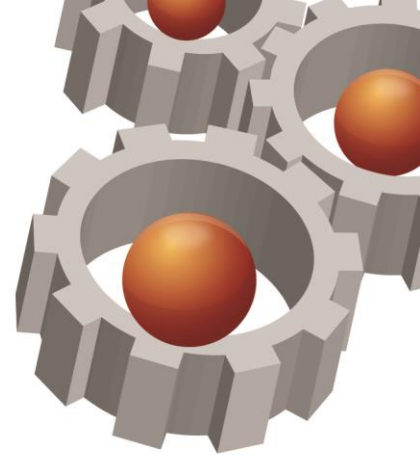




DYNAMIC PLANNING
AND DEVELOPMENTS



Our Ref: 841

17 April 2018

Chief Executive Officer
City of Vincent
PO Box 82
Leederville WA 6902

Dear Sir/Madam,

224 STIRLING STREET, PERTH
CHANGE OF USE TO FROM 'OFFICE' TO 'EDUCATIONAL ESTABLISHMENT'

Dynamic Planning and Developments Pty Ltd acts on behalf of the proponents of 224 Stirling Street, Perth (herein referred to as the subject site). It is understood that a development application has been lodged for the subject site seeking a change of use approval for the upper floor tenancy from 'Office' to 'Educational Establishment'. This submission is intended to provide a detailed planning submission to support the existing development application which is being considered by the City. We provide the following information to assist the City in granting the conditional approval for the subject proposal:

- Development Plans depicting the tenancy which is the subject of the change of use application as well as the site's existing parking layout;
- A completed City of Vincent Parking Management Plan Framework form; and
- Detailed assessment and justification of the development application.

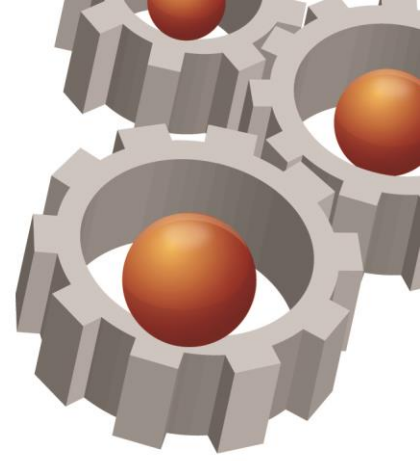
Site Context:

The subject site is located within the municipal area of the City of Vincent. The site is zoned 'Residential Commercial (R80)' under the City of Vincent's Town Planning Scheme No. 1 (TPS 1). The existing development on site is divided into a ground floor tenancy which currently operates as an 'Office' (Enable IT Services) and an upper floor tenancy which is the subject of this application.

The site is conveniently situated amongst major transport corridors including Beaufort Street to the west, Bulwer Street to the north, Lord Street to the East and the Graham Farmer Freeway to the south, all of which are located within a 500m radius of the site. The subject site is also within close proximity of multiple train stations with Perth Station, McIver,



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Claisebrook and East Perth Stations all within a 1km radius. Figure 1 below illustrates the subject site within its context.

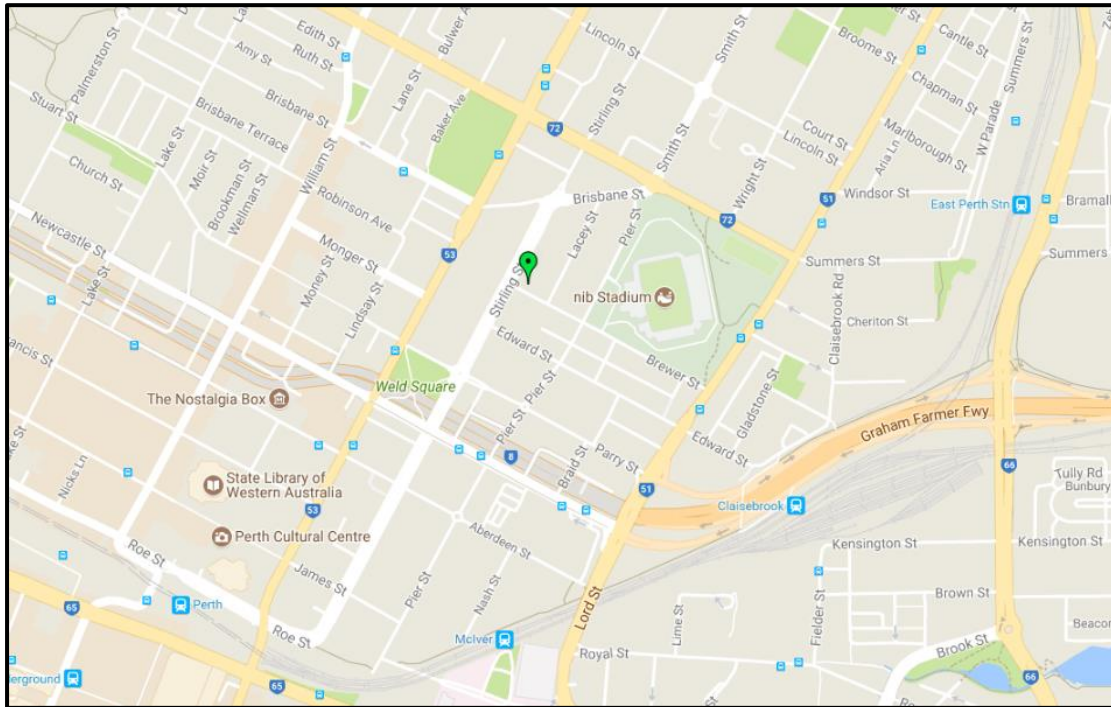


Figure 1 – Aerial context of subject site

Proposal:

This development application seeks approval for a change of use from 'Office' to 'Educational Establishment' in order to accommodate a Specialised Career Solutions WA (SCS) training facility. The SCS tenancy is intended to provide vocational training offering the following courses:

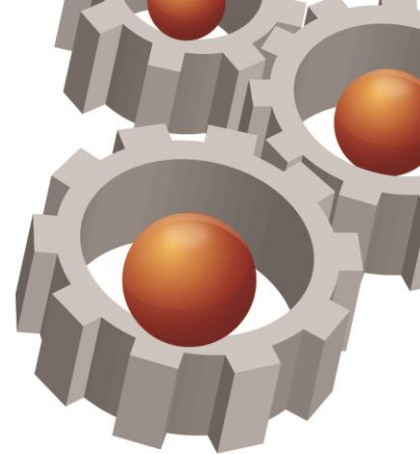
- First Aid;
- Security and crowd control training; and
- Aged/disability care.

The proposed change of use applies to the upper floor only and the ground floor will continue to operate as an Enable IT Services tenancy under its existing land use approval 'Office'.

The SCS tenancy will operate with a maximum of 3 employees and 12 students at any given time. As such, the tenancy's maximum occupancy will be 15 persons. The business will operate between 8:30am to 5:00pm Monday to Friday and between 9:00am to 5:00pm on Saturdays. The business will not operate on Sundays or public holidays.

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The SCS business will utilise the existing office layout and will not require any substantial internal fit-out works within the tenancy. The training courses will not require the use of any major machinery or equipment and will generally involve computers, projectors and other typical office materials only. As such, the training facility will not impact neighbouring tenancies or properties in terms of noise, vibration, odour or other emissions.

The proposal is for a change of use only and will not result in any material modifications to the external appearance of the building, nor will it result in an increase in the floor area of the subject site.

Development plans illustrating the proposed change of use are provided in **Attachment 1**.

Land Use and Permissibility

Metropolitan Region Scheme

The subject site is zoned 'Urban' under the provisions of the Metropolitan Region Scheme (MRS). The proposed 'Educational Establishment' land use is deemed consistent with the land use objectives for land zoned 'Urban' under the MRS.

City of Vincent Town Planning Scheme No. 1

Preliminary discussions have been undertaken with the City of Vincent to ascertain the appropriate land use definition for the proposed SCS premises as listed under TPS 1. The City's planning department confirmed that the City considers 'Educational Establishment' to be the most suitable land use definition for the proposed SCS premises.

Under the provisions of the TPS 1, 'Educational Establishment' is defined as:-

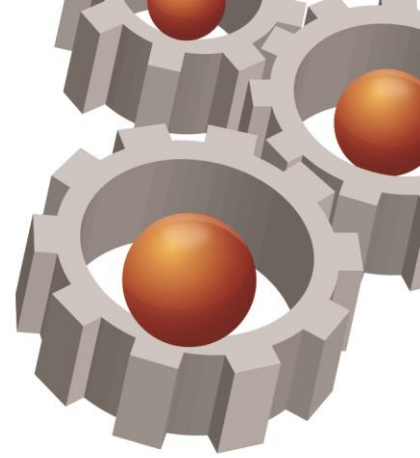
"means a school, college, university, technical institute, kindergarten, academy or other educational centre, but does not include an institutional building."

As noted above, the subject site is zoned 'Residential – Commercial (R80)'. An 'Educational Establishment' is identified as an 'AA' use within the 'Residential – Commercial' zone under the Zone Table of TPS 1 which means that the use is not permitted unless the Council has exercised its discretion by granting planning approval.

To determine the appropriateness of the land use, the proposal must be assessed against the objectives of the 'Residential – Commercial' zone which are outlined under the City's Draft Town Planning Scheme No. 2 (TPS 2). These objectives are as follows:



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“Residential/Commercial –

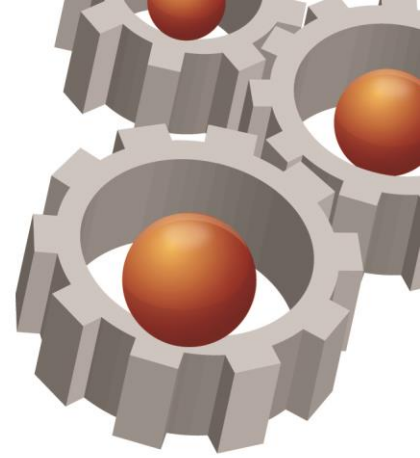
- (i) to provide for a compatible mix of high density residential and commercial development;*
- (ii) to promote residential use as a vital and integral component of these mixed use zones;*
- (iii) to ensure development design incorporates sustainability principles, with particular regard to waste management and recycling and including, but not limited, to solar passive design, energy efficiency and water conservation; and*
- (iv) 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 ‘Educational Establishment’ is considered to be an appropriate use within the ‘Residential/Commercial’ as it will contribute to a compatible mix of commercial development for the locality. The commercial activities associated with the SCS premises are considered to be of a low to moderate scale given that the tenancy is limited to a maximum occupancy of 15 persons and will be restricted to group training sessions in an office setting during sociable hours only. This scale of activity is considered to be appropriate for the locality and will have no significant impact on neighbouring commercial or residential uses in terms of direct emissions or vehicular/pedestrian congestion associated with customers or staff.

In relation to the appropriateness of the land use, it is also important to note that the City of Vincent has previously approved the use of the subject site as an ‘Office’. In this regard, whilst it is noted that the SCS premises is technically defined as an ‘Educational Establishment’, the scale and operations of the business are not dissimilar to a typical office setting. For example, the tenancy previously operated as a Huawei telecommunications marketing premises under the existing ‘Office’ approval which accommodated 20-30 persons during standard business hours. As such, whilst the proposal technically represents a change of use under the City’s planning scheme, the scale and operations of the subject site will remain consistent with the site’s previous use. The proposed change of use is therefore considered to be compatible with its existing development context.

Whilst the objectives of the ‘Residential – Commercial’ zone outline a number of desired outcomes with respect to residential development, it is important to note that the proposal relates to an existing development which was designed to accommodate commercial uses only. As such, it is not feasible for residential uses to be accommodated within the existing development and the residential components of the objectives are therefore not considered to be applicable to this proposal.

In light of the above, the proposed change of use is considered to be appropriate within the ‘Residential – Commercial’ zone and the surrounding development context.



Parking

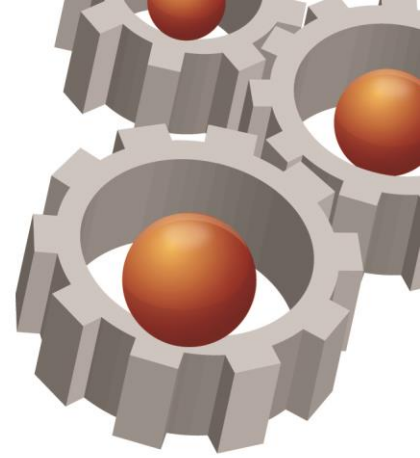
The subject is required to comply with the minimum parking standards prescribed under the City of Vincent's Local Planning Policy – 7.7.1 Non-Residential Development Parking Requirements (LPP 7.7.1). However, LPP 7.7.1 does not prescribe specific parking standards for 'Educational Establishments'. Table 1 of LPP 7.7.1 specifies that the parking requirements for any land use not specifically listed within LPP 7.7.1 should be determined by the City on a site specific Parking Management Plan. As such, an assessment of the site's existing parking provision and a parking management plan is detailed below.

The site currently has 10 parking bays illustrated on the most recent development plans which were approved by the City of Vincent. Bays 1 - 5 are located at the front of the lot directly facing Stirling Street and bays 6 – 10 are located in a rear undercover parking area of the existing development which gains access from Brewer Street. However, it is understood that when the City of Vincent previously assessed a building extension application in 1993, bays 6 and 7 were not considered to be useable in accordance with the minimum Australian Standards and as such, these bays were discredited from the City's planning assessment. It is therefore understood that the City considers only 8 parking bays to be provided on site. Notwithstanding, it is important to note that the City previously approved the existing 'Office' floor area for the subject site and therefore considered the 8 bays to be sufficient parking for the existing development.

Under the site's existing leasing arrangements, bays 1 – 5 are allocated to the ground floor tenancy and bays 6 – 10 are allocated to the upper floor tenancy. As such, according to the City's technical assessment, the proposed SCS premises is allocated 3 parking bays. However, as illustrated on the development plans provided in Attachment 1, whilst bay 7 is slightly restricted in terms of manoeuvring space, it is considered that this bay can function as a 'small car bay' provided that it is adequately signposted. The proponent of the subject site is willing to provide the necessary signage to ensure that this bay functions as a 'small car bay' only. In addition, whilst bay 6 cannot function as a car parking bay, this space can provide an alternative function as a bicycle parking area. As such, the SCS tenancy will be provided with a total of 3 standard car bays, 1 small car bay and a bicycle parking area.

As outlined above, the extent of parking to be provided for 'Educational Establishments' is to be considered by the City on a site specific basis. In this regard, DPD considers the extent of parking provided to be adequate based on the following:

- Through previous decision-making, the City considered 8 parking bays to adequately accommodate the extent of 'Office' NLA which is currently provided on the site. The proposed change of use will not increase the extent of NLA provided on site, nor will it intensify the use of the site's existing floor space;
- The subject site previously operated as a Huawei telecommunications marketing premises under the 'Office' land use approval which accommodated between 20 to



30 persons at any given time. Given that the SCS tenancy will accommodate a maximum of 15 persons at any given time, the proposed change of use will reduce the tenancy's demand for parking;

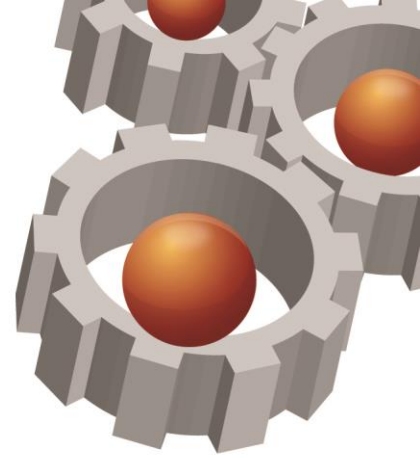
- The parking bays provided for the subject site will be allocated to SCS staff only. Given that a maximum of 3 staff will be accommodated at any given time, the extent of parking is sufficient;
- Students attending classes at the SCS tenancy will be provided clear instructions in relation to transportation to the premises. Students will be advised that no on-site parking will be provided for them and that alternative transportation options will need to be sought. Alternative transportation options available to students include the following:
 - Public transportation through numerous high frequency bus routes surrounding the site and/or via train (Perth Station, Mclver, Claisebrook and East Perth stations);
 - Walking/cycling via the numerous pedestrian paths and cycle routes provided within the surrounding road network. This option will be improved through the formal provision of bicycle parking facilities within bay 6 which will be communicated to students. It should also be noted that end of trip facilities are already available within the subject site;
 - Taxi/Uber or other passenger transportation services which are increasing in use, particularly for inner city transportation; and
 - The use of paid parking facilities surrounding the site including numerous on-street bays along Stirling Street, directly adjacent to the subject site.

A completed 'Parking Management Plan Framework' as provided in Appendix 2 of LPP 7.7.1 is attached for the City's reference (**Attachment 2**) and is consistent with the information outlined above.

In light of the above, the subject site provides sufficient parking to accommodate the proposed change of use, particularly on the basis that the SCS premises will generate no greater parking demand than the site's current 'Office' land use approval.



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AND DEVELOPMENTS



Conclusion:

The proposed change of use from 'Office' to 'Educational Establishment' is considered appropriate within its context and warrants favourable consideration and approval for the following reasons:

- The proposal is consistent with the provisions of the MRS;
- The proposal aligns with the intent and objectives of the 'Residential – Commercial' zone under TPS 2;
- The proposed land use will contribute to the diversity of compatible commercial land uses within the locality; and
- The nature of the proposed SCS 'Education Establishment' will not result in insufficient parking being provided for the subject site.

As such, we respectfully request that the City of Vincent support and approve the attached development plans.

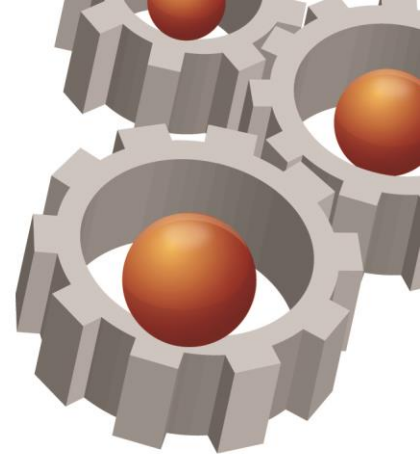
Should you have any queries or require any clarification in regard to the matters raised, please do not hesitate to contact the undersigned on 9275-4433.

Yours faithfully,

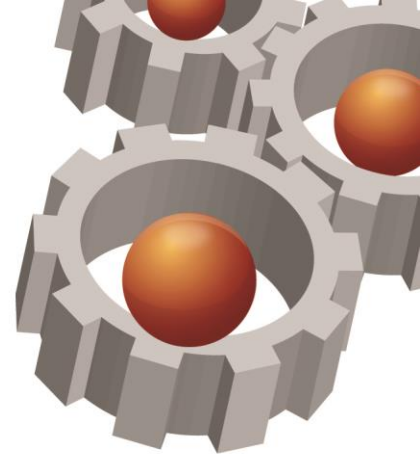
EDWARD O'CONNELL
TOWN PLANNER



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ATTACHMENT 1:
Proposed Development Plans



ATTACHMENT 2:
Parking Management Plan Framework