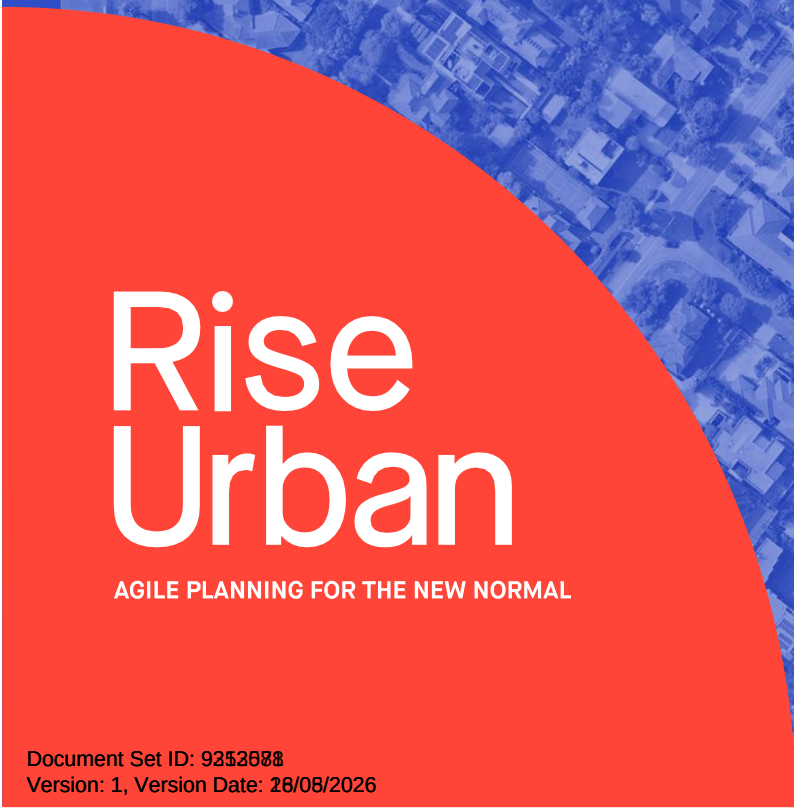




Application for Development Approval –

Rehoboth Christian College – Gibbs Park Precinct,
Maddington



Rise Urban

AGILE PLANNING FOR THE NEW NORMAL

Document Information

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Table of Contents

Executive Summary.....	4
1. Introduction.....	6
2. Site Description and Context.....	8
3. The Proposal.....	10
4. Planning Framework	14
5. Planning Assessment.....	15
5.1 Approval without a Structure Plan.....	15
5.2 Land Use Permissibility	18
5.3 Principles of Good Design.....	20
5.4 Transport, Access and Parking	25
5.5 Planning for School Sites	25
6. Conclusion	30
Appendix 1 –	31
Appendix 2 –	32
Appendix 3 –	33
Appendix 4 –	34
Appendix 5 –	35
Appendix 6 –	36

Executive Summary

Rise Urban, on behalf of Rehoboth Christian College, seeks development approval for Stage 1 of a new private secondary school within the Gibbs Park Precinct in Maddington. The proposal responds to growing enrolment pressure at the College's existing Kenwick and Wilson campuses, both of which are at capacity, and forms part of a staged strategy to establish a third campus on land assembled by the College in the precinct.

Stage 1 relates only to Lots 2, 3 and 4, while future stage works will be pursued separately once land tenure and ownership matters affecting the drainage reserve are resolved.

The subject site occupies a prominent corner location at Maddington Road and Alcock Street and sits within a transitional urban area. The broader precinct has progressively urbanised over time and remains one of the last consolidated precincts in Maddington, making it a logical location for coordinated infill redevelopment. Existing utilities infrastructure is available around the site perimeter, and the dual road frontage provides strong opportunities for access, servicing and pedestrian connectivity.

The proposal is for an Educational Establishment accommodating students in years 10 to 12. Stage 1 includes a two-storey learning block containing general learning areas, specialist facilities such as science laboratories, art, music and food technology spaces, administration, staff areas, canteen facilities, toilets and storage. The development also includes external works comprising car parking, kiss-and-ride bays, on-street parking, bicycle parking, pedestrian paths, a hardcourt, landscaped outdoor areas, fencing, bin storage and servicing infrastructure. The building has been designed as a contemporary facility with a pitched roof and a material palette of glazing, fair faced concrete, and timber-look cladding that responds to the suburban setting.

Access and movement have been planned to support safe and efficient operation of the campus. Two car parking areas are proposed, one accessed from Maddington Road and the other from Alcock Street, with a one-way circulation system to assist with peak school traffic. The proposal also provides 13 kiss-and-ride bays, 10 embayed on-street bays, bus bays, pedestrian links to both frontages and 20 bicycle bays, improving accessibility for students, staff and visitors.

Landscaping is a key component of the design, with retained trees, new shade planting, buffer planting and feature gardens intended to soften the streetscape, improve amenity and support urban cooling.

From a planning perspective, the application has been assessed against the relevant state and local framework, including the Metropolitan Region Scheme, Local Planning Scheme No. 24, SPP 7.0, OP 2.4, Liveable Neighbourhoods and City policies relating to structure plans, parking and design review.

Although the site is in the Urban Development zone and no approved structure plan currently applies, this report demonstrates that orderly and proper planning is not compromised and the development potential of the land is not prejudiced. On this basis, it is open to the City to approve the development on its merits in the absence of a structure plan.

A Concept Subdivision Plan (see **Appendix 3**) shows that the broader precinct can still accommodate a coherent road network, residential subdivision, public open space, drainage infrastructure and future school expansion.



Overall, the proposed Stage 1 development is presented as an orderly, well-designed and strategically located educational use that supports local educational needs while remaining compatible with the future urban structure of the Gibbs Park Precinct.

1. Introduction

Rise Urban, on behalf of Rehoboth Christian College (“**College**”), seeks approval from the City of Gosnells (“**City**”) for the development of a new ‘Educational Establishment’ (i.e., private secondary school) within the Gibbs Park Precinct, Maddington.

The College currently operates from two campuses in Kenwick and Wilson. Both campuses are at capacity, triggering the need for a third campus as proposed on the subject site.

A recent land assembly process has enabled the College to acquire Lots 2, 3, 4, 8, 10 and 21 within the Gibbs Park Precinct, Maddington (see **Figure 1**). This equates to a total land area of approximately 3.41 hectares.

Since acquisition Lots 2, 3 and 4 have been amalgamated into a single lot by a subdivision application (WAPC Ref: 202174). Lots 10 and 21 are subject to a further subdivision application (WAPC Ref: 203021) that is yet to be determined which will amalgamate these into a single lot. These lots are outside of the application area and are subject to a future proposal once land assembly has progressed.

An existing drainage reserve (Lot 33 on Deposited Plan 22762), held in private ownership, currently traverses the subject site and separates Lot 8 from Lots 2 – 4 (see **Figure 1**).



Figure 1 Aerial Photograph of Subject Site (MNGAccess, 14 April 2026)

In light of this, the College intends to develop the proposed secondary school under a staged development strategy to help alleviate enrolment pressure from the existing campuses.



The stages of development include:

- **Stage 1:** Development of a two-storey learning block on the northern portions of Lots 2 – 4. Facilities will include: general learning areas, specialists facilities (e.g., science labs, food studio, art, and music rooms), canteen services, toilets, storerooms and administration rooms. It also includes external works comprising car parking areas, a playing court, and landscaping throughout.
- **Stage 2:** Development of the remainder of the campus on the southern portions of Lots 2 – 4, and Lot 8.

A copy of the College Master Plan is enclosed as **Appendix 1** for ease of reference, as information only. This application relates only to the Stage 1 components as shown on the relevant Development Plans (see **Appendix 2**).

2. Site Description and Context

The Gibbs Park Precinct is located centrally within Maddington, at the interface between established residential development and light industrial land uses. The locality was historically rural-residential in character and has progressively urbanised from the 1970s through to the present day. The Gibbs Park Precinct now represents one of the last consolidated and generally undeveloped landholdings within Maddington.

The subject site comprises Lots 2, 3 and 4 within the Gibbs Park Precinct, Maddington as shown in **Figure 1**, located at the corner of Maddington Road and Alcock Street. The site has a combined area of 21,511m² and forms the Stage 1 landholding for the proposed school development.

A legal description of the relevant landholdings is provided in **Table 1**.

Table 1 Particulars of Certificates of Title

Lot	Diagram	Volume	Folio	Area	Registered Proprietor
2	22762	1235	210	8,090m ²	Association for Christian Education Inc.
3	22762	1235	211	9,384m ²	Association for Christian Education Inc.
4	22762	1235	212	4,037m ²	Association for Christian Education Inc.

As shown by **Figure 2**, Lots 2 and 3 are predominantly open paddocks, while Lot 4 is currently used for residential purposes. A demolition permit for the dwelling on Lot 4 is currently being sought. The site comprises flat scrub land, with levels falling from a high point at the northeast corner (14m AHD) falling to the southwest (12m AHD). There are a number of established trees located within the northern portions of Lots 3 and 4. Two outbuildings are also located within this treed area, one on each of Lots 3 and 4.

It is intended that Lots 2, 3 and 4 are amalgamated prior to commencement of construction. The WAPC granted conditional approval for the amalgamation on 28 November 2025 and the landowner is currently progressing towards condition clearance and issue of title.

Existing utilities infrastructure is present around the edge of the site including power, water, sewer, gas, communications, and fire services.



Figure 2: Aerial Photograph of Subject Site

The site has a dual road frontage, with Maddington Road adjoining the northern boundary and Alcock Street adjoining the north-eastern boundary. A drainage reserve adjoins the site to the south-east, while Lot 1 Maddington Road, a large residential landholding, adjoins the site to the south-west.

The broader Gibbs Park Precinct is generally bound by Maddington Road and Keera Court to the north-west, Alcock Street to the north-east, and Yule Street to the south-east and south-west. The precinct comprises a mix of established residential properties on larger lots, drainage reserves, rights-of-way and undeveloped paddock land. This context reflects the precinct's transitional character and its capacity to accommodate coordinated infill redevelopment.

3. The Proposal

This application seeks approval for works related to the delivery of Stage 1 of the new Rehoboth Christian College. The new campus is intended to accommodate students from year groups 10 – 12.

A summary of the key components of the proposed development is outlined in **Table 2**.

Table 2 Particulars of Land Use Operations

Item	Details
Days of operation	Monday – Friday
Hours of operation	8.00am – 4.00pm
Number of staff (inc. non-teaching staff)	39 members of staff on site each day
Number of students	225
Car parking bays	71 bays, comprising: - 48 x parking bays (including 1 x universal access bay) - 13 x 'kiss & ride' bays - 10 x embayed, on-street bays

Site Preparation and Demolition Works

The development will require site preparation works including the demolition and removal of existing structures, sheds, power poles, fencing, and redundant footpaths.

Tree removal is proposed where necessary (16 trees) to facilitate the building, car parking and associated works. Existing trees identified for retention (41 trees) will be protected during construction and incorporated into the landscape response where practicable.

Building Form and Layout

The main built component of the proposal is a large two-storey building (see **Figure 3**) located on the northern portion of the site with a total internal area of 2,673m². As shown on the submitted plans further buildings are to be located on the subject site in the future, however these will be subject to future planning.



Figure 3: 3D Perspective of Proposed School Building

The main building has been designed to provide a compact and efficient school facility while maintaining a logical relationship with the surrounding access, parking, courtyard and outdoor learning areas.

The building will accommodate a range of teaching, administration, student support and specialist learning functions across two levels. The internal layout is arranged around central corridors that provide clear circulation around the building. Full details are provided in Table 3.

Table 3 Details of Building Facilities

Ground Floor Facilities	First Floor Facilities
• Reception and administration areas • Principal and Deputy Principal offices • Interview and sick bay facilities • General learning areas (classrooms) • Music learning area and associated store and practice rooms • Art studio • Food studio and food preparation area • Canteen • A large covered outdoor area including seating • Student and staff toilets, including universal access facilities • Meeting room • Services, storage and plant areas	• General learning areas (classrooms) • Two science laboratories and science preparation area • Breakout area • Seminar rooms • Staff room • Staff and student toilets • Storage and service areas • Potential for a future pedestrian bridge connecting to later stages of the development.

The two-storey building has a total height of 10.33m with a pitched roof of metal sheeting. Elevations are a combination of glazing, concrete walls, and timber-look cladding. The building design is for a contemporary facility using a material palette that responds to the suburban context of the site. External materials and finishes include:

- Roof: Profiled metal roof sheeting and off-white metal roof fascia. Selected translucent roof sheets over skylights.
- Walls: Fair faced concrete walls, off-white painted blockwork, timber-look vertical battens and cladding.
- Aluminium framed doors and windows with clear glazing in dark frames.

Access, Parking and Movement

The development has been designed to utilise the site's dual frontage to Maddington Road and Alcock Street. The proposed access strategy provides separate and legible movement arrangements for vehicles, pedestrians, cyclists, waste collection and service vehicles.

There are two car parking areas: a northern car park accessed from Maddington Road and an eastern car park accessed from Alcock Street. The northern car park comprises a 22 parking bays and 8 kiss-and-ride bays. The eastern car park comprises 26 parking bays and 5 kiss-and-ride bays. In total 48 on-site parking bays and 13 kiss-and-ride bays are proposed. Access and egress of both car parks is based on a one-way system with the kiss-and-ride areas located inside the lot to minimise congestion and maximise pedestrian safety during peak periods.

New on-street parking bays (10 parking bays total) are provided and bus bays adjacent to the northern car park. These will improve the ability for the campus to manage school traffic during peak times.

Pedestrian access is provided from Maddington Road and Alcock Street, with new footpaths connecting into the existing pedestrian network. Internal pedestrian routes link the car parking areas, street frontages, building entries, hardcourt and landscaped student spaces.

A total of 20 bicycle bays is proposed to the east of the main building, ensuring convenient access for users and supporting active travel access to the campus.

A bin store is located close to the western side of the site next to the northern car park. Waste truck access will follow the one-way system through the northern car park.

External Works

External works form an integral part of the campus and includes a combination of active recreation, informal and landscaped spaces, and circulation. The hardcourt and landscaped outdoor spaces provide recreation opportunities for students during recess and lunch periods, while also supporting outdoor learning. The layout allows for future connections to later stages of the campus as the broader school site is developed.

Key external features are:

- A hardcourt for sports and student recreation.
- A landscaped area between the building and hardcourt as well as to the corner of Maddington Road and Alcock Street. These are for a flexible use comprising a combination of hard and soft landscaping as well as shaded seating areas.
- Pedestrian paths and paved circulation areas that connect into the existing footpath network.

- Site fencing and gates.
- Bin storage and servicing areas.
- New fire boosting assembly.

Landscape Design

A landscape concept has been prepared as a key component of the proposal, with a focus on tree retention where practicable, new shade planting, outdoor student amenity and the softening of the school's street and boundary interfaces.

The landscape package identifies a combination of retained existing trees, proposed new shade trees, native garden beds, buffer planting, courtyard planting, and turf areas. The landscape concept includes:

- Retention and protection of selected existing trees. Existing trees are removed where necessary to accommodate the proposed development.
- New shade trees.
- Internal garden areas.
- Buffer planting to assist with screening and softening of fences.
- Feature garden beds.
- Turfed areas.

Overall, the proposal has been designed to respond to the site's existing treed character whilst also establishing a more structured school environment. It also assists in moderating the visual impact of parking and fencing, improving student amenity, supporting urban cooling and contributing to a more attractive public presentation to Maddington Road and Alcock Street.

Servicing and Waste Management

The proposal includes the servicing infrastructure necessary to support Stage 1 of the school campus, including fire booster infrastructure, electrical services, mechanical plant areas, hydraulic services and bin storage.

The bin store is located to enable service access while maintaining separation from the principal student gathering and pedestrian movement areas. Waste vehicle access has been considered in the architectural access diagrams, with vehicle movement paths shown to confirm that waste collection can occur without compromising the general function of the car parking and access areas.

4. Planning Framework

The following Table provides a summary of the relevant planning and environmental matters considered in support of this application for development approval.

Table 4 Overview of the Planning Framework

Planning Instrument	Description
Local Government Area	City of Gosnells (" City ")
Region Planning Scheme	Metropolitan Region Scheme (" MRS ") Urban
Local Planning Scheme	Local Planning Scheme No. 24 (" LPS 24 ") Urban Development
Structure Plan(s)	N/A
Relevant State Planning Policy / Development Control Policy / Planning Bulletins	- SPP 7.0 Design of the Built Environment - OP 2.4 Planning for School Sites - Liveable Neighbourhoods
Relevant Local Planning Policy	- LPP 1.4 Parking - LPP 3.6 Structure Plans - LPP 4.12 Design Review

The following sections demonstrate how the proposal satisfies key components of the planning framework.

5. Planning Assessment

5.1 Approval without a Structure Plan

The subject site is zoned 'Urban Development' under the City's LPS 24. Under this zone, the development of land would ordinarily proceed in accordance with an approved structure plan. At present, no approved structure plan applies to the subject site.

The absence of an approved structure plan does not, of itself, preclude consideration of the present application on its merits. Importantly, cl. 27(2) of Schedule 2 ("**Deemed Provisions**") of the *Planning and Development (Local Planning Scheme) Regulations 2015* ("**Regulations**") enables the decision-maker to approve an application for development in the absence of an approved structure plan where it is satisfied that it:

- (a) Does not conflict with the principles of orderly and proper planning; and
- (b) Will not prejudice the overall development potential of the subject site.

Accordingly, the central question for this application is whether the proposed development can be supported on the subject site without compromising the coordinated and comprehensive planning of the broader Gibbs Park Precinct.

A Concept Subdivision Plan (see **Appendix 3**) has been prepared to demonstrate that the proposed school can be accommodated within a logical and serviceable urban structure for the Precinct. It provides a useful precinct-scale framework to test whether the school would impede the orderly future planning of the surrounding land. Importantly, it shows that the proposed school can be integrated within a broader subdivision pattern that continues to provide for:

- A defined school precinct and future school expansion area;
- Conventional residential development at R20 and R25 densities;
- Group housing opportunities;
- Public open space equating to 10% of the relevant area;
- Drainage infrastructure; and
- A local road network connecting to Maddington Road, Alcock Street, Yule Street and Keera Court.

The Concept Subdivision Plan therefore demonstrates that the proposal is not being advanced in a manner that sterilises, fragments or otherwise prejudices the future planning of the Precinct. It shows that the school can be accommodated as part of a coherent urban development outcome.

It is also relevant that development approvals have already been granted and implemented within the precinct in the absence of an approved structure plan. Lot 136 Yule Street has an approved development application for a child care premises (DAP/22/02306), with the development appearing to be nearing completion. Similarly, Lot 6 Alcock Street was developed for residential dwellings in 2015, also in the absence of a structure plan. These examples demonstrate that the absence of a structure plan has not previously prevented the City or DAP from approving development within the precinct where the proposal is otherwise capable of orderly and proper planning assessment.

The City's *Local Planning Policy 3.6 Structure Plans* ("**LPP 3.6**") identifies a range of matters relevant to the assessment of development proposals in the absence of an approved Structure Plan.

Table 5 demonstrates that the proposed development is capable of being approved, consistent with the principles of orderly and proper planning, and without prejudicing the overall development potential of the subject site or the broader Gibbs Park Precinct.

Table 5 LPP 3.6 Criteria

Reference	Consideration	Applicant Response
Cl. 3.3(i)	Impedes the eventual achievement of a comprehensive and permeable road network between lots, incorporating consolidated access points to the existing road systems and, if applicable, suitable public access to any conservation and/or recreation reservation.	The proposal does not impede the eventual achievement of a comprehensive and permeable road network. The Concept Subdivision Plan demonstrates a coherent internal road structure, including 15m and 20m road reserves, connecting the Precinct to Maddington Road, Alcock Street, Yule Street and Keera Court. Importantly, the school site is able to be integrated within this broader movement network rather than operating as an isolated or obstructive land use. The surrounding balance land remains capable of being subdivided in an orderly manner with conventional road connections between future lots and adjoining land.
Cl. 3.3(ii)	Impedes the provision of essential services to the site or surrounding area.	The proposal does not impede the provision of essential services. The Concept Subdivision Plan demonstrates a logical urban form in which the school site, residential land, POS and drainage infrastructure can co-exist within a serviceable layout. Importantly, the Project Electrical Consultant, Plexus, has confirmed that the available power supply is capable of accommodating the proposed development.
Cl. 3.3(iii)	Impedes the eventual achievement of consolidated areas of POS.	The proposal does not impede the achievement of consolidated POS outcomes. The Concept Subdivision Plan identifies two areas of POS, providing a total area of 4,146m², equivalent to 10% of the relevant area. This demonstrates that the development of the school site does not compromise the eventual provision of POS, nor will it prejudice the ability to deliver the standard POS contribution expected as part of future urban subdivision.
Cl. 3.3(iv)	Compromises the value or well-being of any environmental feature, including (but not limited to) Bush Forever sites, wetlands, the Canning and Southern Rivers and areas of remnant vegetation.	The proposal is not considered to compromise the value or well-being of any identified environmental features. The placement of buildings and car parking areas within the site has been carefully designed to maximise tree retention. Additional landscaping and tree planting is also proposed, as shown in Appendix 5.

Reference	Consideration	Applicant Response
		In addition, both the College Master Plan (see Appendix 1) and the Concept Subdivision Plan (see Appendix 3) incorporate the drainage network and associated drainage spaces, indicating that water management and land functionality have been considered as part of the overall site and precinct layout. It should be noted that a school campus such as this presents improved opportunities to respect and retain existing trees and vegetation when compared to a typical residential subdivision. The need for additional earthworks, fill, retaining, services and road areas in residential subdivisions make the retention of trees challenging, whereas a larger school campus generates less infrastructure demand and provides greater opportunities for tree retention.
Cl. 3.3(v)	Presents a long-term constraint to the ultimate urbanisation of the area.	The proposal does not present a long-term constraint to the ultimate urbanisation of the area. The Concept Subdivision Plan shows that the balance precinct remains capable of orderly and proper planning, including residential subdivision at R20 and R25 densities, group housing opportunities, POS provision, drainage infrastructure, and an integrated road network. The proposal should therefore be understood as compatible with, and not contrary to, the ultimate urbanisation intent for the precinct.
Cl. 3.3(vi)	Prejudices the operation of a future City-administered contribution arrangement to equalise the cost of providing new or upgraded infrastructure and POS needed to service development.	The proposal is not considered to prejudice the operation of any future development contribution or cost-sharing arrangement. The proposed development does not fragment the land in a way that would prevent future infrastructure planning or the equitable apportionment of costs across the broader Precinct. To the extent a future contribution mechanism is pursued by the City, there remains a coherent precinct structure within which such arrangements can still operate.
Cl. 3.3(vii)	Further fragments landholdings within the precinct.	The proposal does not further fragment landholdings within the Precinct. The College has undertaken a coordinated land assembly process to consolidate ownership of Lots 2, 3, 4, 8, 10 and 21 (see Figure 1), resulting in a combined landholding area of approximately 3.41 hectares. This consolidation assists with the delivery of coordinated planning outcomes.

Reference	Consideration	Applicant Response
		While Lot 33 (drainage reserve) remains in separate private ownership and presently traverses the subject site, the proposed staged development strategy is a practical response to that existing tenure constraint and does not create further fragmentation. The Concept Subdivision Plan demonstrates that a coherent long-term development outcome remains achievable notwithstanding the current staging approach.

5.2 Land Use Permissibility

In the absence of an approved Structure Plan, the Zoning Table of LPS 24 is not directly determinative of land use permissibility in the usual way. In these circumstances, the assessment is more appropriately directed to the following considerations:

- the purpose and intended function of the 'Urban Development' zone under LPS 24;
- the relevant objectives of LPS 24; and
- the purpose of the 'Urban' zone under the MRS.

The following Table demonstrates that the proposed 'Educational Establishment' is capable of being supported on the subject site, in a manner that is consistent with the broader intent and land use objectives of site and does not compromise or prejudice the comprehensive planning the Gibbs Park Precinct.

Table 6 Relevant Planning Objectives

Reference	Objective	Applicant Response
Cl. 22, MRS	To provide for residential development and associated local employment, recreation and open space, shopping, schools and other community facilities.	The proposal is for a school, directly satisfying this objective, as a community facility that is typically associated within an urban and residential context. The proposal will provide a new educational facility to service the College's catchment and respond to existing capacity constraints at its Kenwick and Wilson campuses. The development also includes complementary recreation and open space functions, including a hardcourt, landscaped courtyards, turf areas, shaded student gathering spaces and outdoor learning areas.
Cl. 9(d), LPS 24	Ensure the orderly and proper use and development of land within the City.	The proposal represents an orderly and proper planning outcome as it facilitates the staged redevelopment of a large, underutilised precinct for a use that is compatible with the intended purpose of the precinct.

Reference	Objective	Applicant Response
		Although the site is within the Urban Development zone, where a structure plan is typically required, Section 5.1 of this report demonstrates why the development application can progress in the absence of one. The development has been designed and assessed having regard to the future planning of the broader precinct. The supporting Concept Subdivision Plan demonstrates that the school can be accommodated without sterilising or fragmenting the balance of the precinct, and that surrounding land can still be developed in a coordinated manner with appropriate road connections, residential lots, public open space and drainage infrastructure.
Cl. 9(f), LPS 24	Facilitate the provision of well-coordinated essential services , infrastructure and amenity that meets the needs of the community .	The proposed school will provide a needed education service within the locality and will improve local amenity by converting underutilised land into a purpose-built community and education facility. The proposal will make efficient use of existing urban infrastructure and provide new site infrastructure necessary to support the Stage 1 campus.
Cl. 9(g), LPS 24	Promote the health, safety, convenience , and the economic and general welfare of the community.	The proposal promotes community welfare by providing a new secondary school campus in a location that is accessible to surrounding residential areas, public transport and the broader road network. The design incorporates safe and sustainable access arrangements, provides passive surveillance, and will support student wellbeing, recreation, and social interaction.
Cl. 9(h), LPS 24	Ensure the use and development of land does not result in significant adverse impacts on the physical and social environment.	The proposed school has been designed to appropriately manage its physical and social impacts. The building is set within a landscape-led site response that retains existing mature trees where practicable.

Reference	Objective	Applicant Response
		The built form is two storeys in height and has been designed with a restrained material palette and articulated façades that respond to the site's context. Traffic, access, parking, waste servicing, fencing, lighting and pedestrian movement have been considered as part of the site layout to ensure the school can operate safely and efficiently without unacceptable impacts on adjoining landowners or the surrounding road network.
Table 2, LPS 24	To provide an intention of future land use and a basis for more detailed structure planning in accordance with the provisions of this Scheme.	The proposal is consistent with the intended future urban use of the land and represents a compatible and orderly first stage in the planned urbanisation of the broader precinct.
Table 2, LPS 24	To provide for the progressive and planned development of future urban areas for residential purposes and for commercial and other uses normally associated with residential development.	A school is a use normally associated with residential development and will provide an important community and education facility to support the surrounding catchment. The Stage 1 development has been considered in the context of a broader Concept Subdivision Plan, which demonstrates that the school can be integrated with future stages of the campus, residential subdivision, public open space, drainage infrastructure and a local road network. Accordingly, approval of Stage 1 would not prejudice the future development or subdivision potential of the balance of the precinct.

5.3 Principles of Good Design

Design Principal Statement

A Design Principles Statement, prepared by Parry & Rosenthal Architects, having regard to State Planning Policy 7.0 – Design of the Built Environment (“**SPP 7.0**”), is enclosed as **Appendix 6**.

This describes in detail how the proposal seeks to deliver a high-quality educational campus that responds appropriately to the site context, supports clear and legible access, provides functional and adaptable learning environments, and incorporates landscape, sustainability, safety and amenity considerations into the overall design response.

Design Review

The proposal was presented to the City's Design Review Panel ("**DRP**") on 7 October 2025 for independent design review and feedback in accordance with the City's *Local Planning Policy 4.12 Design Review* ("**LPP 4.12**"). The panel expressed support of the proposed development, pending further attention and/or conditions to be imposed. A copy of the written advice from the City's DRP is enclosed as **Appendix 4**.

Since the design review meeting, the design and master planning for the subject site has been further progressed to address the key issues identified by the City's DRP. The following table summarises the amendments made and demonstrates that the proposal has been materially progressed, with the relevant design matters satisfactorily addressed to the extent that further post-lodgement referral to the DRP is not needed and is unlikely to substantially assist the City's assessment of the application.

Table 7 Key Matters Addressed in Design Review Panel Feedback

Summary	Design Issue	Applicant Response
Street Edge	The subdivision plan should provide a street edge to the school.	Stage 1 of the development provides dual frontage to Maddington Road and Alcock Street. The Subdivision Concept Plan shows that the school expansion over Lot 8 will also provide frontage to Yule Street. There is potential for additional street frontages once future expansion takes place.
Precinct Masterplan	The school masterplan will need to consider the outcome if the land is not assembled and outline how the layout minimises the impact on future residential development opportunities.	The supporting Concept Subdivision Plan demonstrates that, even if further land is not assembled, the balance of the precinct can still accommodate logical residential subdivision, public open space, drainage infrastructure and local road connections. The Stage 1 layout therefore does not sterilise or prejudice future residential development opportunities.
Pedestrian Access	Pedestrian access needs to be well-resolved. Provide a pedestrian access diagram and confirm hierarchies of movement and include clear points of entry/egress and arrival.	This submission includes an access diagram for pedestrians and for access to bicycle parking. Pedestrian access is provided from Maddington Road and Alcock Street, with clear entry points into the campus that connect the street frontage into internal pathways.

Summary	Design Issue	Applicant Response
		Bicycle parking is located on the southern side of the site, accessed from Alcock Street.
Interface	Interface issues are a key consideration, including how the school will present to the street. A fortress fence and moat of parking is a poor urban outcome, and a more responsive approach is needed. Relationships with adjacent neighbours require careful consideration.	Some sections of fencing are required, however this is slightly set back from the site boundary and landscaping is utilised to soften this boundary treatment. The landscape design identifies native buffer planting to screen and soften fencing, feature garden areas at the school entry, shade trees to car parking areas, and retained existing trees that assist in reducing the visual impact of development. The built form, landscaping and access arrangements are intended to create a legible school frontage rather than a purely defensive campus edge.
Internal Courtyard	The DRP supports the creation of a shared square in the school but invites a response that is far more responsive to the context, passive design orientation, and the existing site landscape.	The design of the internal courtyard has been refined since DRP 1. It now works as a series of spaces rather than a single open area. The internal courtyard and covered outdoor area provides the functional core of Stage 1, providing space for students to gather, for informal learning, recreation, extra curricular activities, school functions and community events.
Legibility	The DRP also invite a 'village' response that layers a hierarchy of movement routes and spaces to reinforce legibility, integrate components and also provide breaks to spaces for different groups.	The Stage 1 layout now provides a legible and permeable campus structure comprising the main learning block, covered outdoor area, hardcourt, landscaped courtyards, turf areas, breakout spaces, car parking areas and pedestrian links. The landscape design maps general pedestrian connections through the site and identifies different landscape zones, including buffer planting, gathering spaces, turf, active and passive recreation areas. This supports a more legible "village" structure, with a hierarchy

Summary	Design Issue	Applicant Response
Sustainability	The school should serve as a demonstration of sustainability and biophilic design in response to the local ecology. The architect needs to share and protect. The seeds of this approach are present and require further attention.	of movement routes and differentiated spaces for learning, recreation, gathering and transition. Sustainability and biophilic design are achieved through the retention of existing mature trees where practicable, provision of new shade tree planting, native and waterwise planting, outdoor learning and recreation spaces, and productive garden elements such as herbs and fruit trees. These are detailed in the submitted landscape plans. The Design Principles Statement also identifies passive solar design measures, high-level glazing for natural ventilation, building insulation, high-performance glazing, future rooftop solar potential, shade trees, and drought-tolerant landscaping as part of the sustainability response.
Car Parking	Car park frontage is a common design, but not positive. Consider moving the parking off the street front. Consider connecting with the Community Centre to share parking during peak times.	The car parking arrangement has been reviewed in the context of the operational requirements of Stage 1 and the constraints of the assembled landholding. Car parking remains adjacent to the Maddington Road and Alcock Street frontages to support safe and efficient school access, kiss-and-ride operation and staff / visitor parking. The visual impact of these is mitigated as much as possible through tree provision and verge and edge landscaping. Stage 1 of the school development is not directly adjacent to the community centre. Opportunities for future shared parking management can be explored separately as the campus and broader precinct develop.
Local Context	Expand the narrative on land use and respond to local context/history through the language of the building. This includes ecology, Aboriginal cultural heritage and historic heritage.	The Design Principles Statement sets out the design narrative of the site's semi-suburban setting, residential interfaces, proximity to Bramfield Park Primary School, and light industrial character along Maddington Road.

Summary	Design Issue	Applicant Response
		The architectural response is a contemporary but restrained educational building using durable materials, and landscape integration. The landscape response further reinforces the site's ecological character through retained trees, native and waterwise planting and productive landscape elements. The careful retention of existing trees will serve as a permanent reminder to the original character of the site.
Materials	Develop a material palette that complements the surrounding suburban and parkland context – drawing on natural or muted tones, warm earthy colours, and references to local flora may be a design option.	The material palette has been developed to provide a durable and contextually appropriate school building. The submitted plans identify profiled metal roof sheeting, fair faced concrete walls, timber-look vertical battens, timber-look wall cladding, clear glazing in dark frames, dark grey columns and downpipes, and off-white roof fascia. These materials provide a restrained palette with natural tones and texture, while the timber-look battens and landscape setting soften the built form and assist in integrating the building with the suburban and parkland context.
Existing Vegetation	A detailed tree mapping, along with a clear retention and removal strategy, should be developed, taking into consideration any existing wildlife habitats. Retained or replanted vegetation can help soften site edges, provide noise buffering from traffic and adjacent light industrial uses, and offer visual and acoustic mitigation for residential properties.	The landscape design now includes a tree retention and removal plan identifying existing trees to be retained and protected and trees to be removed. Numerous trees are retained close to the edge of the site helping to soften the site edges. New planting is proposed to complement the retained trees. This will assist in screening fencing, reducing the visual prominence of car parking, improving shading, and provide a landscape buffer between the school and adjoining properties.

5.4 Transport, Access and Parking

A Transport Impact Assessment (TIA) has been prepared by Shawmac in support of the proposed Stage 1 school development. The TIA assesses the internal and external transport implications of the proposal, including traffic generation, intersection performance, parking, vehicle access, servicing, road safety, pedestrian and cyclist access, and public transport availability.

SIDRA modelling was undertaken for the key surrounding intersections. The modelling confirms that all assessed intersections will continue to operate within acceptable capacity during the school peak periods, with adequate capacity to accommodate Stage 1 traffic.

The TIA also confirms that the proposed parking provision satisfies the requirements of the City's Local Planning Policy 1.4, with 71 parking bays proposed across on-site and on-street parking areas. This includes provision for staff / visitor parking, pick-up and drop-off, and student parking.

Vehicle access is proposed via two crossovers to Maddington Road and two crossovers to Alcock Street, with Shawmac recommending that Maddington Road access be restricted to left-turn movements only through appropriate signage, pavement markings and kerb geometry. The TIA confirms that the proposed access points achieve the required sight distances, the parking layout complies with AS2890.1, and swept path analysis demonstrates that waste and emergency vehicles can access and manoeuvre through the site satisfactorily.

In relation to road safety, the TIA finds that the recent crash history of the adjacent road network does not indicate any major safety issue and that the development is not expected to increase crash risk unacceptably. A 40km/h school zone currently applies to part of Alcock Street, and the TIA recommends that the school zone be extended around the school perimeter in consultation with Main Roads WA and the City.

The TIA considers the existing pedestrian network adequate, and the provision of 20 bicycle parking spaces is appropriate.

5.5 Planning for School Sites

Operational Policy 2.4 – Planning for school sites (“**OP 2.4**”) primarily relates to government operated schools but provides useful information on the development of non-government operated schools.

OP 2.4 sets out a number of policy objectives, those relevant to this proposal are assessed in **Table 5** below.

Table 8 Assessment of OP 2.4 Policy Objectives

Policy Objective	Applicant Response
To ensure that school sites are developable, serviceable and have suitable and safe access.	The site is capable of accommodating the proposed Stage 1 in a practical and orderly manner. The land has been assembled and amalgamated for the purpose of establishing the school campus, and is located within an established urban area with access to surrounding services and infrastructure.

Policy Objective	Applicant Response
	The site has suitable access from both Maddington Road and Alcock Street, allowing school traffic, servicing and pedestrian movements to be distributed across two street frontages rather than concentrated at a single point. The proposal is limited to the land that is currently available for development, with future expansion to be addressed through later stages of development.
To ensure that the design and layout of the movement network around school sites provides for safety of pedestrians, cyclists and road users, and encourages active transport.	The access diagrams included in the architectural package demonstrate that car park, waste vehicle, pedestrian and bicycle movements have been considered as part of the site layout. Pedestrian access is available from both Maddington Road and Alcock Street, with internal paths connecting street entries, car parking areas, the main learning block, the hardcourt and landscaped student spaces. Bicycle parking is provided within the campus, supporting active transport by students and staff. Vehicle access is distributed between the northern car park off Maddington Road and the eastern car park off Alcock Street, with kiss-and-ride facilities, on-street parking embayments and bus infrastructure proposed to support safe and efficient school peak-period operation.
To achieve efficient use of land, facilitate supplementary and complementary land uses on site, encourage appropriate adjacent and surrounding land uses and encourage co-location of community infrastructure where feasible.	The proposed school represents an efficient use of a large, underutilised infill precinct within an established urban area. The two-storey built form allows the school to accommodate teaching, administration, specialist learning and student support functions within a compact building footprint, while retaining space for outdoor recreation, landscaping, circulation and future campus staging. The use is appropriate in its context, being located near existing residential areas, Bramfield Park Primary School and the Maddington Community Centre

Clause 3.3.3 of OP 2.4 identifies a desirable site area of 8–10 hectares for non-government secondary schools. The Stage 1 site has an area of approximately 2.15 hectares, with the College's current broader landholding within the Gibbs Park Precinct comprising approximately 3.41 hectares. If the entire masterplan is achieved this would comprise 7 hectares.

While this is below the desirable site area identified by the policy, the 8–10 hectare figure should be treated as a guideline rather than a strict development standard. Clause 3.3.4 expressly contemplates reduced site areas where there is appropriate merit, including where the proposal relates to infill development, unforeseen demand or innovative design. Furthermore, the proposal is for a private school, providing for specific year groups rather than an entire cohort.

The proposal satisfies these criteria as the site is an infill development within the Gibbs Park Precinct, a designated infill precinct, one of the last consolidated and generally undeveloped landholdings in Maddington. Secondly, the proposal responds to an

identified operational need, with the College's existing Kenwick and Wilson campuses at capacity, requiring the establishment of a third campus to accommodate demand. Thirdly, the proposal is innovative in its staged approach and design response delivering a modern school campus on a constrained site. The reduced site area is therefore considered appropriate.

OP 2.4 includes specific provisions relating to transport, access and movement around schools. Clause 3.5.5 addresses parking and set-down arrangements and is satisfied as the on-site car parking and student set-down facilities are provided. These facilities are supplemented by on-street parking embayments and bus infrastructure along the adjoining road frontages, assisting in the safe and efficient management of peak school-period movements. Consistent with Clause 3.5.6, the proposal also prioritises pedestrian and bicycle access through dedicated footpath connections, clearly defined school entries and bicycle parking within the campus, thereby supporting active transport and providing legible access for students, staff and visitors.

Section 3.6 of the policy recommends that common boundaries of schools and residential uses should be avoided where possible. While the school will have some interface with existing and potential residential land, this is capable of being appropriately managed through siting, landscaping, fencing, access design and future staging.

Element 8 of Liveable Neighbourhoods sets out additional policies for the development of schools; these are considered in **Table 6**. It is important to note that Liveable Neighbourhoods is primarily intended to inform the design of new urban communities and does not contemplate scenarios such as this where a school is being retrofitted into a peri-urban area. As such, a number of the requirements of Liveable Neighbourhoods are not directly applicable to this proposal.

Table 6 Assessment of Element 8 Requirements of Liveable Neighbourhoods

Requirement	Applicant Response
R6: A secondary school site should be located on public transport routes and major road frontage with good walking and cycling access.	The site has frontage to Maddington Road and Alcock Street, providing direct access to the surrounding road network. Maddington Road connects to Kelvin Road, which provides broader access to Tonkin Highway and Albany Highway. The site is also accessible by public transport, with bus infrastructure proposed along the Maddington Road frontage and existing public transport services available in the locality. The proposal includes pedestrian connections from both street frontages and bicycle parking within the campus, supporting walking and cycling access for students, staff and visitors.
R8: Variations to the size of schools may occur where: - they are located in an urban centre to accommodate land efficiency; - there is only a portion of a school catchment; and - an interim school is provided.	These requirements are considered in tandem as a reduced size is sought. The proposal is not for a conventional greenfield school, it relies on a reduced footprint on the basis that it is an infill, staged and efficient development within an established urban area. Assembly of sufficient land to meet the

Requirement	Applicant Response
R10: The size of non-government secondary school should generally be as follows: ... 8-10ha for a secondary school.	recommended 8-10ha in this context is extremely challenging and unrealistic. Stage 1 is also limited in its scale and function, accommodating 225 students from years 10-12, rather than a full school population. The development should be considered as a staged campus that responds to immediate enrolment demand, with future expansion intended, as further land assembly and technical matters are resolved.
R19: All of the school site should be usable having regard to: • desirability of a site slope no greater than 1 in 20; • impact of any areas of the site that may require retention for conservation areas (eg wetlands, flora and fauna); • impact of any services easements; and • requirements for noise buffers to primary or integrator arterial routes.	The site is generally flat and capable of accommodating the proposed development. There is no requirement to retain areas of the site for conservation. There is no impact on service easements and no noise buffers are required that would impact the use of the site as a school.
R20: A school should be surrounded by a minimum of three streets, including a neighbourhood connector and a wider access street.	The Stage 1 site has frontage to two existing streets, Maddington Road and Alcock Street. There is potential for further street frontages when the school is expanded.
R21: Schools should not abut more than one neighbourhood connector. Where a school is adjacent to two neighbourhood connectors, the school should also be bounded by two access streets.	The school abuts Maddington Road and Alcock Street. As an infill site it is constrained in this respect, however the school is designed such that access is appropriately managed.
R22: All streets bordering a school should be through streets. Culs-de-sac create congestion at setdown and pick-up times, and should only be considered as an interim measure.	Both Maddington Road and Alcock Street are through streets. There are no culs-de-sac adjacent to the school.
R23: The longest boundaries of the school should be along access streets to maximise the length of the street that can accommodate on-street parking and access to on-site parking.	The longest frontage of the proposal is to Maddington Road. On this frontage there is access to on-site car parking and on-street parking is also provided.
R25: Parking in the surrounding streets should be designed for pedestrian-priority to maximise safety.	The proposal incorporates new pedestrian connections, defined school entries and on-street parking embayments to assist with safe arrival and departure. Pedestrian access is separated and legible, with footpath links from Maddington Road and Alcock Street into the campus.

Requirement	Applicant Response
R26: Streets surrounding schools should accommodate on-street parking, and may need to be designed as special streets (Element 2 movement network) to safely accommodate traffic movement and on-street parking.	On-street parking is proposed along Maddington Road and Alcock Street, totalling 10 bays. The ability to provide on-street parking is limited given this is an established urban area as opposed to a greenfield development, however parking is provided where possible.
R27: As a minimum, on-street parking should be provided adjacent to the proposed location of school site buildings.	
R28: The street network surrounding the school should facilitate short, safe and direct trips for pedestrians and cyclists. Specific safe routes to schools should be identified and detailed to encourage non-car journeys to schools.	The proposal provides pedestrian access from both Maddington Road and Alcock Street, connecting street frontages to internal pathways. Bicycle parking is also provided within the campus, supporting active transport.
R31: School sites, particularly primary and/or middle schools sites, should generally not be located in larger neighbourhood or district and regional centres.	The site is not located within a larger neighbourhood, district or regional retail centre.

Overall, the proposal is considered to broadly align with the intent and requirements of OP 2.4 and Liveable Neighbourhoods wherever applicable.

6. Conclusion

The proposed Stage 1 development for Rehoboth Christian College is suitably located, well considered in design, and capable of being delivered without prejudicing the orderly future development of the broader Gibbs Park Precinct. The application demonstrates that the school can be accommodated consistently with the planning intent of the 'Urban Development' zone of LPS 24, and the zoning of the MRS despite the absence of an approved structure plan.

The proposal responds positively to its context through a compact two-storey built form, clear access and servicing arrangements, integrated landscaping, and a movement network that supports pedestrians, cyclists, vehicles and waste servicing. It also preserves the opportunity for coordinated future subdivision and urbanisation of the precinct, including road connections, public open space, drainage infrastructure and future campus expansion.

Overall, the development represents an orderly and proper planning outcome that meets the requirements of the relevant planning framework and will provide a needed educational facility for the College and the locality while maintaining flexibility for the future planning of the Gibbs Park Precinct.

Appendix 1 –

Rehoboth Christian College Master Plan



Appendix 2 –

Proposed Development Plans



Appendix 3 –

Concept Subdivision Plan



Appendix 4 –

Design Review Panel Feedback (7 October 2025)



Appendix 5 –

Landscape Schematic Design



Appendix 6 –

Design Principle Statement

