

Our Ref: 23-385
26 November 2025

Metro Inner Development Assessment Panel
c/o Chief Executive Officer
City of Melville
10 Almondbury Road
BOORAGOON WA 6154

Attention: Josh Caracciolo – Senior Statutory Planner

Dear Josh,

**RESPONSE TO DEFERRAL REASONS - DAP/25/02925 CHILD CARE PREMISES
- LOTS 143 & 144 (NOS. 34 & 36) ST MICHAEL TERRACE, MOUNT PLEASANT**

We refer to the resolution of the Metro Inner Development Assessment Panel (DAP) at its meeting on **9 October 2025** to defer consideration of the above application for up to 120 days. We appreciate the opportunity to address the matters raised and provide the following response.

Since the October meeting, the project team has undertaken a comprehensive review of the proposal and prepared additional technical documentation to address the key issues identified in the deferral reasons. These documents are summarised below:

- **Updated Transport Impact Statement (TIS) (Urbii, November 2025)** – the TIS incorporates additional site observations, refined operational measures and updated analysis to demonstrate that the development will operate safely and effectively within the surrounding road network. The TIS respond to the matters identified by the Road Safety Audit. Refer Appendix 1
- **Updated Waste Management Plan (WMP) (Urbii, November 2025)** – the WMP refines bin storage design and collection logistics to remove the need for bins to be presented on the verge and improve amenity outcomes. Refer Appendix 2
- **Parking Management Plan (PMP) (Urbii, November 2025)** – The PMP sets out the operational measures designed to ensure safe and efficient use of the car park, including the management of pick-up and drop-off activity to minimise overlap with the school peak periods. Refer Appendix 3
- **Road Safety Audit (RSA) (Shawmac Traffic and Safety, November 2025)** – An independent RSA was undertaken based on the proposed development application plans. The RSA contains findings which require action to improve the safety of the proposed project, to minimise the risk of crash occurrence and reduce potential crash severity. Refer Appendix 4
- **Updated Fence Elevations (Hindley and Associates, November 2025)** – Plans have been updated to increase the visual permeability of the proposed fence. Refer Appendix 5

The additional information demonstrates that the proposed Child Care Premises is compliant with the objectives of the Residential zone contained in the City of Melville Local Planning Scheme No. 6 and relevant local planning policies. We request that the DAP approve the Child Care Premises with conditions based on the plans and supporting information provided.

Project Background

The above mentioned application was considered by the Metro Inner Development Assessment Panel (the DAP) at a meeting held on 9th October 2025. At that meeting the DAP resolved to defer the application for a period of up to 120 days.

The application was deferred by the DAP for the reasons outlined below:

- a. Considers a reduction of the size of the centre in terms of the intensity of the land use to demonstrate compliance with the objectives of the Residential zone in accordance with clause no. 16 of the City of Melville Local Planning Scheme No. 6 and compliance with the objectives of Local Planning Policy 1.12 – Child Care Premises including benefits, issues and impacts of redesigning the basement to take vehicular access off Queens Road
- b. Considers revised design of the front fencing and retaining to either reduce the height of the solid section (noting that the height of screening landscaping within the verge is limited to 600mm) or setback further into the property to provide taller screening landscaping on site in front of the wall; and
- c. Considers options to reduce the number of bins presented and the method of waste collection and management to better align with the objectives of the Residential zone in accordance with clause no. 16 of the City of Melville Local Planning Scheme No. 6 and objectives of the City’s Local Planning Policy 1.3 – Waste and Recyclables Collection for Multiple Dwellings, Mixed Use and Non-Residential Developments.

Response to Deferral Reasons

Deferral Reason A

The project team has reviewed the intensity of the land use and the potential to redesign the basement to take access off Queens Road, however has determined it is not possible to reduce the proposed number of students or revise the access arrangements. The key factors which were considered in making this decision include:

- The additional information provided by the project team which demonstrates that the development can operate without causing amenity or safety issues for the locality.
- The development potential for the subject site which includes,
 - o land to be subdivided to accommodate a minimum of four dwellings, with two crossovers to both Queens Road and St Michaels Terrace.
 - o The potential for the subject site to be developed for two medium size child care premises.
 - o The potential for the subject site to be developed to accommodate a combination of residential dwellings and a child care premises.
- The unmet demand for child care premises within the locality,

- The financial feasibility of the project including construction costs.

We note that under the provisions of the Draft Western Australian Planning Commission (WAPC) Position Statement (the Position Statement) the proposed Child Care Premises is identified as an 'Extra Large' facility due to it being designed to accommodate up to 113 children. This is an arbitrary number, used to characterise child care centres of differing sizes. In this case the proposed development is accompanied by site specific technical reports which demonstrate there are no amenity impacts in terms of noise, waste, traffic or safety. We also note that the position statement is not a statutory document.

Importantly, the City has its own Local Planning Policy LPP1.12 Child Care Premises and Family Day Care (LPP 1.12) which indicates preferred characteristics for child care premises. The subject site meets four of the five preferred site characteristics outlined in LPP1.12. The only areas where the subject site does not meet the preferred characteristic is in relation to St Michaels Terrace which is a local road rather than a local distributor or district distributor road. Importantly an access road is not listed as a 'undesirable' site characteristic and the documentation provided demonstrates that St Michaels can accommodate the proposed development. The Position Statement specifically provides that it is to only be applied in the absence of a local planning policy. Accordingly, the Position Statement is not applicable to this development.

The proposed development is located on a large corner site, opposite a large public primary school. It is also located within 200 metres of an existing local centre. The development is supported by a range of technical reports which demonstrate that all relevant amenity issues have been addressed and on this basis the objectives of the local planning scheme and local planning policy have been met.

Deferral Reason B

In response to deferral reason B, the development plans have been updated to increase the visual permeability of the proposed fence. This has the effect of reducing the visual bulk as viewed from the street. The fence has been carefully designed to respond to site constraints including the fall across the site, provide a safe environment for children and to reduce overall bulk. The proposed fencing design is consistent with fencing found in residential areas including the Mt Pleasant locality and is consistent with the objectives contained in LPP1.12.

Deferral Reason C

A revised Waste Management Plan (WMP) has been prepared in consultation with relevant officers at the City of Melville which removes the need for bins to be presented on the verge for collection. The revised WMP allows for collection of bins outside of peak hours by City staff.

Yours sincerely
Element Advisory

Mark Scarfone
Associate - Planning

Element Advisory acknowledges the Whadjuk people of the Noongar nation as Traditional Owners of the land on which we live and work. We acknowledge and respect their enduring culture, their contribution to the life of this city, and Elders, past and present.