

PS ref: 9511

17 June 2025

City of Melville  
Locked Bag 1  
Booragoon WA 6954

Attention: Planning Services

Dear Sir/Madam,

**CORNER OF CANNING HIGHWAY & STOCK ROAD, PALMYRA  
APPLICATION FOR APPROVAL TO COMMENCE DEVELOPMENT  
AMENDMENT TO APPROVED INDEPENDENT LIVING COMPLEX & RESIDENTIAL AGED CARE FACILITY**

Planning Solutions acts on behalf of Melville Health, Aged and Community Care (WA) Pty Ltd, the proponent of the proposed development of Lot 55 (391) Canning Highway, Lots 830, 831 and 832 (36, 38 and 38A) Waddell Road, and Strata Lots 1-5 (167) Stock Road, Palmyra (**subject site**).

This submission has been prepared in support of an application to amend the existing development approval issued by the Metro Inner-South Joint Development Assessment Panel (**DAP**) on 16 June 2023.

Pursuant to Regulation 17(1) of the *Planning and Development (Development Assessment Panel) Regulations 2011 (DAP Regulations)*, we make this application to amend aspects of the approved development which, if amended, would not substantially change the development approval.

With regard to the above, please find enclosed:

1. City of Melville Development Application Form and Checklist
2. DAP Form 2 Application Form
3. Certificate of Titles applicable to the subject site (**Attachment 1**)
4. Amended Development Plans (**Attachment 2**)
5. Waste Management Plan Addendum (**Attachment 3**)
6. Acoustic Report Addendum (**Attachment 4**)
7. Traffic Impact Assessment Addendum (**Attachment 5**)

We request that an invoice is generated in the name of the proponent '**Melville Health, Aged and Community Care (WA) Pty Ltd**' for the relevant development application fees.

The following submission discusses various matters pertaining to the proposal, including:

- Site details
- Background
- Proposed Amendments
- Consultant reports
- Town planning considerations

## SITE DETAILS

### Legal description

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

**Table 1 - Lot details**

Lot	Deposited Plan	Volume	Folio	Area (m <sup>2</sup> )
55	26589	1891	839	3,705
830	3721	666	197	1,321
831	3721	666	197	1,323
832	3721	699	119	1,113
1-5	48383	2613	671	1,152
Total				8,614

Refer **Attachment 1** – Certificates of Title and Deposited Plans.

### Site context

The subject site is in the suburb of Palmyra, within the municipality of the City of Melville (**City**). The subject site is approximately 11 kilometres southwest of the Perth city centre. The subject site has three street frontages, Canning Highway to the north, Stock Road to the east and Waddell Road to the west. Both Stock Road and Canning Highway connect the site to the wider metropolitan area.

Consistent with conditions at the time of the existing approval, the subject site is improved with various buildings, including community facilities, grouped dwellings, vacant land and public car parking.

Refer **Figure 1** below for an aerial photograph of the subject site.



**Figure 1: Aerial photograph of subject site**

## BACKGROUND

### Form 1 DAP Approval

Development approval for a 'Six Storey (Plus Basement) Mixed Use Development' was granted by DAP at its meeting held on 16 June 2023 (ref: DAP/23/02413). The existing approval has not been substantially commenced, however, the approval remains valid until 16 June 2027.

The approved development comprises the following land uses: Aged Care Facility, Medical Centre, Shop, Private – Recreation, Restaurant/Café, and Community Facility.

### Hall & Prior's commitment

Hall & Prior are strongly committed to delivering this project in a way that maximises the benefits to the City of Melville community. This commitment is emphasised by Hall & Prior's acquisition of the two lots adjoining the City's land to the south. Hall & Prior maintains an intent for these lots to be transferred to the City as part of the overall development process.

### Engagement

Hall & Prior recognise that change can cause some concern within the community, especially amongst residents who adjoin or live nearby to the proposed Residential Aged Care Facility (RACF). Maintaining open lines of communication is critical to ensuring the community and Council are properly consulted and informed of the project, including reasons for any change.

In considering amendments to the approved development, Hall & Prior have met with senior executives of the City and provided a briefing to Elected Members on the status of the proposed development, proposed modifications and rationale.

Additionally, representatives of Hall & Prior contacted the 14 residents immediately adjoining the proposed development to the south, meeting with five residents to date. Residents were provided a briefing on the proposed amendments and rationale for the changes. Hall & Prior will continue to make themselves available throughout the development process, including during the construction phase.

### Requirement for Additional Floor Space

#### *The Economic Perspective*

Construction costs associated with development continue to increase, impacting the viability of projects across Western Australia. Project proponents commonly have two key levers to improve viability when costs exceed project budgets. These are:

- Reduce development costs by delivering a building of lower quality; or
- Increase development yield without increasing relative costs.

Hall & Prior remain committed to, and pride themselves on, delivering Aged Living to the highest possible standard. Increasing development yield best aligns with their care philosophy and ensures the benefit to the community is maximised. Reducing the quality of development to achieve project viability is not considered an acceptable solution.

From an economic perspective, the additional yield reduces the cost per bed/unit, bringing the project feasibility back into a deliverable range, whilst maintaining a high-quality development outcome.

#### *The community perspective*

It is an established fact that the nation is facing a surge in demand for Aged Living. In the next 10 years, the City will see its demand for Residential Aged Care accommodation increase by almost 60%, with the current supply of beds (1,334) estimated to be exhausted by 2028. Concurrently, occupancy rates for beds within Hall & Prior's other Melville facilities remains above the Western Australian average, at rates of between 96% to 100%.



In the medium term, demand will continue to rise in the City, with between 1,800 and 2,100 beds required by 2035, well below the current supply of 1,334 beds. In this context, every bed (and Independent Living Unit (ILU) that can be adapted for care) is critical to supporting opportunities for existing residents to remain within, and stay connected to, their community, social networks and family.

The revised development proposal will increase the critical supply of Aged Care beds by 18 (from 144 to 162), whilst at the same time reducing the cost to deliver each bed, improving project viability. The additional eight ILUs provides a further 18 beds, which could be adapted to care beds should the need arise.

It should be noted that even with the yield obtained from development, the additional supply of beds is predicted to be exhausted by between 2028 and 2030 (within the lower and upper band of demographic estimates).

### **Senior Citizens Event Parking**

In accordance with the City's car parking requirements, the proposed development provides an appropriate level of parking to cater for all uses on the site. The proponent also acknowledges the Senior Citizens Centre hosts key events throughout the year which will require the provision of additional parking. Hall & Prior have made a commitment to continue ongoing discussions with the City to explore options for additional key event parking.

## **PROPOSED AMENDMENTS**

### **Design Modifications**

The amendment application proposes a range of modifications to the existing approved mixed-use development. The following are key amendments between the approved and proposed developments:

- Additional level included within the ILU building, resulting in an increased building height of 3m and eight additional suites.
- Extension of the sixth floor of the RACF building towards the southern boundary, providing two additional suites.
- Modification to the approved unit mix within the RACF building, resulting in an increase of 18 beds. Unit mix is modified, as follows:
  - Single suite – 88 in lieu of 96 (reduction of eight)
  - Companion suite – 24 in lieu of 16 (increase of eight)
  - Premium suite – 14 in lieu of 12 (increase of two)

Refer **Attachment 2** - Amended Development Plans.

Perspectives of the modified development are provided in **Figures 2-5** below, comparing the amended design with the original approval.



**Figure 2: Left - Perspective of approved development from Stock Road; Right - Perspective of amended development.**





Figure 3: Left - Perspective of approved development from Waddell Road; Right - Perspective of amended development



Figure 4: Left - Perspective of approved development from the southeast; Right - Perspective of amended development



Figure 5: Left - Perspective of approved development from the southwest ; Right - Perspective of amended development

## CONSULTANT REPORTS

Whilst the development application proposes minor amendments to the approved mixed-use development, technical consultant reports have been updated, where appropriate.

The following amended consultant inputs are provided in support of the proposed amendments to the development approval.

### Waste Management Plan Addendum

The Waste Management Plan Addendum (**WMP Addendum**) addresses revisions to waste generation rates and bin numbers due to the increase in occupant beds across the two buildings. As per the WMP Addendum, there is no proposed change to the bin store areas (refer **Attachment 3**).

In accordance with Condition 14 of the original approval, the WMP will be adhered to on an ongoing basis for the life of the development.

### **Acoustic Report Addendum**

The Acoustic Report Addendum (**Acoustic Addendum**) includes updated traffic noise assessment in accordance with *State Planning Policy 5.4 Road and Rail Noise (SPP5.4)* (refer **Attachment 4**). The Acoustic Addendum includes recommendations to minimise sound intrusion, including external glazing and external façade treatments.

The Acoustic Addendum recommends a notification on the title, consistent with the requirement of Condition 11 of the original approval.

### **Transport Impact Assessment Addendum**

The Transport Impact Assessment Addendum (**TIA Addendum**) addresses the proposed increase in occupants across the site and impact on parking demand and traffic generation (refer **Attachment 5**).

The TIA addendum anticipates the highest parking demand will be in the shift handover period (between 14:30-15:30). Notwithstanding, the TIA Addendum notes during this period there will be approximately 51 available parking bays, meaning the approved 149 parking bays is sufficient.

In addition to standard car parking bays, the proposal maintains the provision of three ACROD bays and 44 bicycle parking bays, providing alternative transport solutions.

## **TOWN PLANNING CONSIDERATIONS**

### **Metropolitan Region Scheme**

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

The site fronts Canning Highway to the north, which is reserved as 'Primary Regional Road' under the provisions of the MRS. A portion of the Primary Road Reserve encroaches into Lot 55 (refer **Figure 6**).

Additionally, the site fronts Stock Road to the east which is reserved as 'Other Regional Road' under the provisions of the MRS.

The approved development, and proposed amendments, are consistent with the intent of the Urban zone and may be approved accordingly.

### **City of Melville Local Planning Scheme No. 6**

The City of Melville *City Planning Scheme No. 6 (LPS6)* applies to the subject site.

The proposed amendments seek modifications to the existing approved development, as set out within this submission. The scope of proposed amendments is not considered to substantially alter the overall built form or appearance of the approved mixed-use development.

### **Zoning and Land Use**

In accordance with LPS76, Lots 55, 831 and 831 are zoned 'Centre C2' and Lots 832 and Strata Lots 1-5 are zoned 'Mixed Use' under the provisions of LPS6. All lots are coded R-AC0 (refer **Figure 6**).

The proposed amendments relate to the design, functionality and feasibility of the development only and do not propose any new land use not already approved within the existing development approval.

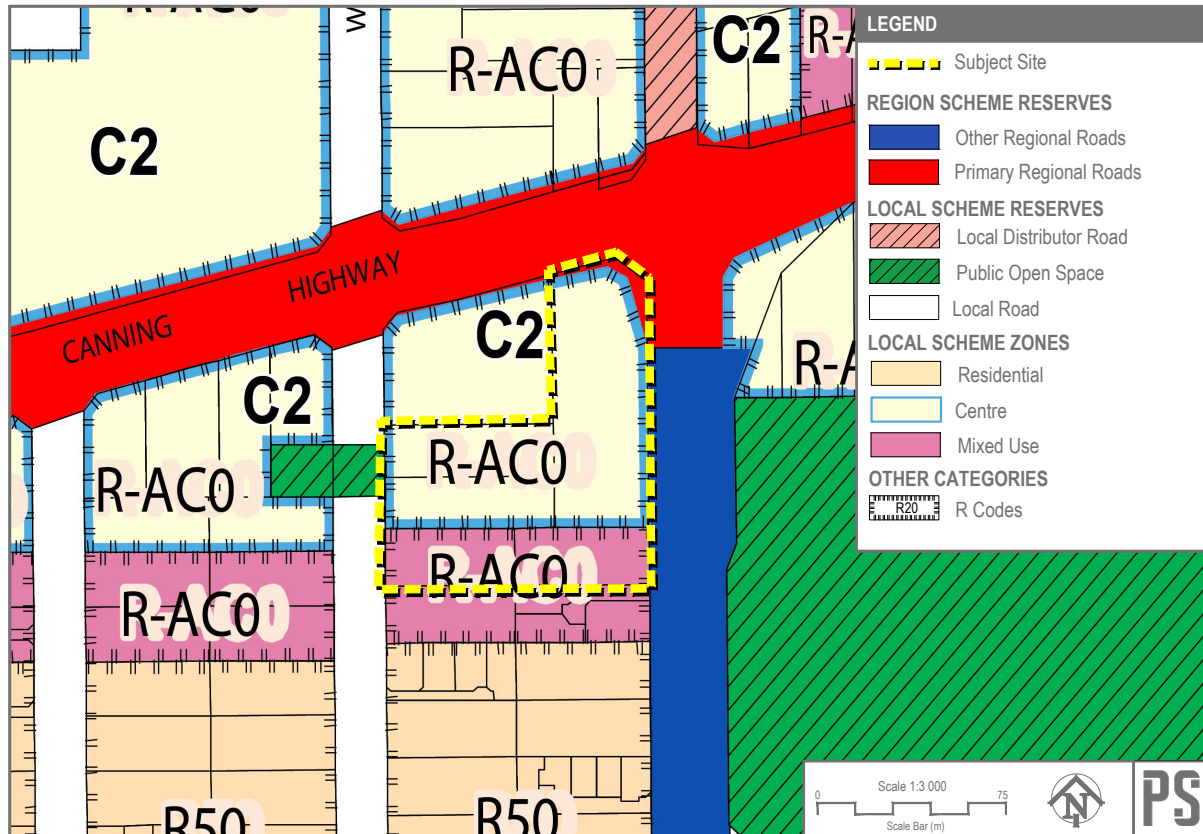


Figure 6: LPS6 Zoning Map

### Development Standards

The site is subject to the provisions of the Melville District Activity Centre Plan (**MDACP**) which outlines the applicable development standards.

An assessment of the proposed amendments against the previous approval and relevant development standards of MDACP is provided in **Table 2** below (*note: **bolded** text indicates changes*).

**Table 2 – MDACP Planning Assessment**

Clause 4.5 / Requirement	Approved Development	Proposed Development	Complies
<b>Building Height</b>	<u><b>Centre Zone:</b></u> 5 storeys + 2 as per cl. 4.5.26	<u><b>ILU Building:</b></u> 5 storeys / 20.7 metres to the roof (as measured from the north).  <u><b>RACF Building:</b></u> 6 storeys / 24.4 metres to the roof (as measured from the north).	Discretion sought  ✓ (approved 2023)
	<u><b>Mixed Use Zone:</b></u> 3 storeys	<u><b>RACF Building:</b></u> 6 storeys / 26.7 metres to the roof (as measured from the south).	Discretion sought
<b>Plot Ratio</b>	No requirement.	N/A	N/A
<b>Facades and Frontages</b>	High quality facades Concealed car parking	The original design was reviewed by the City's Design Review Panel (DRP) and the final design incorporated their recommendations.	✓ The amended design continues to exhibit high quality design and conceals carparking within the basement.



Clause 4.5 / Requirement		Approved Development	Proposed Development	Complies
<b>Vehicle Access</b>	From a secondary street or right-of-way.	Access from Waddell Road and Stock Road.	Access maintained from Waddell Road and Stock Road.	✓
<b>Car Parking</b>	<u>As per LPP 1.6 and 2.1:</u> 202 total reduced by 25% - i.e. 151.5 (152) bays	149 total	149 total	Discretion sought
<b>Private Space</b>	Min 15m <sup>2</sup> of terrace, balcony or courtyard	N/A – not a traditional residential development. Notwithstanding, each suite contains private open space.	N/A – Notwithstanding each new suite has private open space.	N/A
<b>C2 – Non-Residential development</b>	Multiple provisions including those of LPP2.1	The proposal was considered to meet the intent of this clause and approved accordingly.	The portion of building contained in Centre C2 is unchanged with the exception of building height (addressed separately above).	✓

### Building Height

As noted in **Table 2** above, the development proposes to increase the building height of the ILU building and alter the sixth floor of the RACF building, extending it towards the southern boundary to align with the existing building footprint.

### ILU Building Additional Storey

The ILU building, which is increased by a storey or 3 metres, is located in the Centre C2 zone and considered to meet the provisions of the MDACP since the proposal maintains the community benefits previously approved, as follows:

- Partial creation of a future pedestrian connection between Stock Road and Waddell Road.
- Streetscape upgrades including additional planting, footpath upgrades and the removal of a crossover.
- The proposal being deemed a benchmark development as determined by the Design Review Panel.

The provision of floor space for the local Senior's Citizen's Group was not deemed a community benefit by the City in 2023. However, since 2023 Hall & Prior have proposed a commitment to transferring the two lots they own to the City. Therefore, the City of Melville will have full ownership of the subject site and Hall & Prior will enter into a long-term lease agreement following the completion of the development.

The additional storey is located on the corner of Stock Road and Canning Highway, meaning it will not have an impact on any nearby residential development. The amendment is consistent with the planning framework and can be approved accordingly.

### RACF Sixth Storey Alteration

The alteration to the sixth floor of the RACF building, where three storeys is contemplated within the Mixed Use zone, seeks discretionary approval. The primary consideration in terms of the additional height is a minor increase in overshadowing of southern adjoining properties. The proposed amendments are considered acceptable for the following reasons:

### Bulk and scale

- The extension of the existing approved floor plate does not result in unreasonable bulk or scale onto the southern adjoining properties. The sixth floor remains setback from the southern site boundary 8.8m to the wall, and 7m to the canopy. This results in primarily only the top of the roof canopy being visible from immediately adjoining properties, as demonstrated in **Figures 7 and 8** below.
- The alteration to the uppermost floor maintains an appropriate transition between the proposal and adjoining residential development to the south.
- The alteration maintains high levels of building articulation, in comparison to the building envelope of the MDACP provisions, as shown in red within **Figures 7 and 8** below.
- The two additional suites do not result in a significant increase to internal floor space, meaning the overall volume of the RACF is generally consistent with the intent of the Mixed Use zone.

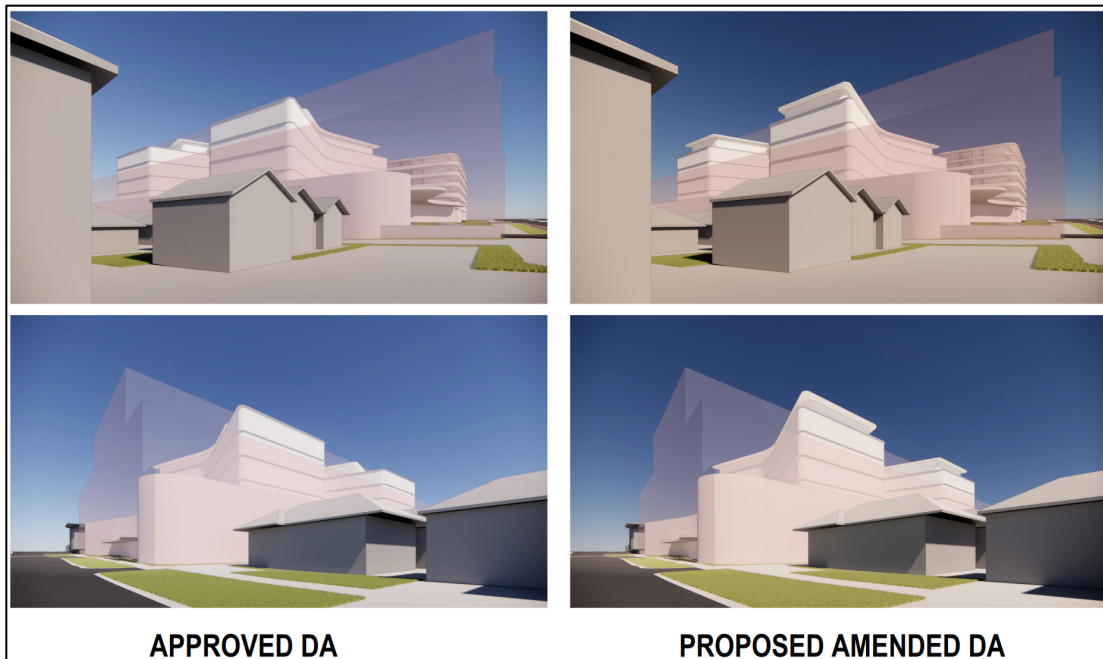


Figure 7: Building Envelope Comparison – Approved design vs Proposed design

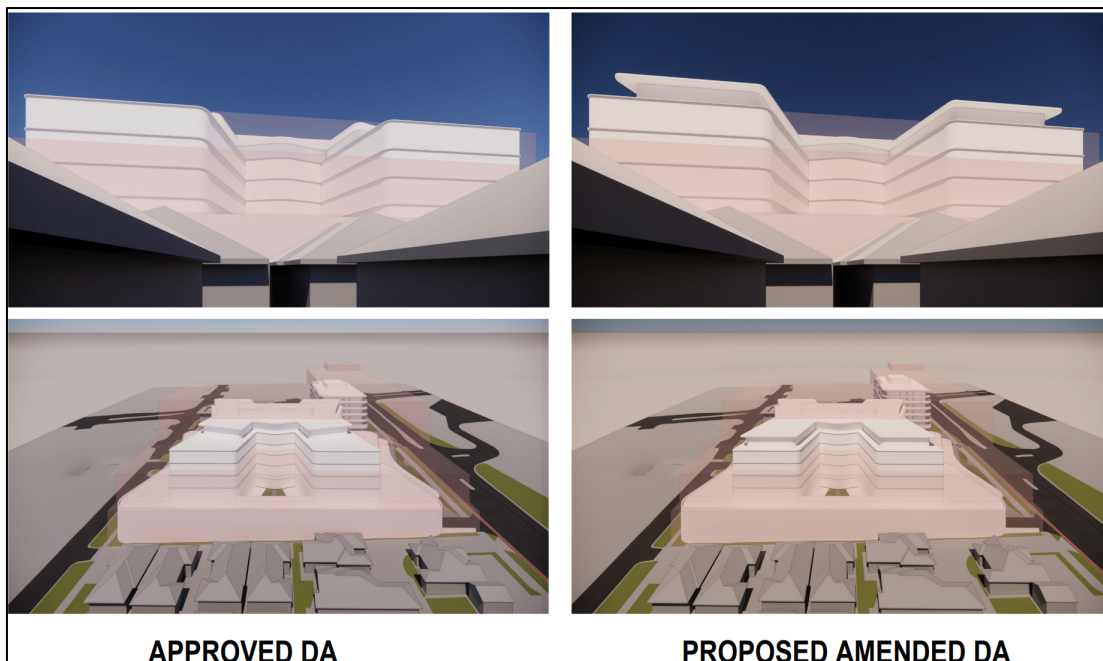


Figure 8: Building Envelope Comparisons - South View

### *Overshadowing to adjoining properties*

- Overshadowing analysis has been prepared by Hassell to support the proposed amendments. The overshadowing diagrams consider the potential additional impact of shadow in June (winter) and December (summer), comparing the proposal against the approved development and the building envelope of a design in accordance with the standards set out in the MDACP (refer Drawing Nos. DA\_050A and DA\_051A within **Attachment 2**).
- As demonstrated in the June overshadowing analysis, there is no greater shadow impact onto the dwellings contained within Nos. 34A-D Waddell Road or Nos. 169A-C Stock Road. Because the coding exceeds R80 there is a nil requirement for overshadowing in accordance with the Residential Design Codes Volume 2.
- In relation to No. 32 Waddell Road (containing four grouped dwellings), the alteration results in a minor increase in shadow cast onto the parent lot in June, as follows:
  - The two dwellings on the western half of the parent lot are most impacted during the morning period. Notwithstanding, the additional shadow predominantly falls onto the roof space of the dwellings and does not adversely impact resident amenity. During the afternoon periods, these two dwellings have unobstructed access to direct sunlight.
  - The two dwellings on the eastern half of the parent lot are most affected during the afternoon period. As above, the additional shadow predominantly falls onto the roof space of the dwellings and does not adversely impact resident amenity. During the morning periods, these two dwellings have unobstructed access to direct sunlight.
  - Given June is the worst-case scenario for overshadowing, each dwelling is considered to maintain access to sufficient levels of direct sunlight in June and throughout the year.
- Regarding 171 Stock Road (containing five grouped dwellings), the alteration results in a minor increase in shadow cast onto the parent lots in June, as follows:
  - The additional overshadowing encroaches into the parent lot from 11am onwards. The shadow is predominantly cast over a communal vehicle access leg and does not fall onto any sensitive habitable spaces.
  - From 3pm, there is some shadow cast onto the north façade of the dwellings. Notwithstanding, the dwellings are considered to achieve sufficient access to direct sunlight for the majority of the day.

In light of the considerations above, the proposed amendments to the RACF building are considered to adhere to the objectives of the local planning framework and are capable of approval accordingly.

### **Car Parking**

In considering the original development application, the City applied the following parking ratios:

- 0.75 bays per ILU
- 1 bay per 4 beds in the RACF; and
- 0.5 bays per staff member.

The parking bays required for the commercial land uses have been applied as per *Local Planning Policy 1.6 – Car Parking and Access (LPP1.6)*, as amended. LPP1.6 required 106 bays (excluding loading/delivery bay) for the commercial land uses. There is no proposed change to the approved commercial land uses or floor space.

Due to the alterations to the number of suites and beds across the development, the proposed amendments result a shortfall in 3 car parking bays.

The TIA Addendum considers the additional occupants and their impact on the available parking and traffic generation in the locality. The parking demand analysis concludes there will be 51 available parking bays during the anticipated busiest period. Therefore, the shortfall of 3 bays is minor and will not significantly impact the amenity of the future occupants or residents within the surrounding area.



Furthermore, condition 25 requires the submission of a Travel Plan prior to occupation. The Travel Plan will support the management of on-site car parking and take up of alternative means of travel.

Regarding traffic generation, the TIA Addendum concludes the proposed amendments will result in a maximum of 34 additional vehicles per day. The anticipated traffic generated from the proposed amendments is minor and will not impact safety or congestion of the existing road network.

In light of the considerations above, the proposed car parking provision is considered acceptable to support the minor variation to parking provision.

## Local Planning Policies

The original development application was considered against the City's local planning policies. **Table 3** considers the proposed amendments against the provisions of the planning policies, where applicable.

**Table 3 – Planning Policy Assessment**

Planning Policy	Comment	Complies
<b>Local Planning Policy 1.3 – Waste and Recyclables (LPP 1.3)</b>	The original application included a WMP which was sufficient. Condition 14 was applied to ensure the WMP was adhered to. An addendum to the approved WMP has been provided outlining the revised waste bins required.	✓
<b>Local Planning Policy 1.4 – Provision of Public Art (LPP 1.4)</b>	Condition 12 was applied to the original approval, requiring the provision of public art. This application does not propose to amend this condition.	✓
<b>Local Planning Policy 1.5 – Energy Efficiency in Building Design (LPP 1.5)</b>	The original application included a sustainability report. The building will be designed to achieve a 5 star Green Star rating. Condition 17 was applied to ensure this is achieved.	✓
<b>Local Planning Policy 1.6 – Car Parking and Access (LPP 1.6)</b>	The car and bicycle parking provision and the access arrangement is unchanged. An addendum to the TIA has been provided to consider the parking demand due to the increase of occupants as a result of the amendments. The addendum confirms that even during the anticipated peak period there will be sufficient onsite car parking.  In addition, Condition 28 was applied to the original approval requiring the submission of a Travel Plan which will outline how demand for onsite car parking is being minimised.	✓
<b>Local Planning Policy 1.8 – CPTED (LPP 1.3)</b>	The proposed amendments do not significantly alter the built form of the approved development. The additional suites proposed result in further passive surveillance opportunities and does not propose any large expanses of blank walls.	✓
<b>Local Planning Policy 1.16 – Flood and Security Lighting (LPP 1.16)</b>	This application does not propose to alter outdoor lighting.	N/A
<b>Local Planning Policy 2.1 – Non-Residential Development (LPP 2.1)</b>	This application does not propose significant alterations to the approved built form. The amendments continue to meet the intent and objectives of this policy.  In addition, Condition 18 was applied to ensure the windows of the ground floor tenancies are visually permeable.	✓
<b>Local Planning Policy 2.2 – Outdoor Advertising and Signage (LPP 2.2)</b>	No specific signage is proposed within this application. Condition 10 of the original approval requires the submission of a signage strategy prior to the installation of any signage. This application does not propose to amend this condition.	✓
<b>Local Planning Policy 1.22 – CMPs (LPP 1.22)</b>	Condition 5 was applied to the original approval, requiring the submission of a CMP prior to lodging a demolition permit. This application does not propose to amend this condition.	✓

## State Planning Policies

The original development application was considered against the relevant State Planning Policies (SPPs). **Table 4** considers the proposed amendments against the provisions of the SPPs, where applicable.

**Table 4 – SPP Assessment**

State Planning Policy	Comment	Complies
<b>State Planning Policy 5.4 – Road and Rail Noise</b>	An addendum to the original Acoustic Report has been prepared in support of the application, which includes an updated traffic noise assessment in accordance with SPP5.4.	✓
<b>State Planning Policy 7.0 – Design of the Built Environment</b>	The amendments do not propose any significant design changes. The amendments are not considered necessary to warrant further review by the City's Design Review Panel as they do not substantially alter the existing approval.	✓

## CONCLUSION

This application seeks approval for minor amendments to the approved mixed-use development. The amendments are necessary to ensure the project is feasible, whilst delivering a high-quality product which will benefit the future occupants of the development and broader community. The amendments do not substantially change the built form.

It is considered the proposal should be favourably determined, on individual merit, recognising the proposed amendments are minor, generally aligned with the previous approval, and are consistent with the applicable planning frameworks.

We therefore respectfully request the application for development approval be considered on its merits and favourably determined under Council discretion.

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

Yours faithfully,



**MATTHEW CAIN**  
**ASSOCIATE**

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