

Schedule of Submissions

Application for Development Approval (5.2025.31.1) – Change of Use from Residential to Short-term accommodation –

147 Sussex Street EAST VICTORIA PARK - LOT 331 PLAN 22521

No.	Submission Position	Summary of Submission Comments	Officer's Comments/ Recommendation
1.	Support	n/a	a) Noted
2.	Objection	<p>I strongly oppose the development application as we've already had an issue with parking on the street. There are quite a few rentals with lots of people in (not sure if they are officially multi-tenant or if everyone there has a car each) but there most definitely isn't enough parking for 4 cars (it's a 4 bedroom house, but potentially 6 cars for 6 unrelated people!?) actually on the property. The car port and drive has room for max. 2 cars which means people are going to be parking on the street - add that to the several rentals with multiple cars on the street already, and we have even more of a problem.</p> <p>We also don't have any public transport close by, there are bus stops on Jarrah, Kent and Etwell but they are more than 400m away. So people block up the street parking on both sides or park on the verge which means the verges get into even more of an unsightly mess than they already are. There is little to no care from the council in terms of keeping verges tidy around this part of East Vic Park - despite improving the streetscape being one of your policies right?</p> <p>We also have a crime issue in the area, the streets around Devenish, Etwell, Jarrah and leading all the way down to Coles on Sussex St are constantly affected by crime. We have had police visit our house 6 times in the last 2 years to request our CCTV camera footage - that's the times they have been looking for footage of a serious crime, not the times when they haven't bothered because it was a smaller crime.</p> <p>Having short-term accommodation is going to add to that issue - who are these transient people coming and going? It's neglectful of a council to even consider</p>	<p>a) Parking – refer to the planning assessment section of the report for further discussion.</p> <p>b) Location Criteria – An assessment has identified bus stops within 400m of the site which have high frequent bus timetables:</p> <ul style="list-style-type: none"> - Kent Street Bus 960: 250m to North <p>However, as discussed the planning assessment section of the report, the application is not considered to satisfy the minimum two locational criteria.</p> <p>c) Crime – whilst the Town understands that there will be a perceived loss of safety created by the transient nature of guests, the previous crimes do not relate to this application.</p>

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		<p>this application let alone put it to consultation.</p> <p>To wrap up I strongly oppose this application on the grounds of:</p> <p>It's ridiculous to put 6 unrelated people in a 4 bedroom short term rental house unless you want a crack den.</p> <p>There is not enough parking for 4 cars let alone potentially 6.</p> <p>You are messing up the streetscape even more when that's one of your policies to improve.</p> <p>Short term accommodation needs to be within 400m of public transport and this is not.</p>	
3.	Objection	<p>As an owner and occupier of a property in close proximity to 147 Sussex Street, I am writing to strongly object to the proposed development application for the use of the property as an unhosted short-term rental accommodation housing up to six unrelated persons in a four-bedroom residential dwelling.</p> <p>This objection is submitted under the provisions of Local Planning Policy 37 – Community Consultation on Planning Proposals, and is based on serious concerns regarding parking inadequacies, incompatibility with the surrounding residential environment, potential for overcrowding, and detrimental impacts to the amenity and safety of the neighbourhood.</p> <p>1. Inadequate Parking Provisions and Traffic Safety Hazards The submitted Management Plan (dated 07/03/2025) of the CONSULTATION-PLAN-SET-147-Sussex-Street document (Section 3.6 – Car Parking) states: <i>"Car port is located on the front of the property which can accommodate two Sedans or Mid-size SUVs. Guests can also park on the driveway as the house is on the back of the block."</i> This provision is grossly inadequate considering the proposal to accommodate</p>	<p>a) Parking – refer to the planning assessment section of the report for further discussion.</p> <p>b) Amenity – the definition of short-term accommodation under LPP31 allows up to a maximum of “6 persons that do not comprise a single family at any one time.” Given residential dwelling is permitted to have a maximum of 6 unrelated persons living in them, this scale is considered acceptable. However, as discussed in the planning assessment section of the report, the number of guests for this Unhosted STRA is unclear.</p> <p>c) Management – LPP31 stipulates that the person responsible for enforcing the management plan must be available by direct</p>

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		<p>six unrelated persons, many of whom may own one or more vehicles. This would create an overflow onto the street, forcing kerbside parking that cannot be safely or legally accommodated.</p> <p>Local Planning Policy 23 – Parking, particularly Section 7.4 – Kerbside Parking, requires that parking must: <i>“Avoid conflict with driveways, street infrastructure or sight lines and consider the impact on adjoining properties.”</i></p> <p>The kerbside along 147 Sussex Street is dipped and includes a stormwater drain, making it unsuitable for parking. Furthermore, it is directly opposite the driveway of 148A Sussex Street, creating a hazardous conflict point. Vehicles have already been observed obstructing driveways and damaging surrounding vehicles due to tight street conditions and limited visibility. This proposal would dramatically worsen these conditions.</p> <p>2. Overcrowding in a Residential-Zoned Property According to the Management Plan, the property will host: <i>“A maximum of no more than 6 unrelated persons.”</i></p> <p>Under Town Planning Scheme No. 2, this qualifies as a discretionary (‘A’) use in the Residential Zone. However, cramming six unrelated adults into a four-bedroom house amounts to overcrowding, particularly when no host is on site to monitor behaviour. This use exceeds the reasonable scale and character expected in a single-dwelling residential area.</p> <p>3. Management Oversight and Local Response Capability The nominated Manager resides in Mount Pleasant, approximately 15–17 minutes away. The reliance on remote noise monitoring and keyless entry fails to provide effective on-site supervision or immediate response in case of disturbances or safety issues.</p> <p>Given the transient nature of the tenants and the lack of a live-in host, enforcement of house rules and neighbourhood consideration will be virtually impossible to guarantee.</p>	<p>telephone at all times and that they can respond within one (1) hour of any complaint.</p> <p>d) Property Values – the Town acknowledges your concerns; however, property values are not a matter that can be considered through a development application.</p> <p>d) Policy Objectives – as outlined in the planning report, the Town officers concur that a number of the LPP31 policy objectives are not met.</p>

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		<p>4. Devaluation of an Already Neglected Area The section of Sussex Street between Etwell Street and Jarrah Road is already suffering from poor road conditions, aging and damaged signage (especially at the Mofflyn Circle path access), and general neglect by the Town. Approval of this proposal would further devalue an already vulnerable part of East Victoria Park and send a concerning message to nearby homeowners who take pride in their properties.</p> <p>5. Non-Compliance with Local Planning Policies The proposal fails to comply with several relevant Town of Victoria Park Local Planning Policies:</p> <p>Local Planning Policy 3 – Non-Residential Uses in or Adjacent to Residential Areas: This policy aims to protect residential amenity, limit traffic generation, and ensure compatibility in scale and design. The proposed use introduces excessive traffic, parking congestion, and transient occupancy into a stable residential community.</p> <p>Local Planning Policy 23 – Parking: Emphasises that parking facilities must not obstruct the streetscape or create safety concerns. Kerbside parking and increased traffic caused by this proposal will violate these core principles.</p> <p>Local Planning Policy 25 – Streetscape: Encourages development that maintains and enhances residential character. Short-term accommodation with a revolving door of unrelated adults stands in stark contrast to the desired character and rhythm of this established street.</p> <p>Local Planning Policy 31 – Serviced Apartments and Residential Buildings: Section 1.2 of this policy requires that short-term accommodation be located within 400m of public transport or a commercial centre. 147 Sussex Street fails to meet the location criteria, meaning it should not be approved under this policy.</p> <p>Conclusion The proposed use of 147 Sussex Street as unhosted short-term accommodation for six unrelated persons poses serious and justifiable concerns, including:</p>	

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		<p>a) Insufficient on-site and kerbside parking resulting in road obstructions and increased safety risks.</p> <p>b) Overcrowding and incompatible land use in a quiet residential area.</p> <p>c) Poorly resourced local management and inadequate enforcement of behavioural standards.</p> <p>d) Degradation of residential amenity, increased risk of antisocial behaviour, and decline in neighbourhood property values.</p> <p>e) Clear breaches of the Town's own Local Planning Policies and objectives.</p> <p>I would like to add to my original objection, as outlined in the attached letter—particularly the point regarding "insufficient on-site and kerbside parking resulting in road obstructions and increased safety risks."</p> <p>This concern was unfortunately demonstrated this morning at approximately 6:00 AM, when we were awoken by a rubbish truck that was forced to reverse all the way back to Jarrah Road after being unable to pass two vehicles parked outside 147 Sussex Street, East Victoria Park.</p> <p>Additionally, I wish to clarify that the carport referenced in the application cannot accommodate two vehicles as claimed. There is a tin shed installed within the carport, which restricts the available space to a single vehicle.</p> <p>In light of these issues, I respectfully request that the Town of Victoria Park refuse Development Application 5.2025.31.1 in its current form.</p>	
4.	Objection	<ol style="list-style-type: none"> 1. Disruption to Residential Character: The transient nature of STRA guests can alter the established character of a neighborhood, leading to a diminished sense of community among long-term residents. 2. Increased Noise and Activity: Short-term tenants may engage in activities that generate higher noise levels, especially during evenings and weekends, disrupting the peace of residential areas. 3. Parking Congestion: Additional vehicles associated with STRA guests can exacerbate parking shortages, leading to inconvenience for 	<p>a) Parking, amenity and safety – refer to above comments</p> <p>b) Noise - noise levels are required to be maintained in accordance with the <i>Noise Regulations</i> and will be monitored through the Management Plan. It is noted that the Town has previously received a noise complaint regarding this Unhosted STRA.</p>

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		<p>permanent residents.</p> <p>4. Safety and Security Concerns: A constant turnover of occupants may raise concerns about neighborhood security, as residents are less familiar with short-term visitors compared to long-term neighbours.</p> <p>5. Impact on Housing Availability and Affordability: The conversion of long-term rental properties to short-term accommodations can reduce the availability of housing for local residents, potentially driving up rental prices.</p>	<p>c) Housing Affordability & Availability – the Town acknowledges that the use of residential dwellings for short-term accommodation has some impact on housing affordability and availability. Notwithstanding this, the Town's objectives regarding short-term accommodation are to find a balance between the economic benefits provided by short-term accommodation and the protection of residential amenity for permanent and long-term residents. This objective may result in some limits placed on short-term accommodation but does not prevent the approval of appropriately located and high-quality short-term accommodation.</p>
5.	Objection	<p>a) Concern about the Managers – investors who don't care about the location, only making money. Priorities and interests don't align with the area. Rules are "authoritarian".</p> <p>b) Housing Affordability & Availability – the short-term accommodation removes additional housing options for those who need places to live.</p>	<p>a) Concern about the Managers – Refer to the planning assessment section of the report for further discussion.</p> <p>b) Housing Affordability & Availability – the proposed development is required to be considered by the Town in accordance with the planning framework. Whilst concern for housing availability for long-term rentals is acknowledged, the application must be considered on its merits.</p>