIT NUMBER	PLOT RATIO AREA
G01	147.40
G02	100.97
101	226.36
102	212.50
201	323.63
TOTAL	**1010.86**
SITE AREA	**1012**

PLOT RATIO=0.99 ✓

APPROVED







UNIT NUMBER	PLOT RATIO AREA	
G01	152.2	(+4.36)
G02	101.31	(+0.34)
101	226.29	(-0.07)
102	210.54	(-2.12)
201	321.41	(-2.22)
TOTAL	**1011.16**	(+0.30)
SITE AREA	**1012**	

PLOT RATIO=0.99 ✓

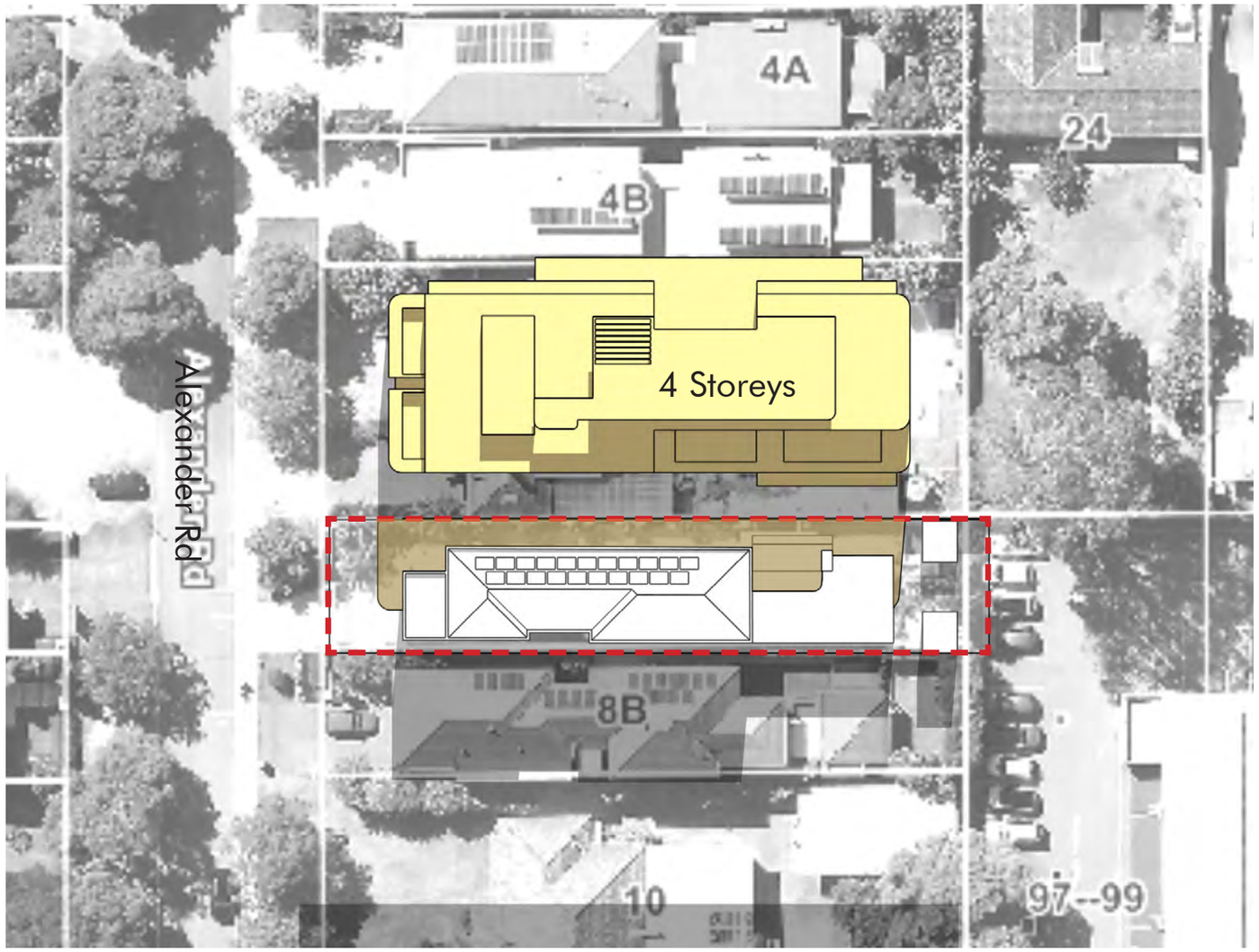
CURRENT

City of Nedlands
Amended Plans Received
13 October 2026

Overshadowing – Existing Conditions

Winter Solstice

Jun 21st -12pm



Shadow projected by 6 Alexander Rd - 23.6%

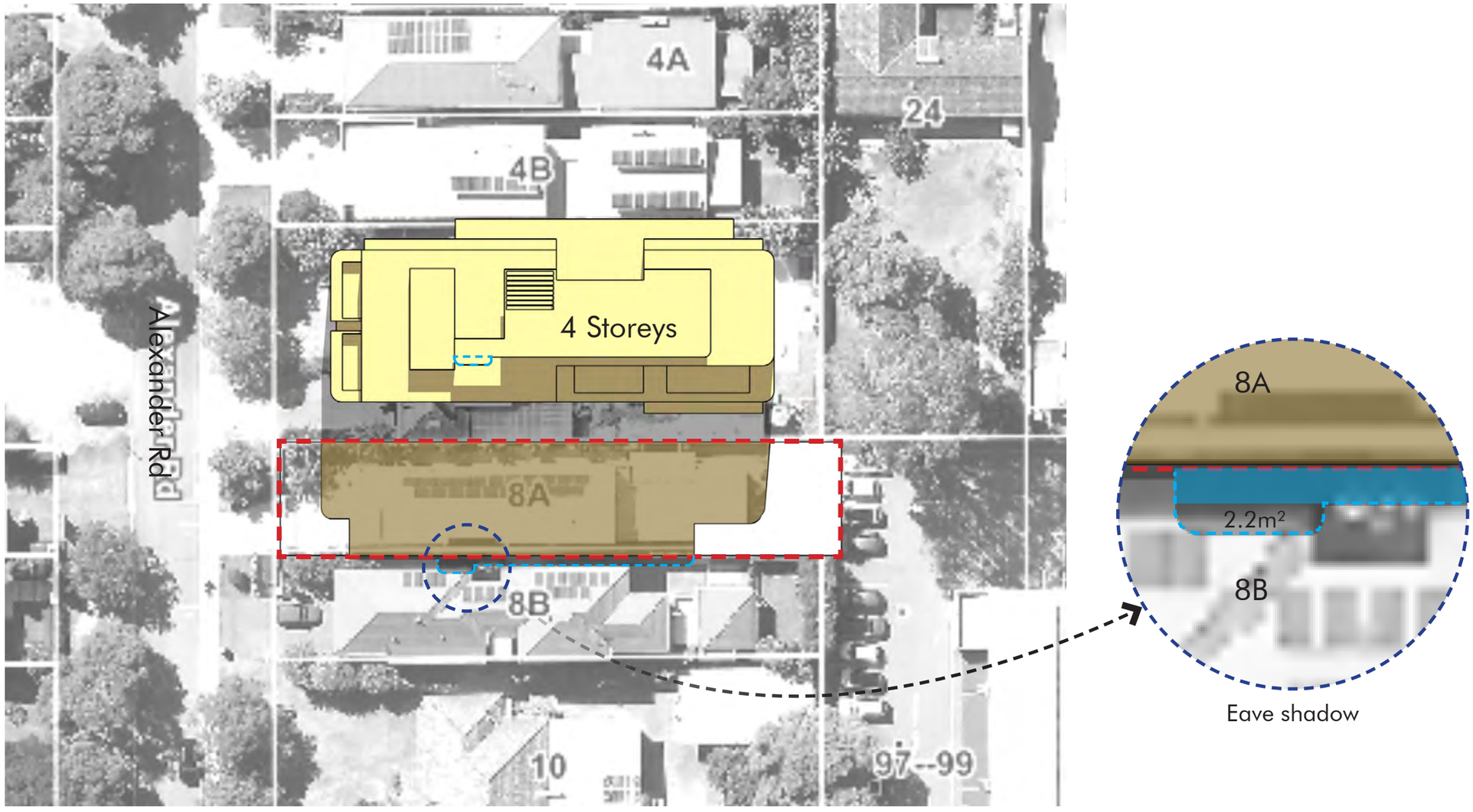
N

City of Nedlands
Amended Plans Received
13 October 2026

Overshadowing – Vacant Site Scenario

Winter Solstice

Jun 21st -12pm



Shadow projected by 6 Alexander Rd - 73.8%

N

Schedule of Submissions – Form 2

6 Alexander Road, Dalkeith

City of Nedlands

nedlands.wa.gov.au

Object	
No.	**Comments**
1	4 Stories still not appropriate. This development was rightly struck down by the previous regime. Overshadowing totally unacceptable. 2 Stories in Alexander only please. This is still looking like a commercial Student focussed development.
2	**See Submission Attachment 1**
3	**See Submission Attachment 2**
4	**See Submission Attachment 3**
5	In objecting to this amendment, the changes that have been made to the height and bulk of this build are still not in keeping with the streetscape, which only presents as two storey homes. There will still be overshadowing at the third storey level and now with the addition of trees, the neighbour on the southern side will still lose substantial sunlight. In the change, waste bins have been relocated, but there is no mention of where? What about air-conditioning? Noise could present as a problem in this matter and also with the position of the pool and outdoor areas. Doing away with no basement will not solve the very serious problem of parking and extra traffic. Where on earth will the residents and visitors park? This is a short street and is already suffering from congestion. More parking will only exacerbate this very dangerous matter and should be addressed by planning. Please use common sense and address these on-going and serious concerns. This development has dragged on for too long and there have been too many inconsistencies following planning rules.

6	We do not accept that 4 storeys is an appropriate height for this part of Alexander Road. The community's longstanding concerns about height, bulk, & overshadowing & the relationship of this building to the surrounding low-rise residential streetscape remain. LPP 5.4 seeks a consistent streetscape on Alexander Road, particularly with regard to height. The amended design fails to contribute to a consistent streetscape. Instead the development introduces a built form of substantially greater height & visual prominence than surrounding development. The resulting streetscape would be characterised by a dominant & visually intrusive building. The 2021 SAT decision concerning this site found unacceptable impacts associated with height, bulk, scale & overshadowing & stated that R80 zoning should not simply be treated as meaning that 4 storeys is inevitable or automatically appropriate. The level of overshadowing is unacceptable & the current amendment is likely to make it worse. The additional 3rd storey trees will increase the overshadowing of the southern neighbour's primary living areas. Four stories on this site continues to result in an unreasonable loss of winter sunlight to neighbouring properties, garden & solar panels. The amendments also change floor levels, articulation & elements of the upper level, so the City should require updated comparative solar analysis to establish whether the amendments further worsen the existing overshadowing & reduce solar access. Other concerns we have as next door neighbours to this proposed development are issues relating to privacy and overlooking from the 4th storey, not to mention noise from the rooftop pool & communal area, the new pool plant & other mechanical services like multiple air conditioning units. Summing up, it is clear that the amendments do nothing to satisfy us. This proposed development is totally unsuitable in the context of Alexander Road & should be refused.
7	I am writing to please object to the amended Form 2 design because the additional trees on the third storey, the taller roof, and the flat southern roof edge will create more shadow over the southern neighbour’s main living areas, which is contrary to O3.2.2 of the Residential Design Codes Volume 2. The currently approved design has not taken reasonable steps to reduce overshadowing. We believe its approval in March 2026 was based on errors in how the overshadowing impacts were assessed. Because of this, any changes that make the overshadowing worse, as proposed in the amended design, are unacceptable and do not comply with the R-Codes or the City's Local Planning Policy 5.14.

	Instead of writing a novel to you to state the concerns, I have simplified into only a few points; Four storeys is still too high The building is still too tall and too bulky for Alexander Road and the surrounding low-rise residential area. We continue to oppose the four-storey design because of its height, size, visual impact, overshadowing, and the way it does not fit with the character of the surrounding neighbourhood. 2. The overshadowing is still unacceptable The development will continue to cause excessive loss of winter sunlight to neighbouring properties. The previous SAT decision did not establish that this level of overshadowing was an unavoidable outcome of a reasonable R80 development. The current amendments should also be carefully assessed to determine whether they further increase these impacts. 3. The changes appear too significant for a Form 2 application The proposal has been substantially redesigned, with changes extending from the basement level through to the fourth storey and roof. Given the extent of these changes, the City and DAP should consider whether a new Form 1 application is required. At a minimum, all missing comparative plans and technical information should be provided before any decision is made.
8	We are formally raising our objecting to the latest planning application for the above site that continues to be materially out of character with both reasonable community expectations and sensible planning outcomes. The key points we wish to raise are 1. Four storeys is too high for the narrow Alexander Street. The height, bulk and scale continue to be inappropriate for Alexander Road and the surrounding low-rise residential area. We have been very clear over the years that a 4 story building on Alexander Road is inappropriate because of height, bulk, scale, overshadowing and incompatibility with the streetscape. 2. The overshadowing continues to be grossly unacceptable. The loss of winter sunlight to neighbouring properties especially to the south remains excessive. The current amendments need to be assessed in detail to determine if this new plan will exacerbate further what is already a deplorable outcome for neighbours. 3. Form 2 or Form 1 Application. The new plans appear to be more substantial then indicated by the proponents are representing and therefore we challenge if a Form 2 is appropriate/legal and suggest a new Form 1 should be demanded by Council. We will be seeking confirmation that Council undertake a detailed assessment and review the cumulative effect of what appears to be many minor changes but in fact is a material change to the design.
9	**See Submission Attachment 4**

10	**See Submission Attachment 5**
11	**See Submission Attachment 6**
12	As residents living very close to this proposed development, we strongly object to the proposal on a number of issues, in particular, as follows: 1. A four storey development in this short area of Alexander Road remains of major concern. The height, bulk, scale, overshadowing and incompatibility with the surrounding residential streetscape are our major concerns with this "out of place" proposal. 2. The overshadowing degree of overshadowing remains unacceptable. The loss of winter sunlight to neighbouring properties remains excessive and was not established by the earlier SAT decision as an inevitable consequence of reasonable R80 development. This comment is particularly relevant when one considers that this proposed development would be the sole R80 development in this precinct. The current amendments must also be assessed to determine whether they serve to make that impact much worse than those which would flow from the previous submission. 3. The cumulative changes included in this Form 2 application appear far too substantial for a Form 2 amendment. The development has been significantly redesigned from the basement through to the fourth storey and roof. The City/DAP should consider whether a new Form 1 application is required and , in any event should require the missing comparative and technical information be provided and considered before making any further decisions regarding this proposed development. 4. Our 4th point, which is of major concern, is regarding parking problems in this a very short and active streetscape. Serious parking problems are already obvious in this very short section of Alexander Road between Waratah Avenue and Philip Road. In our view this is a very poor design, obviously, to be made available for rent to visiting University of WA students. Even with just one tenant for each of the 19 bedrooms in the proposed development and each tenant possessing a vehicle (in addition to visitors parking requirements) another 19 vehicles will require parking in a section of Alexander Road which can only be 200 metres in length and, at present, with 9 access driveways already taking up all available parking space in this very short and active portion of Alexander Road. At least the prior rejected proposal catered for some parking within the basement of the proposed building. With the deletion of the basement of the proposed development such parking will no longer be available. This will render the streetscape almost impassable and such a development must not be allowed. We are extremely concerned that such a huge and bulky development with associated traffic concerns, as mentioned above, will be completely out of character with the other buildings in this short stretch of Alexander Road and, with respect, we implore you to reject this Form 2 application which is now before you for the third time - having already been rejected on two previous occasions.
13	**See Submission Attachment 7**

14	I am writing to object to the amended proposal for the following concerns: 1. The four storey bulk and the scale of the building will impact on the present surroundings. 2. Overshadowing concerns to the residents affected. 3. Cumulative extent in the changes as compared to the previously approved development. 4. The traffic noise along the small road and traffic parking will impact the neighbourhood.
Non-object	
No.	**Comments**
1	Further to your letter dated 28 August 2026, after reviewing the updated design, we confirm that we have no issue with any of the proposed changes, as they will have no affect on our amenity.

[redacted]

[redacted] Alexander Rd

Dalkeith, WA, 6009

Kirsty Molodynia, Urban Planner

City of Nedlands Administration Centre

71 Stirling Highway

Nedlands, WA, 6009

Dear Kirsty,

We object to the recently advertise Form 2 amended design because, most importantly, the additional trees on the 3rd storey, combined with the increased height of the 3rd storey's roof, and the lack of articulation of the 3rd storey's southern roof edge, will exacerbate overshadowing of the southern neighbour's primary living areas, in breach of O3.2.2 of the Residential Design Codes Volume 2.

Given that the currently approved design has *not* made reasonable efforts to mitigate overshadowing, and that we believe that its approval in March 2026 was based on errors of law related to overshadowing, then exacerbating the overshadowing problem with the proposed amended design is not acceptable under the R-Codes nor under the City's own local planning policy LPP 5.14.

Various other reasons against this Form 2 (amendment) application are as follows:

Existing Development Approval Was Approved With Possible Errors in Law

The March 2026 approval of 6 Alexander Rd was, in our opinion, based on errors of law because the MIDAP (and the City's RAR) contradicted one of its main reasons for refusal when the RAR recommended approval, and the MIDAP ultimately approved the development. Our reasons for believing this are:

a) In its refusal on 18 November 2025, the MIDAP and the City's RAR accepted that the development would cause a significant adverse impact on the adjoining southern property;
b) At the 26 March 2026 MIDAP meeting (and the City's RAR submitted to it) the MIDAP accepted that the cause of that impact had not materially changed;
c) The MIDAP and the City's RAR nevertheless concluded that the development was acceptable;
d) We can see no logical or intelligible justification for that conclusion in either the RAR or the MIDAP's reasons for approval.

Why a Form 2 Amendment Application is not Applicable, and a Form 1 Application is Required

Quotations from YourVoice website (with my highlighting):

> "*The City of Nedlands has received a Form 2 (amendment) application for a Multiple Dwelling Residential development*."
>
> "*The amendment proposes the following notable changes*:"

By the City's own words above, the changes are "*notable*". We contend that, for the reasons below, the proposed "notable" changes result in a design which does not represent the same development that was approved in March 2026. It is a substantially changed development, therefore it requires a Form 1 application. The currently approved development was not the result of a straightforward application that was comfortably acceptable from the beginning. The official City history records:

- Form 1 application refused by the MIDAP on 7 May 2025;
- SAT reconsideration refused by the MIDAP on 18 November 2025;
- SAT application ultimately approved by the MIDAP on 26 March 2026, despite what was, in our opinion, errors of law when the MIDAP contradicted a previous reason for refusal when it ultimately approved the development, as articulated above.

The March 2026 approval represented the end of an extended process in which the building design was progressively modified until the decision-maker accepted it. Therefore amendments that undo or weaken those final concessions deserve especially close examination.

The amendments are not confined to one or two minor changes. They include removing the entire basement; changing waste arrangements and the fire booster; changing finished floor levels and roof levels; reducing northern articulation; changing apartment layouts and sizes; increasing plot-ratio area; and addition of the pool/services area on the 4th storey. These various changes combined are a substantial change from the previously approved design. Therefore a Form 1 Development Application process is required, not a Form 2 (Amendment) process.

Another Reason Why a Form 2 Amendment Application May not be Applicable, and a Form 1 Application May Be Required

A neighbour has lodged a Freedom of Information application with the City of Nedlands seeking access to the MRS Form 1 relating to the original development application for 6 Alexander Road. Should it transpire that no valid MRS Form 1 exists in respect of the original development application and approval, then there would be a serious question as to the validity of that approval. In such circumstances, the purported development approval would be fundamentally defective and incapable of supporting any subsequent modification or amendment process.

Consequently, the City would have no lawful basis upon which to consider or determine a Form 2 amendment application, as an amendment cannot validly attach to, or derive authority from, an approval that is itself invalid. The proper course would therefore be for the proponent to submit a new Form 1 development application, to be assessed on its merits in accordance with the applicable planning framework, statutory requirements, and procedural obligations, including public consultation where required.

A Form 2 Approval for a Development Application Commenced Prior to 1 May 2025 Requires A Council Determination To Approve Or Refuse

The original development application was lodged prior to 1 May 2025 and therefore falls within the former statutory planning regime. Any subsequent Form 2 amendment derives its authority from, and remains dependent upon, the original approval. It is therefore arguable that the procedural requirements applying to the original application should also apply to the amendment process, ***including a Council determination as to whether the amendment should be approved or refused.***

Given the uncertainty surrounding the relevant transitional provisions, the City of Nedlands should obtain independent legal advice before determining the current Form 2 application. Failure to do so may expose both the City and the applicant to unnecessary legal risk. If the amendment is determined under an incorrect statutory process, the resulting decision may be susceptible to judicial review in the Supreme Court of Western Australia, potentially rendering any approval invalid and liable to be set aside.

The 3rd Storey Trees and Southern Roofline's Lack of Articulation Exacerbate Overshadowing

The amended design will result in increased overshadowing of the adjoining southern property, yet the extent of this impact has not been adequately assessed or disclosed. ***Importantly, the overshadowing from the 3rd storey trees is not illustrated in the overshadowing drawing!*** The defective overshadowing drawing must be rectified, and then appropriately advertised on the YOURVOICE website.

The absence of any clear "approved design" versus "amended design" solar analysis is a significant deficiency in the assessment of this proposal. Although the advertised overshadowing drawings show shadows at one point in time, they do not quantify the additional impact of the proposed 3rd storey's vegetation, nor the cumulative effect of the vegetation on neighbouring properties. This omission in the Form 2 application is particularly important because Local Planning Policy 5.14 permits consideration of a 4th storey only where the proposal demonstrates the required winter solar access to existing solar panels and primary garden areas on adjoining lots.

To avoid the City breeching its own local planning policy LPP 5.14, a comparative solar analysis of the approved and amended designs is required to objectively assess the additional overshadowing resulting from the increased roofline height and 3rd storey trees.

The additional 3rd storey trees will increase the overshadowing of the southern neighbour's primary living areas. ***Self evidently, this amended design feature does not constitute reasonable efforts to minimise overshadowing of the southern neighbour, making this change a breach of O3.2.2 of the Residential Design Codes Volume 2..***

The vast majority of the overshadowing effect on the southern neighbour is attributable to the 3rd storey's southern roofline, and the amended proposal increases the height of the 3rd storey roofline by a further 1 centimetre. Whilst small, this will increase the overshadowing of the southern neighbour's primary living areas. ***Self evidently, this amended design feature does not constitute reasonable efforts to minimise overshadowing of the southern neighbour, making this change a breach of O3.2.2 of the Residential Design Codes Volume 2.***

Given the above-mentioned potential error in law regarding overshadowing when the MIDAP approved the development in March 2026, and given that these design changes exacerbate

overshadowing of the southern neighbour, then the amended design should be refused because, to quote the MIDAP's words from 18 November 2025 (with our highlighting added):

- "*The proposed development does not meet the element objective of O2.2.1 and O2.2.4 of the Residential Design Codes Volume 2 in that the overall building height of the development does not respond to the future scale and character, including existing buildings on Alexander Road. Further, the building height does not adequately recognise the need for daylight and solar access to the adjoining southern property.*"
- *"The proposed development does not meet the element objective of O3.2.2 of the Residential Design Codes Volume 2 in that the development will have significant impact on the amenity of the adjoining southern property by restricting access to northern sunlight to habitable spaces."*

A New Acoustic Assessment is Required

We note that the proposed fire booster and pump infrastructure, previously located within the basement, is now proposed to be relocated to the front verge area. Should the fire protection system incorporate diesel-powered pumps or associated mechanical equipment, the existing Acoustic Report should be revised to specifically assess and quantify the noise impacts generated by the routine testing, operation and maintenance of that equipment.

Furthermore, the changes include a services/pool plant enclosure added along the southern elevation on Level 4. This also would increase the acoustic impacts on the southern neighbours and must be assessed. Particularly the acoustic droning / resonance when two or more identical pumps are running at the same time.

Furthermore, the five air-conditioning units that used to be on the 4th storey have disappeared, and we cannot see where they are on the new plans. Wherever those air-conditioner units are intended to be, the change in acoustic impact resulting from moving them must be assessed. Particularly the acoustic droning / resonance when two or more identical air-conditioner units are running at the same time.

In the absence of such analysis, it is not possible for affected residents or the decision-maker to properly assess the potential noise impacts on the surrounding residential environment. Accordingly, a revised acoustic assessment should be required, demonstrating that the proposal will not result in unreasonable noise disturbance or a reduction in residential amenity for nearby properties.

The Amended Design Breaches Multiple Policies in LPP 5.14

LPP 5.14 expressly states that: "*new development on Alexander Road shall provide for a consistent streetscape particularly with regard to height*." The amended design / proposal fails to contribute to a "*consistent streetscape particularly with regard to height*". Instead, the development introduces a built form of substantially greater height and visual prominence than surrounding development. The resulting streetscape would be characterised by a dominant and visually intrusive building rather than the consistent and coordinated built form outcome envisaged by LPP 5.14.

LPP 5.14 states that its purpose is: "*to outline the desired future character of development*" and "*provide built form requirements which respond to the context of each precinct and promote design quality*." While residential intensification is contemplated within the R80 coding, LPP 5.14 does not support development at any scale. Rather, it requires development to respond to local

context and desired future character. The excessive bulk, height and massing of the proposed four-storey development demonstrate a failure to respond appropriately to the established Alexander Road context and therefore conflict with the fundamental objectives of LPP 5.14.

One of the stated purposes of LPP 5.14 is to promote: "*design quality of new development*." The extent of overshadowing generated by the amended design, which exacerbates overshadowing of the southern neighbour's primary living areas, is not indicative of high-quality contextual design. Rather, the shadow impacts on adjoining residential properties demonstrate that the scale of development is excessive for the site and has been achieved at the expense of neighbouring residential amenity. Such outcomes are inconsistent with the "*design quality*" objectives of LPP 5.14.

The amended design proposal contradicts many elements of the planning rationale behind LPP 5.14.

Concluding Remarks

Over the last year the City of Nedlands has undergone the removal of its previous Council, Mayor, and Chief Executive Officer (and its acting Chief Executive Officer). That level of institutional reset reflects, at least in part, longstanding concerns regarding governance, decision-making, and standards. And yet here we are today: considering an application that fails the most basic, unambiguous requirements of the R-Codes to mitigate overshadowing.

The additional trees on the 3rd storey, combined with the increased height of the 3rd storey's roof, and lack of articulation of the 3rd storey's southern roof edge, will exacerbate overshadowing of the southern neighbour's primary living areas. Given that the currently approved design did not make reasonable efforts to mitigate this overshadowing, as it was required to do under the R-Codes, then exacerbating this overshadowing problem with the proposed amended design makes an unacceptable design even more unacceptable.

The City adopted LPP 5.14 to provide a precinct-based planning framework that responds to local context, character and built form expectations. The four-storey apartment building directly undermines those objectives and it defies the very planning outcomes that LPP 5.14 was introduced to achieve. The amended design is defies LPP 5.14 to an even greater extent.

If the City's planners are unwilling or unable to refuse a proposal (or an amendment) that so clearly and fundamentally fails the applicable statutory framework, then it raises serious questions regarding the integrity of the assessment process.

We strongly urge the City to refuse this application and, in doing so, demonstrate that the recent changes in the City's leadership amount to more than cosmetic restructuring, and that they reflect a genuine commitment to enforcing the planning framework as written.

Yours sincerely,

[redacted]

SUBMISSION OF OBJECTION

Form 2 Amendment – 6 Alexander Road, Dalkeith
DAP/24/02820 | City Ref: DA24-100314

From: [redacted]

I wish to lodge my formal objection to the proposed Form 2 amendments to the approved development at 6 Alexander Road, Dalkeith.

I object to the application for two main reasons.

First, the number and extent of the proposed amendments raise a serious question as to whether the development can properly be dealt with through a Form 2 application at all.

Second, even if the Form 2 process is considered available, the underlying planning concerns with the development remain. In particular, I continue to object to the **four-storey height, excessive bulk and scale, overshadowing and impacts on neighbouring residential amenity**.

1. Extent of amendments and Form 2 process

A Form 2 amendment must not substantially change the development that was approved.

The current amendments are extensive. They include:

- removal of the basement;
- changes to apartment layouts and bedroom numbers;
- changes to finished floor levels;
- reduced articulation on parts of the building;
- changes to waste and fire infrastructure;
- changes to landscaping and screening;
- a new services/pool-plant enclosure at Level 3; and
- changes to the upper communal level and roof.

These changes affect multiple levels and multiple components of the development. They are not confined to one isolated element.

The correct assessment must therefore consider the **cumulative effect of the amendments**. It is not sufficient to characterise individual changes as minor and then conclude that the development as a whole has not substantially changed.

In my view, the scale and extent of the changes raise substantial doubt that the development now proposed remains materially the same development that was approved in March 2026.

If the cumulative amendments substantially change the approved development, the Form 2 application should be refused and the applicant should be required to lodge a **new Form 1 application**.

2. Inadequate information to properly assess the amendments

There is also insufficient comparative information available to determine the full extent and consequences of the proposed changes.

Residents should not have to compare two complex sets of architectural plans themselves to determine what has changed.

A clear **approved-versus-amended comparison** should be provided showing the changes across every level, including finished floor levels, building articulation, apartment layouts and areas, terraces and balconies, landscaping, services and the upper communal level.

The amendments also affect matters that were the subject of technical reports prepared for the previously approved development.

It should not simply be assumed that those reports remain applicable. Where the physical design has changed, the relevant consultants should confirm that they have reviewed the amended plans and that their previous assessments remain valid.

Without this information, it is difficult to see how either the City, the DAP or affected residents can properly assess the cumulative effect of the amendments.

3. Four-storey height, bulk and scale

I continue to object to the **four-storey height, bulk and scale** of the development.

LPP 5.14 identifies **three storeys** for multiple dwellings on Alexander Road. In my view, the fourth storey results in a building that is excessive for this location and inconsistent with the predominantly lower-scale residential development surrounding the site.

The R80 zoning does not mean that four storeys must be accepted. The development still needs to respond appropriately to the particular site, surrounding streetscape and adjoining residential properties.

I do not support the fourth storey. The height and overall building mass should be reduced rather than requiring surrounding properties to absorb the resulting impacts.

4. Overshadowing and neighbouring amenity

The development continues to raise significant concerns regarding **overshadowing and loss of winter sunlight** to neighbouring properties.

The additional storey is particularly important in this respect. The applicable planning framework requires consideration of solar access to neighbouring solar panels and primary garden areas when an additional storey is proposed.

The amendments now include changes to finished floor levels, screening, upper-level landscaping and roof and services elements. These changes mean that the solar-access outcome for the amended development should be demonstrated through **updated analysis**, rather than simply relying on the assessment of the previously approved design.

The development should also be reassessed for **visual privacy and overlooking**, particularly given the changes to apartment layouts, room uses, terraces, screening and finished floor levels.

These are substantive amenity impacts and need to be assessed against the development actually proposed.

5. Upper communal level and mechanical services

The amendments introduce a new **services/pool-plant enclosure at Level 3**, in an area that already contains a pool and communal facilities.

The location and operation of mechanical equipment at this elevated level creates potential acoustic impacts for surrounding residential properties.

All mechanical plant should be clearly identified and the acoustic assessment should address its actual proposed location, enclosure and operation.

Similarly, the cumulative amenity impacts of the upper communal area, including activity, noise, lighting, privacy and overlooking, need to be properly assessed before approval.

Conclusion

I object to the Form 2 amendment in its current form.

The proposed changes affect numerous interconnected parts of the development and should be considered **cumulatively rather than individually**. On the information presently available, I am not satisfied that the amended proposal can properly be characterised as a development that has not been substantially changed from the March 2026 approval.

There is also **inadequate comparative and technical information** to properly understand the extent and consequences of the amendments.

Separately, I continue to object to the **four-storey height, excessive bulk and scale, overshadowing and impacts on neighbouring residential amenity**. Four storeys remains inappropriate for this location and should not be accepted simply because the site is zoned R80.

I therefore request that the **Form 2 amendment be refused**.

If the cumulative amendments substantially change the approved development, the applicant should be required to lodge a **new Form 1 application**.

At a minimum, the application should not be determined until a complete comparison with the March-approved development and the necessary updated technical information have been provided and properly assessed.

Regards,

[redacted]

SUBMISSION OF OBJECTION

Form 2 Amendment – 6 Alexander Road, Dalkeith
DAP/24/02820 | City Ref: DA24-100314

From: [redacted]
[redacted]**Philip Road, Dalkeith**

I am writing to object to the proposed Form 2 amendments to the development at 6 Alexander Road, Dalkeith.

I live nearby at [redacted] Philip Road. My concern is not that the site should not be developed, but whether a development of this height, size and intensity is appropriate in this location, and what its overall impact will be on the surrounding residential neighbourhood.

I also have concerns about the number and extent of the amendments now being proposed and whether residents have been given sufficient information to properly understand how the development has changed from what was approved in March.

1. Four-storey height, bulk and neighbourhood character

My main concern remains the four-storey height, bulk and scale of the development.

I understand that LPP 5.14 identifies three storeys for multiple dwellings on Alexander Road. In my view, four storeys is simply too large and imposing for this location and is inconsistent with the predominantly lower-scale residential character of the surrounding area.

The fact that the site is zoned R80 does not mean that four storeys should automatically be accepted. Development still needs to respond appropriately to the particular site and to the homes and streets surrounding it.

I therefore do not support the fourth storey and believe the overall height and scale of the development should be reduced.

I am also concerned about the associated impacts of a building of this size on neighbouring properties, particularly overshadowing, loss of winter sunlight, overlooking, privacy and visual bulk. These are significant impacts for the residents living immediately around the development and should not simply be accepted as an inevitable consequence of redevelopment.

2. Extent of the amendments and inadequate information

I am particularly concerned about how many changes are now being made to a development that was only approved in March.

The amendments include removal of the basement, changes to apartment layouts and bedroom numbers, changes to finished floor levels and building articulation, altered waste and fire infrastructure, changes to landscaping and screening, a new services/pool-plant enclosure, and changes to the upper level and roof.

These do not appear to me to be one or two isolated changes. They affect numerous parts of the development from the lower levels through to the roof.

I understand that a Form 2 amendment is only available where the amendment would not substantially change the development approved. Given the number and extent of the changes proposed, I believe the City and DAP need to carefully consider their combined effect, rather than treating each amendment separately.

I am also concerned that residents have not been provided with a clear and comprehensive comparison showing exactly how the development now proposed differs from the development approved in March.

For a development of this size, and with this number of amendments, there should be clear information showing the approved and amended plans side by side, together with the changes to floor levels, building form, apartment layouts, landscaping, services and the upper communal areas.

Without this information, it is difficult for neighbouring residents to properly understand the cumulative impact of what is being proposed.

If the changes substantially alter the approved development, I believe the appropriate course is for the applicant to lodge a new Form 1 application so that the proposal can be assessed properly as a whole.

3. Traffic, access and neighbourhood safety

I am also concerned about the broader impact of development of this intensity on traffic, vehicle movements, servicing and pedestrian safety in the surrounding residential streets.

Five multiple dwellings generate vehicle movements, visitors, deliveries, waste collection and servicing activity. As density increases in the area, these cumulative impacts become increasingly important.

The amended proposal changes the basement and associated infrastructure, waste arrangements and the location of the fire booster. Any effect these changes have on vehicle access, servicing, waste collection, pedestrian safety or the street interface should be properly assessed.

These practical impacts should be accommodated within the development wherever possible rather than creating additional pressure on the surrounding residential streets.

Conclusion

I object to the Form 2 amendment in its current form.

My principal concerns are the four-storey height, bulk and scale of the development, its impact on neighbouring properties and the character of the surrounding residential area, and the broader implications for traffic, servicing and neighbourhood safety.

I am also particularly concerned about the extent of the amendments and the lack of clear comparative information available to residents. With changes occurring across so many different parts of the development, I do not believe they should simply be considered individually and described as minor.

I ask the City and DAP to refuse the Form 2 amendment in its current form.

I do not support the four-storey scale of the development and believe the building should be reduced in height and bulk.

I also ask that the cumulative extent of the amendments be properly considered. If they substantially change the development approved in March, the applicant should be required to lodge a new Form 1 application.

At a minimum, the application should not be determined until sufficient comparative and technical information has been provided to allow both the decision-makers and affected residents to properly understand what has changed and what the consequences of those changes will be.

Regards,

[redacted] Philip Road
Dalkeith WA

SUBMISSION OF OBJECTION

Proposed Amendments – 6 Alexander Road, Dalkeith
DAP/24/02820

From: [redacted]
[redacted] Alexander Road, Dalkeith, WA 6009

To the City of Nedlands,

We wish to object to the proposed amendments to the development at 6 Alexander Road, Dalkeith.

We are the daughters and Enduring Power of Attorneys for Mrs [redacted], the owner of [redacted] Alexander Road, immediately adjoining the development site to the south.

Our late father, Mr [redacted], who died unexpectedly following the approval of the development in March this year, chose [redacted] in large part because of its beautiful northern light. Sunlight enters through the north-facing windows and alfresco entertaining area and into the principal living spaces – the kitchen, dining and living rooms. This was particularly important to Dad because our mother, [redacted], has Alzheimer's disease and he believed that living in a home filled with natural light would be good for her wellbeing.

Having reviewed the amended proposal, we are very concerned that changes are now being sought which may further affect the sunlight, privacy, peace and residential amenity of [redacted], particularly through changes to the uppermost level of a building that we already consider too high and too intensive for this location.

1. Sunlight and overshadowing

An independent study, commissioned by the late [redacted], revealed the development proposed for 6 Alexander Rd, would cause significant and detrimental overshadowing to the northern aspect and principal living spaces of [redacted] Alexander Rd. The result of this study, thereby, raised concerns about the accuracy of the overshadowing information provided for the development.

This is particularly important now because the approved development is being amended. The amendments include changes to the upper levels and additional landscaping, including additional trees to the Unit 201 terrace. Given the history of disputed overshadowing assessments for [redacted], we do not consider that another assessment prepared solely on behalf of the applicant would provide sufficient reassurance.

We therefore specifically request that the City arrange or require genuinely independent updated overshadowing and solar-access analysis of the amended proposal. That analysis should compare the March 2026 approved development with the amended proposal, taking into account the mature height and canopy of proposed trees, and assess sunlight throughout the day to the actual areas affected at [redacted] – particularly its north-facing windows, alfresco entertaining area, kitchen, dining room and living areas.

We ask that the independent analysis be provided to us before the amendment is determined and that we be given a reasonable opportunity to consider and respond to it.

2. Four storeys was already too much – the upper level should not now be intensified

Our parents' concern was never simply about individual windows or shadow diagrams. At its heart was a more fundamental concern: a four-storey development of this scale immediately beside [redacted] was too high and too imposing and would have an unacceptable impact upon their home.

Although the development was ultimately approved in March, that does not mean the impacts of the fourth storey disappeared. Nor, in our view, should that approval become a starting point from which the uppermost level can subsequently become more intensive.

The amended upper level includes a pool, sun deck, dining area, gym, ping-pong room and sauna, together with services/pool plant. The amendments also make further changes to this level, including its amenity configuration, southern elevation, screening and services/pool plant. These are not passive uses. They create an elevated area where residents and their guests may swim, gather, exercise, talk and entertain immediately above neighbouring homes.

From [redacted], the fourth storey is therefore not simply a height measurement on a drawing. It is an elevated recreation and entertainment area above a private home, with the potential for additional activity, overlooking, noise, mechanical services and night-time light.

The relevant question is not simply whether the maximum roof height has increased, but whether the amended fourth storey will be more intensive, more visually prominent, more active or otherwise more intrusive when experienced from [redacted].

If the fourth storey was already one of the most contentious elements of this development, why should subsequent amendments be accepted that further intensify the activity and facilities located on that level? In our view, they should not.

3. Southern elevation, terraces, balconies and overlooking

We are particularly concerned about the relationship between the southern elevation, balconies and terraces of the development and [redacted], because these areas face towards the property immediately to the south.

The impact of a terrace or balcony cannot be assessed simply by looking at its setback on a plan. An elevated outdoor area creates the potential for people to stand, sit, gather and look out over the neighbouring property below. This is particularly important for [redacted] because its north-facing windows, alfresco entertaining area, backyard and pool are on the side of the property facing the development.

The current amendments include two additional trees to the Unit 201 terrace, together with changes to the southern elevation and upper level. Those changes need to be assessed not only for their appearance from within the development, but for their effect upon the property below – including overlooking, visual bulk, screening and potential additional overshadowing as landscaping matures.

We are also concerned about additional glazing and screening shown on the southern elevation. Simply identifying privacy screening on a drawing does not establish what a person standing behind or beside that screening will actually be able to see.

We therefore request proper line-of-sight and visual-privacy assessment from each balcony, terrace, window, glazed area, pool deck and communal outdoor area capable of looking towards [redacted], including assessment of what can be seen of its north-facing habitable-room windows, alfresco area, backyard and pool. Any screening relied upon should be demonstrated to provide effective and permanent privacy.

Our mother's home and garden should not become spaces which are unreasonably overlooked from a neighbouring four-storey development.

4. Pool plant immediately adjacent to [redacted] Alexander Road

The current amendment proposes a services/pool plant enclosure along the southern elevation at Level 3.

This location is directly adjacent to our property at [redacted] Alexander Road.

We are concerned that locating pool pumps, filtration and other mechanical equipment in this position, at an elevated level and immediately adjacent to our property, has significant potential to adversely affect the acoustic amenity of our mother's home and outdoor living areas.

Pool plants can operate for extended periods and can produce continuous mechanical noise, vibration and tonal noise. The elevated location is particularly concerning because ordinary ground-level boundary fencing cannot reasonably be relied upon to provide meaningful acoustic attenuation.

4a. The Acoustic impact has not been adequately demonstrated

The City's current advertising information states that the amendment introduces a “services/pool plant enclosure” along the southern elevation on Level 3.

However, the same information expressly states:

“There are no changes to any technical reports approved under DAP/24/02820.”

This raises a significant concern as to whether the acoustic consequences of the proposed pool plant arrangement have actually been assessed.

The current amendment introduces or modifies the treatment of mechanical plant at Level 3, immediately adjacent to [redacted] Alexander Road. We therefore request that the City establish whether the previously approved technical and acoustic documentation specifically assessed:

- the current location of the pool plant;
- the current configuration of the plant enclosure;
- the height of the plant relative to [redacted];
- the construction and acoustic performance of the enclosure;
- the equipment proposed to be installed within the enclosure;
- the operating hours of the equipment;
- noise propagation from the elevated plant towards [redacted]; and
- noise levels at the boundary and at the habitable and outdoor areas of [redacted]

If these matters have not been specifically assessed for the current proposal, an updated acoustic assessment is necessary before the amendment is determined.

4b. An enclosure is not necessarily an acoustic solution

We acknowledge that the amended plans now identify an enclosure for the pool plant.

However, simply describing a structure as a “pool plant enclosure” does not establish that it will provide adequate acoustic attenuation.

We request that the applicant provide detailed construction information identifying:

- the walls and roof of the enclosure;
- the materials and thicknesses proposed;
- any acoustic insulation;
- ventilation arrangements;
- acoustic treatment to openings;
- equipment mounting and vibration isolation;
- the manufacturer's noise specifications for each item of plant; and
- the predicted noise levels outside the enclosure.

4c. Visual screening

We also have concerns regarding the visual impact of the pool plant and associated services.

Our property should not be exposed to an elevated view of mechanical plant, pipework, pumps, filtration equipment, ventilation infrastructure or other associated services.

The proposed enclosure and horizontal screens should provide complete and permanent visual screening from [redacted] Alexander Road.

5. Noise and night-time light

We are also concerned about the cumulative effect of the amended upper level upon the peace and quiet of [redacted]

An elevated pool, sun deck, dining area, gym and other communal facilities have the potential to generate voices, gatherings, swimming and recreational noise, particularly during evenings and weekends. \

We therefore request an updated acoustic assessment specifically addressing the amended upper-level configuration and its impact upon [redacted], including both communal activity and mechanical equipment.

We are similarly concerned about night-time light spill. Lighting associated with an elevated pool, sun deck, communal areas, landscaping and glazing may be visible from bedrooms, living areas and the garden at [redacted]. The impact of the development should therefore be considered during the evening as well as during daylight hours. An appropriate lighting assessment should be undertaken before these amendments are determined.

6. The amenity of [redacted] deserves genuine protection

We recognise that owning a neighbouring property does not mean that nothing around it can ever change. But equally, development should not proceed as though the amenity of existing neighbours is unimportant.

Reasonable access to sunlight and natural light, privacy within one's home and garden, protection from unreasonable overlooking, noise and light spill, and an appropriate relationship with the height and scale of neighbouring development are fundamental aspects of residential amenity.

The development approved in March already represented a significant and, in our view, unacceptable impact upon the amenity of [redacted], particularly through its height, overshadowing and uppermost level. The fact that it received approval does not make those impacts acceptable, nor should that approval become a baseline from which further impacts can progressively be added.

The current amendments must therefore be assessed on their own merits and for their cumulative effect upon [redacted]. They should not be approved simply because an individual change may appear minor when viewed in isolation or because its impact is said to be no worse than part of the previously approved development. The proper question is what the amended development, considered as a whole, will mean for the sunlight, privacy, outlook, peace and residential amenity of [redacted].

Where the amendments intensify, compound or introduce additional impacts upon an already heavily affected neighbouring property, we do not believe they should be approved.

We are particularly concerned that the technical reports relied upon for the previous approval have apparently not been updated despite changes to the upper levels, southern elevation, terrace landscaping, screening and services/pool plant. Technical assessments prepared for a different version of the development should not simply be assumed to demonstrate the impacts of the amended design. Where an amendment potentially changes the effect upon [redacted], that effect should be reassessed.

We are also concerned that these changes are being dealt with as amendments to the development already approved, rather than as a new application. When considered together – particularly the further changes to the upper level and their potential additional impacts upon [redacted] – these do not appear to us to be minor changes. We question whether it is appropriate for changes of this nature to be dealt with through the Form 2 amendment process and ask that this issue be properly addressed before any approval is given.

Conclusion

We ask the City to independently and carefully assess what these amendments will actually mean for [redacted] before making any further decision.

In particular, we request:

- Independent updated overshadowing and solar-access analysis, including impacts upon the actual living spaces and outdoor areas of [redacted] and the effect of proposed matured landscaping
- Proper assessment of visual privacy and overlooking from windows, balconies, terraces and communal areas
- A detailed plan identifying the precise location of all pool plant and mechanical equipment.
- Manufacturer noise specifications for all proposed equipment.
- Full construction details of the proposed pool plant enclosure.
- Details of all acoustic insulation and attenuation measures.
- An acoustic assessment specifically addressing the impact on [redacted] Alexander Road.
- Confirmation that the proposed installation will comply with the applicable requirements of the Environmental Protection (Noise) Regulations 1997.
- Assessment of night-time lighting and light spill.

We ask that this information be provided to us with a reasonable opportunity to consider and respond to it before the amendment is determined.

Most importantly, we respectfully request that the amendments not be approved where they intensify the fourth storey or further diminish the sunlight, privacy, peace and residential amenity that our father spent so much time trying to protect.

Yours sincerely,

[redacted]

Enduring Power of Attorneys for [redacted]

11 September 2026

[redacted]
Philip Road
Dalkeith WA 6009
[redacted]

Kirsty Molodynia, Urban Planner

City of Nedlands Administration Centre

71 Stirling Highway

Nedlands, WA, 6009

Dear Kirsty

Submission – Form 2 Amendment – 6 Alexander Road, Dalkeith – DAP/24/02820

We continue to be very disappointed with the current plans for 6 Alexander Road, Dalkeith

As per our previous submissions we continue to have the following concerns

* The bulk and scale of the proposed 4 storey apartment block is not in keeping with other existing dwellings on Alexander Road. Four storeys remains too high for this section of Alexander Road

* There is gross overshadowing of neighbouring properties with loss of winter sun which is totally unacceptable and significantly reduces the value of these properties.

* The amended plans submitted appear to not be suitable for a Form 2 application as cumulative changes are significant.

As long term residents of Philip Road and ratepayers we continue to be disappointed that a dwelling of this height, bulk and scale could be approved. It is grossly out of keeping with the neighbourhood.

Your sincerely,

[redacted]

[redacted]
[redacted] Alexander Road
Dalkeith WA 6009

9 September 2026

City of Nedlands
71 Stirling Highway
Nedlands WA 6009

SUBMISSION OF OBJECTION

Form 2 Amendment – 6 Alexander Road, Dalkeith

Development Application: DAP/24/02820 | City Ref: DA24-100314

To the City of Nedlands,

We respectfully wish to object to the proposed Form 2 amendments to the development at 6 Alexander Road, Dalkeith.

We live at [redacted] Alexander Road, immediately adjoining the development site, and will therefore be among the residents most directly affected by this development.

We appreciate that the site is zoned for increased density and can be redeveloped. However, we remain very concerned about the four-storey height, bulk and scale of the development and the effect that a building of this size will have on our home, privacy, sunlight and residential amenity.

The proposed amendments also raise particular concerns regarding overlooking from elevated balconies and terraces, the upper communal facilities and potential noise impacts.

Our primary concerns are set out below.

1. Four-storey height, bulk and impact on our home

Our strongest concern remains the four-storey height, bulk and scale of the development.

We understand that LPP 5.14 identifies three storeys for multiple dwellings on Alexander Road, with a fourth storey able to be considered on its merits. We do not believe four storeys is appropriate for this location or that the circumstances of this site justify the additional storey.

For us, this is not simply a question of how the development will appear from the street. Our property directly adjoins 6 Alexander Road, meaning that this very large four-storey building will sit immediately alongside our home.

The height, length and overall mass of the building will fundamentally change the relationship between our property and the adjoining site. We are concerned about the sense of enclosure and loss of residential amenity that will result from such a substantial building immediately beside us.

Alexander Road and the surrounding streets remain predominantly lower-scale residential areas. While we recognise that redevelopment and increased density will occur, this should be achieved in a way that provides a reasonable transition to existing neighbouring homes.

In our view, the proposed development does not achieve that transition and should be reduced in height and bulk.

2. Privacy, overlooking, balconies and terraces

As the immediately adjoining residents, visual privacy and overlooking are significant concerns for us.

The development contains elevated balconies and terraces, and the amended proposal changes apartment layouts, terrace locations, screening and floor levels. These are not minor matters for the people living immediately next door.

We are particularly concerned about the potential for overlooking from elevated balconies, terraces, windows and communal areas into our home and private outdoor areas. The experience of living beside a four-storey development is very different if occupants at several elevated levels have an outlook towards neighbouring residential properties.

We do not believe adjoining residents should have to rely upon landscaping alone to protect the privacy they currently enjoy. Any screening relied upon to address overlooking should be clearly demonstrated on the plans, permanent and effective.

Given the changes now proposed, we ask that visual privacy be reassessed against the actual amended development, including the lines of sight from all relevant balconies, terraces, windows and communal areas towards [redacted] Alexander Road.

3. Overshadowing, sunlight and residential amenity

We are also concerned about the overshadowing and loss of winter sunlight resulting from the height and scale of the development.

The lots along this section of Alexander Road are relatively narrow and their orientation makes maintaining good solar access to neighbouring properties challenging. In our view, this makes it particularly important that redevelopment is carefully designed to minimise overshadowing rather than placing the consequences of a difficult site orientation onto existing neighbouring homes.

We recognise that the site is zoned for greater density. However, the physical characteristics and orientation of these lots place practical constraints on the scale of development that can reasonably be accommodated without adversely affecting neighbours.

We understand that LPP 5.14 generally provides for three storeys for multiple dwellings on Alexander Road, with a fourth storey considered on its merits. We do not believe the solar impacts of this proposal support allowing that additional storey. Overshadowing and solar access have already been significant issues with the development, including impacts arising from the three-storey built form.

The constrained orientation of the site should therefore be a reason for the development to be designed more sensitively and for its height and bulk to be reduced. A development of this scale should demonstrate that reasonable efforts have been made to protect winter sunlight to neighbouring homes, gardens and outdoor living areas.

Given the proposed changes to floor levels, upper-level elements, terraces, screening and landscaping, we also believe solar impacts should be reassessed against the amended development as a whole.

In our view, the significant overshadowing concerns weigh against allowing a discretionary fourth storey.

4. Noise and the upper communal level

We are also concerned about the potential noise impacts from the upper communal level and associated mechanical equipment.

The development includes an elevated communal area with a swimming pool and recreation facilities, and the amended plans now also include a services/pool-plant enclosure at this level.

For people living immediately next door, noise from communal activity, swimming pools, pumps, mechanical plant and air-conditioning equipment has the potential to be intrusive, particularly during evenings and weekends when residents are using their homes and gardens.

We are concerned that the changes to mechanical services and pool plant may alter the acoustic impacts previously assessed. We therefore believe an updated acoustic assessment of the amended development should be required before approval.

This should consider the cumulative noise from communal activity, the pool and associated equipment, air-conditioning and other mechanical plant and demonstrate that neighbouring properties will not experience unreasonable noise impacts.

5. Extent of the amendments and lack of clear information

We are concerned by the number of amendments now being proposed to a development that was only approved in March.

The changes include removal of the basement, changes to apartment layouts and floor levels, terraces and building form, waste and fire infrastructure, landscaping and screening, and changes to the upper communal level, mechanical services and roof.

Taken together, these appear to be substantial changes across many different parts of the development.

As adjoining residents, it is particularly important that we can clearly understand how the development now proposed beside our home differs from the development approved in March. However, residents have not been provided with a simple and comprehensive comparison showing the cumulative effect of these changes on neighbouring properties.

We understand that a Form 2 amendment should not substantially change the approved development. We therefore ask the City and DAP to consider the combined effect of all the amendments, rather than considering each change separately.

If the development has changed substantially, we believe it should be considered through a new Form 1 application.

Conclusion

We respectfully ask that the Form 2 amendment not be approved in its current form.

As the residents of [redacted] Alexander Road, directly adjoining the development, we will experience its impacts at very close range. Our principal concerns are the four-storey height, bulk and scale of the building immediately beside our home; loss of privacy from elevated balconies, terraces, windows and communal areas; overshadowing and loss of residential amenity; and potential noise from the upper communal facilities, pool and mechanical equipment.

We do not believe the characteristics of this site or the impacts on neighbouring properties provide sufficient merit to justify the additional fourth storey. We would like to see the development reduced in height and scale and designed to provide a more reasonable relationship with the existing homes around it.

Given the extent of the amendments now proposed, we also ask the City and DAP to carefully consider whether the proposal remains appropriately dealt with as a Form 2 amendment. If the amendments substantially change the development approved in March, we believe a new Form 1 application should be required.

Thank you for considering our submission.

Kind regards,

[redacted]
[redacted] Alexander Road
Dalkeith WA 6009

SUBMISSION OF OBJECTION

Proposed Form 2 Amendment – 6 Alexander Road, Dalkeith

DAP Reference: DAP/24/02820
City Reference: DA24-100314

To the City of Nedlands and Metro Inner Development Assessment Panel,

I strongly object to the proposed Form 2 amendments to the development approved at 6 Alexander Road, Dalkeith.

My primary objection is a threshold one.

In my submission, the amendments, considered cumulatively and qualitatively against the development actually approved in March 2026, substantially change the development approved and therefore do not satisfy regulation 17(1)(c).

The proposal should not be approved through the Form 2 pathway. If the applicant wishes to pursue this redesigned development, it should be the subject of a new Form 1 application and full assessment.

The applicant's recently provided approved-versus-current comparison drawings are particularly important. They demonstrate that this is not simply a small collection of internal alterations. The amendments extend through successive levels of the building and culminate in a substantial reconfiguration of its upper portion, including what the applicant itself describes as a **"NEW AMENITY CONFIGURATION"** at Level 3 and a **"NEW ROOF CONFIGURATION"**, together with additional glazing and screening, glazing behind screens, a sauna, services/pool plant and a number of unexplained "OPERABLE" elements.
There are also important unresolved inconsistencies and information gaps concerning the precise approved baseline, floor areas, plot ratio, Level 3 enclosure and classification, and the continued applicability of the approved solar, privacy and acoustic assessments.

Those are not peripheral matters. They go directly to the DAP's ability to determine whether the regulation 17 threshold is satisfied and, independently, whether the amended proposal produces acceptable planning and amenity outcomes.

PART A – THE REGULATION 17 THRESHOLD

1. The threshold question must be determined first

Regulation 17(1)(c) permits an application to amend an aspect of a DAP-approved development only where the amendment **"would not substantially change the development approved."**

DAP Practice Note 3 confirms that this is a preliminary threshold question for the DAP. It is distinct from the subsequent question of whether the amendments should be approved on their planning merits. The Practice Note also recognises that the assessment is not simply quantitative: a seemingly small physical change may nevertheless be qualitatively substantial, and the relevant inquiry includes whether the amended development remains essentially or materially the same as the development approved and whether the changes alter the essence of the approved design and outcome.

That distinction is fundamental here. The question is **not** whether each individual amendment can separately be described as minor.

Nor is the question answered by observing that:

- the proposal remains five dwellings;
- it remains four storeys;
- the maximum roof RL remains 31.800; or
- the numerical increase in plot ratio is relatively modest.

Those matters are relevant, and I acknowledge them. But they do not determine whether the development approved has been substantially changed.

The correct comparison must consider the **whole amended development against the precise development approved in March 2026**, including qualitative changes to built form, enclosure, external interfaces, communal facilities, outdoor spaces and the operational characteristics of the building.

A disaggregated assessment that characterises each amendment separately as minor would therefore ask the wrong question.

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2. The comparison drawings reveal a connected package of changes

The new comparison package is useful because it permits a much clearer approved-versus-current assessment.

The amendments include, amongst other matters:

Part of development	Principal changes apparent from comparison	Significance
Basement / ground	Basement fire tanks/pumps removed; ground-floor terrace, bin-store/bulk-waste and fire infrastructure altered	Demonstrates that the amendment package extends to the base of the development
Level 1	Both apartments materially replanned; bedroom configuration changed; northern indent/building line and glazing altered	Changes dwelling configuration and external building envelope
Level 2	Multiple indent adjustments; terraces and balconies redistributed; external geometry altered; additional trees	Changes three-dimensional form and locations of elevated outdoor activity
Level 3	**“NEW AMENITY CONFIGURATION”; additional glazing/screens; glazing behind screens; sauna; services/pool plant; multiple “OPERABLE” elements**	Potentially changes enclosure, form, operation, privacy, acoustics and intensity of use
Roof	**“NEW ROOF CONFIGURATION”** and changed relationship with Level 3	Further redesign of upper portion of building
Elevations	Additional glazing and screening to northern and southern Level 3 interfaces	Changes external expression and relationship with neighbouring properties

The comparison drawings themselves therefore demonstrate that the changes are not confined to one discrete component.

Level 1 — changed dwelling configuration and building envelope

At Level 1, the significance of the amendment is not simply that Units 101 and 102 have reduced internal floor areas. Both apartments have been substantially replanned, and the comparison drawing separately identifies an “INDENT ADJUSTMENT” and “GLAZING LINE ADJUSTMENT”. The amended layouts also introduce study areas with associated wardrobe provision.

The important point for the Regulation 17 assessment is therefore not the change in bedroom labelling or the numerical reduction in area. It is that the internal arrangement, glazing line and external building edge have all changed as part of the broader redesign.

Level 2 — changed external geometry and elevated outdoor activity locations

At Level 2, the issue is similarly not whether the overall terrace and balcony area has increased or decreased. The comparison drawings show a redistribution of elevated outdoor spaces around Unit 201 together with multiple “INDENT ADJUSTMENT” changes to the building form. The approved arrangement included terraces of 20.6m², 20.0m² and 28.9m² and balconies of 17.2m², 8.9m² and 3.7m²; the amended arrangement changes those to terraces of 18.1m², 14.8m² and 27.7m² and balconies of 16.7m², 8.6m² and 6.9m².

Those numerical changes are not relied upon as adverse impacts in themselves. Their significance is that the location and geometry of elevated outdoor activity areas and the surrounding building edges have changed. That can alter sightlines, acoustic shielding, the location of voices and activity, and the relationship with neighbouring windows and private open space. The amended design therefore requires spatial assessment rather than a simple comparison of square metres.

I do not suggest that every one of these changes is substantial by itself. Their significance lies in the **cumulative pattern of physical change through successive levels of the development**.

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3. The upper portion of the building has been materially reconfigured

The strongest evidence of qualitative change occurs at Level 3 and roof level.

The approved Level 3 already contained significant communal facilities, including a 9m × 4m pool, sun deck, dining area, gym and ping-pong room. The approved plan identified 106.7m² as “COMMUNAL AMENITY”.

The amended plan retains those substantial recreational functions but introduces a different configuration. It identifies only 19.2m² under the label “COMMUNAL AMENITY” and adds or identifies:

- a sauna;
- services/pool plant;
- additional glazing and screens;
- additional glazing behind screens;
- horizontal screens; and
- four elements marked “OPERABLE”.

Most importantly, these are not descriptions imposed by an objector. The applicant's own comparison expressly describes the Level 3 changes as:

“NEW AMENITY CONFIGURATION”
“ADDITIONAL GLAZING AND SCREENS”
“ADDITIONAL GLAZING BEHIND SCREENS”
“SAUNA ROOM ADDITION”.

The applicant then expressly describes the roof amendment as:

“NEW ROOF CONFIGURATION”.

These elements should not be assessed as unrelated annotations.

Together they represent a connected redesign of the **upper portion of the building**.

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4. Same maximum height does not mean the same built form

I acknowledge that the maximum roof level remains RL31.800.

That fact should not be allowed to obscure the qualitative question.

A building can remain at exactly the same maximum height while changing materially in:

- floorplate;
- articulation;
- enclosure;
- glazing;
- screening;
- roof form;
- apparent bulk;
- relationship with adjoining properties; and
- operational use.

That is particularly relevant here because the additional glazing and screening appear capable of making parts of Level 3 more enclosed or potentially more enclosed than in the approved design.

I do not assert from the drawings alone that the whole level has become enclosed. That requires clarification.

However, the amended plans plainly show additional glazing and glazing behind screening, and identify several elements as “OPERABLE”. The northern elevation expressly identifies both **“ADDITIONAL GLAZING AND SCREENS”** and **“ADDITIONAL GLAZING BEHIND SCREENS”**. The southern elevation also identifies additional glazing and screens.

The DAP therefore needs to know exactly what has changed before concluding that the approved fourth storey remains materially the same.

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5. The particular significance of changing the fourth storey

The Level 3 changes require additional scrutiny because this is not simply another floor within an otherwise conventional building envelope.

LPP 5.14 identifies three storeys for multiple dwellings in the relevant Alexander Road precinct, with the policy providing that an additional storey can be considered where it is demonstrated that the proposal allows **two hours per day solar access on 21 June for existing solar panels and primary garden areas on neighbouring properties**.

The fourth storey was therefore never simply a neutral or automatic component of the expected built form.

Its acceptability depended upon the particular planning and amenity outcomes demonstrated by the development that was ultimately approved.

Where the very upper portion of the building that required that careful justification is subsequently reconfigured in its amenity arrangement, glazing, screening, apparent enclosure, services and roof form, the relevant question is whether it remains materially the fourth-storey design that was approved.

The answer cannot be reduced to the observation that the maximum RL has not increased.

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6. The changes potentially alter operational character as well as architecture

The significance of the Level 3 amendments is not confined to appearance.

Additional glazing or operable enclosure may affect:

- weather protection;
- year-round usability;
- duration of occupation;
- evening use;
- acoustic transmission;
- light spill;
- visual privacy; and
- the overall intensity with which the communal level can be used.

Greater enclosure may potentially contain noise when glazing is closed. Equally, it may make the space more comfortable and usable in poor weather, winter and evening conditions, allowing more frequent or longer-duration occupation.

If the glazing or screening is operable, its acoustic and privacy effects may also differ materially between open and closed configurations.

That is why the unexplained word **“OPERABLE”** matters.

The DAP should not be required to infer what those elements are or how they function when deciding whether the development has substantially changed.

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7. The terrace and balcony changes also have qualitative consequences

The amended terrace and balcony arrangements should not be assessed merely by adding their areas.

The location and geometry of an elevated outdoor space determine:

- where occupants congregate;
- where direct sightlines are directed;
- which neighbouring rooms and gardens receive activity noise;
- whether the building itself provides acoustic shielding;
- where evening lighting is visible; and
- whether privacy screening remains effective.

The amended Level 2 plans relocate and resize several outdoor spaces while changing building indents.
Accordingly, even where total outdoor area may not increase, the **amenity relationship can change spatially**.

That is another reason why existing privacy and acoustic conclusions should not simply be assumed to apply unchanged.

THE APPROVED BASELINE AND CURRENT PROPOSAL ARE NOT SUFFICIENTLY RECONCILED

8. The approved apartment-area schedules contain a substantial unexplained discrepancy

Before the DAP can decide whether the development has been substantially changed, it must be clear what development is being used as the approved baseline.

The comparison package presently contains a significant inconsistency.

One drawing reproduced as part of the approved plans gives:

- G01 – 143.2m²
- G02 – 92.7m²
- Unit 101 – 210.2m²
- Unit 102 – 200.0m²
- Unit 201 – **342.0m²**
- **Total apartment area – 988.1m²**.

Other approved drawings give:

- G01 – 135.8m²
- G02 – 90.9m²
- Unit 101 – 205.3m²
- Unit 102 – 194.7m²
- Unit 201 – **291.9m²**
- **Total apartment area – 918.7m²**.

That is a **69.4m² discrepancy in the stated approved apartment-area total**, with Unit 201 alone differing by **50.1m²**.

There may be a straightforward explanation—for example, an outdated schedule may have remained on one drawing.

I make no allegation otherwise.

But the discrepancy must be reconciled.

A Regulation 17 assessment cannot reliably compare the approved and amended development unless the decision-maker first establishes **exactly which plans, dimensions and floor areas comprise the March 2026 approval**.

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9. The plot-ratio position also requires reconciliation

The applicant's comparison gives:

Approved plot-ratio area: 1010.86m²
Current plot-ratio area: 1016.69m²
Increase: 5.83m²

The individual changes are identified as:

- G01: +3.64m²
- G02: −0.05m²
- Unit 101: +1.68m²
- Unit 102: +0.47m²
- Unit 201: +0.09m².

I accept that a 5.83m² increase is modest when viewed solely as a number.

However, the apartment internal-area schedules simultaneously show the total apartment area reducing from **918.7m² to 890.8m²**, a reduction of approximately **27.9m²**.
Apartment internal area and statutory plot-ratio area are different measurements, and this does not establish that the plot-ratio calculation is wrong.

It does, however, make it important to understand **where the statutory plot-ratio area is located and how the amended building has been measured**, particularly at Level 3.

A floor-by-floor marked plot-ratio plan should therefore be provided identifying what is included and excluded, including the treatment of enclosed, partially enclosed, covered and communal areas at Level 3.

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10. The 106.7m² / 19.2m² Level 3 classification change requires explanation

The approved Level 3 identifies **106.7m² "COMMUNAL AMENITY"**.

The amended Level 3 identifies only **19.2m² "COMMUNAL AMENITY"**, notwithstanding the continued presence of the pool, sun deck, dining, gym and ping-pong facilities and the addition of a sauna.

I do not suggest that communal amenity has necessarily physically reduced by 87.5m². The difference may result from changed classification or measurement.

But that is precisely why clarification is required.

The DAP should know:

- what was included within the approved 106.7m²;
- what is included within the current 19.2m²;
- how the remaining Level 3 spaces are now classified;
- which are enclosed, partially enclosed, covered or open; and
- how those areas are treated for plot-ratio purposes.

Those matters are directly relevant to the physical and functional extent of the Level 3 amendment.

EXISTING TECHNICAL ASSESSMENTS CANNOT SIMPLY BE ASSUMED TO APPLY

11. The relevant question is whether the reports still correspond with the amended building

The fact that existing technical reports have not themselves been amended does not establish that their conclusions remain applicable.

The proper question is whether the modelling inputs, geometry, uses and mitigation assumptions considered by those reports still correspond with the July 2026 design.

That question is especially important for **solar access, visual privacy and acoustics**.

Solar access

The additional fourth storey is directly connected under LPP 5.14 to demonstrating the specified winter solar-access outcome.

The amended proposal alters the three-dimensional geometry of the building at Levels 2 and 3 and changes its roof configuration.

I do not assert without modelling that those amendments necessarily worsen overshadowing.

Rather, I submit that it must be **demonstrated, rather than assumed**, that the amended building continues to achieve the solar-access outcome relied upon for the additional storey.

The appropriate question is whether the solar consultant has actually reviewed the **July 2026 amended three-dimensional design** and confirmed that the previous conclusions remain valid.

Visual privacy

The amended plans change terraces, balconies, building indents, glazing and screening.

R-Codes Volume 2 requires the design of buildings, windows and balconies to protect neighbouring privacy, while communal open space must be designed and oriented to minimise impacts on neighbouring habitable rooms and private open spaces. The plans themselves

contain numerous cones of vision and privacy screens, demonstrating that privacy is an active design consideration.
A fresh privacy assessment should therefore be undertaken against the current July 2026 plans, identifying the actual neighbouring habitable-room windows and primary private outdoor areas affected and the screening relied upon.

Acoustic amenity

The acoustic issue has also changed materially.

The amended Level 3 combines a pool and sun deck with dining/social facilities, gym, ping-pong room, sauna and services/pool plant, together with additional glazing and potentially operable elements.

An acoustic assessment of that arrangement should consider the **actual operational system**, including:

- elevated voices and social activity associated with the pool/deck;
- dining and entertaining;
- ping-pong/impact noise;
- gym activity and potential structure-borne noise;
- pool and mechanical plant;
- simultaneous use of facilities;
- actual source and neighbouring receiver heights;
- evening and night-time use; and
- the open and closed configurations of any operable glazing or screens.

If acoustic acceptability depends upon restricted operating hours or glazing remaining closed, those assumptions should be expressly identified and capable of being secured through enforceable conditions.

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12. These information gaps cannot simply be left until after the threshold is decided

This is particularly important.

The missing information does not concern minor construction details.

It concerns matters necessary to understand **what has actually changed**:

- the precise approved baseline;
- the extent of Level 3 enclosure;
- the meaning and operation of the “OPERABLE” elements;
- the classification of Level 3 areas;
- the plot-ratio treatment of those areas;
- the changed privacy relationships;
- the operational/acoustic consequences of the amended communal level; and
- whether the solar-access outcome supporting the additional storey remains satisfied.

These matters cannot sensibly be treated as details to be resolved after the Regulation 17 threshold has already been determined.

They are evidence necessary **to determine that threshold**.

Until they are resolved, I submit that the DAP does not have a sufficiently reliable evidentiary basis to conclude that the amended proposal would not substantially change the development approved.

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13. Cumulative conclusion under Regulation 17

The significance of this amendment is not captured by the modest numerical increase in plot ratio, the unchanged maximum roof RL, or any individual amendment annotation.

The amendments reveal a connected and cumulative redesign extending through successive levels of the development: altered Level 1 building form and dwelling configuration; altered Level 2 articulation and the redistribution of elevated outdoor spaces; a "NEW AMENITY CONFIGURATION" at Level 3; additional glazing and screening to the northern and southern interfaces, including glazing behind screens; the addition of a sauna and services/pool plant; unexplained "OPERABLE" elements; and, ultimately, a "NEW ROOF CONFIGURATION".

These changes potentially alter not only the architecture of the approved development, but most significantly the **form, degree of enclosure, weather protection, operational character and intensity of use of its uppermost level, and its relationship with neighbouring properties**. Their significance is therefore qualitative as well as quantitative and cannot, in my submission, be determined simply by reference to the unchanged dwelling yield, unchanged maximum roof RL or modest numerical increase in plot ratio.

Critically, the current material does not establish the precise approved floor-area baseline, explain the 106.7m²/19.2m² Level 3 classification change, identify what the "OPERABLE" elements are, demonstrate the extent of current Level 3 enclosure, fully reconcile the floor-area and plot-ratio calculations, or demonstrate that the solar, privacy and acoustic assessments relied upon in relation to the approved development remain applicable to the July 2026 design.

These are not peripheral matters. They bear directly upon the physical and operational extent of the amendments and therefore upon the threshold question itself. **Until these matters are resolved, the DAP does not have a sufficiently reliable evidentiary basis to determine that the amendments would not substantially change the development approved.**

In my submission, when the amendments are considered **cumulatively and qualitatively against the precise development approved in March 2026**, they substantially change the development approved for the purposes of regulation 17(1)(c).

The proposal should therefore **not be approved through the Form 2 pathway**.

If the applicant wishes to pursue the redesigned development, it should be the subject of a **new Form 1 application and full assessment**.

PART B – PLANNING MERITS IN THE ALTERNATIVE

If, contrary to the above, the DAP concludes that it has jurisdiction to determine the proposal as a Form 2 amendment, I submit that the amendments should nevertheless be refused on their planning merits.

14. The fourth-storey communal level creates an unusually intensive elevated residential interface

The underlying concern about the fourth storey remains fundamental.

LPP 5.14 identifies three storeys for multiple dwellings on Alexander Road and provides for an additional storey to be considered where the specified neighbouring solar-access outcome is demonstrated.

The amended fourth storey is not merely a passive or incidental rooftop space.

It accommodates a concentrated suite of active communal recreational and social facilities:

- a 9m × 4m swimming pool;
- sun deck;
- dining/social area;
- gym;
- ping-pong room;
- sauna; and
- associated services and pool plant.

The issue is not whether any one of those facilities is individually permissible in a multiple-dwelling development.

The relevant question is whether the **combined intensity, elevation, potential hours of use and relationship with adjoining residential properties** are acceptable at this particular fourth-storey location.

R-Codes Volume 2 Objective O3.4.3 requires communal open space to be designed and oriented to minimise impacts on habitable rooms and private open space within the development and on neighbouring properties. Acceptable Outcome A3.4.7 specifically identifies **noise, odour, light spill and overlooking** as impacts that communal open space should minimise.

The associated design guidance recognises pools and recreation facilities as possible communal amenities but expressly says their potential impacts must be considered, including noise and external lighting.

That is precisely the assessment required here.

The Level 3 uses should therefore be assessed cumulatively, rather than as a collection of individually permissible facilities.

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15. Additional enclosure may increase the intensity and duration of Level 3 use

The additional glazing potentially cuts both ways.

When closed, glazing may reduce outward noise transmission.

However, increased enclosure or weather protection may also make Level 3:

- more usable in poor weather;
- more comfortable during winter;

- more attractive for evening use;
- capable of longer-duration occupation; and
- operationally more intensive throughout the year.

If the glazing is operable, any acoustic benefit may change when it is opened.

The effect of the additional glazing therefore cannot properly be assessed only as a privacy or acoustic mitigation measure. Its potential effect on the **operational character and intensity of the fourth storey** must also be considered.

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16. Elevated terraces and balconies require current privacy and amenity assessment

There are numerous elevated private outdoor spaces throughout the development.

The concern is their relationship with neighbouring properties and the fact that their geometry and position have changed.

R-Codes Volume 2 requires communal open space to minimise impacts on neighbouring habitable rooms and private open spaces, including overlooking and noise.

The current plans should therefore be assessed spatially rather than simply by comparing aggregate balcony areas.

A changed terrace location may alter:

- direct lines of sight;
- the location of voices and social activity;
- the effectiveness of building mass as acoustic shielding;
- the neighbouring rooms or gardens exposed to activity; and
- evening lighting relationships.

The amended privacy solution should be demonstrated against the actual current proposal.

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17. Additional screening does not resolve every amenity or built-form issue

The additional screens may assist in managing visual privacy. However, they should not be treated as having only a beneficial consequence.

Where substantial additional screening is required around an elevated active communal level, the assessment should consider whether the design is increasingly dependent upon mitigation rather than adequate orientation and separation.

Further, additional glazing and screening can increase the apparent **solidity and enclosure of the fourth storey**, even where they reduce overlooking.

There is therefore a potential tension: **privacy mitigation may itself increase perceived bulk and enclosure.** The City and DAP should assess both consequences.

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18. Acoustic amenity has not been demonstrated for the amended Level 3

The acoustic consequences of an elevated communal recreation level are materially different from ordinary ground-level residential activity.

At Level 3, ordinary boundary fences and ground-level landscaping may provide substantially less acoustic shielding.

The assessment should therefore consider the actual elevation and location of noise sources relative to neighbouring bedrooms, living areas and outdoor spaces.

Particular attention should be given to:

- pool/deck voices and social activity;
- kitchen/dining entertaining;
- ping-pong and other impact noise;
- gym activity;
- mechanical and pool plant;
- simultaneous operation;
- evening/night use; and
- operation with any operable façade elements both open and closed.

Without that assessment, I do not consider it demonstrated that the amended Level 3 protects neighbouring acoustic amenity.

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19. Solar access remains fundamental to the fourth-storey merits

The underlying solar-access issue remains especially important because LPP 5.14 makes the additional storey contingent upon demonstrating the specified winter solar-access outcome to neighbouring existing solar panels and primary garden areas.

The amended proposal is not geometrically identical to the approved proposal.

I therefore request confirmation based on the **current three-dimensional design**, rather than the previous plans, that the required solar-access outcome remains achieved.

This is not an assertion that the amended design necessarily creates greater overshadowing.

It is an assertion that the continued justification for the additional storey must be **demonstrated on the development now proposed**.

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20. Night-time light spill requires reconsideration

The additional glazing at Level 3 also changes the potential night-time relationship with neighbouring properties.

The concern is not confined to external luminaires.

A fourth-storey façade containing illuminated dining, gym, recreation, circulation and communal areas may transmit internal illumination through the additional glazing and create a materially different night-time interface.

Given the additional glazing on both northern and southern elevations, the City should be satisfied that the amended design will not create unreasonable light spill or glare to neighbouring bedrooms and private outdoor areas.

INFORMATION REQUIRED BEFORE DETERMINATION

At minimum, I request that the following information be obtained and assessed before the application is determined:

1. **A definitive March 2026 approved baseline**, identifying the plans and schedules constituting the approval and reconciling the 988.1m² / 918.7m² approved apartment-area discrepancy, including the 342.0m² / 291.9m² discrepancy for Unit 201.
2. **An approved-versus-current Level 3 enclosure plan**, clearly distinguishing enclosed, partially enclosed, covered and genuinely open areas.
3. **Detailed identification of every element marked "OPERABLE"**, including what it is, how it operates and its maximum open and closed configurations.
4. **A floor-by-floor marked plot-ratio calculation**, identifying areas included and excluded and explaining the treatment of all Level 3 communal, enclosed, covered and plant areas.
5. **A current visual-privacy assessment** based on the July 2026 design, addressing the altered balconies, terraces, glazing and screening and their relationship with neighbouring habitable rooms and primary private outdoor areas.
6. **Written acoustic review of the July 2026 plans**, addressing the actual Level 3 facilities, elevated source locations, simultaneous use, plant, evening/night use and the open/closed configuration of operable elements, together with any operating restrictions required for acceptable amenity.
7. **Written solar-access confirmation based on the July 2026 three-dimensional design**, demonstrating that the LPP 5.14 solar-access outcome supporting consideration of the additional storey continues to be achieved.
8. **A current lighting/light-spill assessment or review** addressing the additional Level 3 glazing and the night-time operation of the communal/recreational level.

These matters are necessary not simply to refine conditions but to understand **what development is now proposed, how materially it differs from the approved development and what consequences those differences create**.

REQUESTED OUTCOME

For the reasons set out above, I respectfully request that the DAP:

Primary position – Regulation 17

Determine that the cumulative amendments **substantially change the development approved** and therefore do not satisfy regulation 17(1)(c).

The amendments should not be approved through the Form 2 pathway. If the applicant wishes to pursue the redesigned development, it should be required to lodge a new Form 1 application so that the proposal can be assessed as a whole against the applicable planning framework and with the necessary supporting technical information.

Alternative position – planning merits

If the DAP determines that the Regulation 17 threshold is satisfied, I request that the amendments nevertheless be **refused on their planning merits**, having regard particularly to:

- the altered form and increased apparent enclosure of the fourth storey;
- the unusually intensive concentration of elevated communal recreational and social uses;
- unresolved acoustic impacts and operating assumptions;
- changed privacy relationships associated with terraces, balconies and additional glazing;
- increased screening and its consequences for fourth-storey bulk and enclosure;
- potential night-time light spill; and
- the absence of current evidence demonstrating that the amended design continues to achieve the solar-access outcome required for consideration of the additional storey.

At minimum

If the DAP is not presently prepared to refuse the application on either basis, I request that it **not determine the application until the eight information requirements identified above have been satisfactorily addressed and assessed in the Responsible Authority Report**.

The Regulation 17 threshold should then be determined on the basis of the complete amended development and a clearly established March 2026 approved baseline—not by considering individual amendment annotations in isolation.

Conclusion

The comparison material has made the central issue clearer.

The development remains five dwellings and the maximum roof height remains unchanged. I acknowledge those matters.

But those facts do not answer the Regulation 17 question.

The applicant has altered the development through successive levels and, most significantly, has redesigned the upper portion of the building through a **new Level 3 amenity configuration, additional glazing and screening, glazing behind screens, sauna, services/pool plant, operable elements and a new roof configuration**.

Those amendments potentially alter both the **physical form and operational character** of the most sensitive part of the development: the additional fourth storey.

At the same time, fundamental matters necessary to understand the extent and consequences of that change remain unresolved, including the precise approved floor-area baseline, Level 3 enclosure and classification, operable elements, plot-ratio treatment and the continued applicability of the solar, privacy and acoustic assessments.

In those circumstances, I do not consider that it can reasonably be concluded that the amendments **would not substantially change the development approved**.

The Form 2 application should be refused.

If the redesigned development is to be pursued, it should return through the appropriate Form 1 pathway and be assessed transparently and comprehensively as the development now proposed.

Kind regards,

[redacted]

SPP 7.3 R-CODES VOL ELEMENT 2.2	**BUILDING HEIGHT**
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O2.2.1 – The height of development responds to the desired future scale and character of the street and local area, including existing buildings that are unlikely to change.	**Objective achieved - unchanged**
O2.2.2 – The height of buildings within a development responds to changes in topography.	**Objective achieved - unchanged**
O2.2.3 – Development incorporates articulated roof design and/or roof top communal open space where appropriate.	**Objective achieved - unchanged**
O2.2.4 – The height of development recognises the need for daylight and solar access to adjoining and nearby residential development, communal open space and in some cases, public spaces.	**Objective achieved** The amendments do not increase the approved building height and are limited to a minor alteration to the roof form (2.2m²) and a negligible 1cm increase in height to Level 3. The amended design continues to satisfy the requirements of Local Planning Policy 5.14 for consideration of a fourth storey, maintaining the required solar access to adjoining solar panels and primary garden areas. Any change to overshadowing is negligible and does not materially affect neighbouring amenity. Accordingly, the proposal continues to satisfy the intent of Element Objective O2.2.4.
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A2.2.1 – Development complies with the building height limit (storeys) set out in Table 2.1, except where modified by the local planning framework, in which case development complies with the building height limit set out in the applicable local planning instrument.	See below.

(Excerpt from table 2.1)

Streetscape contexts and character *refer A2*	Medium-rise	Higher density residential		Neighbourhood centre	Mid-rise urban centres	High density urban centres		Planned areas
Site R-Coding	**R80**	**R100**	**R160**	**R-AC4**	**R-AC3**	**R-AC2**	**R-AC1**	**R-AC0**
Building height (storeys) *refer 2.2*	4	4	5	3	6	7	9	

LOCAL PLANNING FRAMEWORK	REQUIREMENT
Does the local planning framework amend or replace the above stated controls? If yes, state the applicable requirement:	**Precincts LPP 5.14** **Alexander Road sub precinct – R80** **Multiple dwellings: 3 storeys[1]** **[1] Additional storey can be considered where it is demonstrated that the proposal allows for 2 hours per day solar access on 21 June for existing solar panels and primary garden areas on neighbouring properties.** **Proposed:** 4 storeys (12.3m) – no changes proposed to maximum height 2 hours of uninterrupted sunlight is achieved to solar panels of adjoining southern property (City's assessment)

ELEMENT 2.3	STREET SETBACKS - NO CHANGES

ELEMENT 2.4	SIDE AND REAR SETBACKS
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O2.4.1 – Building boundary setbacks provide for adequate separation between neighbouring properties.	**Objective achieved** The amended development proposes no changes to the approved minimum setbacks to the northern and southern boundaries.The building features articulation along the northern and southern boundaries to provide separation between the development and adjoining properties. The amended development proposes a reduction in the rear ground floor patio setback to the western boundary to 3.2m. The development retains approved setbacks on the first, second and third floors.
O2.4.2 – Building boundary setbacks are consistent with the existing streetscape pattern or the desired streetscape character**.**	**Objective achieved - unchanged**
O2.4.3 – The setback of development from side and rear boundaries enables retention of existing trees and provision of deep soil areas that reinforce the landscape character of the area, support tree canopy and assist with stormwater management.	**Objective achieved - unchanged**
O2.4.4 –The setback of development from side and rear boundaries provides a transition between sites with different land uses or intensity of development.	**Objective achieved - unchanged**
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A2.4.1 - Development complies with the side and rear setbacks set out in Table 2.1, except where: **a)** modified by the local planning framework, in which case development complies with the side and rear setbacks set out in the applicable local planning instrument **AND /OR**	See below

b) a greater setback is required to address *3.5 Visual privacy*.

(Excerpt from table 2.1)

Minimum side setbacks[6] *refer 2.4*	3m	3m	Nil			**local dev plan and/or precinct controls as applicable**
Minimum rear setback *refer 2.4*	3m	6m	6m	Nil	Nil	

(1) Wall may be built up to a lot boundary, where it abuts an existing or simultaneously constructed wall of equal or greater proportions

(2) Where the subject site and an affected adjoining site are subject to different density codes, the length and height of any boundary wall on the boundary between them is determined by reference to the lower density code

(3) Boundary wall only permitted on one boundary, and shall not exceed 2/3 length.

Boundary setbacks will also be determined by provisions for building separation and visual privacy within this SPP and building separation provisions of the NCC.

A2.4.2 – Development is setback from the boundary in order to achieve the Objectives outlined in *2.7 Building separation*, *3.3 Tree canopy and deep soil areas*, *3.5 Visual privacy* and *4.1 Solar and daylight access*.

See Objectives 2.7 Building separation, 3.3 Tree canopy and deep soil areas, 3.5 Visual privacy

LOCAL PLANNING FRAMEWORK	REQUIREMENT
Does the local planning framework amend or replace the above stated controls? If yes, state the applicable requirement:	**Precincts LPP 5.14** **Alexander Road sub precinct – R80** **Side setbacks** **Ground and 1st: 2m** **All other storeys: 3m** **Boundary walls** **1 storey** **2/3 the length of the lot boundary behind the front setback line** **3m behind primary setback line** **1 side**

Proposed:

North - no changes to minimum setbacks

South - no changes to minimum setbacks

Rear av 6m, min 3m

Proposed:

G: min 3.2m to patio, av 7.55m

Setback	Length of setback portion	Proportionate weighting ((portion length / total length) x setback
3.2m	4.6m	0.89m
6.0m	13.4m	4.90m
7.0m	1.0m	0.42m
8.7m	2.0m	1.06m
	TOTAL	7.27m

1st - 3rd floor – no changes to minimum setbacks

ELEMENT 2.5 PLOT RATIO

ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	ASSESSOR COMMENT *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O2.5.1 – The overall bulk and scale of development is appropriate for the existing or planned character of the area.	**Objective achieved** The amendments result in a marginal increase in plot ratio from the approved development, equating to approximately 6.2m² of additional floor area. Given the increase is limited to minor built form articulation and does not alter the approved height, setbacks, bulk, scale or streetscape presentation of the building, the development continues to achieve a built form that is consistent with the intended character and intensity of development envisaged under the R80 coding. Accordingly, the proposal continues to satisfy Element Objective O2.5.1.

ACCEPTABLE OUTCOMES

Acceptable Outcome pathway may not be applicable where a performance solution is provided

A2.5.1 – Development complies with the plot ratio requirements set out in Table 2.1, except where modified by the local planning framework, in which case development complies with the plot ratio set out in the applicable local planning instrument.

(Excerpt from table 2.1)

Streetscape contexts and character *refer A2*	Low-rise		Medium-rise		Higher density residential		Neighbourhood centre	Mid-rise urban centres	High density urban centres		Planned areas
Site R-Coding	R40	R50	R60	R80	R100	R160	R-AC4	R-AC3	R-AC2	R-AC1	R-AC0
Plot ratio [7] *refer 2.5*	0.6	0.7	0.8	1.0	1.3	2.0	1.2	2.0	2.5	3.0	

Refer to Definitions for calculation of plot ratio

AO: 1.0

Proposed: **1.003**– 1015.2m2 / 1012m2

G: 252.8m2
1st: 439.2m2
2nd: 323.2m2

ELEMENT 2.6	BUILDING DEPTH – NO CHANGES

ELEMENT 2.7	BUILDING SEPARATION – NO CHANGES

ELEMENT 3.2	ORIENTATION
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O3.2.1 – Building layouts respond to the streetscape, topography and site attributes while optimising solar and daylight access within the development.	**Objective achieved – no changes**
O3.2.2 – Building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties during mid-winter.	**Objective achieved** Given the R80 coding, there are no applicable Acceptable Outcomes for design element 3.2 Orientation. Assessment is therefore required against the Element Objectives of the R-Codes Volume 2, noting its performance-based framework. The amendments are limited to minor roof form changes, including the addition of a vergola, a 2.2m² increase in roof area and a negligible 0.01m increase to the height of Level 3. Given the limited nature of these changes, the approved overshadowing outcome is not materially altered, and the development retains an appropriate relationship with adjoining properties in terms of solar access. Accordingly, the proposal continues to satisfy the intent of Element Objective O3.2.2.
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A3.2.1 – Buildings on street or public realm frontages are oriented to face the public realm and incorporate direct access from the street.	The development addresses Alexander Road and offers direct pedestrian and vehicle access from the street.
A3.2.2 – Buildings that do not have frontages to streets or public realm are oriented to maximise northern solar access to living areas.	N/A
A3.2.3 – Development in climate zones 4, 5 and 6 shall be designed such that the shadow cast at midday on 21st June onto any adjoining property does not exceed:	Adjoining sites are coded R-80; nil requirement applicable.

– adjoining properties coded R25 and lower – 25% of the site area[1] – adjoining properties coded R30 – R40 - 35% of the site area[1] adjoining properties coded R50 – R60 – 50% of the site area[1] – adjoining properties coded R80 or higher – Nil requirements. (1) Where a development site shares its southern boundary with a lot, and that lot is bound to the north by other lot(s), the limit of shading at A3.2.3 shall be reduced proportionally to the percentage of the affected properties northern boundary that abuts the development site. (Refer to Figure A7.2 in Appendix 7)	
A3.2.4– Where adjoining sites are coded R40 or less, buildings are oriented to maintain 4 hours per day solar access on 21 June for existing solar collectors on neighbouring sites.	N/A. Adjoining sites are coded R80.

ELEMENT 3.3	TREE CANOPY AND DEEP SOIL AREAS
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O3.3.1 – Site planning maximises retention of existing healthy and appropriate and protects the viability of adjoining trees.	**Objective achieved** The site has been cleared of all existing trees through the demolition of the site. The Strawberry Tree at the rear of the site was deemed not to be a regulated tree under the City's Local Planning Policy 3.4: Tree Retention R25-R80. This was permitted to be removed via the demolition following a site visit to inspect the tree.
O3.3.2 – Adequate measures are taken to improve tree canopy (long term) or to offset reduction of tree canopy from pre-development condition.	**Objective achieved via condition** The landscaping plan includes the provision of two new medium trees and four new small trees, in addition to the Strawberry Tree being replaced. Whilst this involves a net increase of four trees from the pre-development condition, it is not considered an ideal design response given that there is the opportunity to provide larger trees within the front and rear.
O3.3.3 – Development includes deep soil areas, or other infrastructure to support planting on structures, with sufficient area and volume to sustain healthy plant and tree growth.	**Objective achieved** The development incorporates 124.3m^2 / 12.2% of deep soil areas, which exceeds the area recommended by A3.3.4. A majority of this area is consolidated to the front and rear of the site where the width and depth of the soil is sufficient to support healthy plant and tree growth.
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A3.3.1 – Retention of existing trees on the site that meet the following criteria: – healthy specimens with ongoing viability **AND** – species is not included on a State or local area weed register **AND** – height of at least 4m **AND/OR** – trunk diameter of at least 160mm, measured 1m from the ground **AND/OR** – average canopy diameter of at least 4m.	No trees are retained on site.

<table>
<tr><td>A3.3.2 – The removal of existing trees that meet any of the criteria at A3.3.1 is supported by an arboriculture report.</td><td>Site is vacant</td></tr>
<tr><td>A3.3.3 – The development is sited and planned to have no detrimental impacts on, and to minimise canopy loss of adjoining trees.</td><td>The development does not impact on any street trees or trees on adjoining sites.</td></tr>
<tr><td>A3.3.4 – Deep soil areas are provided in accordance with Table 3.3a. Deep soil areas are to be co-located with existing trees for retention and/or adjoining trees, or alternatively provided in a location that is conducive to tree growth and suitable for communal open space.
Table 3.3a Minimum deep soil area and tree provision requirements
<table><tr><th>Site Area</th><th>Minimum deep soil area</th><th>Minimum requirement for trees [1]</th></tr><tr><td>Less than 700m²</td><td rowspan="3">10%
OR
7% if existing tree(s) retained on site
(% site area)</td><td>1 medium tree and small trees to suit area</td></tr><tr><td>700 – 1,000m²</td><td>2 medium trees
OR
1 large tree and small trees to suit area</td></tr><tr><td>› 1,000m²</td><td>1 large tree and 1 medium tree for each additional 400m² in excess of 1000m²
OR
1 large tree for each additional 900m² in excess of 1000m² and small trees to suit area</td></tr><tr><td colspan="3">[1] Minimum requirement for trees includes retained or new trees
Refer Table 3.3b for tree sizes</td></tr></table></td><td>Site Area: 1012m²
DSA required: 101.2m² 10% of site area
DSA provided: 124.3m² (12.2%).</td></tr>
<tr><td>A3.3.5 – Landscaping includes existing and new trees with shade producing canopies in accordance with Tables 3.3a and 3.3b.</td><td>Landscaping includes 4 new small trees and 2 new medium tress which achieve the acceptable outcome.</td></tr>
</table>

Table 3.3b Tree sizes

Tree size	Indicative canopy diameter at maturity	Nominal height at maturity	Required DSA per tree	Recommended minimum DSA width	Minimum DSA width where additional rootable soil zone (RSZ) width provided[1] (min 1m depth)	Indicative pot size at planting
Small	4-6m	4-8m	9m²	2m	1m (DSA) + 1m (RSZ)	100L
Medium	6-9m	8-12m	36m²	3m	2m (DSA) + 1m (RSZ)	200L
Large	>9m	>12m	64m²	6m	4.5m (DSA) + 1.5m (RSZ)	500L

[1] Rootable areas are for the purposes of determining minimum width only and do not have the effect of reducing the required DSA.

A3.3.6 – The extent of permeable paving or decking within a deep soil area does not exceed 20 per cent of its area and does not inhibit the planting and growth of trees.	Compliant
A3.3.7 – Where the required deep soil areas cannot be provided due to site restrictions, planting on structure with an area equivalent to two times the shortfall in deep soil area provision is provided.	In addition to achieving 12% deep soil, the application proposes approximately 16.8m² on structure planting

ELEMENT 3.4	COMMUNAL OPEN SPACE
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O3.4.1 – Provision of quality communal open space that enhances resident amenity and provides opportunities for landscaping, tree retention and deep soil areas.	**Objective achieved - unchanged**
O3.4.2 – Communal open space is safe, universally accessible and provides a high level of amenity for residents.	**Objective achieved - unchanged**
O3.4.3 – Communal open space is designed and oriented to minimise impacts on the habitable rooms and private open space within the site and of neighbouring properties.	**Objective achieved subject to condition** The amendments introduce additional operable openings to the fourth-storey communal recreation room, increasing the potential for noise generated within the communal space to affect neighbouring habitable rooms and private open space. While the communal space remains unchanged in size and function, no acoustic assessment has been provided to demonstrate that the amended design continues to minimise impacts on adjoining properties. Accordingly, the City is not satisfied that sufficient information has been provided to demonstrate consistency with the intent of Element Objective O3.4.3, which seeks to minimise impacts on neighbouring amenity.
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A3.4.1 – Developments include communal open space in accordance with Table 3.4	Less than 10 dwellings Required: 0m^2 Proposed: 149m^2

Table 3.4 Provision of communal open space **Development size** | **Overall communal open space requirement** | **Minimum accessible / hard landscape area (included in overall area requirement)** | **Minimum open space dimension** Up to 10 dwellings | Informal seating associated with deep soil or other landscaped areas | NA | NA More than 10 dwellings | Total: 6m² per dwelling up to maximum 300m² | At least 2m² per dwelling up to 100m² | 4m	
A3.4.2 – Communal open space located on the ground floor or on floors serviced by lifts must be accessible from the primary street entry of the development.	Communal open space is accessible from the primary street via lobby and lift
A3.4.3 – There is 50 per cent direct sunlight to at least one communal open space area for a minimum of two hours between 9am and 3pm on 21 June.	Direct northern sunlight to pool area open space and fourth floor internal communal space
A3.4.4– Communal open space is co-located with deep soil areas and/or planting on structure areas and/ or co-indoor communal spaces.	Landscaping to communal areas provided.
A3.4.5 – Communal open space is separated or screened from adverse amenity impacts such as bins, vents, condenser units, noise sources and vehicle circulation areas.	Bins and vehicular circulation areas provided on ground floor.
A3.4.6 – Communal open space is well-lit, minimises places for concealment and is open to passive surveillance from adjoining dwellings and/or the public realm.	Well lit and no places for concealment
A3.4.7 – Communal open space is designed and oriented to minimise the impacts of noise, odour, light-spill and overlooking on the habitable rooms and private open spaces within the site and of neighbouring properties.	The proposed increase in operable openings to the communal recreation space has the potential to alter impacts on neighbouring properties. As no acoustic assessment has been provided to support the amended design, it has not been demonstrated that the communal open space is designed to minimise impacts on adjoining habitable rooms and private open spaces as contemplated by Acceptable Outcome A3.4.7. All overlooking achieves the Acceptable Outcomes for Visual Privacy.

ELEMENT 3.5	VISUAL PRIVACY

ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	ASSESSOR COMMENT *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O3.5.1 – The orientation and design of buildings, windows and balconies minimises direct overlooking of habitable rooms and private outdoor living areas within the site and of neighbouring properties, while maintaining daylight and solar access, ventilation and the external outlook of habitable rooms.	**Objective achieved - unchanged**

ACCEPTABLE OUTCOMES

Acceptable Outcome pathway may not be applicable where a performance solution is provided

A3.5.1 – Visual privacy setbacks to side and rear boundaries are provided in accordance with Table 3.5.

Table 3.5 Required privacy setback to adjoining sites

Cone of vision from unscreened:	First 4 storeys		5th storey and above
	Adjoining sites coded R50 or lower	Adjoining sites coded higher than R50	
Major opening to bedroom, study and open access walkways	4.5m	3m	Refer Table 2.7
Major openings to habitable rooms other than bedrooms and studies	6m	4.5m	
Unenclosed private outdoor spaces	7.5m	6m	

All adjoining properties coded R80

101/102
Front balcony – 6.0m+ to north, south and east
Terraces – north and south entirely screened
Rear balcony/bedrooms – 6.0m east, north and south

201
Front balcony - north 4.0m and south 4.4m in lieu of 6.0m
Bedroom – north 3.0m
Terraces – north 6.4m and south entirely screened
Rear balcony/bedrooms – 6.0m+ east, north and south

Communal space – north, south and east screened, south setback 6m+
East – 12.2m

A3.5.2 – Balconies are unscreened for at least 25 per cent of their perimeter (including edges abutting a building).	201 southern terrace is entirely screened. Additional balconies and terraces provided to the apartment which are unscreened for 25%.
A3.5.3 - Living rooms have an external outlook from at least one major opening that is not obscured by a screen.	Living spaces have outlook independently or not impact by screening
A3.5.4 – Windows and balconies are sited, oriented, offset or articulated to restrict direct overlooking, without excessive reliance on high sill levels or permanent screening of windows and balconies.	The development seeks to provide major openings where applicable on site whilst using screening when required to provide sufficient privacy to neighbours.

ELEMENT 3.6	PUBLIC DOMAIN INTERFACE
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O3.6.1 – The transition between the private and public domain enhances the privacy and safety of residents.	**Objective achieved – unchanged**
O3.6.2 – Street facing development and landscape design retains and enhances the amenity and safety of the adjoining public domain, including the provision of shade.	**Objective achieved - unchanged**
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A3.6.1 – The majority of ground floor dwellings fronting onto a street or public open space have direct access by way of a private terrace, balcony or courtyard.	No changes - One ground floor unit proposed with direct access to the street via terrace.
A3.6.2 – Car-parking is not located within the primary street setback; and where car parking is located at ground level behind the street setback it is designed to integrate with landscaping and the building façade (where part of the building).	No changes - Car parking is not provided in the street setback and is located in garage which is screened from view of street via gate.
A3.6.3 – Upper level balconies and/or windows overlook the street and public domain areas.	No changes -The balconies for 101/102 and 201 overlook the street.
A3.6.4 – Balustrading includes a mix of visually opaque and visually permeable materials to provide residents with privacy while maintaining casual surveillance of adjoining public domain areas.	No changes - Balustrading uses a mix of solid and visually permeable materials.
A3.6.5 – Changes in level between private terraces, front gardens and the ground floor level of the building and the street level average less than 1m and do not exceed 1.2m.	No changes - Maximum level difference between the street and the GF FFL is approximately 0.66m
A3.6.6 – Front fencing includes visually permeable materials above 1.2m and the average height of solid walls or fences to the street does not exceed 1.2m.	Solid to 1.2m along street facing elevation and visually permeable atop. Solid to 1.8m along the northern and

	southern boundaries within the front setback area. The northern solid fencing is considered supported due to the outdoor living area for G01. However a condition has been recommended to reduce the solid fencing along the southern elevation for sight lines and streetscape consistency.
A3.6.7 – Fencing, landscaping and other elements on the frontage are designed to eliminate opportunities for concealment.	No changes - Entrance off the street is direct and offers no opportunities for concealment.
A3.6.8 – Bins are not located within the primary street setback or in locations visible from the primary street.	No changes - Bins are not located within the primary street setback and are screened form the street.
A3.6.9 – Services and utilities that are located in the primary street setback are integrated into the design of the development and do not detract from the amenity and visual appearance of the street frontage.[1] (1) Firefighting and access to services such as power and water meters require careful consideration in the design of the front façade. Consult early with relevant authorities to resolve functional requirements in an integrated design solution.	The amendment seeks the addition of a fire booster within the front setback area as the basement and fire tanks are being removed. The fire booster is to be readily identifiable and accessible in the event of a fire. The fire booster is limited to a maximum of 1.4m in height and is integrated into the design of the front fence and development. Services will be standard-type connections given the small number of dwellings. These will be located as required to meet utility provider requirements. The standard water and power connections necessary will use equipment that is commonly seen in the locality.

ELEMENT 3.7	PEDESTRIAN ACCESS AND ENTRIES – NO CHANGES

ELEMENT 3.8	VEHICLE ACCESS – NO CHANGES

LEMENT 3.9	CAR AND BICYCLE PARKING – NO CHANGES

ELEMENT 4.1	SOLAR AND DAYLIGHT ACCESS	
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*	
O4.1.1 – In climate zones 4, 5 and 6: the development is sited and designed to optimise the number of dwellings receiving winter sunlight to private open space and via windows to habitable rooms.	**Objective achieved - unchanged**	
O4.1.2 – Windows are designed and positioned to optimise daylight access for habitable rooms.	**Objective achieved - unchanged**	
O4.1.3 – The development incorporates shading and glare control to minimise heat gain and glare: – from mid-spring to autumn in climate zones 4, 5 and 6 **AND** – year-round in climate zones 1 and 3.	**Objective achieved - unchanged**	
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*		
A4.1.1 – In climate zones 4, 5 and 6 only: **a)** Dwellings with a northern aspect are maximised, with a minimum of 70 per cent of dwellings having living rooms and private open space that obtain at least 2 hours direct sunlight between 9am and 3pm on 21 June **AND** **b)** A maximum of 15 per cent of dwellings in a building receiving no direct sunlight between 9am and 3pm on 21 June.	All dwellings have a living room and private open space which obtains at least 2 hours direct sunlight between 9am and 3pm on 21 June.	

A4.1.2 – Every habitable room has at least one window in an external wall, visible from all parts of the room, with a glazed area not less than 10 per cent of the floor area and comprising a minimum of 50 per cent of clear glazing.	Achieved
A4.1.3 – Lightwells and/or skylights do not form the primary source of daylight to any habitable room.	No dwellings rely on lgihtwells for solar access.
A4.1.4 – The building is oriented and incorporates external shading devices in order to: – minimise direct sunlight to habitable rooms: ▪ between late September and early March in climate zones 4, 5 and 6 only **AND** ▪ in all seasons in climate zones 1 and 3 permit winter sun to habitable rooms in accordance with A 4.1.1 (a).	Minimal north facing major openings. Shaded by upper floors.

ELEMENT 4.2	NATURAL VENTILATION – NO CHANGES

ELEMENT 4.3	SIZE AND LAYOUT OF DWELLINGS
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O4.3.1 – The internal size and layout of dwellings is functional with the ability to flexibly accommodate furniture settings and personal goods, appropriate to the expected household size.	**Objective achieved** All units are of an appropriate size and layout that allows functionality and flexibility appropriate to the expected number of occupants. The dwellings have been designed with open plan living spaces which are conveniently co-located with private open spaces.
O4.3.2 – Ceiling heights and room dimensions provide for well-proportioned spaces that facilitate good natural ventilation and daylight access.	**Objective achieved** The proposed ceiling heights and room dimensions achieve acceptable outcomes A 4.3.1, A 4.3.2, and A 4.3.3. All units are well-proportioned to allow for access to sunlight and ventilation in every habitable room.
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A4.3.1 – Dwellings have a minimum internal floor area in accordance with Table 4.3a. **Table 4.3a Minimum floor areas for dwelling types** **Dwelling type** / **Minimum internal floor area** Studio – 37m² 1 bed – 47m² 2 bed × 1 bath[1] – 67m² 3 bed × 1 bath[1] – 90m² [1]An additional 3m² shall be provided for designs that include a second or separate toilet, and 5m² for designs that include a second bathroom.	Approved G01 3 x 3 = 136m2 (100m2 req) G02 2 x 2 = 91m2 (72m2 req) 101 4 x 4 (+1 toilet) = 208m2 (108m2 req) 102 4 x 4 (+1 toilet) = 213m2 (108m2 req) 201 5 x 5 (+ 1 toilet) = 296m2 (113m2 req) Amendment G01 3 x 3 = 139.7m2 (100m2 req) G02 2 x 2 = 89.8m2 (72m2 req) 101 3 x 3 (+1 toilet) = 210.4m2 (103m2 req) 102 3 x 3 (+1 toilet) = 196.2m2 (103m2 req) 201 5 x 5 (+ 1 toilet) = 294.3m2 (113m2 req)

<table>
<tr>
<td>A4.3.2 – Habitable rooms have minimum floor areas and dimensions in accordance with Table 4.3b.

Table 4.3b Minimum floor areas and dimensions for habitable rooms
<table><tr><th>Habitable room type</th><th>Minimum internal floor area</th><th>Minimum internal dimension</th></tr><tr><td>Master bedroom</td><td>10m²</td><td>3m[1]</td></tr><tr><td>Other bedrooms</td><td>9m²</td><td>3m[1]</td></tr><tr><td>Living room – studio and 1 bed apartments</td><td>N/A</td><td>3.6m</td></tr><tr><td>Living room – other dwelling types</td><td>N/A</td><td>4m</td></tr><tr><td colspan="3">[1] Excluding robes</td></tr></table></td>
<td>All bedrooms achieve relevent minimum floor area and internal dimension. All living rooms achieve the minimum internal dimension</td>
</tr>
<tr>
<td>A4.3.3 – Measured from the finished floor level to finished ceiling level, minimum ceiling heights are:
- Habitable rooms – 2.7m
- Non-habitable rooms – 2.4m
- All other ceilings meet or exceed the requirements of the NCC.</td>
<td>Min 3.18m floor to floor height</td>
</tr>
<tr>
<td>A4.3.4 – The length of a single aspect open plan living area is equal to or less than 3 x the ceiling height. An additional 1.8m length may be provided for a kitchen, where the kitchen is the furthest point from the window in an open plan living area provided that the maximum length does not exceed 9m.</td>
<td>No single aspect open plan living areas proposed.</td>
</tr>
</table>

ELEMENT 4.4	PRIVATE OPEN SPACE AND BALCONIES

ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	ASSESSOR COMMENT *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O4.4.1 – Dwellings have good access to appropriately sized private open space that enhances residential amenity.	**Objective achieved - unchanged**
O4.4.2 – Private open space is sited, oriented and designed to enhance liveability for residents.	**Objective achieved - unchanged**
O4.4.3 – Private open space and balconies are integrated into the overall architectural form and detail of the building.	**Objective achieved - unchanged**

ACCEPTABLE OUTCOMES

Acceptable Outcome pathway may not be applicable where a performance solution is provided

A4.4.1 – Each dwelling has private open space accessed directly from a habitable room with dimensions in accordance with Table 4.4.

Table 4.4 Private open space requirements

Dwelling type	Minimum Area[1]	Minimum Dimension[1]
Studio apartment + 1 bedroom	8m²	2.0m
2 bedroom	10m²	2.4m
3 bedroom	12m²	2.4m
Ground floor / apartment with a terrace	15m²	3m

[1] Services and fixtures located within private open space, including but not limited to air-conditioner units and clothes drying, are not visible from the street and/or are integrated into the building design.

G01 – achieves min 3m dimension and 15m2
G02 – achieves min 3m dimension and 15m2
101 – achieves min 2.4m dimension and 12m2
102 – achieves min 2.4m dimension and 12m2
201 – achieves min 2.4m dimension and 12m2

A4.4.2 – Where private open space requires screening to achieve visual privacy requirements, the entire open space is not screened and any screening is designed such that it does not obscure the outlook from adjacent living rooms.	101/102/201 feature private open space that is entirely screened. However, the adjacent living rooms have their own openings. The screening does not restrict this outlook.
A4.4.3 – Design detailing, materiality and landscaping of the private open space is integrated with or complements the overall building design.	Landscaping is integrated into balconies and courtyards to provide privacy and soften the external appearance.
A4.4.4 – Services and fixtures located within private open space, including but not limited to air-conditioner units and clothes drying, are not visible from the street and/or are integrated into the building design.	No services are located within private open spaces or visible from the street. All services are integrated into the design of the building.

ELEMENT 4.5	CIRCULATION AND COMMON SPACES
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O4.5.1 – Circulation spaces have adequate size and capacity to provide safe and convenient access for all residents and visitors.	**Objective achieved - unchanged**
O4.5.2 – Circulation and common spaces are attractive, have good amenity and support opportunities for social interaction between residents.	**Objective achieved - unchanged**

ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A4.5.1 – Circulation corridors are a minimum 1.5m in width.	Circulation corridors have a minimum width of 1.5m
A4.5.2 – Circulation and common spaces are designed for universal access.	All common spaces can be accessed via lifts.
A4.5.3 – Circulation and common spaces are capable of passive surveillance, include good sightlines and avoid opportunities for concealment.	Circulation and common spaces have limited opportunities for concealment.
A4.5.4 – Circulation and common spaces can be illuminated at night without creating light spill into the habitable rooms of adjacent dwellings.	Internal hallways can be lit at night without impacting units.
A4.5.5 – Bedroom windows and major openings to living rooms do not open directly onto circulation or common spaces and are designed to ensure visual privacy and manage noise intrusion.	No bedroom windows or major openings open onto circulation or common spaces

ELEMENT 4.6	STORAGE
ELEMENT OBJECTIVES	**ASSESSOR COMMENT**

Development is to achieve the following Element Objectives	*Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O4.6.1 – Well-designed, functional and conveniently located storage is provided for each dwelling.	**Objective achieved** Each dwelling has exclusive use of a separate, weatherproof, bulky goods storage area, which achieves the minimum dimensions in accordance with Table 4.6. The storerooms are located adjacent or within the individual units. They are adequately integrated into the design of the building and not readily visible from the public domain. Additionally, all dwellings feature sufficient internal storage areas via walk in robes or linen closets.

ACCEPTABLE OUTCOMES

Acceptable Outcome pathway may not be applicable where a performance solution is provided

A4.6.1 – Each dwelling has exclusive use of a separate, ventilated, weatherproof, bulky goods storage area. This can be located either internally or externally to the dwelling with dimensions in accordance with Table 4.6.

Table 4.6 Storage requirements

Dwelling type	Storage area[1]	Minimum dimension[1]	Minimum height[1]
Studio dwelling	3m²	1.5m	2.1m
1 bedroom dwelling	3m²		
2 bedroom dwellings	4m²		
3 bedroom dwellings	5m²		

[1] Dimensions exclusive of services and plant.

Each unit has a separate, secure storage space.

G01 = 4.6m2 in lieu of 5m2

G02 = 4.1m2

101 = 6.3m2

102 = 3.7m2 in lieu of 5m2

201 = 4.9m2 in lieu of 5m2

Min 1.5m dimension

Minimum 2.1m in height

A4.6.2 – Bulky good stores that are not directly accessible from the dwelling/private open space are located in areas that are convenient, safe, well-lit, secure and subject to passive surveillance.	Storerooms are conveniently located, safe, well-lit, secure and subject to passive surveillance by residents.
A4.6.3 – Storage provided separately from dwellings or within or adjacent to private open space[1], is integrated into the design of the building or open space and is not readily visible from the public domain.	All storerooms are accessed directly from dwellings and are not readily visible from the public domain

(1) Storage on/adjacent to private open space is additional to required open space area and dimensions.	

ELEMENT 4.7	MANAGING THE IMPACT OF NOISE
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O4.7.1 – The siting and layout of development minimises the impact of external noise sources and provides appropriate acoustic privacy to dwellings and on-site open space.	**Objective achieved subject to condition - unchanged**
O4.7.2 – Acoustic treatments are used to reduce sound transfer within and between dwellings and to reduce noise transmission from external noise sources.	**Objective achieved subject to condition - unchanged**
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A4.7.1 – Dwellings exceed the minimum requirements of the NCC, such as a rating under the AAAC Guideline for Apartment and Townhouse Acoustic Rating (or equivalent).	**AO can be achieved via Condition** No acoustic report or compliance with NCC demonstrated. This has been placed as a condition of approval should the DAP choose to approve.
A4.7.2 – Potential noise sources such as garage doors, driveways, service areas, plant rooms, building services, mechanical equipment, active communal open space and refuse bins are not located adjacent to the external wall of habitable rooms or within 3m of a window to a bedroom.	Driveways located adjacent to walls of habitable rooms of G01 and G02 on ground floor.
A4.7.3 – Major openings to habitable rooms are oriented away or shielded from external noise sources.	Major openings do not face onto external noise sources such as communal open space or utilities.

ELEMENT 4.8	DWELLING MIX

ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	ASSESSOR COMMENT *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O4.8.1 – A range of dwelling types, sizes and configurations is provided that caters for diverse household types and changing community demographics.	**Objective achieved** The development proposes one 2 bedroom, three 3 bedroom, and one 5 bedroom. Each dwelling is intended to provide a similar level of amenity as a stand-alone single house. The units are designed to allow for various types and 'ageing in place'.
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A4.8.1 – **a)** Dwelling mix is provided in accordance with the objectives, proportions or targets specified in a local housing strategy or relevant local planning instrument **OR** **b)** Where there is no local housing strategy, developments of greater than 10 dwellings include at least 20 per cent of apartments of differing bedroom numbers.	There is no adopted housing strategy in place. The development is less than 10 dwellings
A4.8.2 – Different dwelling types are well distributed throughout the development, including a mix of dwelling types on each floor.	n/a one dwelling per floor except ground floor

ELEMENT 4.9	UNIVERSAL DESIGN – NO CHANGES

ELEMENT 4.10	FAÇADE DESIGN – NO CHANGES

ELEMENT 4.11	ROOF DESIGN

ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O4.11.1 – Roof forms are well integrated into the building design and respond positively to the street.	**Objective achieved - unchanged**
O4.11.2 – Where possible, roof spaces are utilised to add open space, amenity, solar energy generation or other benefits to the development.	**Objective achieved - unchanged**

ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A4.11.1 – The roof form or top of building complements the façade design and desired streetscape character.	The flat roof design is consistent with the overall design of the development.
A4.11.2 – Building services located on the roof are not visually obtrusive when viewed from the street.	All services are to be conditioned to be screened from view.
A4.11.3 – Useable roof space is safe for users and minimises overlooking and noise impacts on private open space and habitable rooms within the development and on adjoining sites.	The amendment does not alter the use or extent of the approved space, however the introduction of additional operable openings may increase noise transmission from the communal recreation area. As no acoustic assessment has been provided in support of the amended design, it has not been demonstrated that noise impacts on adjoining habitable rooms and private open spaces have been minimised in accordance with

	Acceptable Outcome A4.11.3. The visual privacy is considered to achieve the Element Objectives, see above *Visual Privacy*.

ELEMENT 4.12	**LANDSCAPE DESIGN**
ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O4.12.1 – Landscape design enhances streetscape and pedestrian amenity; improves the visual appeal and comfort of open space areas; and provides an attractive outlook for habitable rooms.	**Objective achieved - unchanged**
O4.12.2 – Plant selection is appropriate to the orientation, exposure and site conditions and is suitable for the adjoining uses.	**Objective achieved - unchanged**
O4.12.3 – Landscape design includes water efficient irrigation systems and where appropriate incorporates water harvesting or water re-use technologies.	**Objective achieved via condition - unchanged**
O4.12.4 – Landscape design is integrated with the design intent of the architecture including its built form, materiality, key functional areas and sustainability strategies.	**Objective achieved - unchanged** Landscape design is integrated with the design of the built form and is complimentary to the design.
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	

<table>
<tr><td>A4.12.1 – Submission of a landscape plan prepared by a competent landscape designer. This is to include a species list and irrigation plan demonstrating achievement of Waterwise design principles.</td><td>AO achieved subject to condition placement
No information on irrigation plans have been provided.</td></tr>
<tr><td>A4.12.2 – Landscaped areas are located and designed to support mature, shade-providing trees to open space and the public realm, and to improve the outlook and amenity to habitable rooms and open space areas.</td><td>Landscaping plan incorporates a relatively high number of trees reflective of the relatively large rear and front deep soil areas complemented by on structure planting. Apartments and terraces are oriented to look towards the front and rear landscaping.</td></tr>
<tr><td>A4.12.3 – Planting on building structures meets the requirements of Table 4.12.
Table 4.12 Planting on structure: minimum soil standards for plant types and sizes
<table><tr><th>Plant type</th><th>Definition</th><th>Soil volume</th><th>Soil depth</th><th>Soil area</th></tr><tr><td>Large tree</td><td>Over 12m high, crown spread at maturity</td><td>76.8m³</td><td>1,200mm</td><td>64m² with minimum dimension 7m</td></tr><tr><td>Medium tree</td><td>8–12m high, crown spread at maturity</td><td>36m³</td><td>1,000mm</td><td>36m² with minimum dimension 5m</td></tr><tr><td>Small tree</td><td>4–8m high, crown spread at maturity</td><td>7.2m³</td><td>800mm</td><td>3m × 3m</td></tr><tr><td>Small ornamentals</td><td>3–4m high, crown spread at maturity</td><td>3.2m³</td><td>800mm</td><td>2m × 2m</td></tr><tr><td>Shrubs</td><td>--</td><td>--</td><td>500–600mm</td><td>--</td></tr><tr><td>Ground cover</td><td>--</td><td>--</td><td>300–450mm</td><td>--</td></tr><tr><td>Turf</td><td>--</td><td>--</td><td>200mm</td><td>--</td></tr></table></td><td>The application proposes minimal planting on structure (16m2) and landscaping is mostly proposed within deep soil zones.</td></tr>
<tr><td>A4.12.4 – Building services fixtures are integrated in the design of the landscaping and are not visually intrusive.</td><td>Outcome achieved.</td></tr>
</table>

ELEMENT 4.15 ENERGY EFFICIENCY – NO CHANGES

ELEMENT 4.16	WATER MANAGEMENT AND CONSERVATION – NO CHANGES

ELEMENT 4.17	WASTE MANAGEMENT

ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	**ASSESSOR COMMENT** *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O4.17.1 – Waste storage facilities minimise negative impacts on the streetscape, building entries and the amenity of residents.	**Objective achieved - unchanged**
O4.17.2 – Waste to landfill is minimised by providing safe and convenient bins and information for the separation and recycling of waste.	**Objective achieved - unchanged** An amended WMP is required to update WMP image relating to 10 x 240L bins on verge at one time.

ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A4.17.1 – Waste storage facilities are provided in accordance with the Better Practice considerations of the *WALGA Multiple Dwelling Waste Management Plan Guidelines* (or local government requirements where applicable).	The design of the waste storage area is in accordance with the City's Local Planning Policy – Waste Management. A condition of approval has been recommended ensuring that an amended WMP be provided update image relating to bin verge placement.
A4.17.2 – A Level 1 Waste Management Plan (Design Phase) is provided in accordance with the *WALGA Multiple Dwelling Waste Management Plan Guidelines* - Appendix 4A (or equivalent local government requirements).	Waste Management Plan has been provided. As per above

A4.17.3 – Sufficient area is provided to accommodate the required number of bins for the separate storage of green waste, recycling and general waste in accordance with the *WALGA Multiple Dwelling Waste Management Plan Guidelines* - Level 1 Waste Management Plan (Design Phase) (or local government requirements where applicable).	The bin store is of sufficient size and dimension in accordance with the City of Nedlands Waste Management Guidelines
A4.17.4 – Communal waste storage is sited and designed to be screened from view from the street, open space and private dwellings.	Communal waste storage is screened from view from the primary street and located away from the dwellings in the under croft.

LOCAL PLANNING FRAMEWORK	REQUIREMENT
Does the local planning framework amend or replace the above stated controls? If yes, state the applicable requirement:	**Local Planning Policy – Waste Management** See objectives assessment above.

ELEMENT 4.18 UTILITIES

ELEMENT OBJECTIVES *Development is to achieve the following Element Objectives*	ASSESSOR COMMENT *Outline the rationale demonstrating that the proposal has met the Element Objectives, through either a performance based solution or using the Acceptable Outcomes. The Design Guidance provided in the policy may be of assistance.*
O4.18.1 –The site is serviced with power, water, gas (where available), wastewater, fire services and telecommunications/broadband services that are fit for purpose and meet current performance and access requirements of service providers.	**Objective achieved** All required services are available.
O4.18.2 – All utilities are located such that they are accessible for maintenance and do not restrict safe movement of vehicles or pedestrians.	**Objective achieved - unchanged**
O4.18.3 – Utilities, such as distribution boxes, power and water meters are integrated into design of buildings and landscape so that they are not	**Objective achieved subject to Condition** Not sufficiently noted on plans. It is recommended that this be conditioned to be demonstrated prior to building permit.

visually obtrusive from the street or open space within the development.	
O4.18.4 – Utilities within individual dwellings are of a functional size and layout and located to minimise noise or air quality impacts on habitable rooms and balconies.	**Objective achieved** Utilities are functional to the size of units. The air conditioning units have been positioned on the roof and screened to minimise adverse air quality and noise impacts on dwellings.
ACCEPTABLE OUTCOMES *Acceptable Outcome pathway may not be applicable where a performance solution is provided*	
A4.18.1 – Utilities that must be located within the front setback, adjacent to the building entry or on visible parts of the roof are integrated into the design of the building, landscape and/or fencing such that they are accessible for servicing requirements but not visually obtrusive.	Fire booster is located in the front setback area. It is considered integrated into the design of the fencing and accessible but not visually obtrusive. PV system on roof is flush with the roof and not visually obtrusive.
A4.18.2 – Developments are fibre-to-premises ready, including provision for installation of fibre throughout the site and to every dwelling.	Outcome achieved.
A4.18.3 – Hot water units, air-conditioning condenser units and clotheslines are located such that they can be safely maintained, are not visually obtrusive from the street and do not impact on functionality of outdoor living areas or internal storage.	AC condensers are located on roof of floor 3 within a crawl concealed space. A condition of approval is recommended ensuring all utilities be screened from the street and adjoining properties.
A4.18.4 – Laundries are designed and located to be convenient to use, secure, weather-protected and well-vented; and are of an overall size and dimension that is appropriate to the size of the dwelling.	Laundries are located within individual units and are of an overall size and dimension that is appropriate to the size of the dwelling.

LATERAL PLANNING

13 October 2026

Chief Executive Officer
City of Nedlands
71 Stirling Highway
Nedlands WA 6009

Via email: kmolodynia@nedlands.wa.gov.au

Attention: Kirsty Molodynia – Urban Planner

Dear Kirsty,

6 Alexander Road, Dalkeith
Response to Request for Information and Public Submissions

Lateral Planning acts for the owner of No. 6 Alexander Road, Dalkeith (**Site**). We refer to the conditional development approval issued by the Metro Inner Development Assessment Panel dated 2 April 2026 (**Approval**). The Approval provides for the construction of 5 Multiple Dwellings at the Site (**Approved Development**).

We have submitted an Application for Development Approval which proposes minor amendments to the Approved Development (**Application**). We are in receipt of the City Request for Information dated 18 September which requested clarification / responses on various elements of the amended development. Below and attached are our responses.

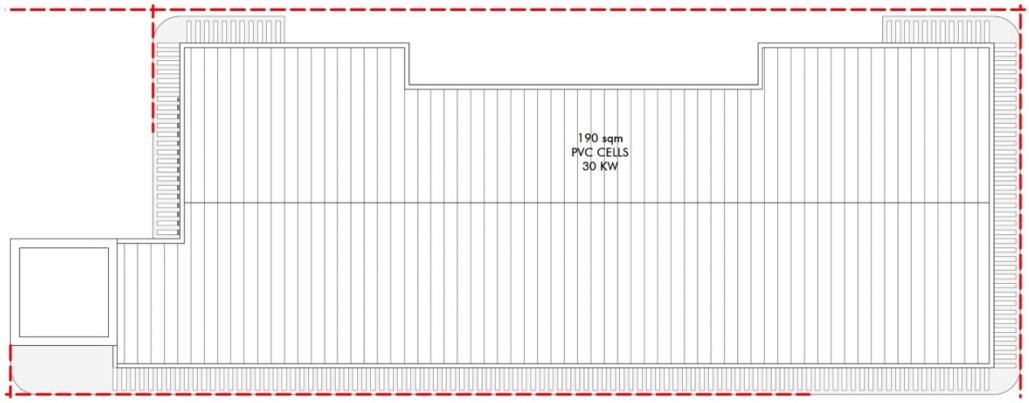
Building Height

As indicated, overall building height remains unchanged from the Approved Development, however, floor-to-floor heights are proposed to be amended as follows:

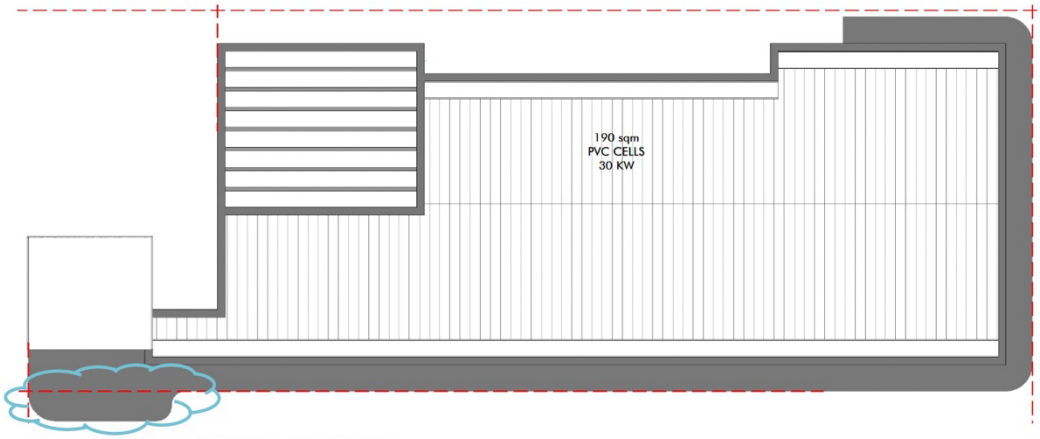
LEVEL	FLOOR-TO-FLOOR HEIGHT (APPROVED)	FLOOR-TO-FLOOR HEIGHT (PROPOSED)
Ground	3,200 mm	3,180 mm
First	3,200 mm	3,180 mm
Second	3,200 mm	3,250 mm
Third	3,200 mm	3,190 mm
TOTAL	12,800 mm	12,800 mm

The consequence of the redistribution of approved height is the overall height of Level 3 has increased by 1cm. The additional 1cm of height at Level 3 does not impact solar collectors, major openings or open space area of southern adjoining property beyond that of the Approved Development (assessed having regard for the existing dwelling to the south).

Separately, a minor amendment to the roof design at the amenities level is proposed. Insofar as it concerns shadow, the amendment to the roof comprises a small portion of awning adjacent the lift shaft. The image below provides a side-by-side comparison of the approved and proposed roof design (blue cloud).



APPROVED ROOF DESIGN



PROPOSED ROOF DESIGN

An updated overshadowing plan is enclosed which shows the overshadowing impact of the amended awning design. Note, however, that the overshadowing plan assumes the southern properties are vacant; having regard to the existing dwellings, there is no impact to the approved shadow caused by the awning redesign.

Orientation

There is no meaningful change proposed to the Approved Development which negatively impacts the actual overshadowing of adjoining properties, including solar collectors, habitable rooms or open spaces.

As attached, the impact of design changes on the shadow cast (assuming adjoining properties are vacant) is:

- Change in floor-to-floor height on 8A Alexander Road:
  - 0.16%.
- Change in awning design at the amenities level on 8B Alexander Road:
  - 1.57%.

Note that the shadow impact set out above does not materialise as an actual impact on adjoining properties, as the shadow assessment assumes the properties are vacant.

Communal Open Space / Privacy

Additional glazing between the ping pong room and gym is an internal design change which does not materially impact the external design and is, therefore, exempt from the requirement of obtaining development approval.

Additional glazing is proposed to the northern and southern elevation of the ping pong room in response to further engagement with nearby landowners. There is no change to the siting of the communal space, which provides a 4.65m and 6.29m setback to the northern and southern boundaries (respectively). The existing setbacks satisfy the required privacy setback to adjoining properties included at Table 3.5 of the R-Code V2.

Notwithstanding, glazing is to be positioned behind privacy screens to mitigate perceived overlooking (noting no statutory overlooking is present). In this regard, it is evident that the design and orientation of the communal space minimises impacts on adjoining properties.

Public Domain Interface

During design development the requirement for and location of the fire booster has been confirmed. The location and orientation of the fire booster is subject to operational requirements imposed by DFES and Australian Standards. DFES Operational Guideline ORG 6 – *Booster Assemblies: Hydrant and Sprinkler* requires booster assemblies to be positioned where they are immediately identifiable and accessible to firefighters on arrival and, generally, at the front of or on the approach to the building. Separately, cl 7.3.3 of *AS 2419.1:2021* requires the fire hydrant outlets and fire brigade booster connection inlets to face the appliance hardstand.

It is therefore necessary to balance the operational requirements with the R-Code guidance concerning public domain interface.

In our view, the proposed amendment does not materially alter the approved public domain interface or the relationship between the development and Alexander Road.

The development retains the same essential design quality, building presentation and landscape response as the Approved Development. The ground floor continues to provide an appropriate level of activation and passive surveillance to Alexander Road, having regard to the established pattern and character of development along the street. The amendment does not introduce any material change to the approved street-facing built form, access arrangements or landscape interface.

Transition between the private and public domain remains appropriately resolved, with no detrimental impact on resident privacy or safety, while the street-facing development continues to maintain the approved townhouse appearance.

On this basis, the proposed arrangement appropriately balances the public-domain objectives of Element 3.6 with the operational requirements applying to fire-fighting infrastructure, and does not result in any significant adverse change to the approved public domain interface.

Circulation and Common Spaces

No change is proposed to the Approved Development with respect to corridor width.

Request for Additional Information / Comments

Additional queries raised by the City are addressed below.

- *Several submissions raised concerns with the additional 2 trees proposed to the southern terrace of 201 and the impact these will have on the shadow cast. Please reconsider the addition of these trees.*

The two additional trees were proposed in response to our engagement with nearby residents, however, have been removed from the development plans.

- *It is noted that Condition 18 of the original approval required an Acoustic Report to be submitted and approved prior to issue of a building permit. It is expected that this Acoustic Report will cover the services/pool plant enclosure and communal area.*

Noted.

- *Confirm what the 'operable' windows entail on Level 3. Are these windows or doors that are openable?*

It is proposed to incorporate operable floor-to-ceiling windows, positioned behind privacy screens.

- *Confirm the apartment schedule discrepancy between the amended plans and the approved plans (notably 201). It is assumed the approved plans schedule was incorrect due to not being updated with the number of revisions.*

The apartment schedule has been corrected, showing the approved and proposed plot ratio floor area remains consistent.

- *Provide further information on services/pool plant enclosure including height. Clearly annotate on southern elevation.*

Updated plans are enclosed which depict the pool plant enclosure.

Health Comments

Comments provided by the City's health team are addressed below.

- *G01 – Laundry is to be separated from Kitchen by a wall extending from the floor to the ceiling or roof. If there is an opening it must not be more than 1220mm wide and have a door which when closed shall completely fill the opening. Please confirm compliance.*

Laundry appliances are permitted within cabinetry. Each laundry space is provided with mechanical ventilation

- *G02 – Please confirm whether the laundry area is minimum 3m2.*

No change is proposed to the approved laundry within G02.

- *External lighting, if any, shall comply with the requirements of Australian Standard 4282 – Control of Obtrusive Effects of Outdoor Lighting to the satisfaction of the City of Nedlands.*

Noted.

- *A suitable bin enclosure is to be provided in accordance with the requirements of the City of Nedlands Health Local Law 2017.*

Noted.

Public Consultation

Form 2 pathway and extent of amendments

Submissions were made which concluded that the amendments to the Approval constitute substantial changes and ought to be considered as a new application.

The Application has been lodged pursuant to r 17(1)(c) of the *Planning and Development (Development Assessment Panels) Regulations 2011* (WA) (**DAP Regulations**). Regulation 17(1)(c) of the DAP Regulations permits an owner of land to apply to amend an existing approval where the scope of amendments contemplated does not substantially change the development approved.

The issue of what constitutes a "substantial change" has been considered in several decisions of the Supreme Court and the State Administrative Tribunal. In *Milem Pty Ltd v Metro Central Joint Development Assessment Panel*, the Court concluded that an amendment would amount to a substantial change if, following the amendment, the development was no longer *essentially or materially the same*, or did not *retain the same essence*. In Milem, the Court noted that even a change which may be considered significant in some respects could still be properly regarded as not substantially altering the approved development.

Determining whether the amendments constitute a substantial change for r 17(1)(c) is quantitative and qualitative. Amendments proposed by the Application are:

- Deletion of basement level and all associated site works (i.e., excavation).
- Ground level:
  - Introduction of fire booster;
  - Reconfiguration of bin store and bulk store; and
  - Reconfiguration of the terrace to G01.
- First level:
  - Adjustment to Alexander Road articulation:

    - glazing setback reduced from 7.9m to 7.75m;
    - setback of north-west masonry increased from 7.75m to 8.00m;
    - balcony alignment relative to western lot boundary is unchanged (at 5.0m).
  - Adjustment to northern articulation adjoining kitchen of Unit 101:
    - Width increased from 1.9m to 2.5m;
    - Depth reduced from 1.25m to 750mm;
    - Setback to the northern lot boundary is unchanged.
  - Internal layout changes (reduction to bedroom and bathrooms numbers).
- Second level:
  - Adjustment to northern articulation adjoining kitchen of Unit 201:
    - Width increased from 1.9m to 2.5m;
    - Depth unchanged;
    - Setback to the northern lot boundary is unchanged.
  - Additional two (2) trees to south-eastern terrace for Unit 201.
  - Adjustment to southern articulation adjoining lift threshold of Unit 201:
    - Width reduced from 2.57m to 2.25m.
    - Depth unchanged.
  - Setback to the southern lot boundary is unchanged.
- Third Level:
  - Enclosure of services within new services room;
    - Note that the services room is not a full-height space. The room is limited to ~1.4m in height, appearing as an extension of the raised planter to the west (i.e., it is a crawl space for plant).
  - Introduction to vergola (i.e., louvred pergola) over dining and kitchen space, and adjustment to roof plan to suit;
  - Internal layout changes (introduction of UAT and sauna);
  - Additional glazing and horizontal screening to rear amenities spaces.

The changes contemplated are the natural evolution of the Approved Development which occurs throughout detailed design and do not depart from the essence of the approval.

It is clear that the amended development proposed through the Application retains the same essence as the substantive approval, and is, in all respects, materially the same development outcome. There is no material change to the height, plot ratio, setbacks, scale, apartment yield or mix, parking, overshadowing, privacy, sustainability or amenity outcomes of the Approval.

On this basis, the development is properly characterised as being of the same essence and is capable of being considered via r 17(1)(c) of the DAP Regulations.

<u>Building height, bulk, scale and streetscape</u>

Submissions object to the approved four-storey height and the relationship of the approved development with the Alexander Road streetscape. Those concerns relate only to the Approved Development rather than to changes proposed through the Application.

As this Application is properly characterised as a r 17(1)(c) application, consideration is to be given to only those elements of development captured within the scope of the Application, not a re-assessment of the approval already granted.

Overshadowing and solar access

Similar to building height, scale and streetscape (above), comments were made which concern the extent of shadow cast by the Approved Development. Again, the scope of assessment of the Application is confined to the amendments proposed.

Additional shadow cast by the redesigned awning at the amenities level is shown on the development plans and addressed separately in this submission, confirming that the impact is negligible having regard to existing structures.

Two additional trees were shown to the south-eastern terrace of Unit 201. The trees are proposed in response to engagement with nearby residents following determination of the Approved Development. Submissions have raised concerns with the potential shadow cast by the additional trees. While the shadow cast by trees is not a part of the overshadowing calculation, trees are able to be deciduous limiting mid-winter shadow and the shadow of a tree is typically considered to improve amenity, we have removed the trees from the development plans.

Upper-level communal amenity, privacy and overlooking

Submissions were made in respect of the northern and southern glazing to the ping pong room. As is set out above, the placement of the ping pong room satisfies the Acceptable Outcomes relating to visual privacy. In a view to minimise the perception of overlooking, privacy screens are proposed to the southern and northern elevation of the amenities level. The amendments do not impact actual or perceived overlooking.

Acoustic impacts, mechanical plant and lighting

Comments were made addressing the impact of noise and light spill.

We note that:

- Condition 18 requires an Acoustic Report prepared by a suitably qualified acoustic practitioner demonstrating compliance with the *Environmental Protection (Noise) Regulations 1997*;
- Condition 19 additionally requires a Noise Management Plan prior to occupation; and
- Condition 20 requires all external lighting to be designed and located to prevent increased light spill to adjoining properties and to comply with AS 4282.

In our view, the existing condition settings provide a suitable framework for ensuring appropriate amenity outcomes.

Parking, traffic, servicing and waste management

Submissions comment on resident and visitor parking, traffic generation, servicing, waste collection and congestion in Alexander Road.

The Application does not propose any changes to the approved on-site parking provision. Dwelling yield remains unchanged. There is no increase in the traffic-generating component of the Approved Development, and no change to the rate of parking provision.

Procedural matters and other issues

We do not support the contention that the decision of the DAP is, in one way or another, defective or invalid.

Submissions continuing to speculate about student accommodation have no basis in reality and have been comprehensively addressed by the Applicant throughout consideration of the Approved Development.

Fundamentally, the majority of submission relate to the Approved Development, not the Application.

Should you require any further information or clarification in relation to this matter, please contact Daniel Hollingworth on 0434 433 000.

Yours faithfully,

Lateral Planning

Daniel Hollingworth
Lateral Planning

Encl.

PART D – OTHER BUSINESS

1. **State Administrative Tribunal Applications and Supreme Court Appeals**

2. **Meeting Closure**