

22<sup>nd</sup> June 2023

Shire of Denmark  
953 South Coast Highway  
Denmark WA 6333

Dear Sir,

**Re: Development Application – Change of Use – 1/31 South Coast Highway, Denmark**

Please find attached our Development Application seeking a Change of Use from Boarding House to Multiple Dwellings (10) for the guest house known as 31 on the Terrace, submitted with the signed consent of the owners. Denmark Futures Ltd has an Option to Purchase this property with the intention to turn this guest house into a community asset to improve the diversity of housing options and make some inroads into our dire rental housing situation.

The change to allow 10 micro apartments will provide a housing solution for 10 households, allowing those community members to have a centrally located, stable and affordable home from which they can link to a range of local services, maintain, or engage in employment, volunteering, education and training and maintain their connection with the community.

Please note that this property is not targeted at meeting the needs of those community members with complex needs, but rather community members who are accessing the normal support mechanisms available to the general population residing in their own homes in Denmark. That is, the only additional support they require is the provision of accommodation. Community members with complex needs will continue to be referred to the appropriate service providers.

The property will be managed by Advance Housing, a Community Housing Provider, under a long-term Headlease, with sub leases to qualifying tenants with suitable references. The priority will be the 36 households (half of which are seniors) currently on the waiting list for one-bedroom accommodation.

Denmark Futures recognises that there may be changes in the needs of the community that occur over time, that are reflected in the tenant mix. However, as the property is intended as a long-term community asset, it will be maintained under its current single title, with no strata

titling of the site sought. Denmark Futures will accept appropriate controls to ensure that this is accounted for in any approval.

We encourage you to consider the needs of the Denmark community in your consideration of this proposal.

Denmark is growing steadily. This growth in population (up 40% from 4,511 to 6,310 since 2006) is being accompanied by a key change to housing tenure, as more affluent people move to Denmark and purchase housing that has formerly been available to tenants, resulting in higher numbers of evictions.

Indeed, the availability of rental accommodation within Denmark has been in decline over the past decade, with a reduction in the absolute number of rental properties available from a peak of 588 in 2011 to the 2021 stock levels of 484. This change has resulted in the displacement of more than 100 households, and rising rents for the remainder. The Social Health Atlas reports that Denmark has the third highest level of Household Rental Stress in Western Australia (of all Local Government Areas).

Denmark has a higher proportion of its population on lower incomes than either of its neighbouring shires, or WA as a whole, increasing the vulnerability of the population to economic shocks, and rising living and housing costs.

More than 44% of the total population is aged over 55 and frequently those over 55 are in part time rather than full time work, or retired, and those that rent thus have less options when rental costs rise. Two community forums conducted in 2021 confirmed community members over 55 were increasingly experiencing difficulties in obtaining or retaining housing, with no ready solutions.

The majority of demand is for one-bedroom households. This is consistent with findings of the Australian Housing and Urban Research Institute that a shift to single person households across all age groups is driving demand for additional and more diverse types of housing in Australia. Further, the absolute number of people entering old age as renters will increase, and more will be renting in the private market. The ability of older renters to access affordable and stable housing is set to be an even more pressing issue than it is now. These conclusions are consistent with the findings of the Productivity Commission.

Whilst the private rental market is the fastest growing segment in Australia's property market, this National experience has not been replicated in Denmark, where the percentage of housing stock available for rental is now at a low of 20.49% of all housing stock, well below the national average of 30.6%, and the WA average of 27.3%. That is, the private sector is not creating stock to meet rental demand within Denmark and has not done so for some years.

## **denmark futures**

The stock of social housing (being the combination of social and community housing), has also not kept pace with demand and now represents just 4% of all housing stock compared to 9.7% in 2006.

The Department of Communities and Advance Housing advise that budgetary constraints mean there are no current plans to increase supported housing stock within Denmark. Only 30 houses have been added in the past 15 years at a time when the population has grown by 1,799.

The need for rental housing is now critical, and Denmark Futures, a local registered charity, is acting in conjunction with the community, to provide a partial solution. A key benefit to the community is that this asset will be owned by Denmark Futures and held for the long-term benefit of the community (as is stated in Denmark Futures' constitution) without the risk of a change in priorities by any tier of government. This means that there will always be some one-bedroom accommodation for rent within the town site, at affordable rates.

In addition, Denmark Futures is concurrently working with social impact investors to create new two and three bed housing stock close to the town centre under a build to rent model, however the time frame for this is some years. The acquisition and repurposing of 31 on the Terrace will allow some of the short term urgent need to be met, for some of our community members – who incidentally are often the same community members volunteering to support our community in other ways.

The option expires in October and there is thus some time pressure to confirm whether the property can be used for the intended purpose.

Denmark Futures has already undertaken a considerable amount of background work to establish what would be needed, in terms of physical building alteration in order to address various Code requirements. We have reached a stage where we will need to invest significant funds to obtain the specialist Fire and Structural Engineering reports (expected to exceed \$40,000), necessary to gain the required building permits for the physical alterations. In the meantime, we are concerned that the Shire may not support the change of use, notwithstanding that this can be structurally achieved.

On this basis we would like to take a staged approach to our application, as follows:

Stage 1: Apply for Shire of Denmark approval for change of use to Multiple Dwellings

Stage 2 (assuming Stage 1 is successful): prepare and submit a subsequent application for a Building Permit for the building works inclusive of all necessary supporting reports.

## **denmark futures**

The guest house currently has a maximum occupancy of 28 guests, and the intended conversion will reduce this maximum to between 20 and 22 by increasing the size of many of the apartments to improve livability.

Plans are included with this DA.

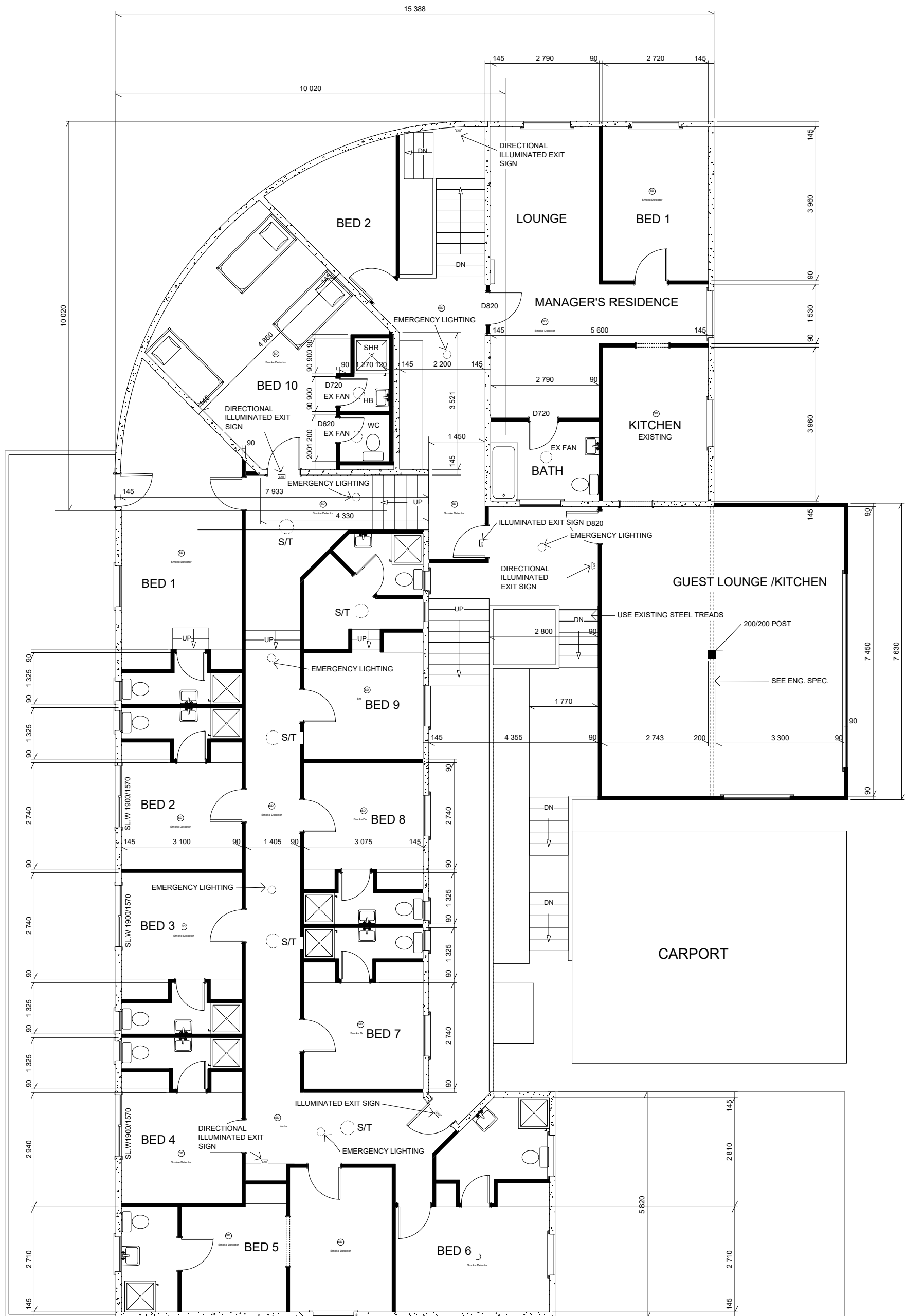
The property has been selected by Denmark Futures Ltd as it is the only property within the Shire of Denmark that has the possibility of multiple occupancy and has zoning suitable for multiple dwellings (use not listed). Whilst other options have been explored the tourist zoning rules them out for conversion to residential use.

We would value your positive consideration of this application.

Kind regards



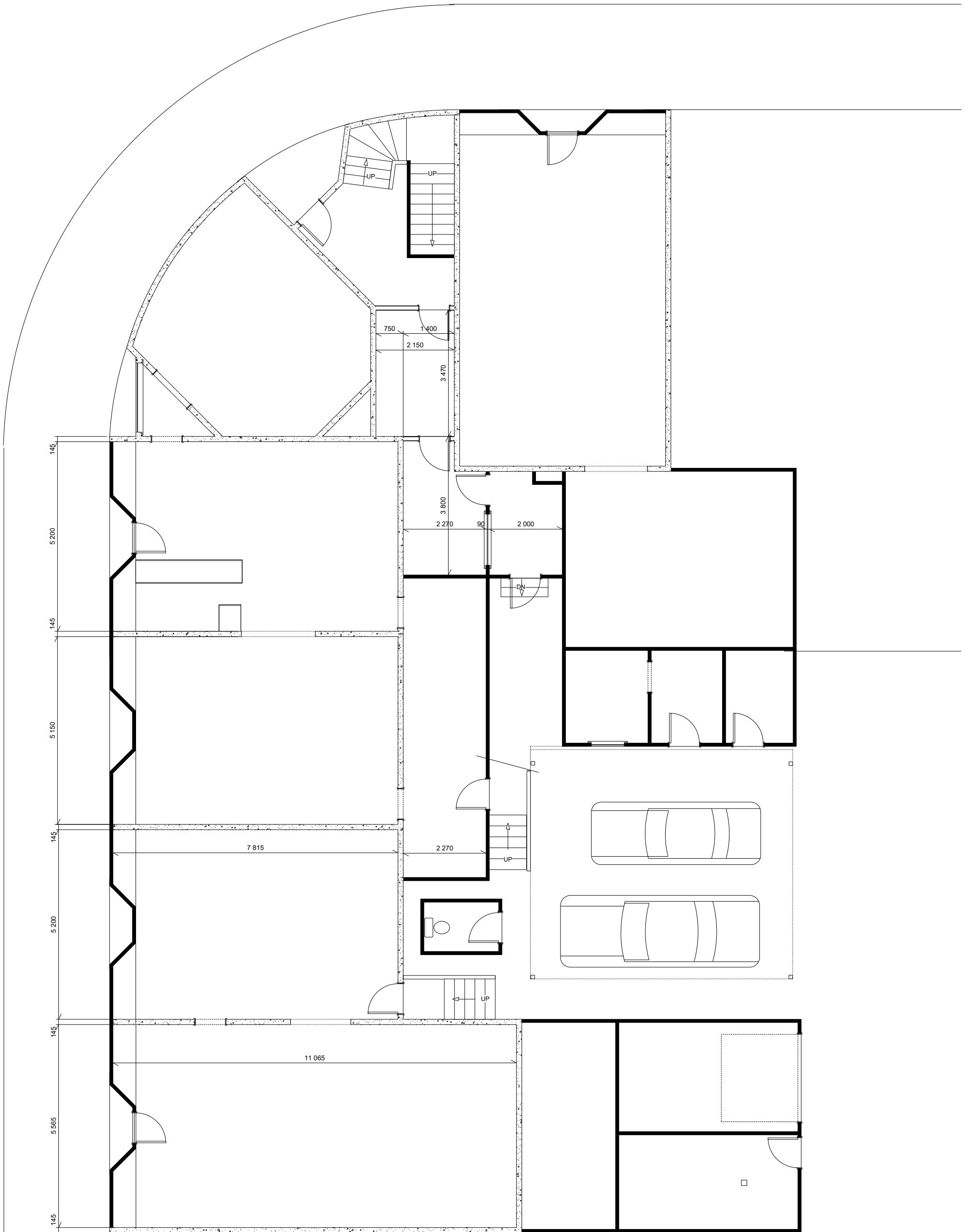
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041 4444 935



**EXISTING FLOOR PLAN 1:100  
UPPER LEVEL**

**PRELIMINARY DRAWINGS**  
17/05/2023

**THE EDINBURGH HOUSE  
STRICKLAND STREET DENMARK WA  
PROPOSED ALTERATIONS AND RENOVATIONS  
TO UPPER FLOOR LEVEL**

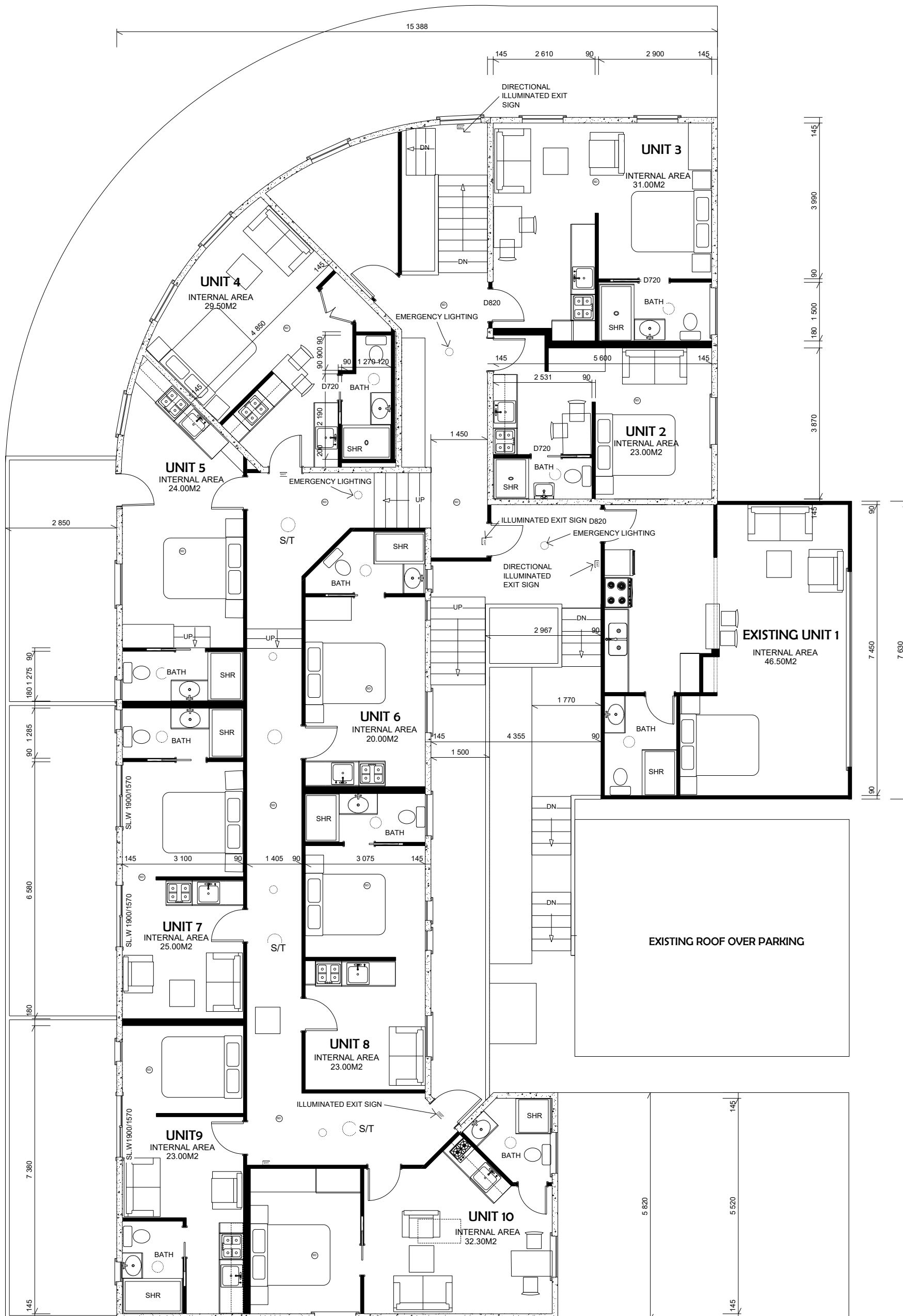


**EXISTING FLOOR PLAN 1:100  
LOWER LEVEL**

**PRELIMINARY DRAWINGS**  
17/05/2023

**THE EDINBURGH HOUSE  
STRICKLAND STREET DENMARK WA  
PROPOSED ALTERATIONS AND RENOVATIONS  
TO UPPER FLOOR LEVEL**

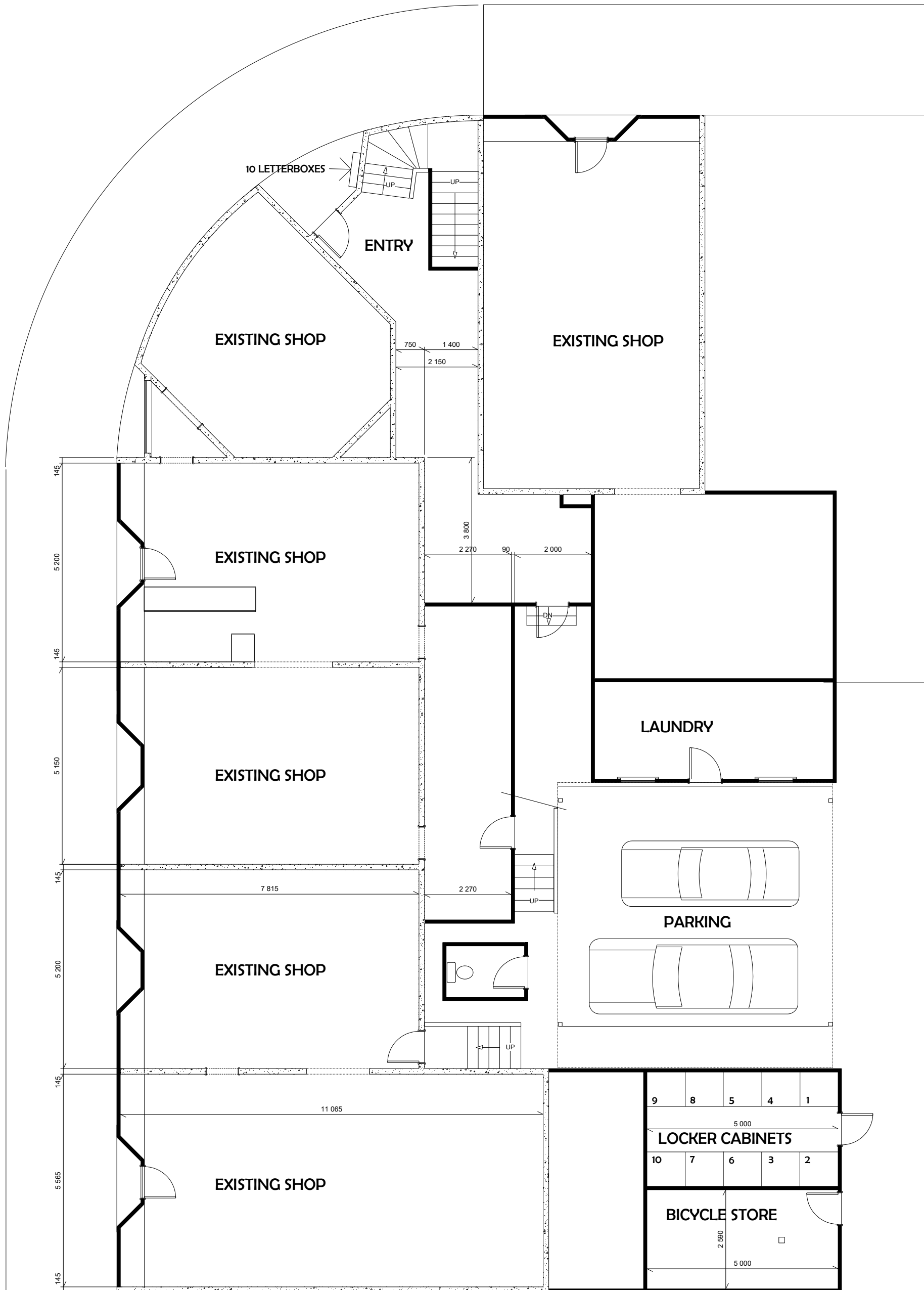
HERMANN FEHR DESIGN 19/03/2023, REV. 20/04/2023, 17/05/2023  
37 STRICKLAND STREET DENMARK WA 6333  
PRINT SIZE A3 DRAWING NUMBER 2



# FLOOR PLAN 1:100 UPPER LEVEL

PRELIMINARY DRAWINGS  
17/05/2023

THE EDINBURGH HOUSE  
STRICKLAND STREET DENMARK WA  
PROPOSED ALTERATIONS AND RENOVATIONS  
TO UPPER FLOOR LEVEL



# FLOOR PLAN 1:100 LOWER LEVEL

PRELIMINARY DRAWINGS  
17/05/2023

THE EDINBURGH HOUSE  
STRICKLAND STREET DENMARK WA  
PROPOSED ALTERATIONS AND RENOVATIONS  
TO UPPER FLOOR LEVEL

HERMANN FEHR DESIGN 19/03/2023, REV. 20/04/2023, 17/05/2023  
37 STRICKLAND STREET DENMARK WA 6333  
PRINT SIZE A3 DRAWING NUMBER 4



# PARKING MANAGEMENT PLAN

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<b>Proposal</b>	Denmark Futures – 31 South Coast Highway, Denmark
<b>Date</b>	8 May 2023
<b>Reference</b>	23/002
<b>To</b>	Shire of Denmark
<b>From</b>	Taylor Burrell Barnett

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## Introduction

TBB was commissioned by Denmark Futures Limited to prepare a Parking Management Plan for the proposed change of use of an existing building on 31 South Coast Highway, Denmark from 'lodging house' to 'multiple dwellings'.

The proposed change of use will involve demolition and construction works within the existing heritage-listed building, to deliver 10 multiple dwellings.

This parking management plan is prepared to address parking for the proposal. Due to the existing building and existing parking on-site is allocated as per the strata plan, a parking 'shortfall' is proposed to be addressed using off-site parking.

## 1.0 Background

### 1.1 Planning Context

The subject site is listed in the Municipal Heritage Inventory. The Shire's *Local Planning Strategy* and relevant local planning policies<sup>1</sup> support the appropriate protection of heritage listed places.

#### **Shire of Denmark *Local Planning Strategy***

Having regard to the Shire's Local Planning Strategy, the Denmark Town Centre is intended to be characterised by the fine-grained design of buildings, human scale and village character.

In terms of future contemplated land use changes, Local Planning Strategy actions include a review of Local Planning Policy 15: "Townscape" and Local Planning Policy 26.1: "Commercial Developments on South Coast Highway" to provide more definitive architectural design guidance for buildings and their associated public spaces within the whole of the town centre.

#### Municipal Heritage Inventory

Having regard to the Strategy and the Municipal Heritage Inventory, section 4.5 of the *Local Planning Strategy* is relevant:

*4.5 Community, Education, Cultural and Heritage:*

*Strategy e: Have due regard to the Municipal Heritage Inventory recommendations in considering applications of listed heritage places and undertake regular review of the Inventory.*

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<sup>1</sup> Refer to LPP 15 – Townscape Policy; LPP 47 – Town Centre Parking and Transportation; and Local Planning Strategy section 4.5 strategies e), g), and h).

*Strategy g: Heritage buildings, structures or places are to be considered of importance for social, aesthetic or cultural reasons, but also to have the ability to be of economic importance to the Shire as well. Redevelopment of heritage sites or assets needs to be undertaken in a sensitive manner that ensures the intrinsic heritage value is maintained.*

*Strategy h: Council or proponents/land owners are encouraged to seek the advice of appropriate professionals before proceeding with development or redevelopment of Heritage sites.*

*Action 3: Council continue to implement the recommendations of the Municipal Heritage Inventory when considering development or subdivision applications.*

### Shire of Denmark Local Planning Scheme No. 3

The site is zoned 'Commercial R25'. The primary purpose and intent of the Commercial zone is for "major service, retail, office and entertainment uses in the townsite".

Pursuant to clause 5.3.3 of the LPS 3, where residential development is proposed in conjunction with other development in the Commercial Zone, Council shall determine the appropriate density code to apply for development requirements purposes. Therefore, and noting the typology of the multiple dwellings, development requirements are provided in Volume 2 – *Apartments* of the R-Codes.

### State Planning Policy 7.3, Volume 2 *Apartments*

The proposal has given due regard to State Planning Policy 7.3 Volume 2 *Apartments*. A full assessment against the Codes will be appended to the development application; this parking management plan is prepared to address car parking.

SPP 7.3 Volume 2, section 3.9 contains element objectives that are relevant to parking as follows:

Car and bicycle parking – Element Objectives	Parking Management Response
O 3.9.1 <i>Parking and facilities are provided for cyclists and other modes of transport.</i>	The site contains a secure and undercover bicycle store, this is available for tenants.
O 3.9.2 <i>Car parking provision is appropriate to the location, with reduced provision possible in areas that are highly walkable and/or have good public transport or cycle networks and/or are close to employment centres.</i>	Parking is existing on-site and is allocated in accordance with the strata plan. The proponent has two (2) parking bays allocated through the strata plan. Existing commercial tenants parking is not able to be re-allocated for this proposal. The subject site is identified within the Denmark townsite. Reduced provision is not proposed; this Parking Management Plan recommends the leasing of existing parking bays for non-exclusive use by tenants of the proposed multiple dwellings.
O 3.9.3 <i>Car parking is designed to be safe and accessible.</i>	Existing car parking is designed in a manner that is considered to be safe and accessible. To further ensure safety of motor vehicles parked off-site overnight, this Parking Management Plan recommends that an agreement between parties address any additional lighting or security features that are deemed necessary between parties.
O 3.9.4 <i>The design and location of car parking minimises negative visual and environmental impacts on amenity and the streetscape.</i>	Existing car parking on-site is sleeved by development. No further car parking is able to be provided on-site. Further, this Parking Management Plan recommends the

Car and bicycle parking – Element Objectives	Parking Management Response
	leasing of existing car parking bays for non-exclusive use by tenants of the proposed multiple dwellings.

**Element 3.9, Table 3.9 Acceptable Outcomes**

It is noted that the existing building has seven (7) car parking bays and no disabled bay. It is understood that two (2) bays are allocated to this strata lot. It is noted from the Shire’s previous advice that the original planning approval required nine (9) car parking bays inclusive of two tandem bays and one ACROD parking bay.

In addition, the site contains a secure and undercover bicycle store (5m x 2.6m) which is calculated to have sufficient space for 7 bicycles.

The R-Codes apply different parking ratios, depending on whether the site is in “Location A” – which should be within 800m walkable catchment of a train station and/or 250m of a transit stop (bus or light rail) of a high-frequency route and/or within the defined boundaries of an activity centre – or “Location B” – which covers all other locations. Given the subject site is located within the Denmark town site the “Location A” provisions are considered to be applicable.

Therefore, applying the Table 3.9 Parking Ratios applicable to “Location A” the proposal is required to provide 0.75 bays per one-bedroom dwelling unit plus one visitor parking bay per four dwellings up to 12 dwellings.

For the proposed 10 one-bedroom dwelling units, Table 3.9 requires 7.5 parking bays and 2.5 visitor parking bays, a total of 10 car parking bays. With 2 parking bays available on-site, this constitutes a short fall of eight (8) car parking bays.

This Parking Management Plan considers that, if deemed necessary, a location plan can be prepared to nominate the location of off-site car parking bays proposed to be allocated for the proposed multiple dwellings. A location plan relevant to the proposal would ensure that the planning rationale for the car parking is understood and implemented through the development approval.

**Local Planning Policy context**

Local Planning Policy 15 *Townscape Policy* supports traffic calming by virtue of an attractive appearance of the streets; and the policy supports off-street parking where it has a low-visual impact, with landscaping and shade trees encouraged. It is noted the Shire has provided off-street parking within its freehold Lot 228 (No. 2) Strickland Street, Denmark, in a manner that it is landscaped and provides a low-visual impact.

Local Planning Policy 47 *Town Centre Parking and Transportation* (LPP 47) supports sustainable transportation options such as walking and cycling. For heritage conservation sites, special parking ratios can apply where sustainable transport options are provided; and 100% of non-residential parking cash-in-lieu payments may be provided. In this regard, the change of use from a non-residential land use to a residential land use requires appropriate consideration of car parking supply. As a residential use category, LPP 47 Table 1 nominates parking requirements “as per the R-Codes, unless varied in an approved Local Development Plan; parking to be provided on-site”. Having regard to LPP 47 and the R-Codes, a proposal accompanied with a location plan to identify the off-site car parking could be used to outline how the proposal addresses car parking for the multiple dwellings.

Although an adequate supply of convenient parking is essential, the local planning policy notes that car parking areas should not dominate the structure of the town centre given it may make the town centre less attractive and vibrant.

## 1.2 Infrastructure Provision

### Site Access

Having regard to the site's location within the Denmark townsite, the proposal is within a walkable catchment.

The site has direct pedestrian frontage and access from the existing footpaths located on South Coast Highway and Strickland Street. Vehicular access to on-site parking is provided from Monk Lane.

South Coast Highway is a two-lane 'primary distributor road' on the Main Roads WA Road Information Mapping System. South Coast Highway has a posted speed limit of 60 km/h, with a lane in each direction and a line-marked and landscaped median with a pedestrian refuge island for convenient crossing. Within the road reserve, four (4) motorcycle angled bays are directly in front of the subject site with time-limited parallel parking provided on the street.

Strickland Street has a red asphalt and brick paved treatment to promote a low-speed environment. Strickland Street has a posted speed limit of 50km/h. The street is designed with landscaping, paths, lighting, parking that enhances the attractiveness of the town centre. Strickland Street includes a median, with four (4) parallel parking bays directly in front of the subject site.

Monk Lane is a no-through road and its purpose is to provide rear-loaded vehicle access for properties fronting South Coast Highway. Monk Lane intersects with Laverack Lane which connects between South Coast Highway and Walker Street. The visual prominence of Monk Lane is minimal when viewed from Strickland Street, with a verandah built between the Denmark Bakery to the commercial tenancies within the subject site and continuation of footpaths, street furniture and landscaping features.

### Active Transport

#### Walking

It is understood that the local government seeks to promote business activity, encourage appropriate redevelopment and development and promote sustainable transportation options such as walking and cycling.

Footpaths are provided along street frontages on South Coast Highway and Strickland Street. The footpath network is well maintained and attractive with landscaping, lighting and awnings for weather protection. The existing footpath network provides suitable connections to all major land uses and destinations within the Denmark townsite. Overall, the subject site has a walk score of 68 due to hospitality venues, supermarkets, retail outlets, schools, government services and parks and recreation facilities being in walkable distance.

#### Cycling

A dual use path is provided along Ocean Beach Road, South Coast Highway through the townsite, Hollings Road and the Denmark River.

#### Trails of Denmark

The Shire of Denmark has published details of local trails. The following trails pass through the Denmark townsite:

- Munda Biddi Cycle Trail;
- Denmark-Nornalup Heritage Rail Trail;
- Mokare Heritage Trail;
- Mt Lindesay, Kwoorabup & Poison Point Trails; and
- Bibbulmun Track.

### Public Transport

TransWA provides a daily GS3 regional coach service between Perth and Albany, which stops in front of the Denmark Hotel on Hollings Road. This service provides a morning departure from Denmark to Perth, or an afternoon arrival from Perth to Denmark (continuing through to Albany).

A school bus service commenced on 1 February 2023, operated by Swan Transit.

St John Denmark Community Transport Service provides a transportation service to help people in Denmark with access to medical or wellness appointments and operates to/from Albany.

The Shire of Denmark provides a commuter car park to support sustainable car travel outside of the area. The commuter car park facilitates the Shire's promotion of carpooling for people that have to travel to Albany for work or other purposes.

### **Car Parking and Bicycle Parking**

Two car parking bays are allocated to the strata unit on-site. A bicycle store is provided on-site for communal use. Within the immediate area, street parking is provided and is time-limited. Elsewhere in the Denmark townsite, parking is provided on-site, on streets or within local government car parks. In March 2023 a 22-kilowatt dual electric vehicle charger was established at Hollings Road near Berridge Park.

## 2.0 Parking Management Plan

This Parking Management Plan provides a suggested car park solution for the proposed change of use for ten multiple dwellings.

Through an analysis of car parking within the Denmark townsite, it has been determined that existing car parking bays within Lot 228, No. 2 Strickland Street, Denmark are considered to be the most appropriate for leasing to the subject site. Lot 228 is owned by the Shire of Denmark in freehold, and lot details are provided below in Table 1. This Parking Management Plan proposes that the proponent could enter into an agreement (i.e., Deed of Agreement) with the Shire of Denmark (as the landowner) to confirm that off-site parking in relation to the proposal can utilise existing car parking bays within Lot 228.

Table 1 Land Ownership Details

Lot No.	Volume/Folio	Plan Number	Land Area (source)	Registered Proprietor
Lot 228	2914/172	DP 217468	2.1126 ha (Landgate)	Shire of Denmark

It is considered that, through a development application, a condition of development approval can require an agreement to be entered into between the Shire of Denmark and the landowner/applicant. Depending on the level of certainty, this agreement could be required whether prior to a building permit, prior to construction, or prior to occupation.

An agreement can detail the arrangements between parties and the documentation clearly link the proposal's location and the off-site car parking location (as indicated in Figure 1), and the duration of the agreement. This Parking Management Plan recommends the nomination of existing parking bays be considered with the Shire of Denmark, whether they are for exclusive-use, or for non-exclusive use by tenants of the proposed multiple dwellings to ensure that parking bays are 'available to the public' but reflecting that occupiers of the multiple dwellings would be able to park in the car parking bays.

To further ensure safety of motor vehicles parked off-site overnight, an agreement may specify any additional lighting or security features that are deemed necessary to be provided, and the timeframe for these to be provided, to be determined between the parties. An aerial image (Figure 1) is below of the subject site, with nominated parking bays marked in red, and subject site in yellow. Measured along footpaths and pedestrian crossings (as depicted by the yellow dash line), the car parking bays are approximately 200 metres from the subject site.



Figure 1 Aerial Image of Proposed Parking Area and Subject Site (MNG 2023)



Figure 2 Indication of eight (8) car bays to address parking requirements for the proposal



Figure 3 Streetview image of parking area (Google 2023)



The car parking area is located on the site of the Denmark Community Resource Centre (CRC). It is considered that this car park has latent capacity to be able to accommodate the additional parking expected from the proposed Multiple Dwellings at the subject site, and is located in close enough proximity to be able to service the subject site effectively.


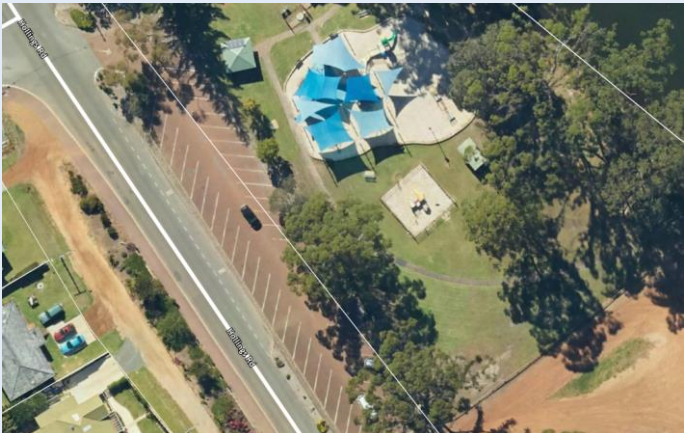
It is understood the building is leased to the CRC; however, the car parking bays are not leased. It is considered that the agreement between the proponent and the Shire could designate eight (8) car bays to address car parking arrangements for the proposal.

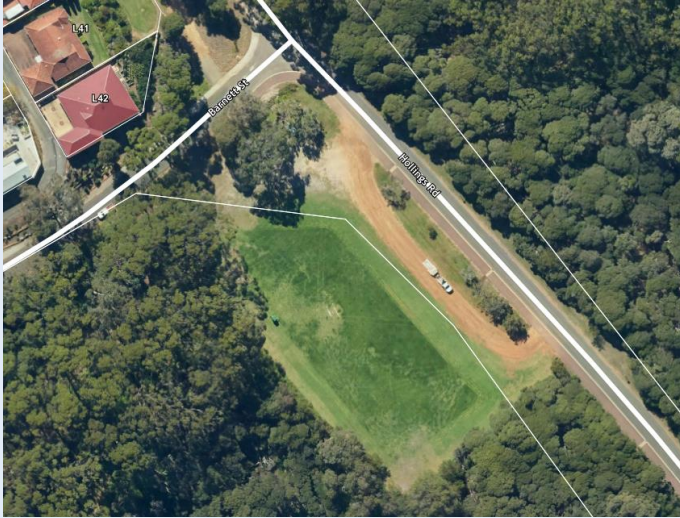

Noting the location of the car parking and to address any concerns associated with safety and security, this Parking Management Plan considers that street lighting and the installation of CCTV in the location can improve surveillance, and may assist in acting as a deterrent.

### Alternative Parking Locations


The site proposed for the off-site parking provision was selected after undertaking a comprehensive analysis of a number of possible locations throughout the Denmark townsite to determine the level of suitability and appropriateness for off-site parking associated with the proposal. Table 2 below sets out each of the other locations that were investigated, and the relevant considerations.

Table 2 Alternative Parking Locations considered unsuitable for parking

Alternative Parking Locations	Consideration
<p>Lot 13, No. 38 Hollings Road, Denmark</p> 	<ul style="list-style-type: none"> <li>&gt; Approximately 200 metre walk from the subject site.</li> <li>&gt; Owned in freehold by the same landowners as the Denmark Hotel.</li> <li>&gt; Signage within the car park states “Hotel Parking Only – Patrons of Denmark Hotel Only”.</li> <li>&gt; Potentially capable of an agreement being entered into between the proponent of this proposal and the landowners of Lot 13.</li> <li>&gt; Difficult for local government to condition a development approval to enter into an agreement with a third party not related to the proposal.</li> </ul>
<p>Hollings Road - Berridge Park</p> 	<ul style="list-style-type: none"> <li>&gt; Approximately 260 metre walk from the subject site.</li> <li>&gt; Car park is partly within Crown Lot 1045 on Plan 219867, Crown Reserve 14376 for ‘Parklands and Recreation’, owned by the State of Western Australia. The Crown Reserve is vested to the Shire of Denmark with power to lease for any term not exceeding 21 years, subject to the consent of the Minister for Lands.</li> <li>&gt; Car park is partly within road reserve.</li> <li>&gt; The parking at Berridge Park is considered to be associated with its purpose for parklands and recreation.</li> <li>&gt; It is considered a lease of car parking for residential purposes would not be consistent with the Reserve’s purpose.</li> </ul>

Alternative Parking Locations	Consideration
<p data-bbox="164 400 654 430">Annie Harrison Park (Lot 1087 Brazier Street)</p> 	<ul style="list-style-type: none"> <li data-bbox="868 407 1410 461">➤ Approximately 500 metre walk from the subject site.</li> <li data-bbox="868 465 1410 607">➤ Existing signage at Annie Harrison Park states “Overnight Camping Not Permitted”. Any vehicles parked here for an extended period of time or overnight, may give the perception that the site is being improperly used for camping.</li> <li data-bbox="868 611 1347 640">➤ Gravel parking is within the road reserve.</li> <li data-bbox="868 645 1410 752">➤ No active surveillance, street lighting, or any other facilities. The location on the periphery of the town-site and surrounded by remnant vegetation does not foster passive surveillance.</li> <li data-bbox="868 757 1410 898">➤ Pursuant to section 57 of the <i>Land Administration Act 1997</i>, the Minister may grant a lease in respect of land comprising a road if the purpose of that lease is consistent with the use of the road by the public.</li> <li data-bbox="868 902 1410 981">➤ It is considered that leasing the bays may not be consistent with the requirements of s.57 of the LAA.</li> </ul>
<p data-bbox="164 1005 542 1034">Randall Park (Lot 780 Millar Street)</p> 	<ul style="list-style-type: none"> <li data-bbox="868 1012 1410 1066">➤ Approximately 220 metre walk from the subject site.</li> <li data-bbox="868 1070 1410 1124">➤ Recently established parking bays within the road reserve of Welsh Street and Millar Street.</li> <li data-bbox="868 1128 1410 1214">➤ Car parking bays are within proximity of residents, businesses and the local police station, providing for passive surveillance.</li> <li data-bbox="868 1218 1410 1359">➤ Pursuant to section 57 of the <i>Land Administration Act 1997</i>, the Minister may grant a lease in respect of land comprising a road if the purpose of that lease is consistent with the use of the road by the public.</li> <li data-bbox="868 1364 1410 1442">➤ It is considered that leasing the bays may not be consistent with the requirements of s.57 of the LAA.</li> </ul>

Alternative Parking Locations	Consideration
<p data-bbox="164 405 608 432">Lot 943 (No. 21) Barnett Street, Denmark</p> 	<ul style="list-style-type: none"> <li data-bbox="869 409 1412 465">&gt; Approximately 520 metre walk from the subject site.</li> <li data-bbox="869 470 1428 555">&gt; Freehold land (subject to Dealing) owned by The Australian Pensioners League Western Australian Division Inc.</li> <li data-bbox="869 560 1364 645">&gt; Potentially capable of an agreement being entered into between the proponent of this proposal and the landowners of Lot 943.</li> <li data-bbox="869 649 1412 757">&gt; Would require capital expenditure to build new car parking bays, and parking management. Potentially would require lighting and CCTV to improve surveillance and security.</li> </ul>
<p data-bbox="164 819 320 846">Street parking</p> 	<ul style="list-style-type: none"> <li data-bbox="869 824 1380 931">&gt; Street parking on the main streets in the Denmark Town Centre is time limited, to promote churn and availability of parking for visitors.</li> <li data-bbox="869 936 1412 1021">&gt; Occupiers of the proposal would then need to move vehicles in accordance with parking time limits.</li> <li data-bbox="869 1025 1428 1169">&gt; Pursuant to section 57 of the <i>Land Administration Act 1997</i>, the Minister may grant a lease in respect of land comprising a road if the purpose of that lease is consistent with the use of the road by the public.</li> <li data-bbox="869 1173 1428 1249">&gt; It is considered that leasing the bays may not be consistent with the requirements of s.57 of the LAA.</li> </ul>

Alternative Parking Locations	Consideration
<p>Denmark Visitor Centre (Lot 501 South Coast Highway)</p> 	<ul style="list-style-type: none"> <li>&gt; Approximately 500 metre walk from the subject site.</li> <li>&gt; Crown Lot 501, No. 73 South Coast Highway is Crown Land, Crown Reserve 48198 for 'Community Purposes' vested to the Shire of Denmark with power to lease for any term not exceeding 21 years, subject to the consent of the Minister for Lands.</li> <li>&gt; It is considered a lease of car parking for residential purposes may be inconsistent with the parking requirements of the Denmark Visitor Centre and inconsistent with the Reserve's purpose.</li> <li>&gt; The Denmark Visitor Centre is on the edge of the Town Centre, and not easily accessible as a parking space servicing the subject site 500 metres away.</li> </ul>

## Summary

Through this a comprehensive review of all the potential parking locations within proximity of 31 Strickland Street, Denmark, it was determined that the car parking area located at the Shire's of CRC is the most appropriate facility to accommodate the parking needs related to this application, for the following reasons:

1. It is within a short walk of the proposal;
2. There is understood to be latent capacity available at this location;
3. It is one of the most accessible sites in proximity to 31 Strickland Street;
4. The parking is off-street and will not result in any adverse traffic situations;
5. The parking area has clear sightlines which serve to provide opportunities for passive surveillance. Furthermore, lighting and active surveillance measures could also be implemented to further enhance the safety and security of the car parking area.

## Recommendation

This Parking Management Plan makes the following recommendations:

1. Lodge a Development Application for the proposed change of use for 'multiple dwellings', with this Parking Management Plan appended as a means of providing the justification and rationale for consideration of the provision of car parking off-site at the discretion of the Council.
2. Should Council deem it necessary and having regard to the R-Codes Volume 2, prepare a location plan to identify the parking off-site as a means to address the Acceptable Outcomes under clause 3.9 car parking and bicycle parking, to reflect the provision of car parking off-site. An approach that may be considered in collaboration for Denmark Futures Pty Ltd and the Shire of Denmark, is to consider the use of an Agreement with the Location Plan to link the off-site parking for future users of the multiple dwellings, with the site itself.
3. Prepare an agreement between the Shire of Denmark and the landowner. This recommendation that a legal agreement between parties makes a clear link between the proposal's location and the off-site car parking location, and the duration of the agreement. This Parking Management Plan recommends nominating existing parking bays for use by tenants of the proposed multiple dwellings.
4. To further ensure safety of motor vehicles parked off-site overnight, this Parking Management Plan recommends that any agreement specifies any additional lighting or security features that are deemed necessary to be provided, and the timeframe for these to be provided, to be determined between the parties.

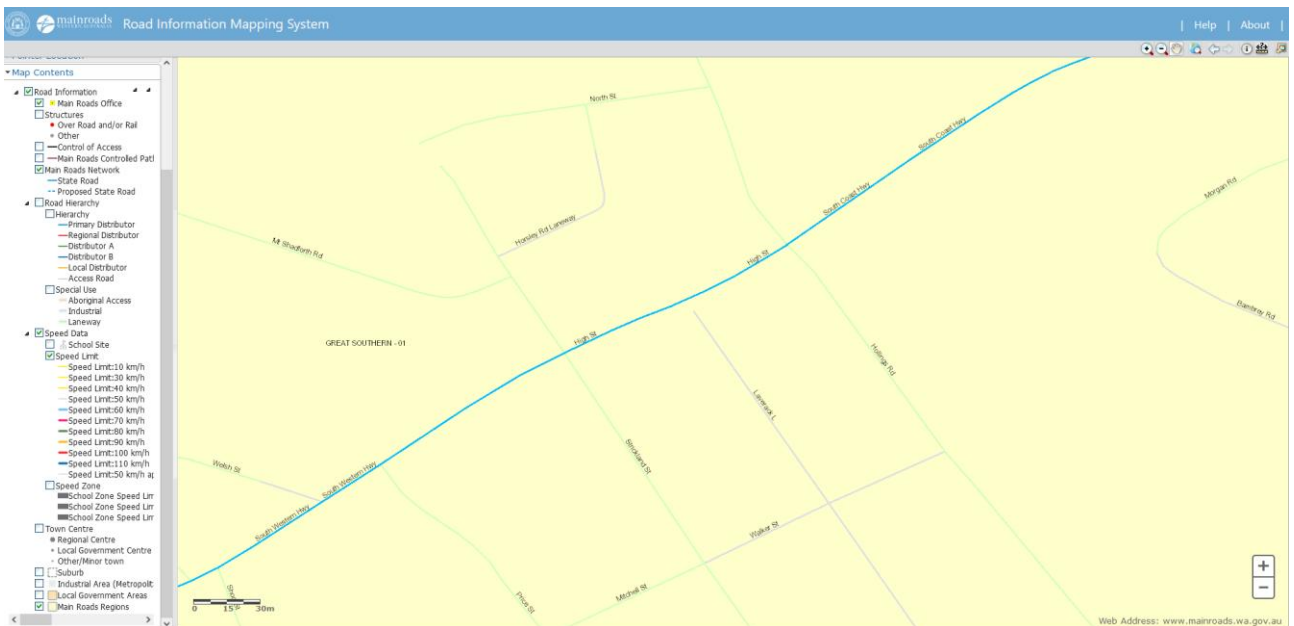
# Appendix A

Main Roads Information Mapping System





MRWA Road Information Mapping System – Road Hierarchy



MRWA Road Information Mapping System – Speed Limits

## SCHEDULE OF SUBMISSIONS

### Town Planning Scheme No.3 – Proposed Change of Use – Boarding House to 10 Multiple Dwellings

**DA2023/78 A3850**

#### Submissions Received from Public

Ref No.	Submitter Details	Verbatim Submission	Planning Services Comment
S1	<p>██████████  ██████████  ██████████████████  ██████████  ██████████████████  ██████████</p>	<p>I write in support of the application before you from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>I am well aware of the need for such accommodation in Denmark and there does not appear to be any practical alternative - either in planning or under way. Many people have grandstanded about "what others should do" but offered little in the way of bringing about a realistic and valued outcome.</p> <p>I have no doubt that, should approval be given, this property will provide a long-term asset for the community, with flexibility to provide for the needs of a range of people over time.</p> <p>Finally, I have been impressed by the devotion of time and high calibre expertise that has brought this much needed resource to this advanced stage. Denmark Futures offers an organisation to Denmark that is professional in its approach and with the skills and practical experience necessary to implement its plan should it gain the necessary approvals and funding.</p> <p>I therefore support the change of use for this building.</p>	Noted.
S2	<p>██████████████████  ██████████████  ██████████████  ██████████████████  ██████████████</p>	<p>I write in support of the application before you from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>I am well aware of the need for such accommodation in Denmark and there does not appear to be any practical alternative - either in planning or under way. Many people have grandstanded about "what others should do" but offered little in the</p>	Noted

		<p>way of bringing about a realistic and valued outcome.</p> <p>I have no doubt that, should approval be given, this property will provide a long-term asset for the community, with flexibility to provide for the needs of a range of people over time.</p> <p>Finally, I have been impressed by the devotion of time and high calibre expertise that has brought this much needed resource to this advanced stage. Denmark Futures offers an organisation to Denmark that is professional in its approach and with the skills and practical experience necessary to implement its plan should it gain the necessary approvals and funding.</p> <p>I therefore support the change of use for this building.</p> <p>From the above facts, you can see that the [REDACTED] are highly supportive of the Proposed Change of Use (an understood precondition of the project's proceeding) and that a significant number of our Members, representing a material proportion of our membership, have so far "put their money where their mouth is" in similar support.</p>	
S3	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>I write in support of the application from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>We encourage you to consider the needs of the Denmark community in your consideration of this proposal. The census has recorded our community as having a very high rate of homelessness, and it is evident from the scarcity of advertised rentals that there is very little to meet the needs of those on lower incomes, and virtually no diversity. Even the properties available from time to time, do not suit single occupancy, and this is reflected in the cost of those rare houses that become available for rent. Creating some rental properties for single bedroom households should also free up some two- and three-bedroom houses for others.</p> <p>With our community having a high aged population, affordable rental accommodation will only become more important over time.</p> <p>In addition, there is a rapidly growing youth population, and we would like to think that these young people will have access to affordable rental housing once they reach adulthood and are seeking independence, as was available to our generation. This was raised as an issue for young people in the community forums.</p> <p>I believe that this property will provide a long-term asset for the community, with</p>	Noted



		<p>flexibility to provide for the needs of our community over time and we therefore support the change of use.</p> <p>In relation to parking, we note that the Shire has discretion to waive this to zero and encourage the Council to put houses ahead of cars in this decision, particularly in view of the current Parking Policy that states there is sufficient parking within the townsite already.</p>	
S4	<p>██████████ ██████████</p>	<p>I write in support of the application before you from Denmark Futures Ltd, which seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>From working at the ██████████ I am in contact with people of all ages who are now homeless or cannot afford a rental. I feel so strongly about this and would like to see a proactive way of supporting those who need help and cannot do it alone.</p> <p>We encourage you to consider the needs of the Denmark community in your consideration of this proposal. The census has recorded our community as having a very high rate of homelessness, and it is evident from the scarcity of advertised rentals that there is very little to meet the needs of those on lower incomes, and virtually no diversity. Even the properties available from time to time, do not suit single occupancy, and this is reflected in the cost of those rare houses that become available for rent. Creating some rental properties for single-bedroom households should also free up some two- and three-bedroom houses for others.</p> <p>With our community having a high-aged population, affordable rental accommodation will only become more important over time.</p> <p>In addition, there is a rapidly growing youth population, and we would like to think that these young people will have access to affordable rental housing once they reach adulthood and are seeking independence, as was available to our generation. This was raised as an issue for young people in the community forums.</p> <p>We believe that this property will provide a long-term asset for the community, with flexibility to provide for the needs of our community over time and we therefore support the change of use.</p> <p>In relation to parking, we note that the Shire has the discretion to waive this to zero and encourage the Council to put houses ahead of cars in this decision, particularly in view of the current Parking Policy that states there is sufficient parking within the townsite already.</p>	<p>Noted</p> <p>Availability of rental accommodation and housing affordability is acknowledged as a serious issue for Denmark. Any housing provision in this space will positively influence the housing continuum.</p> <p>The suitability of waiving the parking requirements in this instance in recognition of the social housing needs is discussed in the body of the Council report.</p>

S5	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>The [REDACTED] strongly advocates for Denmark Futures Ltd Development Application and would encourage the Shire of Denmark and its council to support this proposal as part of one of the many urgently required schemes to help deal with the shortage of accommodation needs in our community.</p> <p>The Board of [REDACTED] has passed a Resolution in support of Denmark Futures Ltd Development Application for the change of use of 1/31 South Coast Highway.</p> <p>We are in full support of the proposed change of use of this part of the building to accommodate 10 households in 10 micro apartments which will allow those in need community members to have a centrally located, stable and affordable home enabling them to continue to access required local services, employment, training, education and volunteering.</p> <p>We encourage the shire and council to do what it can to help facilitate this not for profit endeavour to attend to this urgent need in our community and support the development application.</p>	Noted
S6	<p>[REDACTED]</p> <p>[REDACTED]</p>	<p>We are writing to express our total support for Denmark Future's proposed single person long-term accommodation facility in Strickland Street.</p> <p>Housing is clearly the most important challenge facing the Denmark Community and this is a brilliant project directed towards the demographic (single people) most affected by the massive scarcity and high cost of rental accommodation in Denmark. I, like many Denmarkians dismayed by the tragic housing situation in our town, have donated my Co-op refund towards this project.</p> <p>As you know, there is huge community concern about this problem and this proposed project is a fantastic start.</p> <p>Please do whatever you can to expedite regulations via parking which, let's face it, are only a problem during very peak times of the year.</p>	Noted
S7	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>The [REDACTED] wishes to support this development application filed by Denmark Futures Ltd.</p> <p>The applicant seeks approval to change the use of the building <i>31 on the Terrace</i> from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change will allow the development of 10 micro apartments which, with the proposed program of renovations, will provide housing for 10 households and help address the dire shortage of rental housing in the Shire.</p> <p>The [REDACTED] notes that Denmark Futures have put considerable <i>pro bono</i> effort into the application, that there is wide support for the project in the NFP sphere, and that many [REDACTED] members have already donated their rebate</p>	<p>Noted.</p> <p>The shortage of affordable housing and rental accommodation is accepted.</p>

		<p>towards the project.</p> <p>In your consideration of the proposal we ask you to be aware of the following:</p> <ul style="list-style-type: none"> <li>• The census identifies that Denmark has a very high rate of homelessness</li> <li>• The few advertised rentals are large and expensive, with little suitable for those on lower incomes or those seeking single occupancy</li> <li>• Creating rental properties for single bedroom households will free up larger properties for others</li> <li>• As a community with a high aged population, affordable rental accommodation will become more important over time</li> <li>• Also, as identified in community forums, there is a rapidly growing youth population who will need access to affordable rental housing once they reach adulthood and seek independence.</li> </ul> <p>The [REDACTED] believes that <i>31 on the Terrace</i> can provide a long-term asset for the community, with flexibility to provide for the community over time and therefore supports the change of use.</p>	
S8	[REDACTED]	<p>We write in support of the application before you from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>We feel so strongly about this that we have already donated skills and our Denmark Cooperative rebate towards this project and await the formal fund-raising campaign before supporting further.</p> <p>We encourage you to consider the needs of the Denmark community in your consideration of this proposal. The census has recorded our community as having a very high rate of homelessness, and it is evident from the scarcity of advertised rentals that there is very little to meet the needs of those on lower incomes, and virtually no diversity. Even the properties available from time to time, do not suit single occupancy, and this is reflected in the cost of those rare houses that become available for rent. Creating some rental properties for single bedroom households should also free up some two- and three-bedroom houses for others.</p> <p>With our community having a high aged population, affordable rental accommodation will only become more important over time.</p> <p>In addition, there is a rapidly growing youth population, and we would like to think that these young people will have access to affordable rental housing once they reach adulthood and are seeking independence, as was available to our generation.</p>	<p>Noted</p> <p>The shortage of affordable housing and rental accommodation is accepted. Any housing provided in this space will assist with the housing continuum (i.e. providing single bedroom housing may free up 2-3 bedroom houses).</p> <p>The suitability of waiving the parking requirements in this instance in recognition of the social housing needs is discussed in the body of the Council report.</p>

		<p>This was raised as an issue for young people in the community forums.</p> <p>We believe that this property will provide a long-term asset for the community, with flexibility to provide for the needs of our community over time and we therefore support the change of use.</p> <p>In relation to parking, we note that the Shire has discretion to waive this to zero and encourage the Council to put houses ahead of cars in this decision, particularly in view of the current Parking Policy that states there is sufficient parking within the townsite already.</p>	
S9	<p>██████████ ██████████ ██████</p>	<p>I write in support of the application before you from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>I feel so strongly about this that I have already donated my skills as interior designer towards this project and await the formal fund-raising campaign before supporting further.</p> <p>I encourage you to consider the needs of the Denmark community in your consideration of this proposal. The census has recorded our community as having a very high rate of homelessness, and it is evident from the scarcity of advertised rentals that there is very little to meet the needs of those on lower incomes, and virtually no diversity. Even the properties available from time to time, do not suit single occupancy, and this is reflected in the cost of those rare houses that become available for rent. Creating some rental properties for single bedroom households should also free up some two- and three-bedroom houses for others.</p> <p>With our community having a high aged population, affordable rental accommodation will only become more important over time.</p> <p>In addition, there is a rapidly growing youth population, and I would like to think that these young people will have access to affordable rental housing once they reach adulthood and are seeking independence, as was available to our generation.</p> <p>This was raised as an issue for young people in the community forums.</p> <p>I believe that this property will provide a long-term asset for the community, with flexibility to provide for the needs of our community over time and we therefore support the change of use.</p> <p>In relation to parking, we note that the Shire has discretion to waive this to zero and encourage the Council to put houses ahead of cars in this decision, particularly in view of the current Parking Policy that states there is sufficient parking within the townsite already.</p>	Noted

		I implore you to be on the right side of this decision, one that chooses the people of our town and their well being.	
S10	██████████ ██████████ ██████████ ████████████████████	<p>I am a property owner and rate paying member of this fabulous community of Denmark and as such fully support proposal of application to purchase the property of 31 The Terrace to developed for low cost micro housing.</p> <p>We have had a family staying with us for one year as no rental accommodation available for these two hard working tax paying locals and their three children who are unable to secure a rental .</p> <p>It apalls me that my neighbour is charging \$1300.00 a week for B N B for their property and yet so many honest, working, contributors to the local economy are left homeless.</p> <p>I strongly support review of the proposal and hope the shire can do the same.</p>	Noted
S11	██████████ ████████████████████ ██████████	<p>I am writing to express my support for the development application submitted by Denmark Futures Ltd. The application seeks approval to change the use of the building located at the above address from a Boarding House to a Use not Listed (multi-occupancy).</p> <p>The proposed change, which involves converting the building into 10 micro apartments through a program of renovations, will provide a much-needed housing solution for 10 households in our community. As the ██████████, I understand the pressing issue of a shortage of rental housing, and I firmly believe that this project will contribute to addressing this problem.</p> <p>In line with my commitment to supporting the local community, I have already donated my skills in line with the Denmark Cooperative rebate towards this project. We eagerly await the official fundraising campaign to extend further support.</p> <p>I urge you to consider the needs of the Denmark community while evaluating this proposal.</p> <p>The latest census data has revealed a distressing rate of homelessness in our community. Moreover, the scarcity of available rentals, particularly those suitable for individuals with lower incomes, highlights the lack of diversity in our housing options. Even the sporadically available properties do not cater to single occupancy, resulting in inflated rental prices for the few houses that are suitable. By creating rental properties specifically designed for single-bedroom households, we can also</p>	Noted

		<p>free up larger houses with two or three bedrooms for other families in need.</p> <p>Considering the high proportion of elderly residents in our community, the demand for affordable rental accommodation will only increase over time. Additionally, with a rapidly growing youth population, it is crucial to ensure that these young individuals have access to affordable rental housing as they transition into adulthood and seek independence. This concern has been raised during community forums, highlighting its significance.</p> <p>I firmly believe that this property will serve as a long-term asset for our community, capable of adapting to our evolving needs over time. Therefore, I wholeheartedly support the proposed change of use.</p> <p>Regarding parking, I would like to draw your attention to the discretion held by the Shire to waive parking requirements. I encourage the Council to prioritize housing over cars in this decision, especially considering the existing Parking Policy's assertion that there is already sufficient parking within the townsite.</p>	
S12	<p>██████████ ██████████████████ ██████████ ██████████████████</p>	<p>I am writing in support of the proposal for Edinboro house. We desperately need more affordable rental housing and this seems a good plan.</p>	Noted
S13	<p>██████████ ██████████████████ ██████████</p>	<p>I write to support of the application before you from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>I feel so strongly about this that I have already donated my Denmark Cooperative rebate towards this project to support the formal fund-raising campaign.</p> <p>I encourage the Shire to consider the needs of the Denmark community in their consideration of this proposal. The census has recorded our community as having a very high rate of homelessness, and it is evident from the scarcity of advertised rentals that there is very little to meet the needs of those on lower incomes, and virtually no diversity. Even the properties available from time to time, do not suit single occupancy, and this is reflected in the cost of those rare houses that become available for rent. Creating some rental properties for single bedroom households should also free up some two- and three-bedroom houses for others.</p>	Noted

		<p>With our community having a high aged population, affordable rental accommodation will only become more important over time.</p> <p>In addition, there is a rapidly growing youth population, and we would like to think that these young people will have access to affordable rental housing once they reach adulthood and are seeking independence, as was available to our generation. This was raised as an issue for young people in the community forums.</p> <p>I believe that the change of use of the above his property will provide a long-term asset for the community, with flexibility to provide for the needs of our community over time and we therefore support the change of use.</p> <p>In relation to parking, we note that the Shire has discretion to waive this to zero and encourage the Council to put houses ahead of cars in this decision, particularly in view of the current Parking Policy that states there is sufficient parking within the townsite already.</p>	
S14	<p>██████████</p> <p>██████████</p> <p>████████████████████</p>	<p>I write in support of the application before you from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>Donated skills and Denmark Cooperative rebate towards this project have already taken place and supporters await the formal fund-raising campaign before continuing..</p> <p>I encourage you to consider the needs of the Denmark community in your consideration of this proposal. The census has recorded our community as having a very high rate of homelessness, and it is evident from the scarcity of advertised rentals that there is very little to meet the needs of those on lower incomes, and virtually no diversity. Even the properties available from time to time, do not suit single occupancy, and this is reflected in the cost of those rare houses that become available for rent. Creating some rental properties for single bedroom households should also free up some two- and three-bedroom houses for others.</p> <p>With our community having a high aged population, affordable rental accommodation will only become more important over time.</p> <p>In addition, there is a rapidly growing youth population, and I would like to think that these young people will have access to affordable rental housing once they reach adulthood and are seeking independence, as was available to our generation. This was raised as an issue for young people in the community forums.</p>	Noted

		<p>I believe that this property will provide a long-term asset for the community, with flexibility to provide for the needs of our community over time and we therefore support the change of use.</p> <p>In relation to parking, I note that the Shire has discretion to waive this to zero and encourage the Council to put houses ahead of cars in this decision, particularly in view of the current Parking Policy that states there is sufficient parking within the townsite already.</p>	
S15	<p>██████████  ██████████  ██████████  ██████████</p>	<p>I write in support of the application from <i>Denmark Futures Ltd</i> seeking approval to change the use of <b>31 on the Terrace</b> from a Boarding House to Use not Listed (multi-occupancy).</p> <p>Our community has a high percentage of older people who need affordable rentals. Properties that occasionally become available often don't suit single occupancy - when they do their rarity makes them unaffordable. Creating rental properties for single bedroom households may free up 2 and 3 bedroom houses for others.</p> <p>Census data confirms that Denmark has a high number of homeless people and I see evidence of this myself. Rentals are obviously scarce - I often see people reaching out to the community on the Denmark Bulletin Facebook group page for affordable rentals. It is clear, from the responses of other group members, that there is little available and even less choice. Many are advised to try Albany!</p> <p>I am fortunate enough to share ownership of a very modest home in Denmark. I regularly acknowledge that, as a woman in her 60s, I am one of the demographic that is over represented and most vulnerable in regards to homelessness. I am aware also that homelessness impacts people from other age groups, and all abilities and ethnicities, especially young people. The latter issue has been raised in community forums.</p> <p>There are additional grounds for supporting workers who provide essential services and care for other members of the community, many of whom are employed on a casual or part time basis on low incomes.</p> <p><b>I am so concerned about the shortage of housing for Denmark residents on lower incomes, both current and potential, that I have volunteered my services as a graphic designer to help get this project off the ground. Renovating the 10 micro apartments at 31 on the Terrace will provide much needed housing for 10 households, and go some way to mitigating the critical shortage of affordable rentals in Denmark.</b></p> <p>The current Parking Policy states there is sufficient parking within the townsite so I encourage the Council to prioritise homes instead of cars.</p> <p>If 31 on the Terrace is developed it will be a long-term investment and asset for the</p>	Noted




		community and will be flexible enough to provide for its needs well into the future. Please carefully and compassionately consider the needs of the Denmark community when you are asked to vote on this proposal.	
S16	██████████ ██████████ █	<p>I am writing in support of the application before you from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>I feel so strongly about this that I have already donated time and skills towards this project and await the formal fund-raising campaign before supporting further.</p> <p>Please consider the needs of the Denmark community in your consideration of this proposal. The census has recorded our community as having a very high rate of homelessness, and it is evident from the scarcity of advertised rentals that there is very little to meet the needs of those on lower incomes, and virtually no diversity. Even the properties available from time to time, do not suit single occupancy, and this is reflected in the cost of those rare houses that become available for rent. Creating some rental properties for single bedroom households should also free up some two- and three-bedroom houses for others.</p> <p>Because we have a high aged population, the availability of affordable rental accommodation is critical for attracting long term residents. I believe we also need to support a rapidly growing, vulnerable youth population, and would like to think that these young people will have less stress in their lives if they feel they have access to affordable rental housing once they reach adulthood and are seeking independent lives here. We need young people to stay in the town and be sustainably employed to support our business and services sectors.</p> <p>I believe that this property will provide a long-term asset for the community, with flexibility to provide for the needs of our community over time and we therefore support the change of use.</p> <p>In relation to parking, I note that the Shire has discretion to waive this to zero and encourage the Council to put houses ahead of cars in this decision, particularly in view of the current Parking Policy that states there is sufficient parking within the townsite already.</p>	Noted
S17	██████████ ██████████	I am writing in support of the application before you from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).	Noted

		<p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>I feel so strongly about this that I have already donated time and skills towards this project and await the formal fund-raising campaign before supporting further.</p> <p>Please consider the needs of the Denmark community in your consideration of this proposal. The census has recorded our community as having a very high rate of homelessness, and it is evident from the scarcity of advertised rentals that there is very little to meet the needs of those on lower incomes, and virtually no diversity. Even the properties available from time to time, do not suit single occupancy, and this is reflected in the cost of those rare houses that become available for rent. Creating some rental properties for single bedroom households should also free up some two- and three-bedroom houses for others.</p> <p>Because we have a high aged population, the availability of affordable rental accommodation is critical for attracting long term residents. I believe we also need to support a rapidly growing, vulnerable youth population, and would like to think that these young people will have less stress in their lives if they feel they have access to affordable rental housing once they reach adulthood and are seeking independent lives here. We need young people to stay in the town and be sustainably employed to support our business and services sectors.</p> <p>I believe that this property will provide a long-term asset for the community, with flexibility to provide for the needs of our community over time and we therefore support the change of use.</p> <p>In relation to parking, I note that the Shire has discretion to waive this to zero and encourage the Council to put houses ahead of cars in this decision, particularly in view of the current Parking Policy that states there is sufficient parking within the townsite already.</p>	
S18	<p>██████████ ██████████</p>	<p>I am writing in support of the application before you from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The change to allow 10 micro apartments will, with the proposed program of renovations, provide a housing solution for 10 households, and help with our dire shortage of rental housing.</p> <p>I feel so strongly about this that I have already donated towards this project and await the formal fund-raising campaign before supporting further.</p> <p>Please consider the needs of the Denmark community in your consideration of this proposal. The census has recorded our community as having a very high rate of homelessness, and it is evident from the scarcity of advertised rentals that there is</p>	Noted

		<p>very little to meet the needs of those on lower incomes, and virtually no diversity. Even the properties available from time to time, do not suit single occupancy, and this is reflected in the cost of those rare houses that become available for rent. Creating some rental properties for single bedroom households should also free up some two- and three-bedroom houses for others.</p> <p>Because we have a high aged population, the availability of affordable rental accommodation is critical for attracting long term residents. I believe we also need to support a rapidly growing, vulnerable youth population, and would like to think that these young people will have less stress in their lives if they feel they have access to affordable rental housing once they reach adulthood and are seeking independent lives here. We need young people to stay in the town and be sustainably employed to support our business and services sectors.</p> <p>I believe that this property will provide a long-term asset for the community, with flexibility to provide for the needs of our community over time and we therefore support the change of use.</p> <p>In relation to parking, I note that the Shire has discretion to waive this to zero and encourage the Council to put houses ahead of cars in this decision, particularly in view of the current Parking Policy that states there is sufficient parking within the townsite already.</p>	
S19	<p>██████████ ████████████████████</p>	<p>I am writing to support the application from Denmark Futures for 31 on the Terrace to be rezoned from boarding house to Use not Listed (multi-occupancy).</p> <p>It has been clearly demonstrated that Denmark has a shortage of rental accommodation and I believe that the potential development of this site will go a long way toward relieving that problem. This would be especially so for young single people who often leave town due to lack of accommodation, even though they may have secure employment.</p> <p>I encourage you to consider the needs of the Denmark Community with this proposal and its long term potential benefit. Denmark needs a living heart and this is sadly missing at present with so few people living in the town centre.</p>	Noted
S20	<p>██████████ ████████████████████ ████████████████████ ████████████████████ ██████████</p>	<p>We write to ask the Shire to positively consider the application before you, from Denmark Futures, who are seeking approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>The proposed change will allow the development of a housing solution for up to 10 households, and help with the dire shortage of rental housing within the Shire. Our community has a high aged population and over time this will create a growing need</p>	Noted

		<p>for affordable rental accommodation.</p> <p>In addition, there is a rapidly growing youth population, and we would like to think that these young people will have access to affordable rental housing once they reach adulthood and are seeking</p>	
S21	<p>██████████</p> <p>████████████████████</p> <p>████</p>	<p>I am writing to express my full support for the development application submitted by Denmark Futures Ltd. This application seeks approval to change the use of the property located at 31 on the Terrace from a Boarding House to a Use not Listed, specifically designed for multi-occupancy, allowing for the creation of 10 micro apartments.</p> <p>The proposed conversion, along with the planned renovations, offers a much-needed housing solution for 10 households, which will significantly contribute to addressing our community's dire shortage of rental housing. As you may be aware, the recent census has indicated a distressing rate of homelessness in Denmark, emphasizing the urgent need for accessible rental properties to accommodate those on lower incomes. Additionally, the lack of diversity in rental options further compounds the housing challenges faced by our community. By introducing single-bedroom rental properties, we can also anticipate that two-and three-bedroom houses will become more available for others, enhancing overall housing opportunities.</p> <p>Considering our community's high proportion of aged residents, affordable rental accommodation is of paramount importance. As time progresses, the significance of such housing solutions will only grow. Furthermore, our youth population is rapidly expanding, and it is crucial to ensure that affordable rental housing is readily accessible for them once they reach adulthood and seek independence. In the community forums, this matter was raised as a pressing concern for young individuals, and the proposed development can play a vital role in addressing this issue.</p> <p>Beyond the immediate benefits, I firmly believe that this property will serve as a long-term asset for our community. Its inherent flexibility allows us to cater to the changing needs of our citizens over time, ensuring our housing infrastructure remains resilient and adaptive.</p> <p>Regarding parking, I acknowledge that the Shire possesses the discretionary power to waive parking requirements to zero. I urge the Council to prioritise the well-being of our residents over car-oriented policies, especially considering the existing Parking Policy's assurance of sufficient parking availability within the town site. Moreover, the strategic location of the proposed development is likely to reduce the necessity for tenant parking, further supporting this decision.</p> <p>In conclusion, I wholeheartedly support the change of use for 31 on the Terrace. This</p>	Noted

		development will not only provide essential rental housing for our community but also contribute significantly to alleviating homelessness and housing challenges faced by our residents. I trust that, in your evaluation of this proposal, the needs and aspirations of the Denmark community will be given the utmost consideration.	
S22	<p>██████████</p> <p>████████████████████</p> <p>████████████████████</p>	<p>I am writing in support of the application before you from Denmark Futures Ltd, that seeks approval to change the use of the above building from Boarding House to Use not Listed (multi-occupancy).</p> <p>This proposal from Denmark futures offers one practical solution to the dire housing predicament in Denmark and needs to be supported. It should be seen as a flexible long-term asset.</p>	Noted
S23	<p>██████████</p> <p>████████████████████</p>	<p>I am just emailing some thoughts on the Boarding House to Multiple Dwellings proposal 2023/79.</p> <p>I think it is a great initiative to tackle the housing crisis in Denmark. It is certainly a growing problem and I appreciate the great work the Denmark Futures charity is doing in this space.</p> <p>I do however have some concerns regarding the parking. I operate a ██████████ ██████████. The car park attached to that already gets extremely busy. The parking that is allocated for the housing project is quite far from the units and my concern is that the fig tree car park would be a tempting alternative, especially considering Denmark's wet weather. If we were to get another 8-10 cars parking there from the units it would make it difficult for clients to access my services and other business's in the ██████████.</p> <p>I am not against the proposal, but would ask that if it does go through that whoever is managing the units would ensure people do park in their designated car park near the IGA.</p>	<p>Noted</p> <p>There is no meaningful condition of approval that could be applied to prevent future tenants of the proposed development parking on other private property. The Shire has no ability to police the parking areas at the rear of existing businesses.</p> <p>The use of the car park near the CRC at the northern end of Strickland Street is discussed in the body of the Council report.</p>

			
<p>S24</p>	<p>[REDACTED]</p>	<p>As the previous owner of Edinburgh House and also from my past experience as a master builder of 50 years who undertook the last reconstruction of this building I doubt the feasibility of the current plan to convert this in situ cast concrete structure in to the intended purpose of ultra small apartments as over compact home for growing children and their mothers, there is no outdoor areas, no garden and no parking.</p> <p>Having in the past contributed to parking in the town center I think there should be a level playing field with all developments contributing as I have for parking lots on a common ratio.</p> <p>This venture may appear to be a good idea for some, it is definitely in the wrong location, in a very hard to alter building.</p>	<p>Noted.</p> <p>The viability of the conversion to multiple dwellings is not a matter for the planning assessment. Whether it can be physically achieved in accordance with the requirements of the National Construction Code will be down to a private building surveyor to ascertain.</p> <p>The lack of open space, gardens and parking is addressed in the body of this report and in the</p>

			<p>assessment against the Apartment Codes.</p> <p>Commercial development that has a shortfall in parking has paid cash in lieu for the lack of bays which the Shire will use to provide public parking. The Shire has not taken cash in lieu for residential parking bays but required these bays to be provided on site. In this case it is not so much the number of bays available but their location and timing of their use that is in question.</p>
<p>S25</p>	<p>██████████  ██████████████████  ██████████████████  ██████████  ██████████████████  ██████████</p>	<p>Please take into consideration the following comments on the proposed changes to 31 on the Terrace. You will notice that this reads exactly the same as ██████████ ██████████ email due to the fact we both have a business which operates out of the same strata as 31 on the Terrace and we got together to brainstorm our concerns and make a comprehensive list.</p> <p>Main concern: local tourism, hospitality and retail business are not being considered in this proposal. This budget accommodation is vital for tourism in Denmark, with NO public transport some of these visitors arrive by bus, Denmark's only bus stop is within walking distance. This current boarding house/short term accommodation is vital for visitors hiking or cycling into town. There has been a massive amount of tourism marketing recently promoting our region and attracting these adventurous travellers who hike or cycle into town to explore the pristine beauty of this great southern region. Central 'short term' accommodation also attracts first time visitors to town and encourages repeat visits when they can find comfortable and well-located lodging options, they are more likely to return to explore the towns unique charm and culture further.</p> <p>The future for hospitality and retail is fragile. Business costs have increased significantly with rent rises, wages and superannuation increases as well as future rental increases from cpi still to come. Increased strata management costs will add to the increase expenses. Recent wage increases f.y.i casual adult rates, per person Sunday \$64/ hour Public Holiday \$79.45/hour Don't be surprised to see businesses closed on Sunday's and public holidays. Foot traffic into local businesses from central short term accommodation is essential for year round business viability,</p>	<p>Noted</p> <p>The availability of centrally located tourist accommodation is a function of the market and not a planning consideration.</p> <p>Parking issues are noted and discussed in the body of the report.</p> <p>Plumbing and soundproofing requirements would need to be solved at the building stage should this application be granted approval.</p> <p>Comments on the suitability of public funding being used on the application are noted but are a decision of the funding providers not the Shire of Denmark.</p>

providing a steady flow especially though the winter months May-September.

This is the only multi-room budget accommodation not attached to a licensed premises. Denmark is already unaffordable to purchase property and live here, without budget short term accommodation it will also become unaffordable to visit Denmark.

Parking: deficit 8 bays? No other business development has been afforded this luxury to gain shire approved alternative parking for zero cost. The areas that have been "ear-marked" are not within a close enough walking distance for tenants of the proposed 31 on the Terrace building to walk with their groceries or general items especially in inclement weather (of which we know we get a great deal). I foresee that the parking bays that are currently utilised for commercial tenants of the strata will be used overnight and not vacated in the morning before businesses open (this already occurs on a semi regular basis by tourists staying in 31 on the Terrace now. Therefore we are expected to drive around Denmark looking for alternative parking which as we all know is at a premium and almost non existent through the busy tourist times.

Plumbing: concerns of renovations - my shop has already been completely flooded once due to plumbing issues and I foresee more issues once contractors start renovating. The age of the building is a concern for major renovations.

Soundproofing concerns of a 2nd apartment above our shops.

Private organisation NFP grant paying premium price for this asset in premium location. Approx \$2M should be used more efficiently to house displaced families, Disabled and majority of elderly not able to walk the 2 flights of stairs. The rush to comply with the qualifications for this grant are overriding any concerns for local businesses.

Social housing immediate possibilities - consideration of alternative locations ie CRC conversion for crisis accommodation Denmark Arts share facilities with CRC to free up ex-Blue Wren Lodge. All Air BnB approvals reviewed in crises situation. No new Air BnB applications approved. Annual review of Air BnB applications for renewal. Multiple Air BnB properties per person should not be approved by the shire. Accelerate Amaroo to free up housing for families.

I feel that we need to proceed with caution with this and consider the effect that having previously homeless persons taking up residence in a building that offers no outdoor recreational space for leisure times because whether we like to admit it or



		<p>not a large portion of people that are homeless come with mental health issue that we just dont have the service to assist with in Denmark, they often have drug and alcohol issues on top of that. If they choose to use their leisure time to sit out the front of the building (and generally loiter outside our businesses) it will definitely have an effect on the number of passing potential customers from wanting to stop and browse in our amazing retail businesses and cafe's etc.</p> <p>I am most definitely not against trying to solve the issues of displaced people that are wanting a permanent place to live , however I just dont feel that the corner of our main street in our busy little tourist town is the right place to accomodate them.</p>	
S26	<p>██████████ ██████████</p>	<p>I write as an owner in the same complex at 31 South Coast Highway Denmark (██████████). We are owners of ██████████.</p> <p>Although we are empathetic towards the housing shortage that has been raised and we acknowledge the efforts by the proponent for a solution, we express great concern towards this proposal from the viewpoint of business as a consequence of changing the use from short stay to permanent residential. There are many aspects that need greater consideration to this, including:</p> <ul style="list-style-type: none"> <li>• The detrimental economic impact on local business will almost certainly be immediate and substantial. The existing short stay use, number of rooms and changeover of tourists provides a great economic benefit to the local business. Each of these guests at the existing short stay accommodation spend money in the town centre on non-essential items as tourists. This will not be the case if a change to permanent residential is approved.</li> <li>• Further compounding the above, is the acknowledgement by the proponent that the current capacity of 28 will reduce to between 20 and 22, also reducing the economic viability of business</li> <li>• With some local town centre businesses being marginal on their profitability based on current tourism numbers, this proposal may solve a housing issue but create a new issue of closing local businesses. This has not been considered by the proponent. The proposed use leans towards accommodating older people or couples that are likely to only spend on essential items.</li> <li>• The lack of a solid, workable car parking proposal. Although a parking management plan has been prepared, the practicality is that the residential tenants will park their vehicles in the nearest most convenient location. A</li> </ul>	<p>Noted</p> <p>As noted above, the marketplace will determine if holiday accommodation is the highest and best use of the premises within the land uses permitted by the zoning.</p> <p>Permanent residents would be present year-round (unlike tourists) and would contribute to the local economy. However, it is noted, they are unlikely to regularly contribute to the existing shops located in the same complex as tourists.</p> <p>The issues around lack of parking are noted and discussed in the body of the report.</p> <p>Being a built strata, all works in common property would require assessment and consideration by the strata body, in a process separate to Council consideration.</p> <p>The Shire does not have the details usually provided in a building application that would</p>

		<p>solution that proposes car park lease options between 200 and 500 metres from the property is simply not practical. This will further impact local businesses as the residents will occupy bays immediately outside the property for extended periods.</p> <ul style="list-style-type: none"> <li>• With the property already strata titled, the proposal will require significant legal work with respect to change of uses, by laws, unit entitlements. None of these have been agreed by strata scheme.</li> </ul> <p>I reiterate our empathy towards those that are displaced due to a housing shortage (not only in Denmark but all across Western Australia). With better planning, there can be a more suitable housing solution that does not occupy prime town centre accommodation and jeopardise the viability of local business.</p>	<p>show whether any works are required in the common property to enable this development. This is a matter for the strata body to work through and get their own legal advice.</p>
S27	<p>██████████ ██████████ ██████████ ██████████</p>	<p>We wish to object to the proposed development for the following reasons:</p> <ol style="list-style-type: none"> <li>1. We note there is insufficient parking for the proposed development. The proposal is to "allocate" eight existing public bays at the north end of Strickland Street. These parking bays are currently well used and nearly always occupied. Does the word "allocate" mean that the eight bays are being given to the development gratis or are the developers buying them? In either case, in a town which is already short of parking bays, why is the Shire contemplating transferring to private use, eight existing well used public bays?</li> <li>2. The removal of budget holiday accommodation in the centre of town would stop a small but steady flow of tourists that keep the town flourishing. If the Denmark Council wishes the Town Centre to be vibrant and alive it needs prosperous businesses and a constant flow of visitors. To our knowledge there is no other budget accommodation in or close to the Town Centre.</li> <li>3. The proposed rent is 'from \$190 per week. We must assume that \$190 is for the smallest apartment of 20 sqm which equates to \$9.20 psm of floor area per week. An average 3 bed 1 bath house of around 110 sqm currently rents for \$400 - \$420 per week, which equates to \$3.72 per sqm of floor area per week. We understand the developer is a charity seeking donations from the public and receiving a government grant; this being the case there will be little or no costs ie mortgage repayments etc. Why then are they seeking to charge the people that can least afford it the highest rent psm of floor area in Denmark?</li> <li>4. It used to be the Shire policy, and we presume it still is, that living accommodation had to be a minimum of 55 sqm. If this is still the case, why is it not being applied to this reconstruction?</li> </ol>	<p>The proposal is to either secure the 8 parking bays by a lease or simply sign post them for exclusive use of the proposed development.</p> <p>Parking and economic viability are addressed elsewhere in this report.</p> <p>The Apartment Codes have recommended minimum apartment sizes and dimensions which are at the discretion of Council.</p> <p>These sizes vary as to the nature of the proposed apartment. There is no 55m<sup>2</sup> minimum size for a dwelling.</p>
S28	<p>██████████ ██████████</p>	<p>Main concern: local tourism, hospitality and retail business are not being considered in this proposal.</p>	<p>Noted, refer to S25 for response.</p>

This current Central Short term accommodation is vital for tourism in Denmark, with NO public transport a majority of these visitors arrive by bus, Denmark's only bus stop is within walking distance  
 This current boarding house/short term accommodation is vital for visitors hiking or cycling into town. There has been a massive amount of tourism marketing recently promoting our region and attracting these adventurous travellers who hike or cycle into town to explore the pristine beauty of this great southern region.  
 Central Short term accommodation also attracts first time visitors to town and encourages repeat visits when they can find comfortable and well-located lodging options they are more likely to return to explore the towns unique charm and culture further.  
 Foot traffic into local businesses from central short term accommodation is essential for year round business viability, providing a steady flow especially though the winter months May-September.  
 The future for hospitality and retail is fragile. Business costs have increased significantly with rent rises, wages and superannuation increases as well as future rental increases from cpi still to come. Increased strata management costs will add to the increase expenses.  
 Recent wage increases f.y.i casual adult rates, per person  
 Sunday \$64/ hour  
 Public Holiday \$79.45/hour  
 Don't be surprised to see Businesses closed on Sunday's and public holidays.  
 This is the only multi-room Budget accommodation not attached to a licensed premises.  
 Denmark is already unaffordable to purchase property to live here, without budget short term accommodation it will also become unaffordable to visit Denmark.  
 Parking: deficit 8 bays? No other business development has ever been afforded this luxury to gain shire approved alternative parking for zero cost. The designated parking bays near the CRC are in an area already in extremely high demand.  
 Plumbing: concerns of renovations above my shop to construct a 2nd apartment, especially with the age of the building. The existing bathroom above my shop has the water drain from bath coming down through the roof of my shop and back into the adjoining wall!  
 Soundproofing concerns of a 2nd apartment above my shop.  
 Private organisation NFP grant paying premium price for this asset in premium location.  
 approx \$2M should be used more efficiently to include displaced families, Disabled and majority of elderly not able to walk the 2 flights of stairs.  
 the rush to comply with the qualifications for this grant are overriding any concerns

		<p>for local businesses.</p> <p>Social housing immediate possibilities:</p> <p>CRC conversion for crisis accommodation</p> <p>Denmark Arts share facilities with CRC to free up ex-Blue Wren Lodge</p> <p>Written Encouragement from the shire to all current Air BnB rentals to transfer to full time rental.</p> <p>All Air BnB approvals reviewed in crises situation.</p> <p>No new Air BnB applications approved.</p> <p>Annual review of Air BnB applications for renewal.</p> <p>Multiple Air BnB properties per person should not be approved by the shire.</p> <p>Accelerate Amaroo to free up housing for families</p>	
S29	<p>██████████</p> <p>██████████████████</p> <p>██████████████████</p>	<p>The ██████████ would like to add their voice in support of the above Proposal before The Shire.</p> <p>Recently released statistics from the 2021 Census has identified Denmark as having an inordinately high rate of homelessness – the highest, in fact, in the Great Southern – if not the State.</p> <p>The Proposal before Council from Denmark Futures will go some way to addressing the dire shortage of affordable, available accommodation within the Shire.</p> <p>This community driven initiative is a great beginning and should be seen as a part of a broader approach to address a range of housing needs within our Community.</p> <p>This broader approach will include – but not be limited to – couples, families, those with disabilities and their carers.</p> <p>These were some of the needs identified in the 2 Community Forums which were organised in recent times by BaMHA in conjunction with HPD and supported by the Shire and the various Agencies on the ground, who are endeavouring to tackling this issue.</p> <p>We would humbly suggest that consideration be given in this Proposal to long-term locals, many of whom have been marginalised by the drastic increases in rental costs, combined with a greater influx of new arrivals competing for the very limited available housing stock.</p> <p>We firmly believe that safe housing for all equates to a safe community for all.</p> <p>We thank you for your kind consideration of our views.</p>	Noted

17 August 2023

Craig Pursey  
Manager Development Services  
Shire of Denmark,  
PO Box 183,  
Denmark WA 6333

Via email: [craig.pursey@denmark.wa.gov.au](mailto:craig.pursey@denmark.wa.gov.au)

Dear Craig,

**Re: Response to Submissions – Development Application 31 on the Terrace**

Denmark Futures is pleased to provide the following further information in relation to queries and concerns raised in the Submissions to our Development Application. We have segmented the various matters into themes for easier reading.

**Economic Impact - Tourism**

Tourism WA advises that in the 2022 FY Denmark experienced a total of 640,000 visitor nights. The accounts of 31 on the Terrace for the same period indicate accommodation income equivalent to no more than 2351 room nights at the lowest per room charge. If we assume that each room was always occupied by 2 people (no single occupancy), then this would account for 4,702/640,000 of the total visitor nights for the Shire, or less than 1% of total visitor accommodation.

31 on the Terrace offers a range of rooms varying in price from \$155 to \$250 per night. The Denmark Hotel, also in the centre of town, offers a range of rooms varying in price from \$145 to \$310 per night. As 31 on the Terrace continues to take bookings into 2024, Denmark Futures contacted The Denmark Hotel to explore whether, should DF be successful, the Hotel could accommodate bookings from 31 on the Terrace. The Hotel has confirmed that it has sufficient capacity to provide replacement accommodation and has confirmed this capacity is available in the May-September period that is of most concern.

In addition, we believe that additional short-term accommodation is to shortly come back onto the market in time for the September school holidays. This venue on its own exceeds the capacity of 31 on the Terrace.

## The Size of the Micro-Apartments

The size of the guest house is 469 sqm including common areas, which with 10 micro-apartments would provide a notional allocation of 46.9sq m per apartment.

The size of the individual micro apartments ranges from 20m<sup>2</sup> to 46.5m with an average size of 25.43 sq m. This is consistent with housing developments in other locations such as the famous Cairo Flats in Sydney (23-24 sq m) and the recent redevelopment of the Municipal Heritage listed Albany Primary School on Serpentine Road Albany into 27 apartments (40 bed - also managed by Advance Housing).

## Impact on the Strata

The Strata requires that the upstairs can only be utilised as accommodation but does not specify a type of accommodation. We are uncertain why it is believed that Strata fees would increase as there is no change to the unit holdings, the common areas or the footprint of the building.

In relation to the existing strata rules we note that if the purchase proceeds it will simply be a change of ownership of an existing lot. No change of use is required within the By Laws as they already specify accommodation. Although an application was made to the Body Corporate for some improvements to the common areas that included the addition of a deck to the common property and the addressing of some of the exterior asbestos, no change to the unit allocations were sought and in any case this work was not approved by the Body Corporate.

It has thus been excluded from the Development Application with the Shire and from the funding request (i.e., Is not being progressed).

Within the budget is allowance for all required soundproofing to comply with the Apartment building code.

## Parking

It is our understanding that any apartment development by any proponent for social housing can apply to access parking concessions contained within the Development Incentives – Community Benefit components of the State Planning Policy. We note that parking concessions are specifically noted as an incentive available to Local Government to encourage social housing. These concessions allow the Council to reduce the parking requirement to zero, for any developer prepared to enter into the strict long-term requirements of social housing.

Further, we note that parking incentives are also available through the State Planning Policy for adaptive reuse of a building on the Municipal Heritage Register. This allows Council to reduce the parking requirement to zero, for any developer.

In addition, we note that commercial businesses can apply for parking concessions and pay a fee to the council in lieu of providing a parking space. This ability has been utilised by various businesses around town and was originally proposed by Denmark Futures however we are advised that whilst Council can waive the parking requirement for permanent accommodation, there is no 'fee in lieu' when this is the purpose of the concession.

The waiver of parking space requirements is further supported by the Shire of Denmark's Town Planning Scheme Policy No. 47: Town Centre Parking and Transportation adopted on the 21st April 2020 states clearly that "There is already adequate parking to support the town centre on private property, in the street and in public parking areas without unduly constraining new development with excessive parking requirements. Relaxing the parking requirements is one way in which the land use planning system can assist to incentivise development."

Thus, both the State Planning Policies and the Shire of Denmark Policies allow the Shire to consider waiving the parking requirements within the CBD for any applicant – not just Denmark Futures – for social housing, use of a building on the Municipal Heritage Register, or simply to encourage alternative uses. This is one way that the Shire can encourage apartment development in these difficult times. We have been advised that social housing approved for My Home in Fremantle provides only street parking (no on-site parking), as an example of this in practice.

Should the Council prefer not to waive the parking requirement (noting there is some parking provided) Denmark Futures, with the guidance of Town Planning firm Taylor Burrell Barnett, has proposed an allocation of spaces at the CRC as a potential solution. This has the support of the CRC.

Although some visiting tourists do not come with a car, we suspect that many potential residents will similarly not have a car. The number of onsite parking bays are not changing with this proposal, however the demand for onsite parking is expected to reduce, with a lower occupancy under the apartments than currently exists as a guest house.

The concern around shop allocated parking bays within the complex is noted. A risk management pathway for these concerns could be managed through strategies such as using a code operated entry gate for designated users only. This would prevent unauthorised parking and ensure that the operators of the strata commercial units could access their allocated bays at all times (including overnight which is presently not permitted by the shared use arrangements). We do not see this is an insoluble problem.

## Disability Access.

It is true that this property will not be able to meet the needs of the disabled, or elderly without mobility. However, we note that the Social Health Atlas identifies 293 Denmark residents (as at August 2021) with profound or severe disability of which 130 are under 65 and 163 over 65.

This cohort represents around 5% of our community, who will indeed be unable to access the building. However, we note that there are many that would benefit, with a waiting list that is three times the size of the capacity of this property.

## Appropriateness of Rental

Denmark Futures, in its draft Business Case provided to the Department of Communities in 2022, originally sought to adopt the same model that has been used by the State Government for state funded rental houses across many local government areas. This has included, for example, funding 27 two-bedroom homes in Merredin (population 3228). Rentals are set to be affordable and managed locally, and the level of rent is not assessed against a person's income but rather at a sustainable rate. Rentals vary depending on location.

We proposed a range of differing rents ranging from \$170 to \$270 per week, depending on the size of the apartment, with a registered real estate agent managing the building. Like Merredin, the building was intended simply to increase the diversity of housing options within the town, allowing anyone needing it to apply for a lease.

This proposal was rejected by the Department of Communities at the draft stage, with a non-negotiable requirement for the property to be Social/Community Housing and managed by a Community Housing Provider imposed.

One of the implications of this requirement is that the maximum weekly rental fee is set by the ATO, and we have been advised that this is \$190 per week for one bedroom occupancy in Denmark. Rates for 2- and 3-bedroom housing is also set. The rate is updated annually.

Whilst this is the maximum rental, the actual rental is calculated as the lower of \$190 or the assessed rental under the social/community housing rental assessment rules. For example, we are advised that at the time of our formal resubmission (March 2023), this would mean that someone on Newstart would pay \$146 per week rental.

It is intended that donations and Government Grants will enable the purchase of the property. As social/community housing the Government requires the rental return to go to the Community Housing Provider and to meet the ongoing operating costs of the building.

If the building is ultimately funded with a government contribution, it may be that the Government elects to own it itself – we don't know that at this stage. However, Denmark Futures believes that no-one will care about keeping the building maintained and in order more than a local charity on behalf of the community, so DF has proposed local ownership.



## Closing Remarks

Please note that this is not 'homelessness housing'. Someone can be on the waiting list for housing and not be homeless. We are unable to access (for privacy reasons) the personal situation of those on the waiting list.

For Denmark's waiting list, there are more than 30 households waiting on one bedroom housing, and half of these are aged 65 or over. One in five is older than 70. Nearly all are single people.

Most of the demand for social or community housing in Denmark is for one-bedroom households. Denmark Futures hopes that the provision of some one-bedroom accommodation may free up some family style accommodation for others, when tenants are able to move to more appropriate accommodation.

What this proposal does is increase the diversity of housing options, allowing for more people to find the type of housing that they need.

There is significant misinformation bias that we would like to be able to correct, that suggests that the majority of homeless come with mental health issues. Numerous studies have been completed on this topic, and the data does not support this view at all. Quite the contrary. Each of us, no matter our situation, is statistically only three events away from homelessness. Indeed, estimates of homelessness risk (calculated utilising data from the Household, Income and Labour Dynamics in Australia (HILDA) survey, and the Census), suggest that within Denmark at present there are between 536 and 738 persons that are considered immediately vulnerable.

Statistically speaking, more than 80% of homelessness is simply a housing issue, caused by a lack of housing supply or a lack of finances to rent the housing that exists. Across the board, around 10% of homeless people have complex needs, and another 10% have some other areas of support identified. In our initial discussions the Minister for Housing has made it clear that those needing additional supports will be unable to be housed in 31 on the Terrace, as Denmark does not have wrap around services. 31 on the Terrace is specifically for those who only require a home. This is made clear in our Development Application support letter. We are aware that homeless people in our town also include a wide range of essential workers.

Development Application consent is one of several critical pathway points for this project.

Should DA approval be provided, further investigation will be undertaken on the building structure itself with a Structural Engineer and a Fire Engineer as part of the due diligence process.

Preliminary builder and architect assessments note that interior walls are stud (not solid) and there is no intention to alter the location of any of the solid walls. All bathrooms but one remain in their current location. Nevertheless, should the structural or fire engineer reports make the

conversion unviable, then it will not proceed. Similarly, all require financial support, without which it will also not proceed.

The Development Application approval will allow one of the critical pathway points to be resolved.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Trevor Hunt', with a small flourish at the end.

Trevor Hunt  
**Chair**

## A6 – Objectives summary (1/4)

*This summary assists proponents and assessors to explain and assess the development against the Element Objectives listed in this policy.*

### PART 2 – PRIMARY CONTROLS

#### 2.2 Building height

- 2.2.1 The height of **development** responds to the desired future scale and character of the street and local area, including existing **buildings** that are unlikely to change.
- 2.2.2 The height of **buildings** within a **development** responds to changes in topography.
- 2.2.3 **Development** incorporates articulated roof design and/or roof top **communal open space** where appropriate.
- 2.2.4 The height of **development** recognises the need for **daylight** and **solar access** to adjoining and nearby residential development, **communal open space** and in some cases, public spaces.

#### 2.3 Street setbacks

- 2.3.1 The **setback** of the **development** from the **street** reinforces and/or complements the existing or proposed **landscape character** of the street.
- 2.3.2 The **street setback** provides a clear transition between the public and private realm.
- 2.3.3 The **street setback** assists in achieving visual privacy to **apartments** from the street.
- 2.3.4 The **setback** of the **development** enables **passive surveillance** and outlook to the **street**.

#### 2.4 Side and rear setbacks

- 2.4.1 **Building** boundary **setbacks** provide for adequate separation between neighbouring properties.
- 2.4.2 **Building** boundary **setbacks** are consistent with the existing **streetscape** pattern or the desired streetscape character.
- 2.4.3 The **setback** of **development** from side and rear boundaries enables retention of existing trees and provision of **deep soil areas** that reinforce the **landscape character** of the area, support tree canopy and assist with **stormwater** management.
- 2.4.4 The **setback** of **development** from side and rear boundaries provides a transition between **sites** with different land uses or intensity of development.

#### 2.5 Plot ratio

- 2.5.1 The overall bulk and scale of **development** is appropriate for the existing or planned character of the area.

#### 2.6 Building depth

- 2.6.1 **Building depth** supports **apartment** layouts that optimise **daylight** and **solar access** and **natural ventilation**.
- 2.6.2 Articulation of **building** form to allow adequate access to **daylight** and **natural ventilation** where greater **building depths** are proposed.
- 2.6.3 Room depths and / or ceiling heights optimise **daylight** and **solar access** and **natural ventilation**.

#### 2.7 Building separation

- 2.7.1 New **development** supports the desired future **streetscape** character with spaces between **buildings**.
- 2.7.2 **Building** separation is in proportion to building height.
- 2.7.3 **Buildings** are separated sufficiently to provide for residential **amenity** including visual and **acoustic privacy**, **natural ventilation**, **sunlight** and **daylight** access and outlook.
- 2.7.4 Suitable areas are provided for **communal** and **private open space**, **deep soil areas** and **landscaping** between **buildings**.

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## A6 – Objectives summary (2/4)

### PART 3 – SITING THE DEVELOPMENT

#### 3.2 Orientation

- 3.2.1 Building layouts respond to the **streetscape**, topography and **site** attributes while optimising **solar** and **daylight access** within the **development**.
- 3.2.2 Building form and orientation minimises overshadowing of the **habitable rooms**, **open space** and **solar collectors** of neighbouring properties during **mid-winter**.

#### 3.3 Tree canopy and deep soil areas

- 3.3.1 Site planning maximises retention of existing healthy and appropriate trees and protects the viability of **adjoining trees**.
- 3.3.2 Adequate measures are taken to improve tree canopy (long term) or to offset reduction of tree canopy from pre-**development** condition.
- 3.3.3 **Development** includes **deep soil areas**, or other infrastructure to support planting on structures, with sufficient area and volume to sustain healthy plant and tree growth.

#### 3.4 Communal open space

- 3.4.1 Provision of quality **communal open space** that enhances resident **amenity** and provides opportunities for **landscaping**, tree retention and **deep soil areas**.
- 3.4.2 **Communal open space** is safe, **universally accessible** and provides a high level of **amenity** for residents.
- 3.4.3 **Communal open space** is designed and oriented to minimise impacts on the **habitable rooms** and **private open space** within the **site** and of neighbouring properties.

#### 3.5 Visual privacy

- 3.5.1 The orientation and design of **buildings**, windows and **balconies** minimises direct overlooking of **habitable rooms** and private outdoor living areas within the **site** and of neighbouring properties, while maintaining **daylight** and **solar access**, ventilation and the external outlook of habitable rooms.

#### 3.6 Public domain interface

- 3.6.1 The transition between the private and **public domain** enhances the privacy and safety of residents.
- 3.6.2 **Street** facing **development** and **landscape** design retains and enhances the **amenity** and safety of the adjoining **public domain**, including the provision of shade.

#### 3.7 Pedestrian access and entries

- 3.7.1 Entries and pathways are **universally accessible**, easy to identify and safe for residents and visitors.
- 3.7.2 Entries to the **development** connect to and address the **public domain** with an attractive **street** presence.

#### 3.8 Vehicle access

- 3.8.1 Vehicle access points are designed and located to provide safe access and egress for vehicles and to avoid conflict with pedestrians, cyclists and other vehicles.
- 3.8.2 Vehicle access points are designed and located to reduce visual impact on the **streetscape**.

#### 3.9 Car and bicycle parking

- 3.9.1 Parking and facilities are provided for cyclists and other modes of transport.
- 3.9.2 Car parking provision is appropriate to the location, with reduced provision possible in areas that are highly walkable and/or have good public transport or cycle networks and/or are close to employment centres.
- 3.9.3 Car parking is designed to be safe and **accessible**.
- 3.9.4 The design and location of car parking minimises negative visual and environmental impacts on **amenity** and the **streetscape**.

## A6 – Objectives summary (3/4)

### PART 4 - DESIGNING THE BUILDING

#### 4.1 Solar and daylight access

- 4.1.1 In climate zones 4, 5 and 6: the **development** is sited and designed to optimise the number of **dwelling**s receiving winter **sunlight** to **private open space** and via windows to **habitable rooms**.
- 4.1.2 Windows are designed and positioned to optimise **daylight** access for **habitable rooms**.
- 4.1.3 The **development** incorporates shading and glare control to minimise heat gain and glare:
  - from mid-spring to autumn in **climate zones** 4, 5 and 6 **AND**
  - year-round in climate zones 1 and 3.

#### 4.2 Natural ventilation

- 4.2.1 **Development** maximises the number of **apartment**s with **natural ventilation**.
- 4.2.2 Individual **dwelling**s are designed to optimise **natural ventilation** of **habitable rooms**.
- 4.2.3 **Single aspect apartment**s are designed to maximise and benefit from **natural ventilation**.

#### 4.3 Size and layout of dwellings

- 4.3.1 The internal size and layout of **dwelling**s is functional with the ability to flexibly accommodate furniture settings and personal goods, appropriate to the expected household size.
- 4.3.2 Ceiling heights and room dimensions provide for well-proportioned spaces that facilitate good **natural ventilation** and **daylight** access.

#### 4.4 Private open space and balconies

- 4.4.1 **Dwelling**s have good access to appropriately sized **private open space** that enhances residential **amenity**.
- 4.4.2 **Private open space** is sited, oriented and designed to enhance liveability for residents.
- 4.4.3 **Private open space** and **balconies** are integrated into the overall architectural form and detail of the **building**.

#### 4.5 Circulation and common spaces

- 4.5.1 Circulation spaces have adequate size and capacity to provide safe and convenient access for all residents and visitors.
- 4.5.2 Circulation and common spaces are attractive, have good **amenity** and support opportunities for social interaction between residents.

#### 4.6 Storage

- 4.6.1 Well-designed, functional and conveniently located **storage** is provided for each **dwelling**.

#### 4.7 Managing the impact of noise

- 4.7.1 The siting and layout of **development** minimises the impact of external noise sources and provides appropriate **acoustic privacy** to **dwelling**s and on-site **open space**.
- 4.7.2 Acoustic treatments are used to reduce sound transfer within and between **dwelling**s and to reduce noise transmission from external noise sources.

#### 4.8 Dwelling mix

- 4.8.1 A range of **dwelling** types, sizes and configurations is provided that caters for diverse household types and changing community demographics.

#### 4.9 Universal design

- 4.9.1 **Development** includes **dwelling**s with **universal design** features providing dwelling options for people living with disabilities or limited mobility and/or to facilitate ageing in place.

#### 4.10 Façade design

- 4.10.1 **Building façades** incorporate proportions, materials and design elements that respect and reference the character of the local area.
- 4.10.2 **Building façades** express internal functions and provide visual interest when viewed from the public realm.

## A6 – Objectives summary (4/4)

### PART 4 - DESIGNING THE BUILDING (CONTINUED)

#### 4.11 Roof design

**O4.11.1** Roof forms are well integrated into the **building** design and respond positively to the **street**.

**O4.11.2** Where possible, roof spaces are utilised to add **open space**, **amenity**, solar energy generation or other benefits to the **development**.

#### 4.12 Landscape design

**O4.12.1** **Landscape** design enhances **streetscape** and pedestrian **amenity**; improves the visual appeal and comfort of **open space areas**; and provides an attractive outlook for **habitable rooms**.

**O4.12.2** Plant selection is appropriate to the orientation, exposure and **site** conditions and is suitable for the adjoining uses.

**O4.12.3** **Landscape** design includes water efficient irrigation systems and, where appropriate, incorporates water harvesting or water re-use technologies.

**O4.12.2** **Landscape** design is integrated with the design intent of the architecture including its built form, materiality, key functional areas and **sustainability** strategies.

#### 4.13 Adaptive reuse

**O4.13.1** New additions to existing **buildings** are contemporary and complementary and do not detract from the character and scale of the existing building.

**O4.13.2** Residential **dwellings** within an adapted **building** provide good **amenity** for residents, generally in accordance with the requirements of this policy.

#### 4.14 Mixed use

**O4.14.1** **Mixed use development** enhances the **streetscape** and activates the **street**.

**O4.14.2** A safe and secure living environment for residents is maintained through the design and management of the impacts of non-residential uses such as noise, light, odour, traffic and waste.

#### 4.15 Energy efficiency

**O4.15.1** Reduce energy consumption and greenhouse gas emissions from the **development**.

#### 4.16 Water management and conservation

**O4.16.1** Minimise **potable water** consumption throughout the **development**.

**O4.16.2** **Stormwater** runoff from **small rainfall events** is managed on-**site**, wherever practical.

**O4.16.3** Reduce the risk of flooding so that the likely impacts of **major rainfall events** will be minimal.

#### 4.17 Waste management

**O4.17.1** Waste storage facilities minimise negative impacts on the **streetscape**, **building** entries and the **amenity** of residents.

**O4.17.2** Waste to landfill is minimised by providing safe and convenient bins and information for the separation and recycling of waste.

#### 4.18 Utilities

**O4.18.1** The **site** is serviced with power, water, gas (where available), wastewater, fire services and telecommunications/broadband services that are fit for purpose and meet current performance and access requirements of service providers.

**O4.18.2** All **utilities** are located such that they are accessible for maintenance and do not restrict safe movement of vehicles or pedestrians.

**O4.18.3** **Utilities**, such as distribution boxes, power and water meters are integrated into design of **buildings** and **landscape** so that they are not visually obtrusive from the **street** or **open space** within the **development**.

**O4.18.4** **Utilities** within individual **dwellings** are of a functional size and layout and located to minimise noise or air quality impacts on **habitable rooms** and **balconies**.