Development Application Report

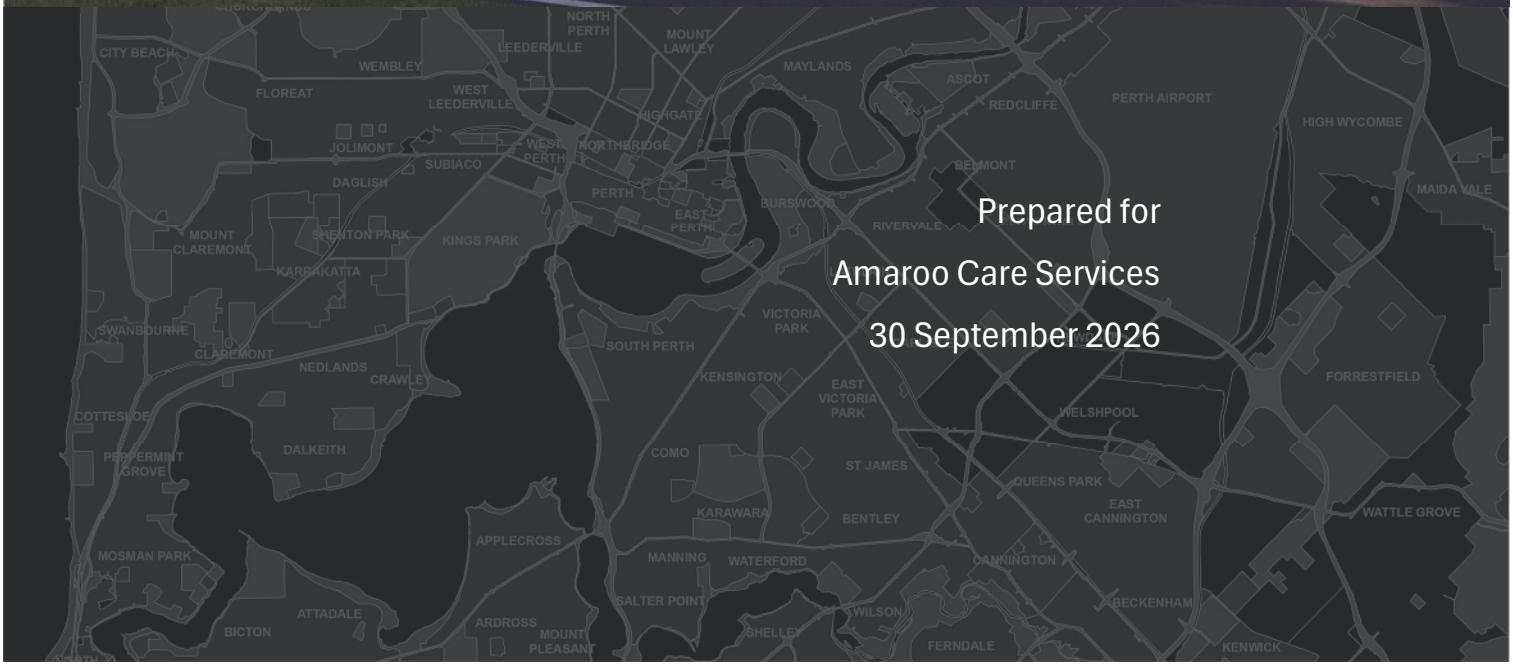
Independent Living Complex and Residential Aged Care Facility

Lot 20 (2) Hamilton Court and Part Lot 200 (73) Dorothy Street, Gosnells WA 6110

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Prepared for

Amaroo Care Services

30 September 2026

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1 PRELIMINARY

1.1 Introduction

Planning Solutions acts on behalf of Amaroo Care Services Ltd, the registered proprietor of Lot 20 (2) Hamilton Court and Lot 200 (73) Dorothy Street, Gosnells.

Planning Solutions has prepared the following report in support of an application for development approval on Lot 20 and Part of Lot 200 (**subject site**). The application relates to a proposed Independent Living Complex and a Residential Aged Care Facility. This report will discuss various matters pertinent to the proposal, including:

- Background.
- Site details.
- Proposed development.
- Strategic planning framework.
- Statutory planning framework.

The application seeks approval for the redevelopment of part of the site to enable an expansion of the existing village and caring centre. This proposal represents Stage 1 of a broader masterplanned redevelopment of the site.

The current application relates solely to Stage 1, with any future stages to be subject to separate development applications. Stage 1 includes the relocation of the existing substation, the demolition of unused car park, and the construction of two new blocks of buildings (one comprising the Independent Living Complex and one comprising the Residential Aged Care Facility), as well as associated landscaping, access and parking.

1.2 Demand Analysis

Western Australia's population is ageing rapidly, with the number of people aged 85+ forecast to rise by around 86% by 2031, according to the Western Australian Planning Commission. This is driving strong demand for age-appropriate seniors housing, which research by National Seniors Australia suggests is undersupplied.

Aged care capacity is also under strain, with a clear demand for such services across the metropolitan area of Perth. A further 2,700 aged care beds are expected to be needed across Perth and WA by 2030, with few providers positioned to meet this demand.

2 BACKGROUND

2.1 Pre-lodgement consultation with the City of Gosnells

A pre-lodgement meeting was held with officers of the City of Gosnells (**City**) on 29 June 2026 to discuss the proposed development, approval pathway and application requirements. During these discussions, the project team presented the development concepts and the high-level planning considerations related to the proposal.

The proposal was generally well received by City officers. Officers acknowledged the design rationale was underpinned by the masterplan and commended the proponent in the presentation of a well-resolved development design.

Key matters suggested for consideration were:

- Pre-lodgement Design Review Panel
- Ground floor tenancy specific land use (removed following the discussions with the City)

2.2 Design Review Panel

The development proposal was presented to the City's Design Review Panel (**DRP**) for initial review on 18 August 2026.

The DRP acknowledged support for early engagement and presentation to the DRP prior to the lodgement of a development application and provided comments on the proposal, its strengths, and opportunities for further refinement of the proposed development.

Following Design Review 1, the DRP minutes (refer to **Appendix 1**) confirmed that the proposed development included the following key strengths:

- *Strong, comprehensive presentation covering all 10 principles. Clear alignment with Amaroo masterplan and an encouraging first delivery of first part thereof.*
- *An attractive cornerstone to Amaroo's transformation.*
- *Massing fits context; large setbacks, arrangement of building and moderated massing.*
- *Rear-sleeved parking is well contained and improves streetscape.*
- *Assisted Living entry well placed on Hamilton Court.*
- *Robust landscape strategy: deep soil, retained trees, new planting.*
- *Native species palette; softened street interfaces and focus on biodiversity.*
- *Solid ESD direction: all-electric, PV, water reuse, EV charging.*
- *Efficient Assisted Living planning; generous floor to floor heights.*
- *Strong resident amenity.*
- *Well-articulated elevations.*

The DRP provided a range of potential design recommendations for consideration in the final design. The following summary recommendation was provided following DRP 1:

- *Design development of the west pedestrian link.*
- *Hamilton Court pedestrian path could be wider and more public-friendly.*

- *Respite care entry lacks legibility; improve wayfinding.*
- *Landscape Plan needs more detail (understorey, ground materials, on-structure planting).*
- *Renders under-represent tree canopy.*
- *ESD strategy needs additional detail (PV, water capture, EV chargers).*
- *Communal lounges small; consider enlarging.*
- *Strengthen vertical rhythms on Eudoria Street façade.*
- *Improve passive surveillance of car park/accessways.*
- *Public Art Strategy needed; encourage bold contemporary outcomes.*
- *Explore front-yard opportunities for Eudoria Street units.*
- *Waste Management Plan required.*
- *Substation relocation unresolved.*

In response to recommendations made by the City's DRP, the proposed development has been subject to a range of design updates to address and respond to the DRPs commentary. Key design modifications in response to DRP recommendations are outlined in **Appendix 3**, DRP Responses.

As confirmed by the DRP, the project is largely consistent with the principes set out by *State Planning Policy 7 – Design of the Built Environment* (**SPP7.0***)*. The recommendations of the DRP have been reviewed and considered by the project team, with modifications integrated into the proposed design, where practical.

3 SITE DETAILS

3.1 Land description

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

Table 1: Lot details

Lot	Deposited Plan/Diagram	Volume	Folio	Area (m^2)
20	D 66973	2076	469	5,261
200	DP 414640	2971	875	69,300

There are four (4) easements listed on the Certificate of Title for Lot 200. The easements are not deemed to be impacted by the proposed development. No notifications are listed on the Certificate of Title for Lot 20.

Refer to for a copy of the Certificates of Title and Deposited Plan/Diagram.

3.2 Location

3.2.1 Regional context

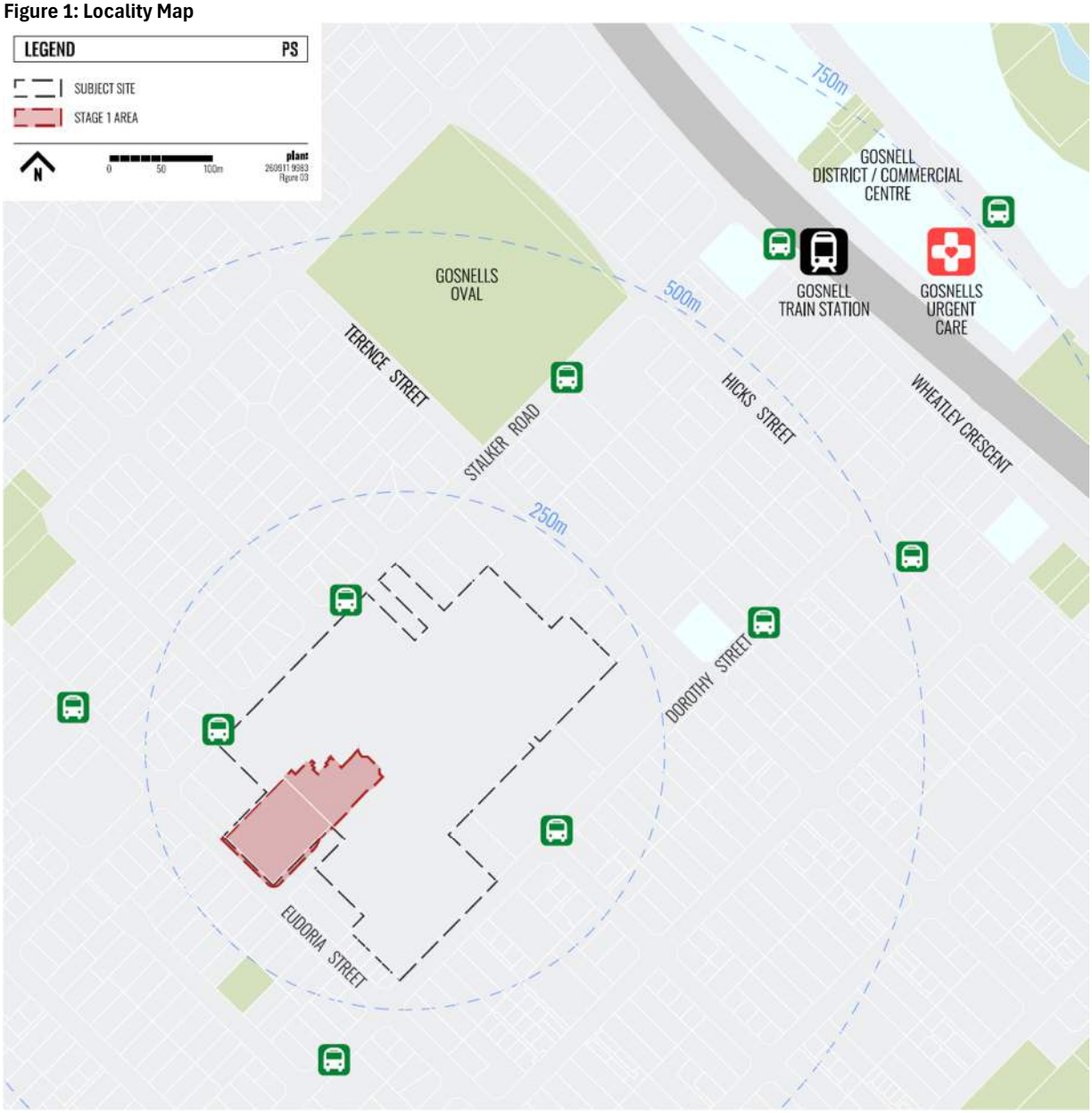
The subject site is located within the suburb of Gosnells, with the local government being the City of Gosnells. It is situated approximately 17.9 kilometres south-east of the Perth city centre, 2.8km south-east of the Maddington Strategic Centre, and 650m south-west of the Gosnells District Centre.

The site benefits from strong regional connectivity due to its proximity to multiple public transport services. The site is well served by rail, with Gosnells train station located 500m north-east of the site, providing convenient connectivity to the local and wider regional area. There are several bus services running along Dorothy Street and Stalker Road, connecting the subject site to Thornlie, Cockburn and the wider Gosnells area.

Albany Highway, Tonkin Street and Corfield Street provide excellent road connectivity to the wider metropolitan region.

The surrounding area features a range of key land uses, services, and facilities, including Gosnells Oval, multiple public open space areas, supermarkets, and health services, contributing to a well-established and highly accessible environment.

Figure 1: Locality Map



3.2.2 Local context, land use and topography

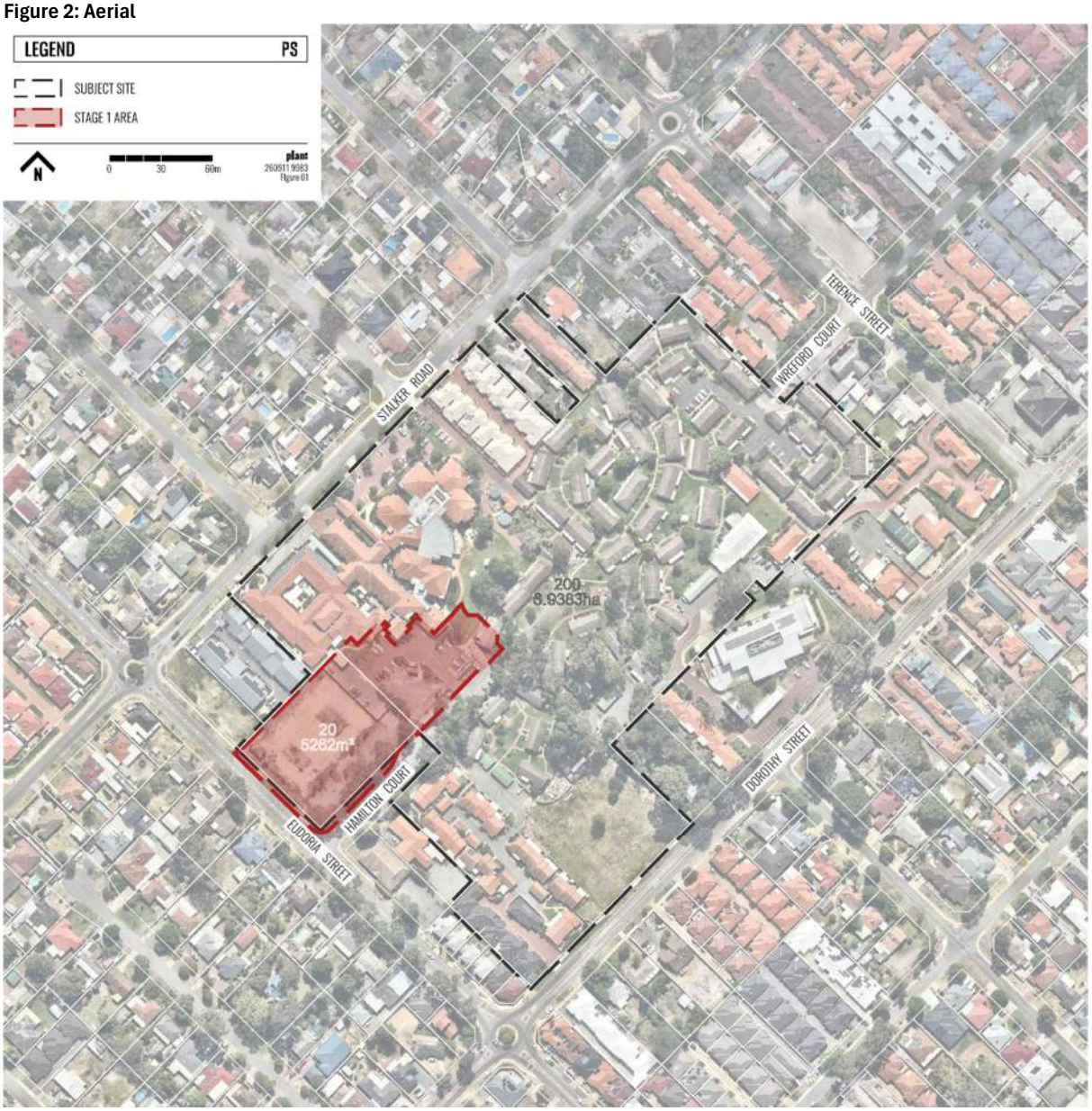
The broader site comprises two landholdings of approximately 7 hectares consisting of the Gosnells Village and Buckley Caring Centre. The site contains a range of spacious one, two and three-bedroom villas within the retirement village component, as well as 128 residential aged care beds (including 36 support units) as part of the Buckley Caring Centre, which offers a high quality care to those who are no longer able to live in their own home.

The site contains a number of buildings with varying typologies, some of which are interconnected, forming part of the existing and operational Amaroo model (**Figure 1**).

The Stage 1 area consists of approximately 5,300m^2 of currently vacant land following the demolition of the former Gosnells Family Hospital in 2023, an existing electrical substation, existing unused car parks, and rows of trees along Hamilton Court.

Outside of the site, the immediate context mainly consists of single and grouped dwellings, with residential density increasing closer to the Gosnells train station and district centre.

Figure 2: Aerial



4 PROPOSED DEVELOPMENT

4.1 Development Summary

This application seeks development approval for Stage 1 of the proposed redevelopment of Amaroo site. The Stage 1 development comprises the construction of the following:

- a 4-storey Independent Living Complex (**ILC**) building featuring 40 apartments;
- a 3-storey Residential Aged Care Facility (**RACF**) comprising 36 aged care beds;
- upgrades to the existing vehicle access from Eudoria Street and internal circulation arrangements;
- new resident, staff and visitor parking (including additional separate car park area to the south-east of the new buildings, and a new crossover to Dorothy Street);
- landscaping; and
- associated services.

As part of the Stage 1 development, it is also proposed to relocate existing Amaroo internal bus stop in line with the masterplan, as it is currently not well integrated into the site and is not currently accessible via a pedestrian footpath. The existing electrical substation on the south-western corner will be relocated, in line with advice from an electrical engineer and discussions with Western Power.

It is also important to note that existing residences will remain occupied during construction.

Landscaping will retain the majority of the existing trees on-site, together with new plantings as part of the overall landscape strategy.

4.1.1 Use

Lot 200 is currently occupied by the Gosnells Village and Buckley Caring Centre, which features an Independent Living Complex / Retirement Village component with a range of spacious one, two and three-bedroom villas, and a Residential Aged Care Facility component with 128 residential aged care beds (including 36 support units). The proposal seeks to retain and continue these uses within Lot 200, and approval for them to establish within Lot 20.

There are two components proposed as part of this development application: Independent Living Complex (western building) and Residential Aged Care Facility (eastern building). Refer to **Sections 6.3 and 6.4** for further detail.

4.1.2 Masterplan and site redevelopment

The majority of the existing buildings on site are more than 30 years old, with several exceeding 50 years. These ageing buildings are approaching the end of their operational life and no longer meet contemporary standards, presenting a clear opportunity for redevelopment to meet contemporary aged care standards and community needs.

The site is a substantial two-lot landholding comprising the existing Amaroo Buckley Caring Centre, the Nancye Jones Centre, the Amaroo Clubhouse, housing stock and areas of vacant land. Its scale and configuration make it well suited to staged redevelopment, while its current use and location facilitate more intense development.

A masterplan (non-statutory) has been prepared for the long-term redevelopment of the site, identifying a staged approach across four development zones delivering a mix of residential apartments and residential aged care accommodation, supported by communal and recreational facilities. It is structured around a central pedestrian link connecting Eudoria Street to Terence Street, with retained mature trees, communal garden spaces, and key existing buildings integrated into the design.

Refer to **Appendix 5**, Design Report, for a copy of the Masterplan.

4.1.3 Development particulars

A detailed summary of the Stage 1 development is provided in **Table 2** below. Refer to **Appendix 4**, Development Plans, and **Appendix 5**, Design Report, for further details.

Table 2: Development description

Element	Description	
	Independent Living Complex	**Residential Aged Care Facility**
Use	• Independent Living Complex (south-western building)	• Residential Aged Care Facility (north-eastern building)
Yield	• 40 two-bed apartments	• 36 beds
Height	• 4 storeys (13.8m)	• 3 storeys (10.5m)
Setbacks	*Hamilton Court (front boundary):* • 4.5m-7m *Eudoria Street (side boundary):* • 9m-12m *North-western (rear boundary:* • 7m Building separation: • 7.5m from proposed Residential Aged Care Facility	*Hamilton Court (front boundary):* • 7m Building separation: • 7.5m from proposed Independent Living Complex • 8m from existing Buckley Building
Pedestrian entry	Main entry from Hamilton Court and another resident entry from the at-grade car park	Main entry from Hamilton Court
Parking	45 total bays, including: • 40 resident car bays (1 per apartment) • 4 EV charging bays • service bay	17 total bays, including: • 12 staff car bays within the Stage 1 boundaries • 3 service bays (existing retained) • 2 drop-off bays • Bus parking zone
	6 visitor bays | A separate staff car park off Dorothy Street comprising 41 car bays	
Landscaping	• A deep soil area of 1,667m^2 (16% of the 8,320m^2 site) • Main pedestrian entry configured around existing trees • Existing trees in majority to be retained, with new plantings proposed • Native planting list	
Levels		
Ground	• 7 two-bedroom apartments and associated terraces • Entry lobby • Circulation (stairs, lifts and corridors) • Plant • Back of house support areas	• 12 beds with ensuites • Dining/lounge area and associated terrace • Sitting area • Nurse station • Entry and reception • Circulation (stairs, lifts and corridors) • Bin store

Element	Description	
Upper	Levels 1-3, each comprising: • 11 two-bedroom apartments and associated balconies • Sitting area • Back of house support areas • Circulation (stairs, lifts and corridors) • Plant	Levels 1-2, each comprising: • 12 beds with ensuites • Plants • Balconies • Dining/lounge area and balcony • Sitting areas • Nurse station, back of house support areas and servery • Circulation (stairs, lifts and corridors)

4.2 Built form

The development is a high-quality, contemporary architectural design that will serve as a purpose-built facility within the site. The proposed buildings have been designed in a contextual and site-responsive manner, with the existing context guiding proposed materiality, finishes and colours. The development incorporates red/terracotta blockwork, neutral colour textured paint, grey/sage powdercoat aluminium finish, dark grey colorbond metal cladding,

The development supports higher density, diverse living opportunities in an area that lends itself to this type of redevelopment opportunity. The Stage 1 development provides high level of amenity to future residents by developing a series of communal spaces across different levels that allow for resident interaction within the RACF building, as well as the provision of generous private balconies for the ILC apartments. These will support social engagement and enhance resident amenity. The design outcome at ground level includes significant landscaping opportunities around the buildings and a legible pedestrian pathway along Hamilton Court. RACF resident lounges, outdoor terraces and ILC balconies are provided across all levels, and are oriented towards the Eudoria Street and Hamilton Court interfaces to provide activation and passive surveillance to the public realm.

Overall, the proposal delivers a well-integrated development that balances resident amenity with a considered street presence. The combination of internal layout, landscaping and passive surveillance to the public realm supports a high-quality living environment consistent with the Amaroo portfolio.

Refer to **Appendix 4**, Development Plans.

4.3 Landscaping

The landscaping strategy envisages a landscape environment of clear legibility at street level, focusing on species suited to local conditions to deliver increased canopy cover and tree planting within the car park and along verge areas.

Substantial planting is proposed along the site's boundaries and key interfaces, including the Eudoria Street and Hamilton Court frontages, to create a high-quality visual edge and soften the building's presentation to the streets. Outdoor terraces and balconies will also incorporate landscaping and planter boxes to enhance amenity and privacy.

The landscape strategy for the development proposes:

- A deep soil area of 1,615m^2 (16% of the Stage 1 area).
- Main pedestrian entry configured around existing trees.
- The retention of 10 existing large trees within the site and along Hamilton Court, the planting of an additional 10 medium trees, and additional small trees.
- A native planting list emphasising sustainability.

- Garden bed footprint and brick wall screening from carparking for residents.
- New sitting area under tree canopy along Hamilton Court.
- Ground planting under and opportunities for outdoor deck options under tree canopies.

A Landscaping Plan has been prepared to demonstrate the intended landscape strategy, as well as planting typology for the proposed development.

Refer to **Appendix 6** for a copy of the Landscape Plan.

4.4 Access, parking and traffic management

4.4.1 Pedestrian access

Primary pedestrian access to the ground floor of the ILC building is proposed via a principal entry located on the south-eastern corner, from the Hamilton Court elevation. The existing footpath along Hamilton Court will be upgraded and extended, and a dedicated pedestrian pathway will provide a direct connection from the footpath to the new building. A secondary resident entry is also provided from the at-grade car park at the rear.

Main pedestrian entry to the RACF building will be from the north-western corner, opposite the proposed drop-off bays and internal bus stop.

Both buildings will be connected by a corridor link across all levels.

4.4.2 Vehicle access

Vehicular access to the site is afforded via the following:

- The existing crossover on Eudoria Street will be widened and upgraded. It will continue to operate as a two-way access and provide vehicle access to back-of-house and at-grade rear car park through a secure access gate and driveway.
- A new crossover along the Dorothy Street interface, adjacent to the existing buildings on Lot 200, which provides access to additional staff parking south of the Stage 1 development site.
- Access from Hamilton Court will be retained and will provide access to the RACF frontage, including the visitor parking, pick-up/drop-off area and dedicated bus parking zone.

4.4.3 Parking

A total of 109 car bays will service the Stage 1 development, including:

- 40 resident bays for the ILC residents within the at-grade car park;
- 4 EV charging bays within the at-grade car park;
- 12 staff bays for the RACF component within the at-grade car park;
- 2 pick-up/drop-off bays;
- 1 new service bay for the ILC, and 3 existing service bays for the RACF to remain, also within the at-grade car park;
- 6 shared visitor car bays are also provided behind the secure gate to Hamilton Court into the site's internal road; and
- An additional 41 staff parking spaces south-east of the development area.

The proposal will require removal of 29 existing car bays, which have been historically used for staff parking. These displaced spaces will be replaced as part of the new Dorothy Street staff car park, together with additional parking required to support the proposed development.

A Transport Impact Statement (**TIS**) has been prepared for the proposed development, addressing transport related matters including vehicle access and egress, traffic generation and distribution, and car parking. The TIS demonstrates the surrounding road network will be able to accommodate the proposed development and its associated traffic generation.

Refer to **Appendix 7**, Transport Impact Statement.

4.5 Sustainability

The proponent is committed to designing and constructing buildings that minimises environmental impact, promote the wellbeing of residents, and contribute positively to the community.

Existing large tree canopies, specifically along Hamilton Court, will be retained and managed throughout construction. New tree canopies will be placed along Eudoria Street and within the resident/staff parking zone, increasing the overall landscape provision and quality of the site.

A Sustainability Report has been prepared in support of this application which outlines the sustainability initiatives proposed to enhance the development's environmental performance. The report identifies sustainability initiatives considered for inclusion in the design.

Sustainable initiatives include:

- Low 'e' neutral glazing, LED lighting, high efficiency HVAC and hot water, lift standby mode
- Hot water, space heating and cooking all provided by electricity-based systems
- Approximately 30 kW grid-integrated array across more than 200 m^2 of nominated roof area
- 5 Star WELS taps, 4 Star WELS toilets, 3 Star WELS showers
- Stormwater management plan addressing pollution runoff and flooding
- Extensive metering of all major end uses of energy and water, in keeping with NCC Section J
- Light-coloured roofing at 0.32 solar absorptance, existing trees retained and additional planting
- General, comingled recycling and a third stream such as FOGO
- Future provision for EV chargers – switchboard spatial capacity and conduits, with load management software

Refer to **Appendix 9**, Sustainability Report.

4.6 Waste

A Waste Management Plan (**WMP**) has been prepared in support of the proposed development. The WMP considers estimation of general waste volumes and recommendations for appropriate collection, storage, handling and management of waste and recycling for the development. The development proposes the relocation of the existing bin store to a dedicated bin store area adjacent to the RACF component.

The bin store is able to accommodate 1 x 1,100L and 5 x 240L refuse bins, collected twice each week; and 1 x 1,100L and 5 x 240L recycling bins, collected twice each week. A private contractor will service the development onsite, directly from the modified loading area. The private contractor's waste collection vehicle will enter and exit the site in forward gear via the existing driveway off Eudoria Street. Managers/caretakers will oversee the relevant aspects of waste management.

Access for the private contractor's waste collection vehicle has been assessed by qualified traffic engineers and is addressed within the accompanying TIS. The WMP confirms that the proposed development provides sufficient bin storage and adequate bins to service the site for refuse and recycling, and that servicing of the bins by the private contractor can be adequately achieved without adverse impact on the site or the local street network.

Refer to **Appendix 8**, Waste Management Plan.

5 STRATEGIC PLANNING FRAMEWORK

5.1 Local Planning Strategy

The City of Gosnells Local Planning Strategy (**Strategy**) was endorsed by the Western Australian Planning Commission (**WAPC**) on 27 August 2025. The Strategy recognises that the City's ageing population will increase demand for a range of dwelling types, including retirement villages and nursing homes, as the number of residents aged over 65 continues to grow. This points to increasing demand for smaller, more diverse dwelling typologies, including assisted living and aged care, consistent with the kind proposed as part of this development.

In recognition of this need, LPS24 has introduced 'Residential Aged Care Facility' as a new land use category, consistent with the WAPC Position Statement 'Residential Accommodation for Ageing Persons'. Independent Living Complex is also identified under Strategy No. 22 of the Strategy as a use proposed for future recognition within the local planning scheme.

The Strategy further supports the intensification of residential development close to public transport nodes and community infrastructure. The subject site is well positioned in this regard, being located within 500m of the Gosnells train station and Gosnells District Centre. Specifically, the Strategic Plan Map identifies the site as capable of accommodating medium density residential development.

The proposed development is generally consistent with the strategic direction established by the Strategy, particularly its recognition of the City's ageing population, support for diverse housing outcomes, and its focus on more intense development in proximity to public transport.

6 STATUTORY PLANNING FRAMEWORK

6.1 Metropolitan Region Scheme

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

The subject site is not affected by land reserved by the MRS, nor is it subject to any resolution or declaration made under the MRS.

6.2 State Planning Policies

6.2.1 State Planning Policy 7.0 – Design of the Built Environment

State Planning Policy 7.0 Design of the Built Environment (**SPP7**) is the lead policy that elevates the importance of design quality, and sets out the principles, processes and considerations which apply to the design of the built environment in Western Australia, across all levels of planning and development.

SPP7 establishes a set of ten 'Design Principles', providing a consistent framework to guide the design, review and decision-making process for planning proposals. These principles guide the DRP.

Silver Thomas Hanley has prepared a detailed design report, having regard to the ten design principles, and feedback through the DRP process. The proposed development provides design outcomes which are consistent with the intent of SPP7 and therefore warrants support accordingly.

Refer to **Appendix 5**, Design Report.

6.3 Other relevant State policies and/or guidelines

6.3.1 Position Statement: Residential Accommodation for Ageing Persons

The Western Australian Planning Commission's (**WAPC**) Position Statement: *Residential Accommodation for Ageing Persons* (released March 2024) outlines requirements to support the provision of appropriate residential accommodation for ageing persons within Western Australia's local government planning framework.

The Position Statement encourages the provision of appropriate supply and diversity of residential accommodation options to meet the needs of an ageing population. It also recommends that local planning schemes incorporate clear land use definitions to support this objective. In particular, the following definitions are relevant:

> **Residential Aged Care Facility**:
>
> *A residential facility providing personal and/or nursing care primarily to people who are frail and aged or dependent persons which, as well as accommodation, includes:*
>
> *a) appropriate staffing to meet the nursing and personal care needs of residents*
>
> *b) meals and cleaning services*
>
> *c) furnishings, furniture and equipment.*
>
> *This may consist of multiple components that include communal amenities and facilities for residents and staff that are incidental and ancillary to the provision of such accommodation, residential respite (short-term) care, and/or an independent living complex, but does not include a hospital, rehabilitation or psychiatric facility.*

Independent Living Complex:

A development with self-contained, independent dwellings for aged or dependent persons together with communal amenities and facilities for residents and staff that are incidental and ancillary to the provision of such accommodation, but does not include a development which includes these features as a component of a residential aged care facility

The Position Statement further advises that, where applicable, the Residential Aged Care Facility and Independent Living Complex land uses should be classified as 'P' (permitted) uses within Residential zones under local planning schemes. A discretionary classification ('D' or 'A') should only be applied where supported by appropriate planning justification relating to orderly and proper planning or locational considerations.

Overall, residential aged care facilities and independent living complexes are strongly encouraged within residential zones to support ageing-in-place and community integration outcomes.

The proposal is consistent with the Position Statement, as it facilitates the redevelopment of an existing ILC and RACF within an existing site, located in a Residential zone. The facility incorporates appropriate staffing arrangements to support the care needs of aged care residents, together with essential services and facilities including dining areas, communal spaces, and associated amenities. The design supports a high standard of living for residents through the provision of purpose-built accommodation in an appropriate and accessible location.

6.3.2 Residential Design Codes

The Residential Design Codes (**R-Codes**) provide planning and design provisions for residential development across Western Australia.

We note that the R-Codes are not strictly applicable to this proposal, as the development is classified as an Independent Living Complex and Residential Aged Care Facility. Notwithstanding, an assessment against the relevant provisions of the R-Codes (as set out in the City's planning scheme) is provided under **Section 6.4.3** of this report.

6.4 Local Planning Scheme

The local planning scheme applicable to the subject site is the City of Gosnells Local Planning Scheme No.24 (**LPS24**). The provisions of LPS24 are supplemented by the **deemed provisions** at Schedule 2 of the *Planning and Development (Local Planning Schemes) Regulations 2015*. Where a deemed provision is inconsistent with a provision of LPS24, the deemed provision prevails.

6.4.1 Zoning

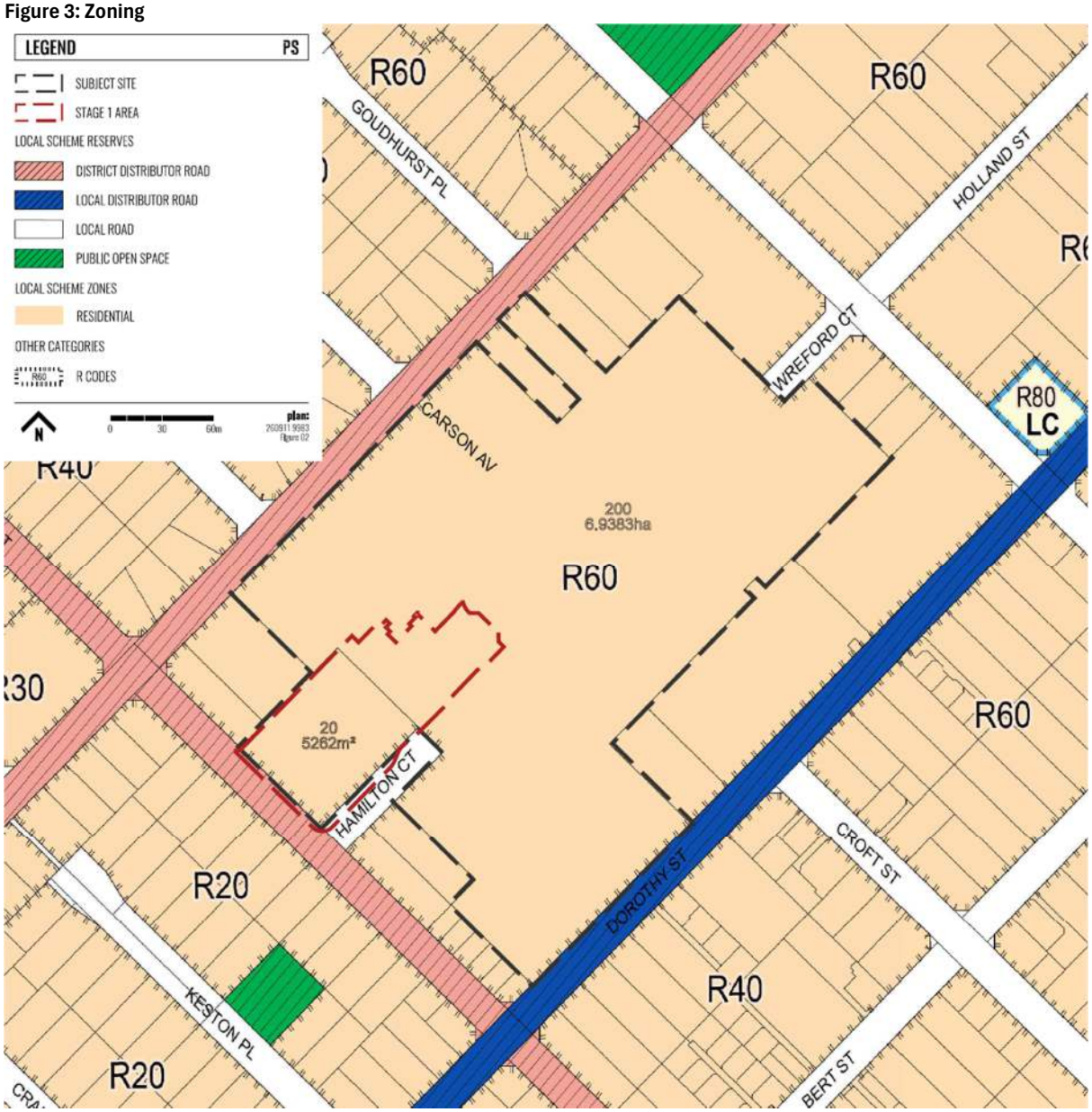
The site is zoned 'Residential' under LPS24, with a density code of R60. The objectives of the Residential zone are:

- *To provide for a range of housing and a choice of residential densities to meet the needs of the community.*
- *To facilitate and encourage high quality design, built form and streetscapes throughout residential areas.*
- *To provide for a range of non-residential uses, which are compatible with and complementary to residential development.*

The proposed development is consistent with the objectives of the Residential zone, contributing to the diversity of residential and comparable products within the municipality while remaining compatible with standard residential uses. The design presents a high standard of architectural quality, enhancing the streetscape through a carefully considered built form, presentation and materiality, and positively contributing to the amenity of the surrounding area.

Importantly, ILC component provides for additional diverse housing for the elderly, and the RACF proposal provides short term accommodation for elderly individuals transitioning from hospital care and awaiting placement in permanent aged care facilities. The development will deliver a bespoke facility in an accessible location, catering to the needs of the wider community. See Figure 3: Zoning below for a zoning map.

Figure 3: Zoning



6.4.2 Land use permissibility

This development application seeks approval for two separate land uses:

- Independent Living Complex (south-western building), and;
- Residential Aged Care Facility (north-eastern building).

Residential Aged Care Facility is a 'P' use in the Residential zone under LPS24, meaning the land use is permitted 'as of right'.

We note that 'Independent Living Complex' is a 'use not listed' under the LPS24. This use is considered to meet the objectives of the zone as it provides for a diversity of housing options to meet the needs of the community. The development also incorporates a high-quality architectural design that is compatible with the site's context while providing purpose-built, contemporary housing for the ageing population.

We also note the WAPC's Position Statement, outlined above, which support the provision of residential accommodation for ageing persons, suggesting both RACF and ILC be considered 'P' (permitted) uses in Residential zoned land.

6.4.3 Development standards and requirements

Pursuant to Clause 32, Table 7 of LPS24, additional site and development requirements apply to non-residential development in the Residential zone. Non-residential development in the Residential zone shall conform to the plot ratio, setback, open space, building height, privacy and solar access (where appropriate) provisions of the R-Codes applicable to the density code afforded to the lot.

Refer to **Table 3** below for an assessment against the relevant provisions of Volume 1, Part C of the Residential Design Codes, as required under LPS24.

Table 3: Clause 32 Assessment

LPS24 Clause 32 Assessment Table				
Deemed-To-Comply Requirement			**Proposed**	**Compliance**
Plot ratio	Not applicable under the R-Codes, Part C		**N/A**	**N/A**
Private open space	Studio/1 bed (RACF)	8m^2 2m min. Max 25% screened	No private open space provided due to the nature of a Residential Aged Care Facility.	**N/A**
	2 bed (ILC)	10m^2/ 2.4m min. Max 25% screened	All apartments are fitted with either a balcony or a terrace, measuring at least 2.5m and with areas above 29m^2. Less than 25% screening is provided.	**Yes**
Communal open space	Minimum area	300m^2	Due to the nature of the development, communal spaces will be shared amongst residents of the wider facility and remain accessible for both RACF and ILC residents. Shared amenities include landscaped courtyards, outdoor barbeque and gazebo areas, and green gardens, which are universally accessible for all residents.	**Yes**
	Minimum accessible/hard landscape area	100m^2		
	Minimum dimension	4m		
	Maximum roof coverage	25%		
	In common property and behind street setback line			
	Universally accessible for all occupants			
	Exclusive to residential component of mixed-use development			

LPS24 Clause 32 Assessment Table				
	Separated or screened from potential sources of noise and odour		Additional indoor communal areas are also available, including the existing clubhouse. The RACF component will also feature both indoor and outdoor communal areas across each level. The masterplan will also deliver a number of additional communal gardens, gathering spaces and green links. Noise, odour, lightspill and overlooking has been taken into consideration in the design of the development.	
	Designed and oriented to minimise the impacts of noise, odour, lightspill and overlooking on the habitable rooms and private open spaces			
Solar access	Every habitable rooms has at least one openable external window visible from all parts of the room; a glazed area not less than 10% of the internal floor area; minimum 50% transparent glazing		All habitable rooms to be compliant.	**Yes**
	Where a courtyard is the only source of daylight to a habitable room, the courtyard must be uncovered and open to the sky with a minimum dimension of 0.5 times the wall height and minimum area of $4m^2$		Not applicable. Habitable rooms benefit from daylight and open outlooks.	**N/A**
	Bathrooms located on external walls must have a minimum one openable window		While a number of bathrooms are located on external walls, no external windows are proposed. all bathrooms are provided with a mechanical exhaust ventilation system designed in accordance with the relevant requirements of the National Construction Code.	**Variation**
Orientation of major openings	For multiple dwellings in climate zones 4, 5 and 6: i. a minimum of 70 per cent of dwellings have a primary living space that achieves at least 2 hours direct sunlight between 9am and 3pm on 21 June; and ii. a maximum of 15 per cent of dwellings in a building receiving no direct sunlight to the primary living space between 9am and 3pm on 21 June.		Due to orientation of building and layout, all primary living spaces of the ILC component achieve at least 2 hours direct sunlight between 9am and 3pm on 21 June.	**Yes**
	Every habitable rooms has at least one openable external window visible from all parts of the room; a glazed area not less than 10% of the internal floor area; minimum 50% transparent glazing		All habitable rooms will have at least one openable window meeting these requirements.	**Yes**
Visual privacy	Major opening from bedroom and study	3m	The buildings are set back from all boundaries in excess of the minimum dimensions, and cones of vision do not exceed the requirement.	**Yes**
	Major opening from habitable room other than bedroom and study	4.5m		
	Major opening from habitable room other than bedroom and study	6m		

LPS24 Clause 32 Assessment Table				
Building height	Max wall/roof height (skillion)	11m 3 storeys	ILC: 4 storeys (13.8m) A minor variation is proposed in the ILC height in the order of 1 storey and 2.8m. This is considered appropriate in terms of streetscape and private realm impact on the basis that the building provides increased setbacks beyond the deemed-to-comply requirement to the street and side boundaries. The building also presents a highly articulated façade and landscape strategy along the boundaries, offsetting any additional bulk. The overall scale and form are in accordance with the contemporary built form requirements of such uses, the surrounding Amaroo landholding, and its beneficial location in proximity to an activity centre and public transport services. This ensures the development remains compatible with its context and does not unreasonably impact adjoining properties.	**Variation**
			RACF: 3 storeys (10.5m)	**Yes**
Street setbacks	Primary street (Hamilton Court)	2m	4.5m-7m	**Yes**
	Secondary Street (Eudoria Street)	1m	9m-12m	**Yes**
	Adjoining communal street	0.5m	Not applicable. However, the development is set back in excess of 0.5m from the internal driveways and from the extension of Hamilton Court into the Amaroo site.	**Yes**
3.4 – Lot boundary setbacks C3.4.1	Wall height greater than 10.1m	3m	7m setback to Lot 800 (64) Stalker Road. 7.5m building separation between proposed ILC and RACF buildings. 8m building separation from existing Buckley Building.	**Yes**
3.9 – Solar access for adjoining sites C3.9.1 - C3.9.3	Maximum overshadowing onto adjoining property	50% of dwelling site area	Given the site orientation and adjoining streets, the majority of the shadows are cast to Eudoria Street, Hamilton Court and its extension into the site. The development casts significantly less than 50% shadow to adjoining properties.	**Yes**
	Maximum overshadowing onto diagonally adjacent lots	25% of dwelling site area	The proposed development casts majority of its shadow (winter solstice) onto roads. The site has no diagonally adjacent lots.	**Yes**
	Maximum overshadowing of the front half of the site	N/A – not a narrow lot		**N/A**
	Maximum overshadowing of the rear half of the site	N/A – not a narrow lot		**N/A**

6.4.4 Matters to be considered

See below **Table 4** for an assessment against Clause 67 of the Deemed Provisions.

Table 4: Matters to be considered

Matter to be considered	Provided
(a) the aims and provisions of this Scheme (including any planning codes that are read, with or without modifications, into this Scheme) and any other local planning scheme operating within the Scheme area;	The proposal is generally consistent with the aims and objectives of LPS24.
(b) the requirements of orderly and proper planning including any proposed local planning scheme or amendment to this Scheme that has been advertised under the Planning and Development (Local Planning Schemes) Regulations 2015 or any other proposed planning instrument that the local government is seriously considering adopting or approving;	There are no known scheme amendments that would affect the assessment of this application. The proposed development is considered to be consistent with the principles of orderly and proper planning, as outlined in throughout this report.
(c) any approved State planning policy	The relevant SPPs have been considered in **Section 6.2** of this report.
(e) any policy of the Commission	The relevant policies of the commission have been considered in **Section 6.3** of this report.
(fa) any local planning strategy for this Scheme endorsed by the Commission	The City's local planning strategy has been considered in **Section 5.1** of this report.
(g) any local planning policy for the Scheme area;	The relevant LPPs have been considered in **Section 6.5** of this report.
(h) any structure plan or local development plan that relates to the development	There are no structure plans nor local development plans that apply to the site.
(m) the compatibility of the development with its setting, including — *(i) the compatibility of the development with the desired future character of its setting; and* *(ii) the relationship of the development to development on adjoining land or on other land in the locality including, but not limited to, the likely effect of the height, bulk, scale, orientation and appearance of the development;*	The proposal is considered to be of high-quality and will be compatible with the existing and desired future development in this setting, as follows: i. The proposal is generally in accordance with the applicable planning framework and is compatible with the development expectations in its surrounding context considering its proximity to a district activity centre, public transport infrastructure, and higher density residential development. ii. The development is of high-quality contemporary architectural design and is of a scale and design which complements the existing character of the area as well as supports the operations of the established residential aged care facility. Any potential perceived impacts of bulk or scale are adequately mitigated through a high level of articulation of the façade and incorporation of setbacks at varied distances from the street frontage.

Matter to be considered	Provided
(n) the amenity of the locality including the following — *(i) environmental impacts of the development;* *(ii) the character of the locality;* *(iii) social impacts of the development;*	The proposed development is considered to have a positive impact on the amenity of the locality as follows: i. The application proposes sufficient landscaping, contributing to the amenity of the locality. ii. The proposal is considered to respect the established context of the site while also complement the pattern of emerging development in both the site and immediate surrounds. It is noted that the redevelopment of the site will be in accordance with a staged masterplan. iii. The development will deliver a bespoke independent living and aged care facility in a central location, catering to the needs of the wider metropolitan community.
(o) the likely effect of the development on the natural environment or water resources and any means that are proposed to protect or to mitigate impacts on the natural environment or the water resource	The proposed development will not detrimentally impact on the natural environment or water resources.
(p) whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved;	A landscaping strategy has been prepared demonstrating the additional areas of vegetation and trees that will be planted within the proposed development.
(q) the suitability of the land for the development taking into account the possible risk of flooding, tidal inundation, subsidence, landslip, bushfire, soil erosion, land degradation or any other risk	The area is characterised by established residential and other complementary development. The proposed development is not at a significant risk of natural disaster and will not increase the possible risk to human health or safety.
(r) the suitability of the land for the development taking into account the possible risk to human health or safety	As above.
(s) the adequacy of — *(i) the proposed means of access to and egress from the site; and* *(ii) arrangements for the loading, unloading, manoeuvring and parking of vehicles;*	i. The proposal seeks to retain and upgrade the existing crossover to the at-grade car park on Lot 20, and to create an additional crossover leading to the proposed additional staff car park on Lot 200 from Dorothy Street. Pedestrian access is afforded from a continuous pedestrian pathway from the footpath into the existing main entries of each building. Proposed access arrangements are considered to be adequate. ii. Service and loading/unloading areas have been appropriately located within the car park, screened for public view, and will allow for full vehicle manoeuvrability within the parking area.
(t) the amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety;	A TIS has been prepared, demonstrating the proposed development is appropriate from a traffic and access perspective.

Matter to be considered	Provided
(u) the availability and adequacy for the development of the following — *(i) public transport services;* *(ii) public utility services;* *(iii) storage, management and collection of waste;* *(iv) access for pedestrians and cyclists (including end of trip storage, toilet and shower facilities);* *(v) access by older people and people with disability;*	i. The subject site serves the wider metropolitan catchment with regards to resident opportunities. The site is also serviced by multiple bus routes and Gosnells train station within walking distance, which connect the site to the Perth city centre and the wider metropolitan area. ii. Utility services will be adequately integrated throughout the development site. iii. A WMP has been prepared, outlining sufficient storage, management and collection of waste. iv. Pedestrian access is sufficient. v. The development has been designed to be universally accessible.
(v) the potential loss of any community service or benefit resulting from the development other than potential loss that may result from economic competition between new and existing businesses;	The development provides a community benefit in respect of delivering high-quality independent living units and a bespoke aged care facility in a central location, catering to the needs of the wider metropolitan community. It is also noted that the proposed development will provide additional employment opportunities for the aged care sector.
(w) the history of the site where the development is to be located;	The history of the site has been taken into consideration in developing this proposal. The Stage 1 development will be part of a four-stage development of the wider Amaroo site.
(y) any submissions received on the application;	To be considered as part of the assessment.
(za) the comments or submissions received from any authority consulted under clause 66;	To be considered as part of the assessment.
(zb) any other planning consideration the local government considers appropriate.	To be considered as part of the assessment.

6.5 Local Planning Policies

6.5.1 Local Planning Policy 1.4 – Parking

Local Planning Policy 1.4 – Parking (**LPP1.4**) prescribes the requirements for parking and end-of-trip facilities for development applications in the City. This policy prescribes statutory car and bicycle parking rates for Residential Aged Care Facility land use. However, no rate is prescribed for the Independent Living Complex land use.

6.5.1.1 Car parking

This policy prescribes statutory car and bicycle parking rates for Residential Aged Care Facility land use. However, no rate is prescribed for the Independent Living Complex land use.

The following table provides an assessment against the car parking requirements of LPP1.4.

Table 5: Car parking requirements

Land use	Rate	Benchmark	Requirement
Residential Aged Care Facility	1 bay for every 3 beds	36 beds	12 bays
Independent Living Complex	Discretionary: *Guidance 1 bay per apartment* *	40 apartments	40 bays
Visitor bays (ILC)	Discretionary: *Guidance 1 bay per 4 apartments* *	40 apartments	10 bays
		Total required	**62 bays**

** As per the R-Codes*

The following Table provides a breakdown of car parking provision as part of the Stage 1 development.

Table 6: Car parking allocation

Land use	Parking allocation	Provision
Independent Living Complex	Resident parking	40 bays
	EV charging bays	4 bays
	Service bays	1 bay
	Total bays	**45 bays**
Residential Aged Care Facility	Staff parking	12 bays
	Existing service bays (retained)	3 bays
	Pick-up/drop-off bays	2 bays
	Dorothy Street staff car park	41 bays
	Total bays	**58 bays**
Visitor parking	Shared visitor parking	6 bays
	Total provided	**109 bays**

As the RACF is a recognised land use in LPP 1.4, it has been assessed against its requirements. As demonstrated above, the proposed parking provision for the RACF component is consistent with the requirements under LPP1.4.

Whilst no specific parking rate is prescribed for an Independent Living Complex, the proposed parking provision is considered appropriate having regard to the nature of the development and when assessed against a comparable land use (ie. Multiple Dwelling). A total of 40 resident parking bays are provided, equating to one bay per dwelling. This is in accordance with the R-Codes parking requirements for multiple dwellings, which require a minimum of one bay and maximum of two bays for a two-bedroom dwelling in this location.

The adequacy of the proposed parking provision is further supported by the site's access to public transport infrastructure. A bus stop servicing route 232 is located approximately 120m walking distance from the site, while bus stops servicing routes 215 and 233 are located approximately 235m walking distance. While the Gosnells Railway Station is currently within a 920m walkable catchment, upon full implementation of the masterplan, including the delivery of internal pedestrian links and the Wreford Court / Hamilton Court extensions, the walking distance to the station will reduce to approximately 750m.

In addition, existing parking across the broader site will be available to use. The development also provides dedicated drop-off bays, an internal bus stop, four service vehicle bays and a designated delivery bay to accommodate operational requirements.

The proposal will require removal of 29 existing car bays, which have been historically used for staff parking. These displaced spaces will be replaced as part of the new Dorothy Street staff car park, together with additional parking required to support the proposed development. However, the new 41-bay staff car park proposed near Dorothy Street will fully replace the displaced parking and provide a net surplus of 12 bays for broader operational requirements within Amaroo Village. Accordingly, the proposal will result in an overall improvement to staff parking provision.

The proposed vehicle parking areas will be designed and constructed in accordance with the relevant Australian Standards and will be appropriately line-marked, sealed and drained to the satisfaction of the City.

Overall, the vehicle parking provision is considered sufficient to meet the anticipated demands of the development and will not adversely impact the surrounding road network.

6.5.1.2 Bicycle parking and end-of-trip facilities

LPP1.4 prescribes a statutory bicycle parking rate for the RACF component, at a rate of 1 space per 200m^2.

Similar to the above section, bicycle parking for the ILC does not have a prescribed rate. Bicycle parking is recommended at a rate of 0.5 resident bicycle spaces per apartment and 0.1 visitor bicycle spaces per apartment.

Bicycle provision has been addressed in the appended TIS. The TIS recommended that the resident bicycle parking be accommodated within a dedicated secure and covered bicycle parking room rather than within individual apartments' storage. The room should be conveniently accessible from the building entry and external bicycle network and designed to accommodate at least 20 bicycles. A further 4 visitor bicycle spaces should be provided in a readily accessible location near the independent living building entry.

Bicycle parking demand associated with the RACF is expected to be relatively modest. Based on the proposed staffing levels, it is recommended that a minimum of one secure and covered staff bicycle space be provided. Visitor bicycle parking should also be provided near the RACF main entry, with two double-sided bicycle rails providing four visitor bicycle spaces considered suitable for the anticipated level of demand.

We note that accessible staff end-of-trip facilities incorporating a shower will be provided within the RACF. This is considered appropriate to support the relatively low anticipated level of staff cycling demand.

Ther recommended bicycle parking and end-of-trip facilities can be readily incorporated during subsequent design stages.

6.5.2 Local Planning Policy 4.11 – Public Art

This policy details the requirements for public art contributions as part of a development proposal and provides performance standards to guide the assessment of development applications that include public art.

Public art contributions are required for proposals for commercial developments with an estimated cost of development of $2million or greater (up to a maximum $100,000). Under this policy, a contribution of 1% of the total cost of development associated with the RACF component is required to be paid to the City for the provision of public art.

A suitably flexible condition of approval that affords the option to include public art within the development or as a cash contribution is requested.

7 CONCLUSION

In summary, the proposed Independent Living Complex and Residential Aged Care Facility meets the intent of the applicable planning framework. The proposal represents a well-considered, high-quality redevelopment of Stage 1 of the Amaroo Masterplan. The proposal delivers a 4-storey Independent Living Complex comprising 40 two-bedroom apartments and a 3-storey Residential Aged Care Facility comprising 36 beds, supported by high-quality landscaping, parking and safe access arrangements. The site's location in close proximity to the Gosnells District Centre and Gosnells train station supports the establishment of higher density seniors housing and aged care facilities, consistent with the City's Local Planning Strategy and the WAPC Position Statement on Residential Accommodation for Ageing Persons.

The scale of development is contextually appropriate and site-responsive, with an architectural design that incorporates materials and tones complementing the existing site and surrounding residential context, responds to the Design Review Panel's feedback, and enhances the Eudoria Street and Hamilton Court streetscapes. All areas of discretion, including the minor variation to building height, have been justified and are consistent with the objectives of the Residential zone and the broader planning framework.

The proposal demonstrates a high standard of design, delivering sustainable accommodation and well-integrated communal spaces. Considerations relating to landscaping, sustainability, transport, parking, waste, drainage and geotechnical matters have been appropriately addressed, ensuring the development will positively contribute to the amenity and function of the surrounding area.

On this basis, it is respectfully requested that the Metro Outer Development Assessment Panel (**DAP**) approve the development accordingly.

Appendix 1:
Certificate of Title

Appendix 2:
DRP Minutes

Appendix 3:
DRP Responses

Appendix 4:
Development Plans

Appendix 5:
Design Report

Appendix 6:
Landscape Plans

Appendix 7:
Transport Impact Statement

Appendix 8:
Waste Management Plan

Appendix 9:
Geotechnical Report

Appendix 10:
Sustainability Report

Appendix 11:
Preliminary Drainage Plan

Appendix 12:
Site Feature Survey