

05 July 2025

Planning Department
Town of Victoria Park
99 Shepperton Rd,
Victoria Park, WA 6100

Dear [REDACTED],

RE: APPLICATION FOR CHANGE OF USE FROM SINGLE HOUSE TO 'RESIDENTIAL BUILDING (SHORT TERM ACCOMMODATION)' ON LOT 6 (18) BLAIR ATHOL STREET, EAST VICTORIA PARK DA Ref: 5.2025.152.1

PAR Property Development Consultants (PAR) acts on behalf of Mr M R Labunda with respect to provide further information request dated 17 June 2025 for the application for change of use from Single House to 'Residential Building (Short Term Accommodation)' for the above subject site.

The proposal for short-term accommodation at subject site is now being submitted under the "*Residential Building*" use classification in accordance with Local Planning Policy No. 31 – Serviced Apartments and Residential Buildings including Short Term Accommodation (LPP31), which serves as the guiding policy framework for such developments within the Town of Victoria Park. The decision to apply the proposed change of use as a *Residential Building (Short Term Accommodation)* reflects both the nature of the intended operation and the strategic locality of the site, which is covered in the body of this report.

The information provided below outlines how the proposed use is fully compliant with the Metropolitan Region Scheme (MRS), Town of Victoria Park Local Planning Scheme No. 2, and other relevant planning policies. Based on this compliance, we respectfully request planning approval for the proposed development.

1.0 BACKGROUND

1.1 Site Description

The subject site is strategically positioned to offer significant advantages for the development of Residential Use – Short Term Accommodation (STRA). The location combines excellent accessibility with proximity to key transport routes, local amenities, educational institutions, and vibrant lifestyle destinations, making it highly suitable for short-term rental accommodation.

The site benefits from immediate access to major transport corridors. It is located approximately 250 meters northeast of Shepperton Road, a Primary Regional Road and 310 meters northwest of Oat Street, District Distributor Road. These connections facilitate seamless travel to and from the Perth CBD, Perth Airport, and surrounding suburbs, enhancing the convenience for both visitors and service providers.

In terms of local amenity, the site is situated just 550 meters from Albany Highway, a prominent dining and entertainment precinct in Victoria Park. This corridor offers a wide variety of cafes, restaurants, pubs, and retail services, providing STRA guests with easy access to everyday conveniences and leisure options.

Furthermore, the location is well-situated within a 4.5-kilometre radius of key metropolitan hubs, including Perth International Airport and the Perth Central Business District, positioning it as an attractive option for business and leisure travellers alike. Its proximity to education facilities further enhances its appeal: Curtin University of Technology and the South Metropolitan TAFE Bentley Campus are approximately 2.0 kilometres away, while the South Metropolitan TAFE Carlisle Campus lies just 200 metres from the site. This makes the location particularly desirable for visiting students, academics, and professionals requiring temporary accommodation.

In summary, the strategic positioning of the site—characterised by strong transport links, proximity to employment, education, retail, and recreational nodes—supports its suitability for Short Term Rental Accommodation and aligns with broader planning objectives for sustainable and accessible urban development.

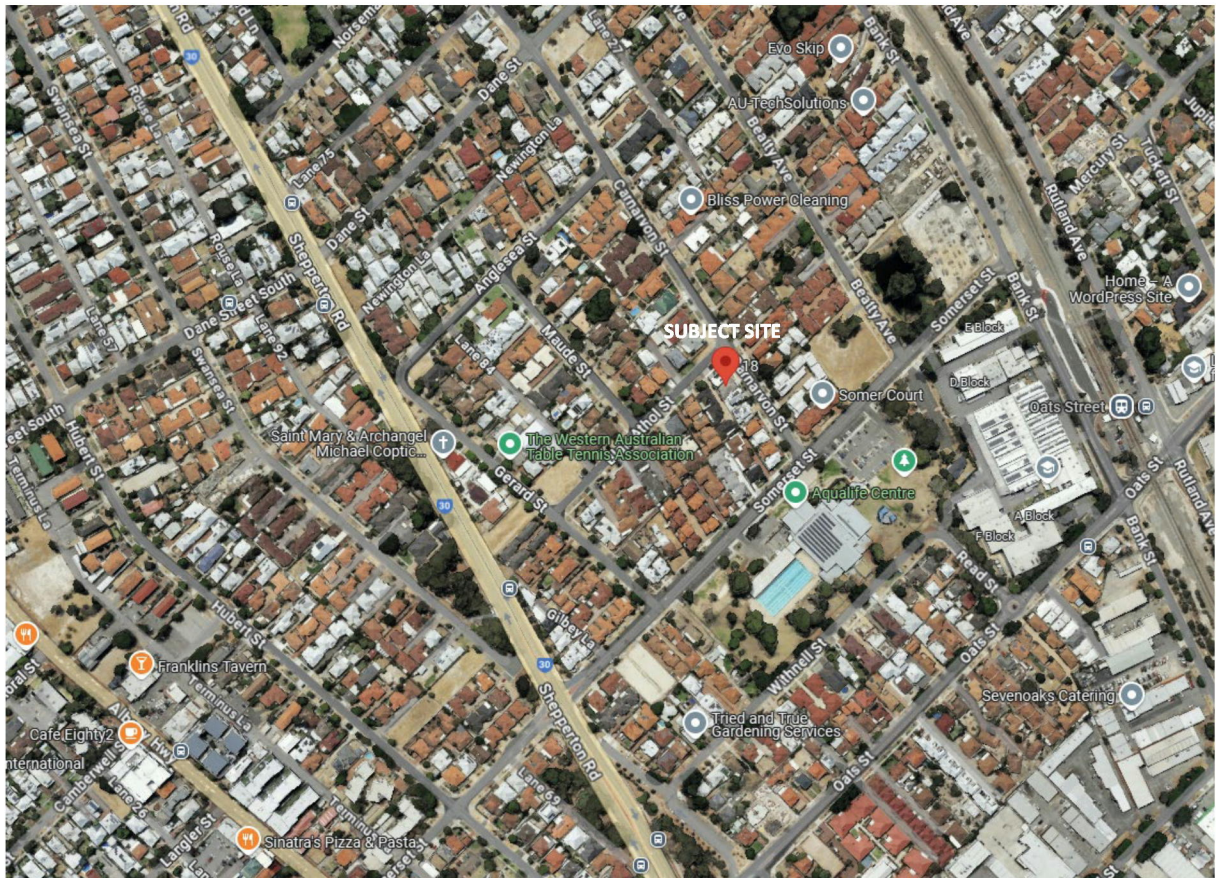


Figure 1 above provides an illustration of the locality

(Source: Google Map)

1.2 Proposal

This Application is seeking the Town's approval for the Change of Use of an existing residential property to a 'Residential Building (Short Term Accommodation)' property featuring 3 bedrooms and 2 baths configuration as outlined in the architectural plans attached.

The existing single storey Single House comprising:

- Double garage accessed from Blair Athol Street;
- Ground floor – Open plan Dining, Living and Kitchen, Master room and ensuite, Bed 2 & 3 and shared Bathroom/ WC.
- North facing outdoor living area located at within front setback area.

Please refer to the attached **Architectural plans** located in **Appendix A**.

The attached **Management Plan** located in **Appendix B** has been developed to ensure that the development is managed to mitigate possible management conflicts and ensure the equitable management of this property. This Management Plan addresses various aspects of management, including tenant expectations, property management and maintenance, waste management and disposal, emergency procedures, and noise mitigation measures.

2.0 PLANNING FRAMEWORK

The following section addresses the relevant town planning considerations affecting the subject site including the MRS, Local Planning Scheme 1 and relevant planning policies.

2.1 DPLH Planning for Tourism Short-Term Rental Accommodation Guidelines

With reference to of Clause 4.4.1, the statutory considerations provide several of locality criteria for local government to assess the suitability of proposed Residential Building location:

Location Criteria to be considered by Council	Assessment
<ul style="list-style-type: none">Areas of current or future tourism amenity (eg: access to facilities, Transport & availability of services)	<p>The subject site demonstrates strong alignment with the criteria relating to areas of current or future tourism amenity. Its strategic location provides immediate access to a wide range of facilities, services, and transport options that enhance its suitability for Short Term Rental Accommodation (STRA).</p> <p>The site is located just 550 metres from Albany Highway, home to a vibrant dining and entertainment precinct. This area features a diverse mix of cafes, restaurants, pubs, and retail outlets, attracting both local residents and visitors. The proximity to this established amenity strip ensures that short-term guests have convenient access to high-quality dining and social experiences within walking distance, significantly enhancing their overall stay experience.</p> <p>In addition to leisure and hospitality offerings, the site is within close proximity to key recreational and lifestyle facilities. The Aqualife Leisure Centre, located nearby, offers opportunities for physical activity and relaxation, making it an attractive feature for visiting tourists and professionals alike.</p> <p>The site also benefits from its adjacency to several prominent educational institutions. South Metropolitan TAFE Carlisle Campus is located only 200 metres away, while Curtin University of Technology and the South Metropolitan TAFE Bentley Campus lie approximately 2.0 kilometres to the north-west. These institutions attract a steady flow of visiting academics, students, and professionals, presenting a viable market for short-term accommodation.</p> <p>Transport connectivity is a major strength of the site. It is located approximately 250 meters northeast of Shepperton Road, a Primary Regional Road and 310 meters northwest of Oat Street, District Distributor Road. These roads provide efficient vehicular access to the Perth CBD, Perth Airport, and surrounding suburbs.</p> <p>Public transport accessibility further enhances the site's appeal. The Oat Street Train Station is located within 340 metres, offering direct rail access to central Perth and surrounding areas. Additionally, the site is well-served by high-frequency bus routes, including No. 221, 230, 282, 283, 907, and 930 , with services operating every 10 minutes during peak hours. This robust public transport network supports car-free mobility for guests and facilitates seamless exploration of the wider metropolitan area.</p> <p>Finally, the area offers a comprehensive range of additional amenities within close proximity, including shopping centres, healthcare facilities, and entertainment venues.</p>

	The presence of these essential services ensures that short-term guests can enjoy a comfortable and self-sufficient stay, with all necessary conveniences readily available.
<ul style="list-style-type: none"> Natural hazards (eg bushfire, cyclone and floods) 	Subject site is not located within Bushfire Prone area.
<ul style="list-style-type: none"> Potential of land use conflict or impact on local housing supply and infrastructure in residential areas. 	<p>Its proximity to major transport corridors—including Shepperton Road, Oats Street, and the Oats Street Train Station—along with multiple high-frequency bus routes, ensures excellent accessibility. This reduces pressure on local traffic networks and minimises congestion and parking spillover into surrounding residential streets.</p> <p>Importantly, the proposed short-term accommodation supports the housing ecosystem by offering a temporary option for visitors, students, and professionals. This relieves pressure on long-term rental stock, supporting housing availability for permanent residents rather than competing with it.</p> <p>The existing infrastructure in the area—transport, roads, and utilities—is well-established and capable of absorbing the modest increase in demand associated with short-term stays. With appropriate management and design measures, the development can integrate seamlessly into its urban context, enhancing local amenity and economic activity without adverse impacts.</p>

2.2 TOWN OF VICTORIA PARK LOCAL PLANNING SCHEME NO. 2

The proposal seeks approval for a Residential Building (Short Term Accommodation), reflecting the intended operational model, the strategic location of the site, and its alignment with both Local Planning Scheme No. 2 (LPS2) and the Town’s Local Planning Policy No. 31 – Serviced Apartments and Residential Buildings Including Short Term Accommodation (LPP31).

LPP31 defines a Holiday House as:

“A Residential Building occupied on a short-term/temporary basis by no more than six persons that do not comprise a single family at any one time; and excludes a Lodging House, Bed and Breakfast accommodation and Serviced Apartments.”

The proposed use aligns with this definition and the broader classification of “Residential Building” under LPS2. The dwelling will accommodate short-term stays for individuals or small groups (up to six persons) who do not constitute a single family, including tourists, students, and visiting professionals. Importantly, the premises will not operate as a serviced apartment, B&B, or lodging house. It will not include on-site management or hospitality-style servicing, thereby maintaining its residential character.

The subject site’s location presents a range of advantages that make it ideally suited for short-term accommodation within a Residential Building:

Transport Accessibility:

The site is well connected via Swansea Street East, a Local Distributor Road, with Shepperton Road (100m) and Oats Street (240m) providing regional road access. Oats Street Train Station is within 500 metres, offering convenient public transport connections to the Perth CBD, Perth Airport, and other key destinations.

Proximity to Educational Institutions:

The site is located near Curtin University (2.0km) and South Metropolitan TAFE Bentley and Carlisle Campuses (2.0km and 430m respectively), making it a suitable and convenient location for visiting academics, exchange students, and education sector professionals.

Access to Lifestyle and Amenity:

Just 550metres away, the Albany Highway commercial strip offers a wide array of dining, retail, and entertainment options. This enhances the visitor experience and supports the amenity expectations of short-term guests.

Compatibility with Surrounding Urban Environment

The area surrounding subject site contains a mix of medium residential density, which supports a diversity of activities and accommodates varying lifestyle needs. The proposed use is considered compatible with the existing built form and urban character. As the proposal involves no external changes to the dwelling, it will maintain the existing streetscape and residential appearance. The site will continue to function as a low-scale, residential-style building, mitigating any concerns regarding visual or land use conflict.

Alignment with Policy Objectives – LPP31

The proposal strongly aligns with the objectives of LPP31 by:

- Providing diverse and flexible housing options, supporting a growing demand for short-term accommodation in strategic, well-serviced locations;
- Stimulating local economic activity by attracting temporary visitors who patronise nearby businesses, cafés, and shops;
- Preserving residential character, as no external modifications are proposed, and occupancy will be managed in accordance with best-practice standards to ensure minimal disruption to neighbouring properties.

In particular, the use of the property as a Holiday House offers a non-residential yet complementary use that enhances the vibrancy and vitality of the neighbourhood. This type of accommodation supports the local economy while offering lodging flexibility for temporary residents. It also contributes to the liveability of the area by expanding the housing mix and ensuring that accommodation options remain adaptable to the community's evolving needs.

Compliance with LPS2 Zoning Objectives

Under LPS2, the subject site is located within a residential zone where development is guided by principles of compatibility, amenity, and sustainable urban form. The proposed short-term accommodation use aligns with these objectives by:

- Maintaining the residential appearance and function of the building;
- Supporting population diversity and housing flexibility;
- Integrating well with surrounding land uses; and
- Delivering low-impact accommodation without altering the physical fabric of the neighbourhood.

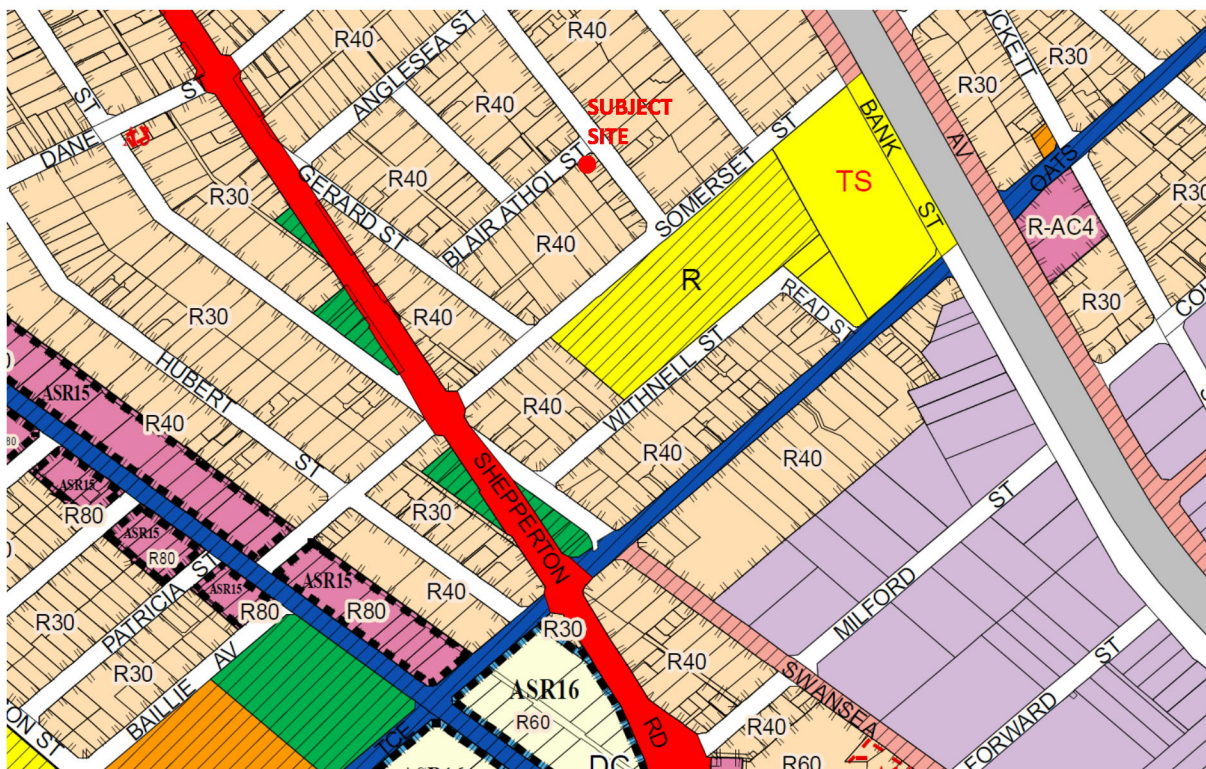
2.3 LOCAL PLANNING POLICY – SHORT TERM ACCOMMODATION

Town of Victoria Park *LPP No. 31 - Serviced Apartments and Residential Buildings including Short Term Accommodation* serves as the primary planning instrument for evaluating the development of Residential Building within the town. This policy outlines development standards and offers specific guidance for such proposals.

2.3.1 General requirements for all short-term accommodation

The LPP provides for the management of tourism accommodations, encompassing aspects such as car parking standards, car parking, location & design, and management plan to control noise and other potential disturbances. The Management Plan outlined will comprehensively tackle these amenity considerations on the subject site, focusing primarily on the key considerations identified in the report below.

General requirements to be considered by Council	Assessment
<ul style="list-style-type: none"> Location <i>Meet at least two or more of the following criteria:</i> <ul style="list-style-type: none"> <i>a) Are on a Primary, District or Local Distributor road;</i> <i>b) Are within 400 metres of a train station or high frequency bus route stop;</i> <i>c) Are within 400 metres of an area of tourist potential as determined by the Town, such as adjacent to the Swan River foreshore and major sporting/entertainment complexes;</i> <i>d) Are within 400 metres of a District Centre zone, Commercial zone or other location providing convenience shopping and access to everyday goods and services; and/or</i> <i>e) Are within 800 metres of a higher education provider (TAFE or University campus), where the proposal is for Short Term Accommodation to house students.</i> 	<p>The site is well-served by high-frequency public transport, with bus routes 221, 230, 282, 283, 907, and 930 accessible within a 300-metre walk to the nearest stop on Shepperton Road. These routes provide frequent services, operating at approximately 10-minute intervals during peak periods. Additionally, the subject site is conveniently located just 350 metres from Oat Street Train Station.</p> <p>The South Metropolitan TAFE Carlisle Campus is located 430m from subject site.</p> <p>Satisfied 2 out of 5 criteria. Complies</p>
<ul style="list-style-type: none"> Conversion of Existing Buildings <ul style="list-style-type: none"> <i>a) The existing building is approved by the Council as a Single House or Grouped Dwelling</i> <i>d) Short Term Accommodation, there are a maximum of six (6) rooms designed for and/or capable of use as bedrooms.</i> 	<p>The existing single storey dwelling has been previously approved as Single House. Complies</p> <p>As illustrated in the drawings submitted, the proposed dwelling currently only has 3 rooms. Complies</p>
<ul style="list-style-type: none"> Signage and Advertising <i>On land zoned 'Residential' under the Scheme, a maximum of one (1) sign on the site not exceeding 0.2m2 in area, and incorporated into a front fence, wall, structure or building that identifies the name and address of the accommodation is permitted.</i> 	<p>No signage or advertisement proposed on the subject site. Not applicable.</p>
<ul style="list-style-type: none"> Car Parking <i>All resident, guest, staff or visitor car parking associated with the accommodation shall be contained on site.</i> 	<p>The double garage has direct and unimpeded access from Blair Athol Street, without impacting neighbouring properties. Complies</p>
<ul style="list-style-type: none"> Management Plan 	<p>Refer to Section 3.0 below and attached Management Plan which entails Code of Conduct, House Rules, noise restriction, check-in/out procedures and car parking management.</p> <p>Guest Register is also added to the Management Plan to maintain a register of guests which records all complaints that guest details. Guests will be informed of the rules upon booking and reminded during their stay.</p>



Zoning Map

Source- Town of Victoria Park Scheme Map

3.0 MANAGEMENT PLAN

A comprehensive Management Plan has been established to ensure that the proposed Short-Term Accommodation activities do not have a negative impact on the local amenity. The Management Plan details the measure that will be implemented to mitigate any potential adverse effects on neighbouring properties such as noise and other disturbances, complaint procedures, safety and security, anti-social behaviour, house rules, and parking management.

Table 1 below provides an assessment of the key amenity considerations associated with the proposed development. The table summarizes the potential impacts on the surrounding environment and how the measures outlined in the Management Plan address these impacts.

Requirements to be considered by Council	Assessment
<ul style="list-style-type: none"> Noise, antisocial behaviour and other potential disturbances 	<p>The Management Plan been developed to mitigate possible conflicts and address potential issues that might arise. To prevent the property from being used for parties or disruptive activities, a minimum length of stay of three (3) nights and a maximum length of stay of three (3) months has been put in place. This minimum and maximum stay condition aims to ensure that only guests seeking more extended stays - such as tourists, business travellers, or families relocating temporarily to the area - will make reservations for the property, declining bookings for short-term stays by groups of people gathering for parties or events that may cause amenity issues.</p> <p>Check-in times are restricted to weekdays after 3pm and no later than 9.30pm on any day of the week. This clear check-in time policy will ensure that check-in times are reasonable, allowing guests to settle in comfortably while also ensuring minimal disturbance to adjoining neighbour. In compliance with the Environmental Protection (Noise) Regulations 1997, noise-generating activities on the premises are strictly prohibited during specified quiet hours before 8:00am and after 9:00pm in the evening.</p>

	<p>It is important to note that the outdoor living area is located within the front setback, facing Blair Athol Street. This positioning significantly minimises potential noise impacts on adjoining properties, as the public street acts as a buffer between the outdoor area and neighbouring dwellings. Additionally, the corner location of the property further reduces the number of adjacent residences potentially affected by noise, thereby limiting any disturbance to the surrounding neighbourhood.</p>
<ul style="list-style-type: none"> Complaint procedures 	<p>A well-established complaint procedure is in place to manage any complaints effectively. The Management Plan shall outline details of how complaints will be addressed, the means for reporting, and the appropriate channels through which they can be addressed.</p>
<ul style="list-style-type: none"> Safety and security 	<p>Safety and security are of paramount importance for Short-Term accommodation. Therefore, the Management Plan will incorporate safety and security measures that would be followed to limit potential safety concerns.</p>
<ul style="list-style-type: none"> House Rules 	<p>The House Rules comprise a comprehensive set of guidelines that specify what visitors are allowed to do during their stay at the premises and what is considered unacceptable behaviour. They provide a clear and concise outline of what is permissible and prohibited within the Holiday home to ensure that all occupants and guests are aware of the expectations and requirements in maintaining an orderly and respectful environment.</p> <p>The House Rules also cover a range of topics, such as noise levels, smoking, pets, and general safety and security measures. They also provide clear instructions on how to utilise the amenities within the accommodations and how to maintain them in a clean and hygienic condition while maintaining amenity of the residential neighbourhood. By adopting these measures, the owner can rest assured that their asset is well-maintained, while visitors abide by the House Rules during their stay.</p>
<ul style="list-style-type: none"> Car Parking 	<p>The Management Plan incorporates parking measures to ensure safe and accessible use of the existing double garage, minimising any adverse impact on the surrounding neighbourhood. The two parking bays within the garage are considered sufficient to meet the expected demand for the short-term accommodation, which is intended to cater to couples, families, or small groups who typically arrive with no more than two vehicles.</p> <p>As shown in Appendix A – Architectural Plans, the 3-bedroom dwelling is designed to accommodate a maximum of six (6) adults. This occupancy cap directly supports the proposed parking arrangement, as it ensures that vehicle numbers remain consistent with available on-site parking.</p> <p>The parking provision within the double garage is therefore adequate for the scale and nature of the accommodation. Furthermore, the limit on guest numbers—enforced through a condition of approval—will help manage parking demand and prevent overflow into the surrounding area.</p>

4.0 CONCLUSION

The purpose of this application is to seek planning approval for a Change of Use from 'Single House' to 'Residential Building (Short Term Accommodation)' at Lot 6 (18) Blair Athol Street, East Victoria Park. As outlined in the accompanying planning report, the proposed use complies with the objectives and requirements of the Town of Victoria Park Local Planning Scheme No. 2.

The subject site offers a highly suitable location for short-term accommodation, given its close proximity to current and future tourism amenities. Situated near the vibrant Albany Highway dining precinct, guests will enjoy convenient access to a wide array of cafes, restaurants, and pubs—enhancing their overall visitor experience.

With strong transport connections, nearby dining and entertainment options, and its close proximity to key education and employment hubs, 18 Blair Athol Street is ideally positioned to support short-term rental accommodation. The proposal aligns with the Town's criteria for areas of tourism interest and contributes to the provision of accessible, high-quality visitor accommodation within the Town of Victoria Park.

Furthermore, the existing dwelling presents a design and scale that is consistent with the surrounding residential character, ensuring it blends harmoniously into the streetscape. The accompanying Management Plan and House Rules provide clear operational guidelines to mitigate any potential impacts on neighbouring properties, maintaining residential amenity in the local area.

In view of the development's contribution to local tourism, economic activity, and its compatibility with planning objectives, we respectfully request that the Town of Victoria Park give favourable and timely consideration to this application.

Should you require any further information, please contact the undersigned via email on peter@parpdconsultants.com

Yours sincerely,



DIRECTOR

Master Urban & Regional Planning (Curtin)

Bachelor of Architecture (Hons) (Deakin)



APPENDIX A – Architectural Plans