

PS ref: 8461

12 October 2023

Department of Planning, Lands & Heritage
140 William Street
Perth, WA 6000

Attention: Campbell Grace, Planning Officer – Land Use Planning

Dear Sir/Madam,

**LOTS 465, 466, 470, 471 ANDERSON STREET, PORT HEDLAND
APPLICATION FOR APPROVAL TO COMMENCE DEVELOPMENT
PROPOSED WEST END ACCOMMODATION**

Planning Solutions acts on behalf of DMG Architects Australia, the proponent of the proposed development of Lots 465 (46), 466 (44), 470 & 471 Anderson Street, Port Hedland (**subject site**). We are pleased to make this submission for a six-storey hotel to accompany the development application lodged by DMG Architects Australia.



Figure 1 – 3D perspective of proposed hotel development

The following submission discusses various matters pertaining to the proposal, including:

- Site details
- Proposal
- Town planning considerations

SITE DETAILS

Legal description

The subject site is legally described as:

- Lot 465 on Deposited Plan 208641, within Certificate of Title Volume 1252 and Folio 346;
- Lot 466 on Deposited Plan 208641, within Certificate of Title Volume 1264 and Folio 556;
- Lot 470 on Deposited Plan 208641, within Certificate of Title Volume 440 and Folio 16A;
- Lot 471 on Deposited Plan 208641, within Certificate of Title Volume 1375 and Folio 142.

The subject site has a total area of approximately 4,434 m² with frontage to Anderson Street.

Regional and local context

The subject site is located approximately 13 kilometres northwest of the Port Hedland International Airport and about 17 kilometres north of the South Hedland city centre.

The subject site is within the municipality of the Town of Port Hedland.

The subject site is located within the suburb of West End, being widely surrounded by residential, light industrial, commercial and supply chain logistical activities.

The subject site is bounded by a floor-covering store and an electrical and building contractors company on its western side, Lion's Club Park on the opposite side of Anderson Street, a warehouse/storage facility on its northern side and demountable weatherboard homes on its eastern side.

The subject site is currently occupied by a few demountable weatherboard homes and its adjoined metal veranda, concrete slabs, and semi-permanent storage materials.

Refer Figure 2 below.

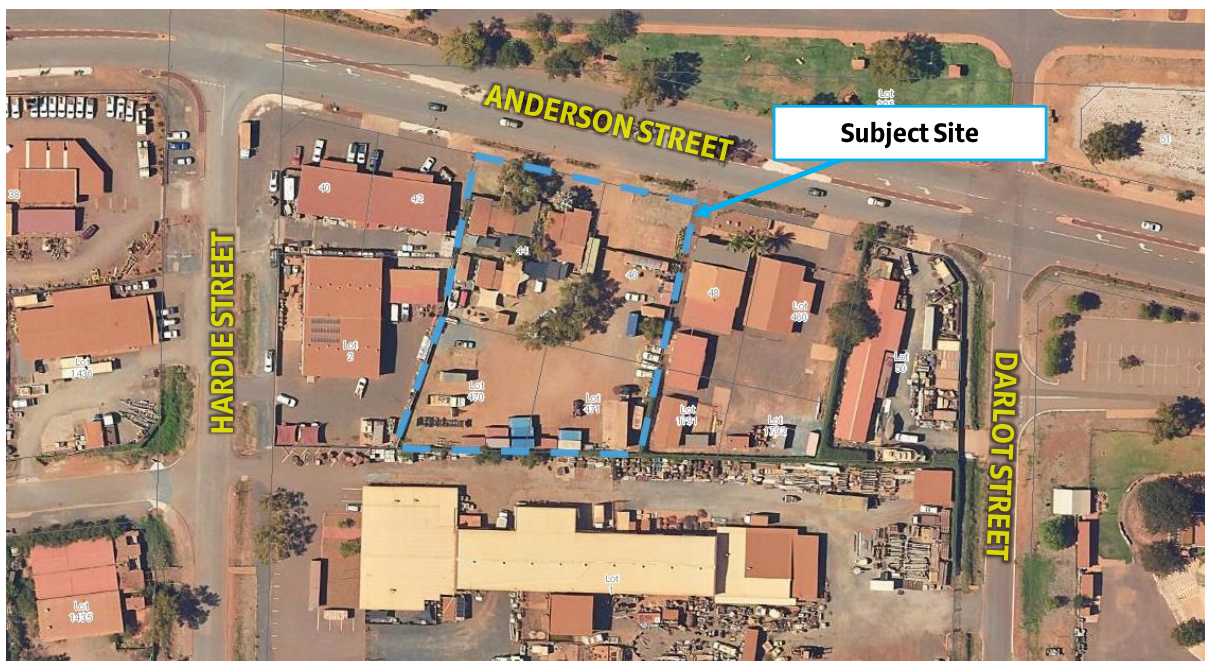


Figure 2: Local context

PROPOSAL

The application proposal seeks to develop a six-storey hotel and associated landscaping, access, parking and amenities. Specifically, the proposal comprises the following:

- A six-storey hotel comprising the following:
 - Ground floor restaurant (360m²)
 - First floor amenities including:
 - 190m² conference room
 - 300m² dining room
 - 90m² gym
 - Second floor recreational areas comprising a pool with decking and landscaping.
 - Accommodation on levels 2-6, comprising 300 rooms in total (36 executive suites, 21 hotel suites and 30 standard rooms)
 - A rooftop bar (400m²)
- Car parking comprising:
 - 118 car parking bays (39 on the ground, 79 on the first floor)
 - 8 motorcycle bays (four on the ground, four on the first floor)
 - 20 bicycle parking racks (all located on the ground floor)
- Associated landscaping along the street boundary and to the rear of the site.
- Removal of existing crossovers with three new crossovers to Anderson Street.

SUPPORTING PLANS AND REPORTS

The following technical reporting and documentation has been provided in support of the proposed development:

Landscaping plan

A landscaping plan detailing site and internal on-structure planting has been prepared by UDLA in support of the application, with the outcomes summarised as follows:

- Landscaping along the street boundary will provide a focal point to the hotel entrance whilst improving the streetscape presentation.
- Planting areas located at the rear boundary provide a barrier between the hotel and adjoining lots,
- Internal planting is focussed around communal and higher traffic areas including the second-floor pool and decking area and internal carparks.

The development will be appropriately landscaped, taking into consideration the location and climate and warrants support accordingly.

Traffic Impact Assessment

The development is supported by a Traffic Impact Assessment undertaken by Urbii. This assessment demonstrates that the development will not result in any negative impacts on the surrounding road network, with the report conclusions summarised as follows:

- The site achieves good connectivity with the existing and planned road network, including cycling and pedestrian infrastructure.

- Modelling demonstrates that traffic generated by the development can be accommodated by the surrounding road network and intersections.
- The subject site contains adequate parking supply to meet the needs and requirements of the development provided that strategies are utilised to reduce car parking demand.

Overall, the TIA is supportive of the proposed development.

Demand analysis report

A demand analysis report has been prepared by Pracsys. This report contains a summary of a demand analysis undertaken to determine the viability of providing 3.5 star to 4 star hotel rooms within Port Hedland. The potential market for the hotel is summarised as follows:

- Overflow accommodation for shut down crews (driven by peak accommodation demand at the beginning and end of shut down projects, and proximity to the port and rail infrastructure).
- Executive accommodation (Port Hedland identified as fifth most-visited domestic business destination from Australia; potentially unmet demand—currently managed by executives limiting overnight stays or being accommodated within workforce accommodation camps).
- Tourism (demand not driven by destination but as a way-point on journeys further north, potential ability to pick up some of the 1.1 million nights spent in Port Hedland per year).
- Other potential sources of demand include construction projects in the surrounding region and backpacker accommodation.

The demand analysis report demonstrates that a viable market for hotel rooms exists in the West End of Port Hedland.

Stormwater management plan

A Stormwater Management Plan was prepared by Ionic Design Australia.

Waste management plan

A Waste Management Plan was prepared by Talis Consultants.

The WMP demonstrates that the development proposal will adequately accommodate the storage of all refuse and recyclables and confirms that a designated private contractor will be responsible for servicing the development onsite. The contractor's waste collection vehicle will enter and exit the site via Anderson Street in forward gear.

Operational management plan

A draft operational management plan has been prepared by Centurion, the proponents of the proposed development.

The operational management plan demonstrates that the proposed hotel will be operated in a professional manner by an experienced operator. The plan also provides a framework for additional changes and updates in response to comments from relevant stakeholders as part of the assessment process.

TOWN PLANNING CONSIDERATIONS

An assessment against the relevant provisions of the local planning framework is provided as follows:

WEST END IMPROVEMENT SCHEME NO. 1

Use class and permissibility

Pursuant to the provisions of WEIS1, the subject site is zoned "West End".

The proposed development has been designed as a hotel capable of delivering 3.5 to 4.0 star rooms in the West End of Port Hedland. Under WEIS1, a "hotel" is defined as follows:

"premises the subject of a hotel licence other than a small bar or tavern licence granted under the Liquor Control Act 1988 including any betting agency on the premises."

The proposed development will be the subject of a hotel licence and provides accommodation and is appropriately classified as a "Hotel".

Whilst the development will accommodate workers engaged in construction, resource and other industries—accommodation will be available to the public, including tourists, backpackers and people visiting family and friends. It would not be appropriate to classify the development as workforce accommodation.

Within the West End zone, a Hotel is a D-class use, meaning that it is capable of approval subject to the Commission exercising their discretion in approving it.

Improvement Scheme Report

Pursuant to clause 6 of WEIS1, the Improvement Scheme Report is to be read in conjunction with the scheme. The Improvement Scheme Report identifies the following opportunities for the development of the West End:

The West End also provides opportunities for the temporary accommodation of workforces linked to the establishment of local businesses and infrastructure projects in the region. Land to be used for this purpose should be identified, with the potential for this type of development to be later converted for tourism purposes or short-term accommodation for employees. A related issue is the need to provide short-term accommodation for people visiting Port Hedland from remote areas to access government support services.

The proposed development will provide for temporary workforces, tourists and short-term accommodation for employees and is consistent with the strategic objectives of the Improvement Scheme Report and warrants support accordingly.

Zone objectives

The objectives of the West End zone under WEIS1 are as follows:

- (a) To establish a flexible zone in which new residential development and other sensitive land uses are prohibited.*
- (b) To provide for the development of a mix of varied land uses such as short-term accommodation, tertiary training and education facilities, offices, showrooms and hospitality establishments.*
- (c) To promote and provide for tourism opportunities including varied short-term accommodation styles and associated uses, retail and service facilities where those facilities will not impact detrimentally on the surrounding or wider area.*
- (d) To encourage the location of tourist facilities so that they may benefit from existing cultural, heritage and port attractions, natural features and urban facilities.*
- (e) To provide for a broad range of port related industrial, service, storage and logistical activities which do not generate nuisances detrimental to the amenity of the surrounding or wider area district.*

(f) To achieve high quality built form and public place design.

(g) Seek to manage possible impacts on local area amenity arising from noise, dust and odour within the zone.

The proposed development is wholly consistent with these objectives for the following reasons:

- The proposed development is for short-term accommodation with guests limited to a maximum of three months per calendar year.
- The development will increase the number and range of short-term accommodation options available within the zone.
- The development has been designed to a high quality consistent with the contemporary expectations of a development of this nature, including architectural detailing, amenities, construction materials and landscaping.

The proposal is consistent with the objective of the West End zone and warrants support accordingly.

Implementation of limitations on short-stay accommodation

It is acknowledged that the operational management plan provided does include specific operational practices intended to ensure that guests are not accommodated for more than three months per calendar year. These details will be resolved in discussion with the DPLH and the Town of Port Hedland and incorporated into a revised operational management plan as a condition of approval.

Precinct intent

To guide the exercise of discretion, the WAPC has adopted *Improvement Scheme Policy No. 1 – West End Precincts (West End Policy)*. This policy provides a guide to land use and development within the West End of Port Hedland.

The West End Policy locates the subject site within the Business Park Precinct (Precinct 2). The West End Policy identifies "preferred" land uses within each precinct. A Hotel is not identified as a preferred land use within Precinct 2—however, this does not prevent the WAPC from exercising their discretion in approving a Hotel in accordance with the scheme provisions.

The intent of the precinct is outlined as follows:

The intent of the business park precinct is to facilitate typical light industrial, commercial and supply chain logistical activities servicing the safe and efficient operation of the Port of Port Hedland and wider community.

Defined uses and development which are generally considered to meet the precinct intent may include manufacturing industries, warehouses, wholesale trade, transport services, distribution centres and associated storage facilities, motor vehicle sales and service facilities.

The precinct may include associated infrastructure required for daily operations of the port such as materials laydown and hardstand areas, security, customs and quarantine requirements, parking facilities, utility installations, and materials transportation infrastructure to support industry.

This precinct may also include other development that does not compromise the existing and future expansion of port operations, port-related industry and supply chain infrastructure.

The precinct clearly entertains "other development" where it does not compromise the existing and future expansion of port operations. This is consistent with the proposed development.

Development requirements

According to Clause 23 of the WEIS1, there are no general development standards and requirements that apply to the Scheme.

PARKING ASSESSMENT

Car parking requirements

Schedule 1 of the Port Hedland *West End – Improvement Scheme No.1* stipulates the car parking requirements applicable to the proposed development. An assessment is provided in the table below.

Table 1 – Assessment of parking provision against the Clause 1 of Schedule 1 – Carparking requirements

Minimum parking requirements		Assessment	Calculated parking requirement
Hotel (includes Dining area, conference room, gym)	1 bay for every bedroom	Levels 2 to 6 have the overall of 300 rooms.	300 bays
	1 bay for every employee	Staffing assumed at 1:15 beds = 20 staff.	20 bays
Restaurant	1 bay for every 4 seats; or 1 bay for every 5m ² seating area, whichever is the greater	Ground floor Restaurant has 270m ² of seating area and 68 seats	54 bays (17 based on seating area)
Total number of bays required			374 bays
Total number of bays provided			118 bays
Total parking shortfall			256 bays

In light of the parking shortfall identified by the assessment above, further justification is required.

Justification for parking variation

The proposed parking shortfall is appropriate for this development for the following key reasons:

1. The methodology and minimum parking requirements under WEIS1 are excessive in light of comparable planning instruments, including the interim guidelines of the DPLH.
2. The proposed operation of this Hotel is expected to generate lower demand for parking due to guests arriving via alternative means of transport.

Further detailed justification is provided as follows:

Inadequate methodology and excessive minimum requirements

The proposed development includes a ground-floor restaurant. An assessment under WEIS1 requires the restaurant to be assessed separately to the rest of the hotel. The ratio for Restaurants varies dramatically depending on whether the seating area versus the number of seats is used (54 v 17) with WEIS1 requiring the greater number to be used.

The DPLH's *Draft Interim Guidelines for Non-Residential Parking* recommends a single wholistic rate be used for assessing Hotels in Service Commercial zones (approximately equivalent to the Mixed Business precinct this site is located in) as follows:

1 space per 2 rooms, plus one space per 4 persons accommodated in bar / restaurant / hospitality areas.

An assessment against this parking rate is provided in the following table:

Table 2 – Assessment of parking requirements against the interim parking guidelines

Minimum parking requirements		Assessment	Calculated parking requirement
Hotel (includes Dining area, conference room, gym)	1 bay for two rooms	300 rooms	150 bays
	1 bay per 4 persons	Ground floor Restaurant has 68 seats	17 bays
		Rooftop bar has an area of 400m ² (est: 90 people)	23 bays
Total number of bays required			190 bays
Total number of bays provided			118 bays
Total parking shortfall			72 bays

This assessment demonstrates that an assessment against the minimum parking requirements recommended by the DPLH generates a significantly smaller shortfall.

Furthermore—this shortfall is like an ‘on-paper’ shortfall only due to the expectation that a large proportion of hotel guests will be either workers or executives and managers who will arrive in taxis/ride-share or company vehicles includes buses.

The proposed access and vehicle movement paths through the development have been designed to easily facilitate vehicle movements and pick-up/drop-off of customers. The ground floor parking area also includes a large pick-up/drop-off bay.

Moreover, the proponent and architect are experienced designers and operators of short-term accommodation and have designed this facility to accommodate the projected number of vehicles during peak occupancy.

For these reasons the parking shortfall is considered to be suitable and appropriate and warrants approval accordingly.

Minimum carparking specifications

Schedule 1 of the Port Hedland *West End – Improvement Scheme No.1* also stipulates the minimum specifications for car parking bays. This includes a requirement that parking bays shall have minimum dimensions of 2700mm wide and 5700mm long.

The proposed parking bays have minimum dimensions of 2500mm wide and 5400mm long. The proposed variation is capable of approval, subject to the WAPC exercising their discretion. The justification for the variation is provided as follows:

- The variation is justified by reference to Australian Standard AS2890.1 which identifies the minimum dimensions for Class 2 Hotel parking bays as 2500mm wide and 5400mm long. The proposed parking is therefore consistent with the Australian standards.
- A minimum width of 2700mm is required for parking areas around shopping centres as these are high turnover bays. The proposed parking area is not a high turnover parking area as most of the cars will parking for an overnight stay.
- 10 ground floor parking bays along the southern boundary are setback 0.8m from the wall allowing for slightly longer vehicles.

- The proposed width of the parking aisles on the ground and first floor is 6m, or 0.2m wider than the minimum dimensions specified by Schedule 1. The increased width accounts for the slightly long vehicles which WEIS1 provides for.
- About a third the parking bays have additional space around the marked bays due to the location of columns, pedestrian walk paths and separation from building walls.

In light of the above, the proposed parking dimensions are demonstrated to be appropriate and warrant support accordingly.

STATE PLANNING POLICIES

Clause 20 of WEIS1 requires several state planning policies to be read into the scheme for the purpose of development assessment. A consideration of applicable policies is provided as follows:

State Planning Policy No. 4.1 – State Industrial Interface

The intent of *State Planning Policy No. 4.1 – State Industrial Interface (SPP4.1)* is to prevent conflict and encroachment between industrial and sensitive land uses. The policy measures encourage decision-makers to consider risks to health and amenity, future strategic land use plans including industrial expansion, management of impacts and transitional arrangements between uses. Whilst these principles are broadly applicable, they are of limited relevance to the assessment of the proposed development for the following reasons:

- *The Port Hedland Dust Management Taskforce Report to Government (2016)* identified the West End of Port Hedland as being impacted by dust generated by port activities associated iron ore export. Most sensitive land uses were identified as being incompatible with the dust impacts.
- *Improvement Plan No. 50 (IP50)* was imposed over the West End to act as the strategic planning instrument for the delivery of an improvement scheme.
- The *West End Improvement Scheme No. 1 (WEIS1)* was gazetted over a portion of the IP50 area to prohibit sensitive land uses and restrict population growth in the West End whilst facilitating opportunities for investment in support of Port activities. WEIS1 specifically excluded short-term accommodation from any prohibition on new sensitive developments subject to no guest being accommodated for periods totally more than 3 months in any 12-month period.

This demonstrates that the existing planning framework has been prepared in a manner consistent with the principles of SPP5.4 and was specifically adopted for the purpose of managing the impacts associated with the industrial activities of the port.

In light of the fact that the proposed development is specifically entertained as a use capable of approval subject to limitations on the length of time guests can be accommodated, the proposed development is considered to be consistent with SPP5.4 and warrant approval accordingly.

State Planning Policy No. 5.4 – Road and Rail Noise

The subject site is located within 300m of Wilson Street, which is classified by *State Planning Policy No. 5.4 – Road and Rail Noise (SPP5.4)* as a "Strategic freight and major traffic route". This triggers an assessment against SPP5.4 to determine if the lot is affected and to what extent.

As short-term accommodation, a Hotel is classified as noise-sensitive land use under the policy. The noise targets for new noise sensitive land uses are as follows:

- Outside, 55dB during the day, and 50dB at night
- Inside, 40dB in living areas during the day, and 35db in bedrooms during the night

Under the policy, a preliminary assessment is required.

Table 3 – Assessment against Road and Rail Noise of SPP 5.4

Transport Corridor Classification	No. of lanes	Distance from road to site	Forecast noise exposure	Exposure Category
Strategic freight/major traffic route (Wilson Street)	2 to 4 lanes	210m	53 dB	None

This preliminary assessment demonstrates that the subject site does not fall within an exposure category which means that the proposed noise sensitive premises is acceptable and does not require the implementation of any additional noise mitigation measures.

State Planning Policy 7.0 – Design of the Built Environment

State Planning Policy No.7.0 – Design of the Built Environment (SPP 7.0) became operational on 24 May 2019. It 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. Refer Table 3 below for an assessment against the ten design principles of SPP7.0.

Table 4 – Assessment against Schedule 1 – Design Principles of SPP 7.0

Design Element	Assessment
1. Context and character Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.	The development is contextually appropriate and consistent with the neighbourhood character and objectives, such as by providing a mix varied land use, promoting and providing tourism opportunities, achieving high quality build form and public place design.
2. Landscape quality Good design recognises that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context.	A concept landscape project has been prepared by UDLA to ensure the proposed landscaping is implemented to the highest standard. The proposal involves native plants that highlight and complement the surrounding Pilbara landscape. Materials, furniture, and fixtures were proposed to enhance the built form and streetscape.
3. Built form and scale Good design provides development with massing and height that is appropriate to its setting and successfully negotiates between existing built form and the intended future character of the local area.	The development is six storeys in height. The design is contemporary, and the facades are well articulated to soften the impact of building height. The reduced setback results in an activated streetscape, providing for high levels of pedestrian interaction.
4. Functionality and build quality Good design meets the needs of users efficiently and effectively, balancing functional requirements to deliver optimum benefit and performing well over the full lifecycle.	Internal circulation is adequately provided through the site with separate pedestrian and vehicle access ensuring good functionality. Functionality and quality are at the core of the proposed design to ensure the needs of users are met.
5. Sustainability Good design optimises the sustainability of the built environment, delivering positive environmental, social and economic outcomes.	The design maximises both ventilation and solar access. The roof is partially covered with solar panels. In addition to the positive environmental aspects, the proposed development will also deliver social benefits (through employment opportunities and an active space) and positive economic outcomes
6. Amenity Good design optimises internal and external amenity for occupants, visitors and neighbours,	The development incorporates functional internal layouts, ensuring appropriate amenities to users besides accommodation. The overall development form and design

	contributing to living and working environments that are comfortable and productive.	treatment will create a high-quality streetscape environment focused on pedestrian movement, safe / efficient vehicle movements and appropriate public realm treatments.
7.	Legibility Good design results in buildings and places that are legible, with clear connections and memorable elements to help people find their way around.	The development has strong articulation with architectural elements on the facade facing the street, ensuring a positive streetscape response. A central element (tree or sculpture) will highlight the entrance to the project.
8.	Safety Good design optimises safety and security, minimising the risk of personal harm and supporting safe behaviour and use.	Safety and security are promoted through maximising opportunities for both passive and active surveillance. The project features an attractive facade facing the main street, allowing pedestrian traffic. Accommodations on all floors are oriented towards the front or sides of the building. The Restaurant/Bar located on the ground floor ensures a higher flow of people.
9.	Community Good design responds to local community needs as well as the wider social context, providing buildings and spaces that support a diverse range of people and facilitate social interaction.	The project responds the local demand for accommodation for temporary workers, visitors, and tourists, offering a variety of three rooms typologies suited to the targeted demographics.
10.	Aesthetics Good design is the product of a skilled, judicious design process that results in attractive and inviting buildings and places that engage the senses.	Overall, the development offers a strong aesthetic outcome by delivering a coherent building form, high-level of articulation and extensive architectural treatment including a range of materials that includes stone cladding, glazing, balustrades, aluminium screens and concrete (in less visible locations).

In light of the assessment in the table above, the proposed development delivers strong design outcomes an warrants approval accordingly.

CONCLUSION

As detailed in this submission, the proponent seeks approval for a six-storey on the subject site. The proposal is consistent with statutory planning framework, with any variations satisfactorily justified. The development warrants approval for the following key reasons:

1. The proposed development delivers a significant investment within the West End of Port Hedland consistent with the strategic objectives of the local planning framework.
2. The development will deliver a boost in short-term accommodation in an ideal location in proximity to port and rail infrastructure.
3. The proposed development offers a positive design outcome in response to the site conditions and surrounding development and is proposed to be constructed to a high-quality
4. Any potential impacts arising from the design and location of the development have been considered and appropriately addressed through this application and supporting documentation.

We therefore respectfully request the application for development approval be considered on its merits and favourably determined.

Should you have any queries or require further clarification in regard to the proposal, please do not hesitate to contact the writer.

Yours faithfully,



JOSHUA CARMODY
SENIOR PLANNER

231012 8461 DA Letter - West End accommodation