

26 June 2026

SLR Project No.: 675.074013.00001

**RE: Approved Mixed Use Development at 192 Stirling Street, Perth
Minor Amendment Application**

Further to the development approval issued by the Metro Inner Development Assessment Panel (DAP) at its meeting of 4 June 2025, SLR Consulting Australia Pty Ltd (SLR) is pleased to enclose this minor amendment application seeking approval for proposed modifications to the approved mixed-use, co-living development at 192 Stirling Street, Perth (the subject site).

In accordance with Regulation 17 of the *Planning and Development (Development Assessment Panel) Regulations 2011*, the applicant elects for this minor amendment application to be determined by the Metro Inner DAP, based on a report and recommendation prepared by the City of Vincent (the City).

In accordance with the City and DAP requirements, please find enclosed:

- Completed and signed Application for Development Approval and MRS Form 1.
- A completed DAP Form 2.
- A current copy of the relevant Certificate of Title and associated Plan of Survey.
- A copy of the amended architectural plans prepared by CCN Architects.
- An updated Waste Management Plan (WMP) prepared by Talis Consulting.
- An updated Transport Impact Statement (TIS) and associated Parking Management Plan (PMP) prepared by Urbii.
- A copy of the preliminary Operational Management Plan (OMP) for the co-living component of the approved development.

Subject Site

The subject site comprises Lot 601 (No. 192) Stirling Street, Perth and is situated at the southeast corner of the intersection of Stirling Street and Edward Street.

The Certificate of Title details for the subject site are summarised in Table 1 below.

Table 1 – Certificate of Title Details

Lot	Plan	Volume	Folio	Area	Street Address
601	65807	2759	696	1,221m ²	192 Stirling Street Perth

The subject site is owned by 192 Stirling St Pty Ltd in freehold, and there are four separate easements listed on the Certificate of Title, as detailed in the original development application submission.

However, these easements are all located towards the south-eastern boundary of the subject site, along the existing through site link that connects to the adjacent property at 190 Stirling Street. The approved development has therefore been designed around the required clearances for all existing easement rights to be retained at Ground Floor level, with built form above from Level 1 onwards. No changes are proposed to this previously approved arrangement as part of this minor amendment application.

The subject site is zoned 'Urban' under the Metropolitan Region Scheme (MRS) and is not affected by any reservations or Clause 28 resolution areas under the MRS.

The subject site is zoned 'Mixed Use' under the City of Vincent Local Planning Scheme No. 2 (LPS2), with an associated residential density coding of R80.

Project Background

At its meeting of 4 June 2025, the Metro Inner DAP granted conditional approval for the construction of a seven-storey mixed use development at the subject site, comprising a 565m² ground floor commercial tenancy with 88 co-living apartments and four associated guest suites above, supported by ground and basement level car parking facilities.

The proposed co-living model is intended to provide centrally managed, build-to-rent accommodation that offers compact, high-quality living options with flexible leasing arrangements and a range of shared communal amenity facilities.

On-site parking for private vehicles was intentionally limited, to encourage a mode shift to more sustainable transport options within a true mixed-use, inner-city urban area, and to reflect the unique nature of the co-living use and its targeted resident demographic.

The development was approved with a standard four (4) year substantial commencement period from the date of the issued approval notice of 12 June 2025. Accordingly, the approval remains valid until 12 June 2029.

Proposed Amendments

Following receipt of the original development approval, the proponent finalised property settlement and was able to undertake more detailed site investigations to support the implementation of the approved development.

These site investigations included a detailed geotechnical assessment, which identified that conditions on-site are less conducive to successful, low-impact basement construction than was previously known, due to the identified sandy soil conditions, high water table and presence of acid sulphate soils. These considerations greatly impact the viability of basement construction on what is a relatively small, inner-city site with neighbouring buildings established at a nil boundary setback.

As a result, this minor amendment application seeks to remove the previously approved Basement level, and reconfigure the Ground Floor parking and servicing facilities to accommodate the removal of the previously approved Basement level.

Specifically, these changes to the Ground Floor include:

- A reduction in the size of the previously approved commercial tenancy, to accommodate additional car parking, bicycle parking and residential stores.
- Reconfiguration of building services and waste storage facilities.
- Removal of the dedicated on-site loading area and ACROD bay, with alternative arrangements provided as detailed in this correspondence and the accompanying TIS and WMP.



No changes are proposed above the Ground Floor level, and a comparison with the composition of the originally approved development is provided in Table 2 below.

Table 2 – Amended Development Summary Comparison

Component	Approved Development	Amended Development
Co-living units	88 units and 4 guest suites	88 units and 4 guest suites
Commercial floorspace	565.1m ²	285.49m ²
Resident car bays	10 bays	2 bays
Resident car share bays	6 bays with cars to be provided by the operator	8 bays with cars to be provided by the operator
Visitor car bays	4 bays	4 bays
Commercial car bays	5 bays, including one ACROD bay	2 bays, with ACROD bay proposed in Edward Street verge
Resident motorcycle bays	8 bays	1 bay
Resident bike spaces	44 spaces	44 spaces
Commercial bike spaces	9 spaces	4 spaces
Visitor bike spaces	6 on-site spaces 12 spaces in Stirling Street verge.	0 on-site spaces 12 spaces in Stirling Street verge
E-scooter charging bays	4 bays	10 bays
End-of-trip facilities	1 shower and associated lockers	1 shower and associated lockers
Residential Stores	39 stores	39 stores

Works Within the Road Reserve

To support the implementation of the previously approved development, the proponent has always intended to pursue related modifications within the adjacent road reserves in order to deliver new street trees and on-street car parking arrangements along Edward Street, and a new pocket park within the Stirling Street verge.

As an extension of these previously identified works within the road reserve, the proponent now intends to relocate the ACROD bay that was previously provided on-site by providing a dedicated on-street ACROD bays as part of the proposed Edward Street modifications. This approach enables on-site parking bay provision to be optimised as much as possible, whilst also resulting in the ACROD bay being located closer to the main commercial entries and in a location that can better service the broader community.

Whilst these proposed works within the road reserve are located outside the boundaries of the subject site and therefore do not form part of the development application, the proposed modifications have been shown on the plans provided for context and completeness, and we would welcome the opportunity to discuss this further as part of the development application amendment process.



Planning Assessment

Car and Bicycle Parking

The primary planning considerations associated with the proposed amendments are in relation to the required car and bicycle parking provision in the context of both the removal of the previously approved Basement level, and the reduction in the size of the Ground Floor commercial (shop) tenancy. These matters are addressed below.

Residential Co-Living Component

A revised assessment against the residential parking requirements set out under Section 3.9 of the Residential Design Codes – Volume 2 (R-Codes) is provided in Table 3 below.

Table 3 – Residential Parking Requirements

Applicable Parking Rates	Required	Provided
<u>Car Parking</u> 0.75 resident bays per dwelling, noting that the development comprises studio and one-bedroom co-living units only. 1 bay per 4 dwellings up to 12 dwellings, and 1 bay per 8 dwellings for the 13 th dwelling and above, for residential visitors.	66 resident bays. 12.5 residential visitor bays.	2 lettable resident bays and 8 resident car share bays, with car share vehicles to be supplied, maintained and managed by the co-living operator. 4 residential visitor bays.
<u>Bicycle Parking</u> 0.5 resident bike spaces per dwelling. 1 residential visitor bike space per 10 dwellings.	44 resident bike spaces. 9 residential visitor bike spaces.	44 secure, on-site bike spaces are provided for residents. 12 visitor bike spaces are located within the Stirling Street verge, as shown in the previously approved development plans. These are intended to be shared between commercial and residential visitors in a reciprocal arrangement.

As the above table demonstrates, the proposed development complies with the relevant residential bicycle parking requirements.

Residential visitor car parking is also consistent with the original development approval, with four (4) on-site residential visitor bays to service the 88 approved co-living apartments.

However, the removal of the previously approved Basement level has resulted in a reduction in the number of lettable resident car parking bays from ten to two, offset by an increase in the number of share cars to be provided from six to eight.

In this regard, it is noted that the City previously assessed each car share bay as having the capacity to offset demand for nine standard resident car parking bays, based on the guidance provided by the Austroads Guide to Traffic Management, resulting in the following assessment at the time of the original development approval:



Based on the proposed provision of six car share vehicles, this would reduce the need for 54 privately owned vehicles. Including the provision of 10 dedicated resident bays, the car share model would accommodate the equivalent of 64 car bays.

Utilising this same methodology, the proposed new car parking allocations would result in the eight car share bays offsetting demand for 72 standard resident car parking bays, which exceeds the minimum car parking requirement. With two standard resident car parking bays provided, this would effectively represent an assessed car parking equivalency of 74 bays.

Whilst the number of lettable resident car parking bays is reducing, this can be effectively managed through the centrally managed, build-to-rent, co-living model, as detailed in the accompanying OMP, and noting that:

- The proposed co-living model, offering smaller, furnished apartments and more flexible leasing terms, typically attracts intentional user groups with reduced private car ownership, including younger people and transient students and workers.
- The proposed co-living model therefore does not provide as-of-right car parking availability with leases and allocation of one of the two available car parking bays for private resident vehicles would be an optional extra that is actively managed and negotiated up-front at leasing stage on a user-pays basis. Availability of on-site car parking will be known to prospective tenants at the time they sign their lease.
- The provision of shared vehicles in lieu of parking for private vehicles is fundamentally aligned with the co-living model, which aims to support more flexible and minimalist lifestyles through an increased focus on communal amenities and facilities.
- The provision of shared electric vehicles and the promotion of alternative modes of transport is aligned with the sustainability objectives of the project, as detailed in the original development application submission.

As established through the original development application process, the subject site is also ideally located to accommodate a development of this nature, based on it being in a true mixed-use, inner-city area that is highly walkable and located close to major employment and service functions of the Perth CBD, local retail amenities, and high frequency public transport.

This is also supported by the provision of bicycle parking and e-scooter charging facilities, as well as the framework for promoting the use of alternative modes of transport that is set out in both the enclosed PMP and the previously submitted Sustainable Travel Plan (STP).

The revised approach to the provision of parking for the residential component is therefore still considered appropriate having regard to the nature of the proposed co-living use.

It is also noted that the electric car share facilities would be available for use by residents through a centrally managed, app-based booking system. This will utilise a keyless system to ensure that the availability of vehicles can be appropriately managed based on the tandem parking arrangements proposed for the resident car share bays, as discussed in further detail in the accompanying TIS and PMP. Residents will book access to a car from one of the three tandem bay stacks, rather than booking a specific vehicle, and the electronic booking system will track vehicle scheduling to ensure that cars are not double-booked by residents.

Non-Residential Component

A revised assessment against the non-residential parking requirements set out under the City's Non-Residential Parking Policy is provided in Table 4 below. This is based on the commercial tenancy test fit-out plan that is enclosed as Attachment 1, consistent with the



assessment undertaken by the City as part of the original development application, resulting in an assessed Net Lettable Area (NLA) of 255m².

Table 4 – Non-Residential Parking Requirements

Applicable Parking Rates	Required	Provided
<u>Car Parking</u> 4 bays per 100sqm NLA. Rounded to nearest whole number.	10.2 (10) bays.	Two (2) commercial bays. These are provided in a tandem arrangement and are therefore intended for commercial tenants only (not commercial visitors).
<u>Bicycle Parking</u> 1.6 short term (visitor) spaces per 100sqm NLA. Rounded up. 0.9 long term (tenant) spaces per 100sqm NLA. Rounded up.	4.1 (5) visitor bike spaces. 2.3 (3) tenant bike spaces.	12 visitor bike spaces are located within the Stirling Street verge, as shown in the previously approved development plans. These are intended to be shared between commercial and residential visitors in a reciprocal arrangement. 4 secure, on-site bike spaces are provided for tenants.
<u>End-of-Trip Facilities</u> 1 shower per 5 tenant bicycle parking spaces. 1 locker per tenant bicycle parking space.	1 shower facility. 3 lockers.	1 unisex, universally accessible shower facility. 6 lockers.

As the above table demonstrates, sufficient bicycle parking and end-of-trip facilities are provided to service the modified Ground Floor commercial tenancy. However, a shortfall of eight on-site commercial car parking bays is proposed. In support of the approval of this revised commercial car parking shortfall, the following points that informed the assessment undertaken by the City at the time of the original development approval are noted:

- Based on the location of the subject site in an inner-city, mixed-use area, the proposed shop is expected to serve a relatively local catchment, with a primary focus on serving customers that reside in the co-living accommodation above. These local customers would not require car parking and could walk or cycle to and from the subject site, meaning that the City was prepared to reduce the assessed car parking requirement by the equivalent number of surplus bicycle parking spaces provided for commercial tenants.
- Public parking is available in the locality, providing a suitable alternative in the context of the mixed-use nature of the surrounding area, where customers parking in the area may attend the proposed shop in conjunction with a range of other local businesses in one trip.
- A cash in lieu payment to offset the requirement for four commercial car parking bays was applied at the time of the original development approval.



Utilising this same methodology, the proposed shortfall in on-site commercial car parking can be reduced by five bays, based on the one bay surplus of commercial tenant bicycle parking and the agreed four bay cash in lieu arrangement.

The remaining three bay shortfall can then be appropriately offset by the availability of public on-street parking in the immediate vicinity of the subject site, having regard for both:

- The proposed provision of three on-street bays immediately adjacent the subject site within the Edward Street verge; and
- The general availability and spare capacity of street parking within Stirling Street and Edward Street that was identified through previous occupancy surveys undertaken by the City and referenced in the City's report on the original development application.

This approach also reflects the nature of the surrounding area as an inner-city, mixed-use precinct, where a proportion of patrons can be expected to typically park once and visit a range of destinations, with high levels of reciprocity in car parking use.

The revised approach to the provision of parking for the non-residential component is therefore still considered appropriate having regard for the previous assessment methodology and the reduced size of the proposed commercial (shop) tenancy.

It is also noted that the two commercial bays are proposed in a tandem arrangement and are therefore intended for commercial tenant use only, rather than general customer parking. This will avoid customer vehicles blocking each other and supports more orderly operation of the on-site commercial parking supply.

Loading and Servicing

As noted previously, the proposed amendments will result in the removal of the designated on-site loading area that was previously proposed.

However, the proposed development is not expected to generate significant service vehicle traffic, and the majority of deliveries associated with the commercial tenancy and co-living component (which provides fully furnished units) are expected to be undertaken by smaller vehicles, such as vans or utes.

Smaller delivery vehicles can therefore utilise an available visitor bay for short-term loading and unloading activity, subject to the management arrangements detailed in the accompanying PMP.

Waste collection is then proposed to occur within the shared easement / right-of-carriageway area to the rear of the subject site, which connects from Edward Street through to Parry Street.

As detailed in the accompanying TIS and PMP, swept path analysis has been undertaken for an 8.8m Medium Rigid Vehicle (MRV), to verify the suitability of access and circulation for a small rear loader waste truck. The waste collection vehicle will enter the easement area from Parry Street, temporarily park within the shared parking aisle adjacent the waste collection point, and then proceed to exit via Edward Street in forward gear.

Loading and waste collection activities will also be actively managed to avoid conflict with peak parking demand and general vehicle circulation within the ground level parking area, consistent with the accompanying PMP.

Revised waste generation calculations based on the reduced commercial tenancy area have also been provided in the enclosed WMP.



Requested Modifications to Conditions

The proposed amendments also give rise to a request to modify a number of the existing conditions of development approval, as set out in Table 5 below.

Table 5 – Requested Modifications to Conditions

Condition No.	Proposed Modifications	Rationale
5.1	Prior to occupation or use of the development car parking bays shall be provided on-site and are to be permanently marked for the exclusive use of the mixed use development parking in accordance with Australian Standard AS2890.1 and AS2890.7 as per the following: - A minimum of ~~10~~ two resident, ~~six~~ eight car share and four visitor car parking bays and ~~eight~~ one motorcycle/scooter parking bays shall be provided for the residential component. The resident, car share and visitor parking bays shall be clearly marked and sign posted and legally accessible at all times; and - A minimum of ~~five~~ two car parking bays for the non-residential component.	To reflect the modified parking provision and allocations put forwards as part of this minor amendment application.
5.4	Bicycle parking and end of trip facilities shall be designed and constructed in accordance with Australian Standards AS2890.3, and shall be installed prior to occupancy or use of the development in the following locations, to the satisfaction of the City: - A minimum of 44 long term bicycle parking bays and ~~four~~ ten E-Scooter parking and charging bays, allocated for the use of residents and provided within the basement car park. - A minimum of ~~nine~~ four long term bicycle parking bays, allocated for use by of the commercial tenancy and provided within the ground floor commercial bicycle store; ~~A minimum of six short term bicycle parking bays provided within the ground floor car park;~~ - A minimum of 12 short term bicycle parking bays provided within the Stirling Street verge; and - A minimum of one end of trip facility for the commercial tenancy, comprising a single unisex shower, associated change space and individual locker.	To reflect the modified parking provision and allocations put forwards as part of this minor amendment application.



Condition No.	Proposed Modifications	Rationale
5.5	Prior to occupation of the development, a detailed Parking Management Plan for the management of the car share bays shall be submitted to and approved by the City. The Parking Management Plan is to include, but is not limited to addressing details and measurement measures relating to the following matters: - Detailed management measures for the operation of the basement ground floor car park, to ensure access is readily available for visitors at all times; - The installation of signage if required to identify the location of and access to the on-site car parking bays for residential visitors; ~~The installation, provision and ongoing maintenance of an appropriate traffic management system to the vehicle access ramps and within the car parking areas. This system may include signals, alerts and mirrors and shall be designed to minimise conflict of vehicles entering and exiting the basement car parking area;~~ - Management of shared car parking bays for use by residents and arrangements for where a resident owns a private vehicle, including a maximum allowance on the amount of bays that can be allocated for exclusive use by residents; and - Detailed management measures for the management of deliveries and service vehicle movements to ensure the function of the car parking area is not impacted and all deliveries and service vehicle movements would occur on-site. The approved Parking Management Plan shall be implemented prior to the occupation or use of the development, and the development shall be carried out in accordance with the approved Parking Management Plan, to the satisfaction of the City at the expense of the owners/occupiers.	To reflect the proposed removal of the previously approved basement car parking level and associated modifications to car parking and access arrangements.

Conclusion

In addition to the assessment and justification provided throughout this correspondence, we note that the proposed minor amendments will support the delivery of a project that will make a significant contribution to local housing supply and diversity in a manner that aligns with the key State and local planning priorities.



The project is also of a high quality and appropriate to its setting, as clearly established through the original DAP application process, with the proposed minor amendments not proposing any alteration to the approved bulk and scale of the development, or the layout of the co-living apartments and associated communal amenities.

As such, the proposed minor amendments are consistent with the principles of orderly and proper planning, and warrant approval accordingly.

We trust the information provided will assist the City in its assessment of the proposed minor amendments, and we look forward to the approval of this application at the earliest opportunity.

Should you have any queries or require clarification on the above matters, then please do not hesitate to contact the undersigned on 0437 056 465.

Yours sincerely,

Attachments 1. Commercial Tenancy Test Fitout

