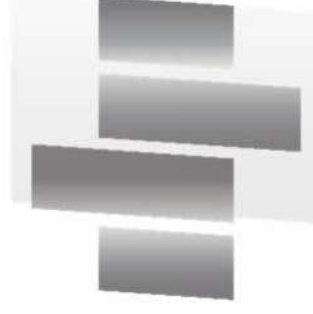


ELVIRE STREET AFFORDABLE RETIREMENT COMMUNITY

LOT 5 (NO. 13) ELVIRE STREET, VIVEASH



PROJECT REF: 1789



1.0 Executive Summary

Seeking approval to alter and extend an existing approved non-conforming use of 'Aged Persons Dwelling' at Lot 5 (No. 13) Elvire Street, Viveash (herein referred to as the 'subject site').

Development Summary	
Aged Persons Dwellings	
- Existing Dwellings – 36 - Proposed Dwellings - 12	
Communal Facilities	
Existing clubhouse.	
Additional Works	
- Provision of an additional 16 car bays. - Construction of an additional bin store. - Minor demolition works. - Landscaping and pedestrian path works throughout.	

Planning Framework Summary	
Metropolitan Region Scheme	Urban
City of Swan Local Planning Scheme No. 17	Special Use 26
State Government Policies	- State Planning Policy 3.7 – Planning in Bushfire Prone Areas. - State Planning Policy 7.3 – Residential Design Codes (Volume 1).
Local Planning Policies	POL-TP-127 Building and Development Standards – Other Zones

2.0 Introduction

Dynamic Planning and Developments acts on behalf of the registered proprietor of Lot 5 (No. 13) Elvire Street, Viveash (herein referred to as the 'subject site').

This planning report has been prepared in support of an Application for Planning Approval to extend an existing approved non-conforming use for Aged Persons Dwellings at the subject site. The planning report contains the following pertinent details of the proposal deemed to be relevant as part of considering the merits of the application:

- Details of the proposal.
- Detailed assessment of the proposal against the City of Swan Local Planning Scheme No. 17 (LPS 17) and any relevant State or Local Planning Policies.

In addition to this planning report, the following documentation has been provided in order to assist the City of Swan and the Metro Outer Development Assessment Panel in supporting and approving this development application.

- Certificate of Title pertaining to the site (**Appendix 1**).
- Relevant development plans (**Appendix 2**).
- Stormwater Management Plan (**Appendix 3**).
- Bushfire Management Plan (**Appendix 4**).
- R-Code Assessment (**Appendix 5**).
- Waste Management Plan (**Appendix 6**).

3.0 Site Details

3.1 Legal Description

The subject site is legally described as:

Lot	Plan	Volume	Folio	Street Address
5	48061	1400	707	13 Elvire Street, Viveash

Table 1 – Site Details

The area of the subject site is 9,403m².

A copy of the Certificate of Title pertinent to the subject site is contained in **Appendix 1**.

3.2 Locational and Land Use Context

The subject site is located within the City of Swan municipal area and suburb of Viveash, sitting approximately 17 kilometres north east of the Perth CBD. The site sits within an established low-medium density residential area.

The subject site is bounded by Elvire Street to the east, a Parks and Recreation reserve associated with the Swan River to the west, an existing grouped dwelling development to the south and existing residential development and an area of public open space to the north.

At present the site is occupied by existing aged persons dwellings which Aspen has recently significantly refurbished. Prior to Aspen's acquisition of the site at least 12 dwellings were deemed uninhabitable by the City of Swan. The site presently has large undeveloped sections throughout suggesting that the site is underdeveloped.

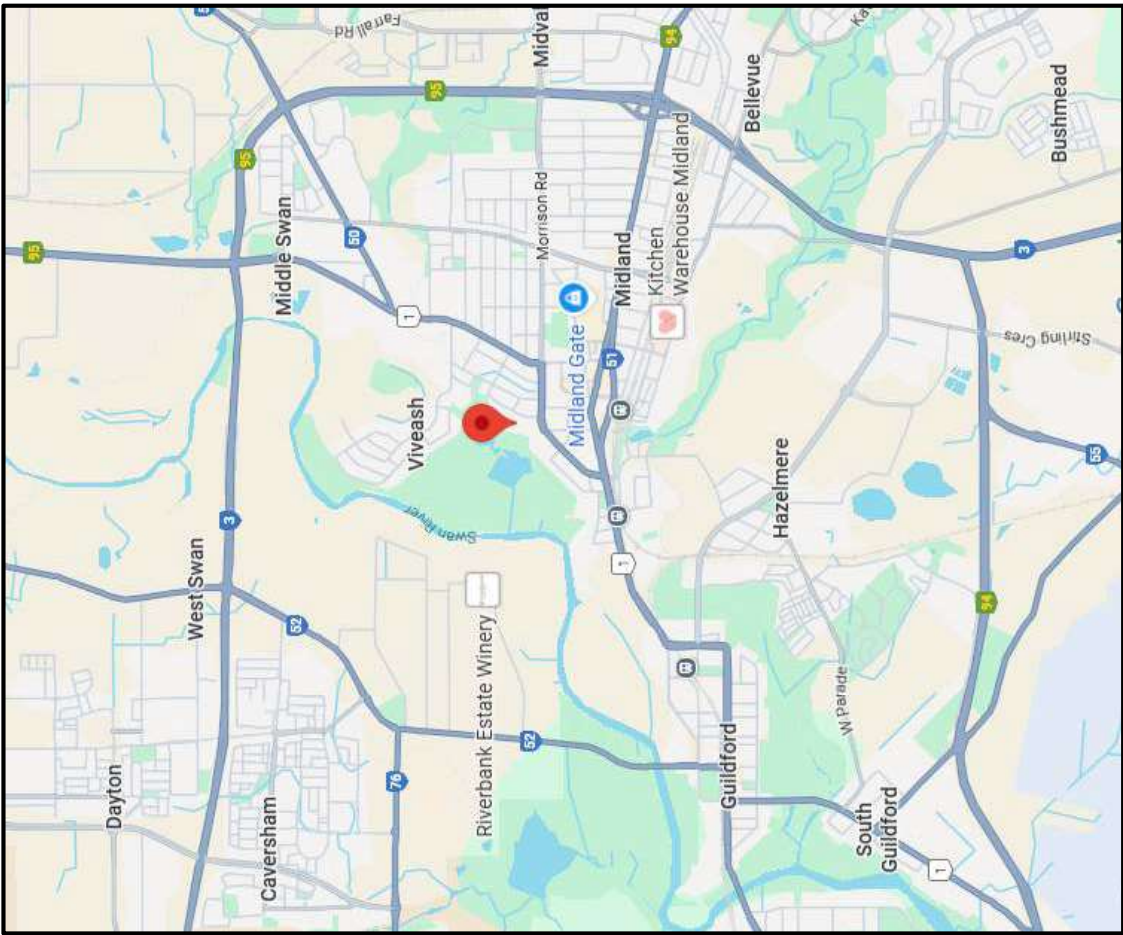


Figure 1 – Regional Context



Figure 2 – Local Context

4.0 Proposal Details

4.1 Aspen Group

Aspen Group is a national brand known for the provision of accessible living across Australia. They were founded on the principle that everyone deserves access to quality accommodation without sacrificing value. Their focus is the provision of affordable, quality accommodation with 40% of their tenant base being Australian households with an annual income of less than \$90,000.

This mandate results in a focus on delivering a range of housing options (lifestyle resorts for over 50's, aged persons dwellings and standard residential accommodation) that provide rental accommodation for residents at prices well below the median in any local area. This is critical in the current housing market in Perth with some of the communities most vulnerable, who are often forgotten about, able to access developments owned and managed by Aspen Group.

Aspen Group own and manage all of their assets and invest for the longer term, which will also be the case for the subject site. Given this there is a willingness to provide a more considerable investment into the asset as they can see the return over a longer time period, as opposed to developers who look to buy and sell.

4.2 Development Details

The proposed development involves an alteration and extension of an existing non-conforming use pertaining to Aged Persons Dwellings at the subject site. We are seeking approval to add an additional 12 Aged Persons Dwellings at the subject site in and around the existing development at the subject site.

The dwellings will be:

- Between 70sqm and 79sqm in size and be a 1 bed, 1 bath configuration with a private designated courtyard area.
- The intended occupant will be a single person or married couple over the age of 55.
- Each unit will also have a designated, exclusive veggie garden connected to the dwelling via a communal pedestrian path. The cumulative 'exclusive' lot area will be 100sqm.
- Classified as 'small dwellings' in accordance with Clause 1.1.7 of the R-Codes.
- Intended to be rented out at a significant discount from the median rent in Viveash. At present the existing dwellings are being rented for \$330 per week with the median rent in Viveash being \$570 per week. The new dwellings will also be rented at a significant discount to the median rent. Examples elsewhere in WA where Aspen have delivered on a similar intent have been summarised below.

	Maylands	Applecross	Glendalough	Claremont	Swanbourne
Total Apartments	391	36	9	48	8
Current Median Unit Rent in Area	\$550	\$895	\$580	\$725	\$970
Aspen Average Rent	\$443	\$524	\$410	\$409	\$479

Other aspects associated with the proposal include:

- Expansion of the pedestrian path network.
- Provision of an additional 16 car bays.
- Landscaping throughout.
- Modification to and addition of bin storage.

4.3 Prior Refurbishment

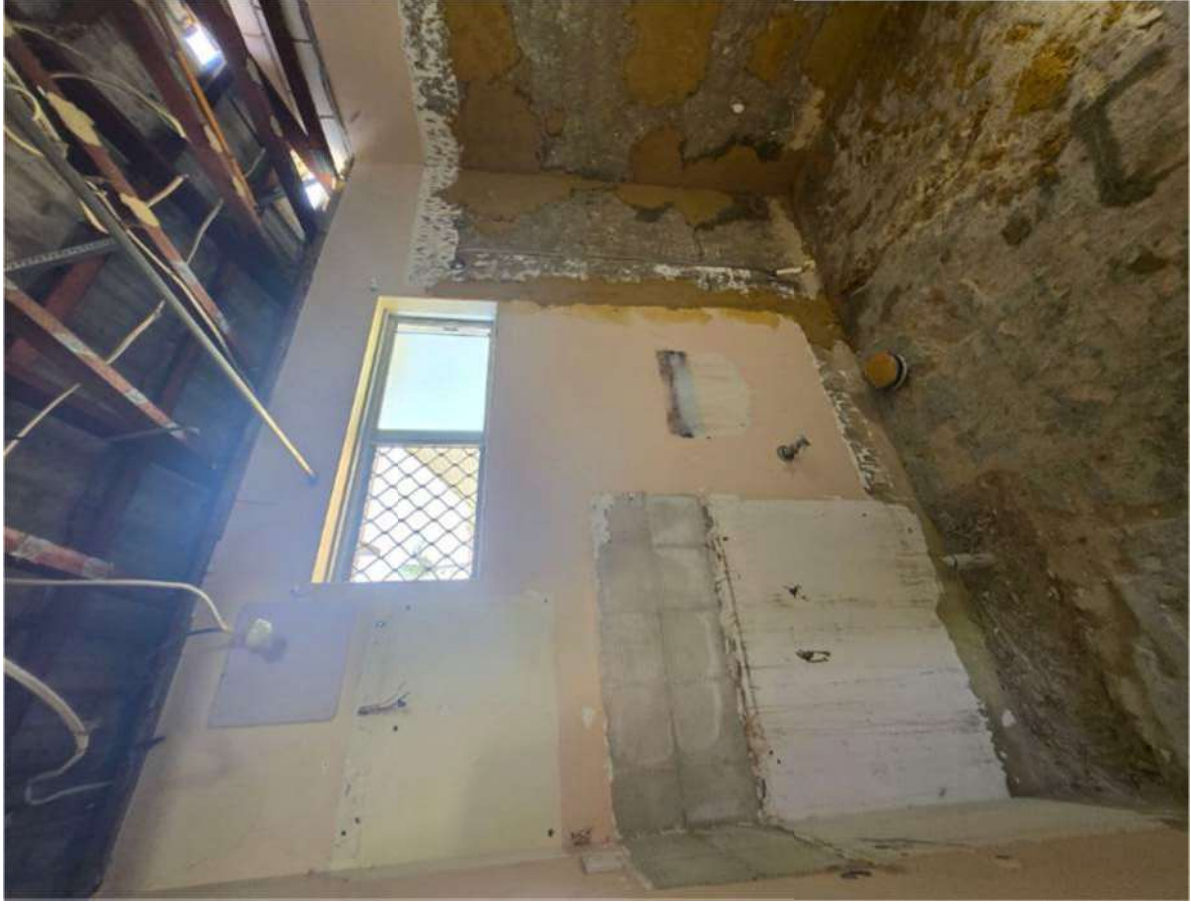
As previously noted, the existing dwellings at the site were deemed uninhabitable by the City of Swan prior to Aspen purchasing the site and they have subsequently undertaken a considerable refurbishment including structural rectifications, common amenity upgrades and site landscaping throughout. To give an indication of the extent of works required, the below figures provide a range of before and after photographs.

It is relevant to note that the refurbishment works included a requirement to remove existing vegetation on site (20 trees) with the roots of this vegetation growing through existing service lines throughout the site resulting in cracking and erosion of the pipes (evident in the before photos below). The impact of these trees were also a major component of the structural deficiencies which led to the City of Swan deeming them uninhabitable prior to Aspen's rectification works. Whilst removal of existing vegetation isn't desirable, it was critical in this instance, and the new landscaping outcome on site has greatly improved the existing amenity with a total of 52 new, more appropriate trees being planted throughout the site.

The decision to refurbish the existing 36 buildings, rather than demolishing and constructing new buildings, has significantly reduced the environmental impact of the development. The refurbishment approach minimised construction waste and reduced the carbon emissions associated with new material production and transport. Additionally, the 12 new dwellings will achieve a minimum 7-star rating and will be fully electric

Before

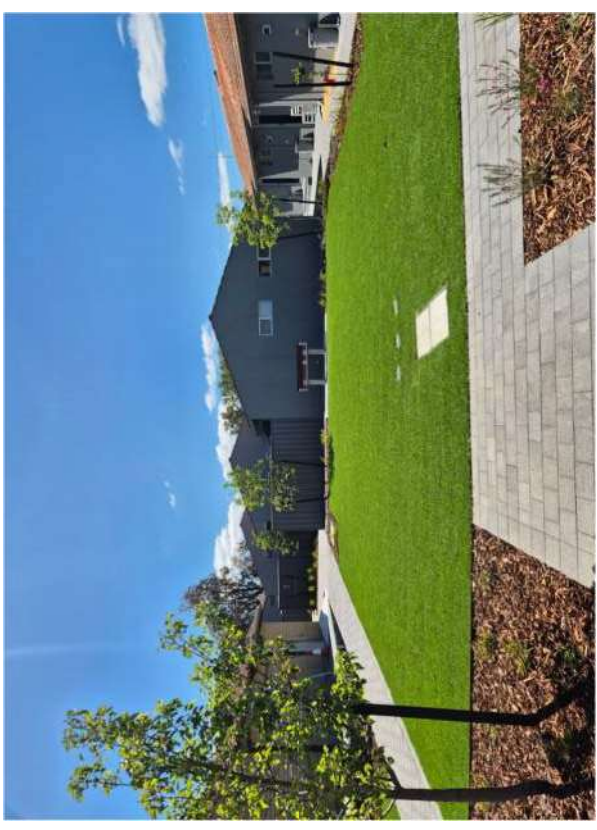


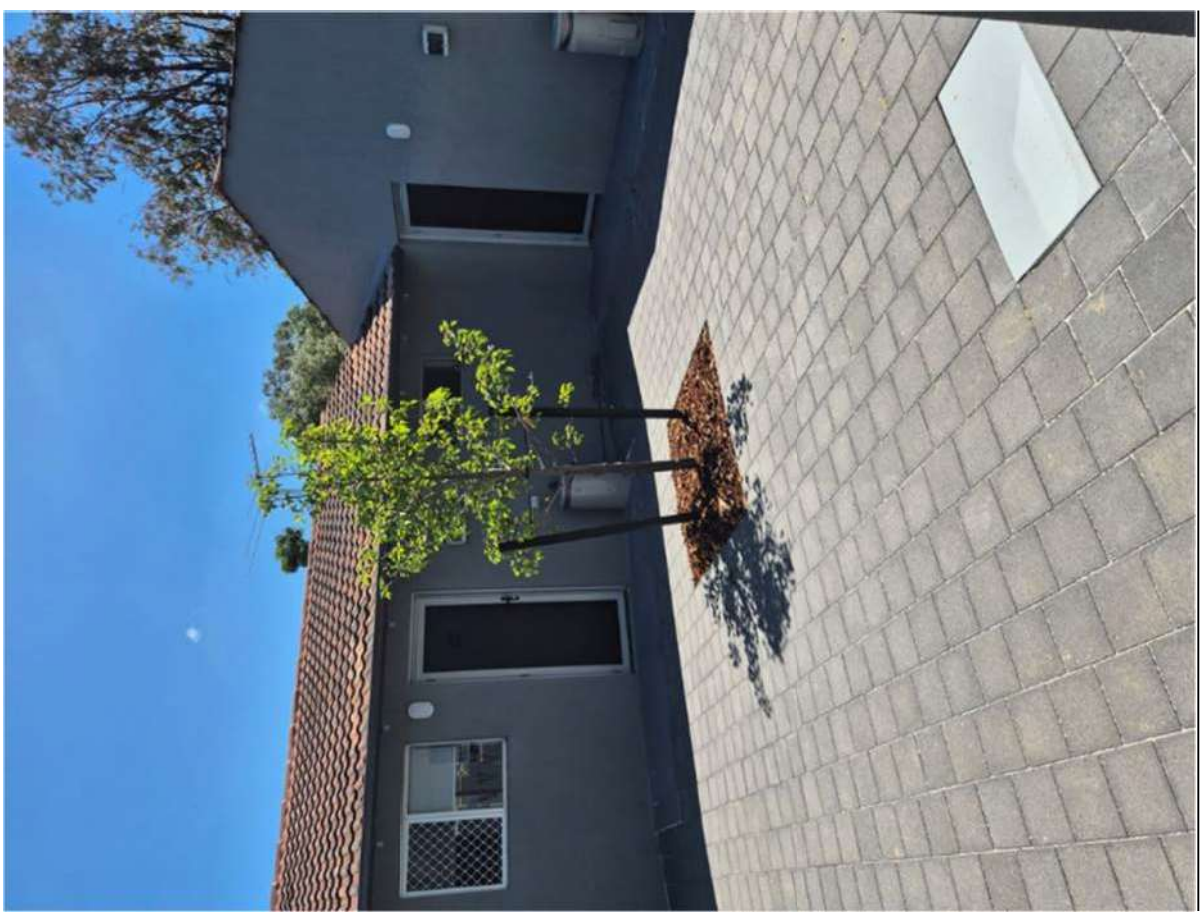




After







5.0 Planning Framework

5.1 Metropolitan Region Scheme (MRS)

The subject site is zoned 'Urban' under the provisions of the Metropolitan Region Scheme (MRS) and abuts an 'Parks and Recreation' reservation associated with the Swan River. It is commented that no portion of the site is impacted by this reservation.

For reasons outlined further in this report, the proposed development is considered to be consistent with the 'Urban' MRS zoning applicable to the subject site.

5.2 City of Swan Local Planning Scheme No. 17 (LPS 17)

The subject site is zoned 'Special Use' under the provisions of LPS 17. The objectives of the 'Special Use' zone are outlined in Clause 4.2.19 of LPS 17 and has been summarised below:

- a) *Provide for specific uses or combination of uses in circumstances where the uses have a particular locational and developmental requirements for which a generic zoning is unsuitable.*
- b) *Facilitate the development of strategically important facilities that cannot be satisfactorily provided for with any of the generic zones, and to ensure compatibility with adjacent development.*

It is acknowledged that the subject site is designated as 'Special Use 26'. The objectives of the SU26 zone applicable to the subject site is indicated in LPS 17 and has been summarised below:

'The objective of the zone is to provide for the coordinated development of a future retirement village estate that incorporates both Independent Living Units in addition to Low and High Care Accommodation.'

Consideration of how the proposed development meets the provisions of LPS 3 has been addressed in Section 6 of this report.

5.3 State and Local Planning Policies

The proposed development requires consideration against a number of State and Local Planning Policies, these include:

- State Planning Policy 3.7 – Planning in Bushfire Prone Areas.
- State Planning Policy 7.0 – Design of the Built Environment.
- State Planning Policy 7.3 – Residential Design Codes (Volume 1).
- POL-TP-127 Building and Development Standards – Other Zones.

Consideration of how the proposed development meets the provisions of the abovementioned policies has been addressed in Section 6 of this report.

6.0 Assessment

The statutory provisions applicable to the subject site require assessment of the proposal to be undertaken against the provisions of the following documents:

- City of Swan Local Planning Scheme No. 17 (LPS 17).
- State Planning Policy 3.7 – Planning in Bushfire Prone Areas.
- State Planning Policy 7.0 – Design of the Built Environment.
- State Planning Policy 7.3 – Residential Design Codes (Volume 1).
- POL-TP-127 Building and Development Standards – Other Zones.

The below sections will address the relevant land use permissibility, planning considerations and development requirements outlined in the abovementioned statutory planning documents.

6.1 Land Use Permissibility

The proposed development includes 12 'Aged Persons' Dwellings' which is defined in the R-Codes as:

Aged Person – a person who is aged 55 years or over.

Dwelling – a building or portion of a building being used, adapted or designed or intended to be used for the purpose of human habitation on a permanent basis by a single person, a single family, or no more than six persons who do not comprise a single family.'

In accordance with the SU26 provisions the 'Aged Persons Dwellings' is not a land use that is capable of consideration. However, as the subject site has an existing approval for 'Aged Persons Dwellings', the application represents a 'non-conforming use' as per Clause 4.8 of LPS17. In this regard the additional 12 dwellings can be considered as 'Discretionary' in accordance with Clause 4.9 of the LPS17 and as such are capable of approval.

6.2 State Planning Policy 3.7 – Planning in Bushfire Prone Areas

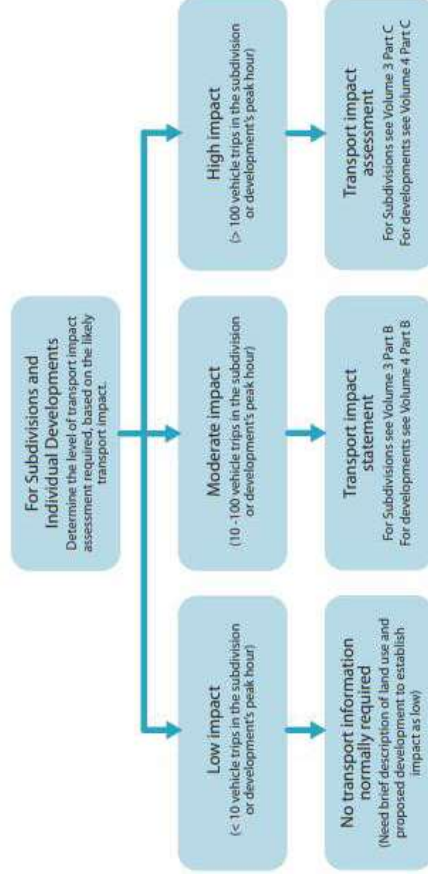
The subject site is identified as being bushfire prone due to existing vegetation surrounding the western boundary of the site. In this regard the provisions of State Planning Policy 3.7 – Planning in Bushfire Prone Areas (SPP3.7) is of relevance.

To address SPP3.7, Bushfire Prone Planning were engaged to prepare a Bushfire Management Plan (BMP) to provide guidance on the siting of the proposed development and ensure the development complies with the relevant policy provisions. A copy of the relevant BMP has been included in Appendix 4 with the findings summarised below:

- The proposed development is able to achieve a BAL rating of BAL-12.5.
- The existing driveway doesn't meet the requirements noted in SPP3.7, however firefighters are not likely to be required to enter the site due to alternative public access that is available and as such a performance solution warrants approval.
- Ultimately the provided BMP illustrates compliance has been achieved with SPP3.7.

6.3 Traffic & Car Parking

The proposed development includes a total of 12 dwellings, to be utilised for aged persons. For similar developments a trip generation rate of 50% of typical standard residential dwellings is applied meaning that this development is likely to generate approximately 6 trips in the peak hour. In accordance with the WAPC Transport Impact Assessment Guidelines, this is assessed as 'low impact' and does not require a Traffic Impact Statement or similar to support the proposed development.



Parking

An integral part of the design process, was the consideration of car parking. At present the approved development consists of 36 existing dwellings with a provision of 25 car bays. This is a ratio of 0.69 bays per dwellings which is considerably less than the R-Code requirement of 1 bay per dwelling. It should be noted that this property was previously developed and owned by the City of Swan who deemed that the parking ratio for the site was appropriate

The proposed development seeks to add 16 new car bays to service the 12 new dwellings as well as the existing development. In considering the new development in isolation this is an overprovision of car parking. However, in considering the entire development, a total of 48 units are being provided with 41 car bays. This is an overall shortfall of 7 resident bays and 12 visitor bays. However, the provision of car parking is considered to be entirely sufficient for the following reasons:

1. The development was developed and operated by the City of Swan without issue for many years with an approved parking ratio of 0.69 bays per dwelling. This is being improved to a ratio of 0.85 bays per dwelling which will only assist the car parking availability at the site.
2. The demographic occupying the site (over 55's) are often without a car with research demonstrating a downward trend in car ownership [Vehicle ownership rates: The role of lifecycle, period, and cohort effects - ScienceDirect](#). This is supported by the fact that only 50% of the existing residents at the site own a vehicle.
3. The site is in close proximity to a range of services and amenities (1.3km from the Midland train station, multiple nearby bus routes and 1km to Midland Gate).
4. With this in mind, alternate modes of transport such as public transport and walking will be relied on for residents. Research suggests that 23% of individuals aged 65+ use public transport and 16% rely on walking as the primary mode of transport –

[04151097PAC_KeyTransportAndMobilityIssues_Report_Final.pdf](#)

5. Aspen operates a range of similar developments around Australia and their experience with similar developments suggest a minimum parking requirement of 0.4 bays per dwelling for Aspens living properties. The proposed development exceeds this.

In addition to the above, preliminary assessment of the proposed development by the City's Design Review Panel included additional parking along the Elvire Street frontage of the development which ultimately wasn't supported despite the shortfall in car parking and as such it has been removed from the proposal.

6.4 State Planning Policy 7.0 – Design of the Built Environment

In accordance with SPP7.0, the proposed development was considered by the City's Design Review Panel on the 29 July 2025. A copy of the relevant minutes and the submitted presentation are included in Appendix 5. In response to the comments received a number of changes have been made to the proposed design which are summarised in the below table.

Design quality evaluation		Applicant Response
Principle 1 Context and character	Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.	
Comments and Recommendation	Strengths - Some useful broader context has been provided (but lacked local context – see below). - The placement of the new dwellings minimises impact on the public realm. Areas for improvement - Provide more information (e.g. photos and floorplans) of the existing building stock and the in-between spaces) on site, which is the primary context. - The new car parking and driveway in the front setback results in a loss of landscape and a diminished contribution to the streetscape – investigate a reduction in car parking based on a needs analysis (noting this type of housing has low car ownership) or, at the very least, offset the impact of the parking with a very generous landscape Recommendations Provide more information (e.g. photos and floorplans) of the existing building stock and the in-between spaces of context. Review or satisfactorily mitigate the placement of car parking in the front setback. Explore opportunities to provide direct access to the open space at the rear of the site.	- Photos provided above in relation to the before and after refurbishment works. - The additional access and parking at the front of the site has been removed. We are confident the provision of parking is sufficient to service the proposed development. - From Elvire Street these proposed new dwellings will largely not be visible at all. - Direct access will be provided to Elvire Park.
Principle 2 Landscape quality	Good design recognises that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context.	

Comments and Recommendation	Strengths - The general intent for the re-landscaping of the site looks promising but lacks detail. - The inclusion of productive gardens is commendable, especially in a development for residents on low incomes. Areas for improvement - Clarify whether the overall landscaping of the site is part of the application. - Provide more detail on the landscape associated with the infill component – trees and other species, hardscape materials and fencing treatments, including the courtyard areas. - Clarify which of the existing trees on the site survey have been removed. - Make some/ all the veggie patches communally available for use by any resident who wants to grow produce, rather than allocating them to specific units. - Use as large a tree as possible for the available space where new trees are identified (real trees, not toy trees). - Given the tightness/intimacy of the spaces created, carefully consider how buffer landscape can be used to enhance privacy to openings. - Provide more details on the central communal space and its usability. - The amount of landscaping in this stage of the proposal appears limited in comparison to the previous stage of work (to be clarified in a more detailed landscape plan). Recommendations Clarify the extent of landscape associated with the DA. Provide more detail on the landscape associated with the infill component.	- Stage 1 & 2 landscaping completed. Context photos and details have been provided in the after photos. Masterplan and DA relates to the balance of the site. - Additional detail on landscaping intent has been provided on the updated landscaping plan to clarify a number of the DRP comments. - Buffer landscaping has been provided between pedestrian paths and access to the dwellings. - The landscape design focuses on creating a welcoming entry experience with key areas landscaped to provide shade and to assist with pedestrian wayfinding. The landscape areas help to soften the hardscape surround through the planting of trees, groundcovers, and where appropriate screening species to ensure sightlines remain clear for safe pedestrian movement, while also offering privacy where required. Planting selections are tailored to local climate conditions and require minimal irrigation, aligning with water-sensitive urban design principles. Small to medium sized tree species (mixture of native and deciduous) are proposed throughout the development to provide a mixture of colour, habitat, amenity and passive solar benefits. A total of 125 new trees are proposed within the development (this includes 57 trees already installed within stage 1&2) The remaining 68 trees are proposed in the stage 1&2 East and stage 3 works. 5 new street trees are proposed within the
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	3. Clarify which of the existing trees on the site survey have been removed. 4. Review the allocation of the veggie patches. 5. Upsize the species of trees where space allows. 6. Carefully consider how landscape can be used to enhance privacy. 7. Provide more details on the central communal space and its usability, or at least for context if not part of the application.	Elvire Street verge. Tree pot size's includes 1,500L (transplants), 300L, 100L, 45L and 5L(5L are for the Citrus trees) The non fruit tree species are small to medium native and deciduous tree species selected for their suitability in the intimate spaces formed by the built form. The trees range from approximately 4 to 10m in height at maturity with deciduous species located adjacent pathways & courtyards to aid in the solar benefits of summer shade and winter sun, with the native species located to the perimeter of the site providing seasonal colour and habitat for native birds and insects. Approximately 4,190 new shrubs and groundcovers are proposed across the development with 1,680 installed in stage 1&2 with the remaining 2510 proposed in the balance of landscape works. Shrub planting in garden beds to provide spatial definition and screening (where appropriate) with groundcover planting proposed to areas requiring clear sightlines to ensure suitable view corridors. Predominantly native plant species are proposed to maximise local habitat for birds and insects, while minimising water dependence. Species selection has been based on reduced maintenance, fertilising and watering. All garden beds will be mulched to reduce water loss through evaporation. The Central Community Space provides a
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		open (but also sheltered) shared green space of open lawn area with shade trees, which provides a breakout space in close proximity to residents' private courtyards. The area is proposed as a flexible space suitable for individual use, groups of residents and as a breakout space for visitors. A fixed bench seat has been provided, with loose seating / furniture also proposed on the Community Hall verandah. The Community Garden space is located directly opposite the central green space providing and opportunity for activation of the areas and interaction and community building between the residents.	
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.		
Comments and Recommendation	Strengths - The intent for infill into the existing development is an innovative way of providing more affordable housing and is strongly supported. - The overall massing and scale of the infill is appropriate. - The single-storey scale is consistent with the existing development. - The use of a modest modular buildings avoids over-capitalising and, thus, diminishing the capacity to redevelop the whole site in the future. Areas for improvement - Review the articulation of the gable ends where exposed to view – inclusion of minor openings, material palette, etc. - Use a roof pitch consistent with the existing development, which may allow a higher ceiling for most of the habitable	- Ceiling heights have been lifted as part of the proposed development to ensure improved amenity. - Existing roof pitch doesn't align to this product being implemented and as such hasn't been adopted. - Southern lots have been altered with regard to entry points and internal layout to offer an alternate house type.	

	floorspace. In this respect, a skillion roof pitched towards the living area could also allow greater volume in the living area. - Using two or more house types may enable a more responsive design outcome rather than trying to shoe-horn in a single housing type. - Provide cross sections to better enable an understanding of the spaces between the new and existing buildings. Recommendations Review the articulation of the gable ends where exposed to view Use a roof pitch consistent with the existing development Consider the use of two or more-house types may enable a more responsive design outcome. Provide cross sections to better enable an understanding of the spaces between the new and existing buildings.	
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.	
Comments and Recommendation	Strengths - The unit plans are functional and efficient and appear to be fit for purpose. - A WMP with details of an upgrade of the existing waste management approach has been provided. Areas for improvement - Review the configuration of the southern units – flipping them so that the entry is to the living area via a front veranda, which will take better advantage of a northern orientation. - Clarify where the existing transformer is relocated to. - Identify locations for AC condenser units where they are discreet and do not compromise amenity.	- The southern units have been reoriented as requested. - The new transformer has been added to the plans. - AC unit details have been added to the plans. - Parking at the front of the site has been removed. - Sheds included in revised plans to act as storerooms. - Living rooms exceed minimum dimensions in R-Codes and bedroom dimensions are greater than the minimum required for

	• Provide an overlay of the plans to demonstrate the claimed gold-level liveability. • Clarify before-and-after parking arrangements and identification of visitor bays. • Consider whether the tenant profile really justifies so many new car bays – undertake a needs analysis based on other similar developments. • The units will require stores for consistency with the R- Codes. • Check the room sizes against R-Code requirements (although is noted that the R-Codes are overly generous in the context of affordable housing). Recommendations 1. Review the configuration of the southern units to achieve better solar orientation and a more engaging presence to the pathway. 2. Clarify the new location for the transformer. 3. Identify appropriate locations for AC condenser units. 4. Demonstrate achievement of gold-level liveability. 5. Review the parking provision in the context of the expected tenancy profile and identify visitor bays. 6. Include stores for the new dwellings. 7. Check room sizes and justify any variations based on efficiency and affordability	multiple dwellings suggesting an appropriate amenity outcome.
Principle 5 Sustainability	Good design optimises the sustainability of the built environment, delivering positive environmental, social and economic outcomes.	

Comments and Recommendation	Strengths - The modular approach and use of lightweight framed construction is strongly supported. - The light colour palette is appropriate, albeit one-shade of grey is dull. - Cross ventilation to all units is positive. - The re-use of existing structures is a strong component of the potential sustainability narrative. - The intent for an all-electric development is supported. Areas for improvement - Provide a sustainability strategy, utilising an ESD consultant if required, noting that the project has the fundamentals of a strong sustainability narrative and that there is more to sustainability than ESD. - Include PV on the roofs to increase on-going affordability for tenants. - Either bake-in sustainability initiatives into the design or make firm commitments on 'add-on' initiatives. - Review roof overhangs to ensure adequate summer shading of larger windows. - Make provision for EV charging (noting also the new requirements under the NCC). Recommendations 1. Develop a sustainability strategy that builds on the fundamentals of a strong sustainability narrative, noting the comments above.	- The proposed development will be 7 Star light weight construction and fully electric - Solar bollards and lighting will be provided throughout. - The development re-uses existing built form as opposed to demolition and redevelopment which has huge sustainability benefits. - Proposed tree and plant species are low water use species with drip irrigation proposed throughout all planted gardenbeds. All garden beds will be mulched to reduce water loss through evaporation. - Proposed tree species are suitably located to assist in provide solar passive benefits to the adjacent courtyards and walkways
Principle 6 Amenity	Good design optimises internal and external amenity for occupants, visitors and neighbours, providing environments that are comfortable, productive and healthy.	

Comments and Recommendation	Strengths - Habitable rooms have access to natural light, ventilation and an outlook. Areas for improvement - There was much discussion on the tightness/intimacy of the relationship between the new and existing housing – there needs to be more detailed and creative design work in both plan and section to demonstrate the spatial qualities and balance the competing needs for privacy and social engagement. Unless satisfactorily addressed, this could be a fatal flaw. - Include minor openings to gable walls to enable better cross ventilation of bedrooms. - Ceiling levels of 2450mm are tight. Recommendations <i>Provide more analysis and detail in both plan and cross-section of the interfaces and the spaces between the new and existing buildings and the associated path network.</i> <i>Include minor secondary openings in the exposed gable walls where possible.</i> <i>Review the ceiling heights, especially in the living areas.</i>	- Cross sections shown to demonstrated interaction with existing built form. - Openings in exposed gable walls impact affordability and would mean these units aren't able to be rented at a lower cost. - Ceiling heights have been increased.
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.	
Comments and Recommendation	Strengths - The unit entrances are clearly visible from the path network. Areas for improvement - Clarify the pedestrian movement paths from the new units to the public path network.	- Site plan clearly articulates where the path network integrates with existing. This network is clear and will be signposted for residents and visitors. - Pedestrian paths shown on landscape masterplan.

	- Simplify the pedestrian network by minimising sharp turns, kinks, and blind vistas (this could be achieved to some extent by angling paths and better staggering units). Recommendations 1. Provide an all-of-site pedestrian path diagram that includes connections to the public path network. 2. Review and simplify the pedestrian network on site.	
Principle 8	Good design optimises safety and security, minimising the risk of personal harm and supporting safe behaviour and use.	
Safety		
Comments and Recommendation	Strengths - Bushfire risk analysis has been provided. - Passive surveillance of the adjacent P&R reserve has been increased. Areas for improvement - The internal pedestrian network is tortuous and results in blind spots – review and refine the geometry of the network, provide more passive surveillance, and even mirrors on major changes of direction. - Provide an overview of the lighting strategy, particularly in respect to the pedestrian network. - Clarify the pedestrian movement paths from the new units to the public path network and associated pedestrian/vehicle conflict points. Recommendations 1. Review and simplify the pedestrian network on site. 2. Provide an overview of the lighting strategy. 3. Provide an all-of-site pedestrian path diagram that identifies pedestrian/vehicle conflicts and identifies measures to mitigate them.	- As above on the pedestrian path network. - Lighting will be provided throughout with solar bollards and this can be a condition of approval. - Plant species adjacent to pathways are proposed as low height species providing clear sightlines. Tree species are suitable for uplifting of lower branches also providing clear sightlines.

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.	
Comments and Recommendation	Strengths - The new units improve housing diversity and availability in the locality. - The new units seek to resolve the conundrum of achieving both affordability and an acceptable level of amenity. - Veggie gardens are an opportunity to engender social interaction if not otherwise allocated to individual units. Areas for improvement - Develop a narrative around how the loss of communal landscape has been offset through initiatives such as better planting, new tree planting, and communal veggie gardens. - Consider flipping units so the rear al-fresco becomes a front porch, which provides an opportunity for more social interaction (and, in some cases, better orientation of living areas). Recommendations Develop a narrative around how the loss of communal landscape has been offset through other landscape initiatives. Review the orientation of units to improve communal engagement and orientation.	- Landscaping was previously dispersed through the site with limited value to the residents and also impacted important services. The revised planting and landscaping strategy is coordinated and provides space for interaction and improved amenity. - Southern lots reorientated to improve amenity and engagement with the community.
Principle 10 Aesthetics	Good design is the product of a skilled, judicious design process that results in attractive and inviting buildings and places that engage the senses.	

Comments and Recommendation	Strengths • The designs go to some length to avoid the 'donger' look associated with modular construction. • There is a pleasing simplicity to the form and articulation. • The use of lightweight cladding provides texture. Areas for improvement • Fencing treatments will be critical in establishing an appealing and appropriate aesthetic, as well as enabling an appropriate balance between privacy and social engagement and should not be left as an afterthought. • The colour palette is dull – consider a mix of unit palettes and the use of colour highlights to provide more visual interest. Recommendations 1. <i>Include details of fencing treatments.</i> 2. <i>Review the colour palette.</i>	1. Fencing detail has been added to the development plans. 2. Colour palette has been updated.
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6.5 Development Requirements

The relevant development requirements pertaining to the proposed development are outlined in:

- City of Swan Local Planning Scheme No. 17 (LPS 17) – Special Use 26.
- POL-TP-127 Building and Development Standards – Other Zones.
- State Planning Policy 7.3 – Residential Design Codes (Volume 1).

An assessment of the proposed development's compliance with the abovementioned documents has been provided in the below tables with an assessment against the relevant provisions of the R-Codes included in Appendix 6.

City of Swan Local Planning Scheme No. 17 (LPS 17)

Table 1 below provides an assessment of the proposal against the relevant requirements outlined in LPS 3. Where there are variations to the applicable requirements, these have been noted in **red**. As a general comment, we note that these Special Use 26 zone provisions were designed to be applicable to a redevelopment of the subject site, not an alteration/extension to an existing approved non-conforming use. In this regard, some provisions have limited applicability to the proposed development.

City of Swan Local Planning Scheme No. 17 (LPS 17)	Proposed Development	Compliance (Yes/No)
Special Use Zone (SU26) Conditions		
1. All development in this zone shall: a) Be a maximum building height of two (2) storeys. b) Be in accordance with the R-Codes provisions and requirements for R40 coded land. If a greater setback is required under Condition 1c) for a major opening, the greater setback shall apply. c) All major opening(s) in the second storey of buildings that face toward the zone's northern side boundary are to be set back no closer than 6 metres from the northern side boundary. The setback area shall contain landscaping. d) Vehicle access and parking must be set back no closer than 10 metres from the zone's northern boundary.	a) The proposed development is single storey in height. b) The proposed development meets the requirements to qualify for the R60 density coding. c) No second storey proposed. d) Vehicular access is existing and as previously approved. Minor changes to add additional parking adjacent to this access is being proposed but this will have no impact on the amenity of adjoining properties.	Yes
2. Discretion to vary Condition 1 and permit development up to a maximum of R60 and a maximum building height of three (3) storeys shall only be permitted if: a) The third storey is located to minimise visual impact from the primary street and adjoining properties, to the satisfaction of the local government. b) All buildings are set back no closer than 4 metres from the zone's primary street boundary (Elvire Street). c) All buildings are set back no closer than 3 metres from the zone's southern side boundary.	a) The development is single storey in height. b) All buildings are set back greater than 4m from the primary street. c) No buildings are within 3m of the southern side boundary. d) No buildings are within 3.5m of the northern side boundary. e) The buildings are single storey in height. f) Vehicular access is existing and as previously approved. Minor changes to add additional parking adjacent to this access is being	Yes

City of Swan Local Planning Scheme No. 17 (LPS 17)		Proposed Development	Compliance (Yes/No)
d) All buildings are set back no closer than 3.5 metres from the zone's northern side boundary. If a greater setback is required under Condition 2(e) for a major opening, the greater setback shall apply. e) All major opening(s) in the second and third storey of buildings that face toward the zone's northern side boundary are to be set back no closer than 6 metres from the northern side boundary. The setback area shall contain landscaping. f) Vehicle access and parking must be set back no closer than 10 metres from the zone's northern boundary		proposed but this will have no impact on the amenity of adjoining properties.	
3. All buildings must be set back no closer than 4 metres from the Regional Reserve - Parks and Recreation.		No buildings are within 4m of the rear setback to the Parks and Recreation reservation.	Yes
4. A mosquito management plan, prepared in accordance with the Department of Health's Mosquito Management Plan template, should be submitted as part of any development application, at the discretion of the local government.		As the proposed development relates to additions and not a redevelopment of the subject site, a Mosquito Management Plan isn't considered to be required as the ability to incorporate management measures is limited.	Yes

Table 1 – LPS 17 Assessment

City of Swan POL-TP-127 Building and Development Standards – Other Zones

Table 2 below provides an assessment of the proposal against the relevant requirements outlined in POL-TP-127 Building and Development Standards – Other Zones. Where there are variations to the applicable requirements, these have been noted in **red**.

POL-TP-127 Building and Development Standards – Other Zones		Proposed Development	Compliance (Yes/No)
Plot Ratio & Site Coverage As per the R-Codes.		Not applicable to the R-Code assessment.	Yes
Setbacks As per the R-Codes.		Refer attached R-Code assessment sheet and compliance with the SU26 zone provisions.	Yes
Use of Setbacks - No person shall use the area of land between a building setback line and a street alignment for any purpose other than one or more of the following: - A means of access; - Landscaping; - The loading and unloading of vehicles; - The daily parking of vehicles used by employees and customers or clients but subject to the requirements of any duly adopted policy as to off-street parking. No such area shall be used for the parking of vehicles displayed for sale or which are being wrecked or repaired, or for the stacking or storage of fuel, raw materials, products, or by-products, or wastes of manufacture		The primary street setback area is only to be used for parking and access.	Yes
Landscaping - In connection with any application for approval to commence development in a zone to which this policy applies, the Council shall require that such landscaping be provided as the Council sees fit in the interests of amenity and orderly and proper planning. Any landscaping required shall be provided in accordance with the provisions set out hereunder: - The required landscaping shall cover a minimum of 10% of the total site area in a form approved by the		The development includes well in excess of 10% landscaping throughout the site with a detailed landscaping plan being proposed for the site in Attachment 2. This pertains to existing landscaping areas as well as around the proposed development.	Yes

POL-TP-127 Building and Development Standards – Other Zones	Proposed Development	Compliance (Yes/No)
Council. The calculation of this area shall include any area required as boundary landscaping and open parking facilities landscaping where off-street parking is required in accordance with the Vehicle Parking Standards policy; b) Any landscaped area shall be separated from an adjacent vehicular area by a wall or kerb at least 150mm higher than the adjacent vehicular area or in some manner be protected from vehicular damage; c) Landscaped areas shall not average in width less than 1.5 metres, and shall not be continuous for more than 10 metres without a properly designed pedestrian crossing point, except where such landscaped area is adjacent to a permanent fence, or a wall of a building; d) The part of the area of the site required to be provided as landscaping shall not include areas which would normally be set aside for pedestrian movement; and e) Landscaped areas required by this policy shall be planted in accordance with an approved landscape plan, and within 30 days of practical completion of the development, or any relevant part thereof, as determined by the Council or at such later time as may be agreed in writing by the Council.		

Table 2 – POL-TP-127 Assessment

7.0 Conclusion

Based on the contents of this planning report, it is clear that the project proposal is appropriate for approval as it has been demonstrated that all relevant planning considerations have been appropriately addressed. Further, the development will deliver access to important affordable housing for our elderly population. Further the proponent, Aspen Group, has a strong track record of delivering affordable rental accommodation on this site and in WA more generally with a large portfolio of quality properties that are rented below median rents.

As considered in detail within the contents of the planning report, the proposal will deliver a functional built form outcome that is broadly compliant with the applicable development requirements relevant under the local planning framework. Further, the development will have no negative impacts on adjoining properties and will largely not be visible at all from the Elvire Street frontage. It is hard to imagine a more suitable and logical location for urban infill to provide critical affordable accommodation.

With regard to the above, the proposed development is considered to warrant favourable consideration by the City of Swan.