



SARACEN
PROPERTIES PTY LTD

9 September 2024

Mr Andrew Malone
Town of East Fremantle
EAST FREMANTLE, WA 6158

Dear Andrew,

ROYAL GEORGE HOTEL – CHANGE OF USE APPLICATION

We are pleased to submit this change of use request in relation to the Royal George Hotel on behalf of the owner, 34 Duke Street Pty Ltd, which is part of the Saracen Properties Group of companies (**Saracen**).

Saracen have previously received approval from the SDAU for a Form 17C on 11 April 2024, which sought a change of use to 'Tavern', along with minor amendments to the built form of the apartment component of the development.

In addition, the Town of East Fremantle recently approved a change of use application in July 2024 for the basement and part of the ground floor to be converted to a sauna and ice bath facility and pilates studio respectively.

The following change of use request deals with the balance of the heritage building and is seeking approval for the following uses:

- 'Office' – multiple rooms on the lower ground, ground and first floors; and
- 'Use not listed' – to accommodate Alchemy Saunas, offering an additional sauna facility on the lower ground floor; and
- 'Medical Centre' – multiple areas on the first floor

To assist the Town in their consideration of this request, please find enclosed the following:

- Certificate of Title – **Appendix A**
- Floor plans – **Appendix B**

Site Details

The below table identifies the legal lot details for the subject site.

Address	Lot/Plan	Vol/Folio	Proprietor	Area
34 Duke Street, East Fremantle	Lot 303 on Diagram 91758	2929/940	34 Duke Street Pty Ltd	1,499sq.m

A copy of the Certificate of Title is provided in **Appendix A**.



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PROPOSED CHANGE OF USE

The proposal seeks to change the approved uses within specific areas of the hotel building consistent with the Town of East Fremantle (**Town**) Local Planning Scheme No.3 (**LPS 3**). The specific uses proposed are:

- 'Office' – multiple rooms on the lower ground, ground and first floors; and
- 'Use not listed' – to accommodate Alchemy Saunas, offering an additional sauna facility on the lower ground floor; and
- 'Medical Centre' – multiple areas on the first floor

Minor internal works are required for the proposal, including the installation of a toilet on the first floor and minor demolition to internal walls on the first floor. These internal works have been discussed between the client and Heritage Council, who advised they have no issues with the proposal and the proposed works do not substantially vary from the Heritage Impact Statement prepared in the previous development applications approved over the site.

The general nature and details of each use are outlined below.

Office

- **Description:** Office facilities for various local businesses spread throughout a number of internal rooms across the lower ground, ground and first floors. The various rooms are connected by common area hallways and stairs and will share toilet facilities.
- **Operating hours:** standard business hours of 8:30am – 5pm. Tenants will be provided with access outside of these hours.
- **Expected occupancy:** Unknown at this stage, however, standard floor space ratios per person are expected based on similar uses.
- **Total Area:** The total office area that is the subject of this application is 263sqm distributed across the building as follows:
 - Lower Ground – 63sqm
 - Ground Floor – 118sqm
 - First Floor – 82sqm

Medical Centre

- **Description:** A Healthcare provider offering integrative health services, women's health, fertility, preconception care, pregnancy, pediatric care, chiropractic care, and general wellness services. These services are designed to enhance overall health and wellbeing within the community
- **Operating hours:** Monday to Friday 8am – 6:30pm and Saturdays 8am – 1pm
- **Staffing:** Up to 6 full time and 2 part-time practitioners with supporting administrative staff.
- **Total Area:** An area totalling 172sqm on the first floor of the building

Use Not Listed – sauna and ice bath facility

- **Description:** An additional room for the current Alchemy Saunas venue to provide additional facilities for members. It is proposed that the additional room will not



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change any of the other provisions previously approved by the Town of East Fremantle (venue capacities, operating hours etc.)

- **Operating hours:** Existing development conditions to apply
- **Staffing:** No change to previous approval, existing development conditions to apply
- **Occupancy Limit:** No change to previous approval, existing development conditions to apply
- **Total Area:** An additional area totalling 38sqm on the lower ground floor of the building

PLANNING FRAMEWORK CONSIDERATIONS

Local Planning Scheme no.3

The site is zoned 'Special Zone – Royal George Hotel' under the Town's Local Planning Scheme No. 3 (**LPS3**). The objectives of the Special Zone – Royal George Hotel are:

- *To encourage the preservation and re-use of the Royal George Hotel building;*
- *To accommodate the redevelopment of the Royal George Hotel site in a manner which will complement the preservation of the hotel building.*
- *To enhance and promote George Street as a vibrant main street.*

Offices, Medical Centre and Use Not Listed (Alchemy Saunas) are all uses that are consistent with the objectives of the Special Zone – Royal George Hotel, as they propose to reuse the heritage building whilst having minimal impact on the heritage fabric. The uses will also compliment the George Street main street precinct, as the uses generally promote health and wellness within the local community as well as providing space for businesses.

Permissibility

Medical Centre and Office are both 'A' uses within the Special Zone – Royal George hotel, meaning it's not permitted unless the local government exercises discretion and advertises the application in accordance with clause 9.4 of LPS3.

Alchemy Saunas is best characterised as an unlisted land use, as previously agreed upon with the Town and subsequently confirmed in the July 2024 Council approval for the main Alchemy Sauna facility. Whilst there are no specific provisions in LPS3 for unlisted uses, generally speaking a proposal for an unlisted use requires advertisement, similar to 'A' uses. An unlisted use generally is required to demonstrate how the use will not unduly impact upon the amenity of the surrounding area.

Parking

A parking assessment is provided in **Table 2** below against the provisions of LPS3.

A further **Table 2** also includes the previously approved uses from the July 2024 Council approval to provide an holistic overview of the on-site parking situation.

Whilst the Town does not apply a specific car parking rate for the Medical Centre, the Town has preliminarily advised via email they would seek to apply a car parking rate of 2 bays per practitioner, consistent with the Draft Interim Guidance on Non-Residential Car Parking



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Requirements (**Interim Guidance**) recently released by the Department of Planning, Lands and Heritage (**DPLH**)

Table 2: Car parking assessment against provisions of LPS3

Use	LPS 3 Provision	Area/Occupancy	LPS Requirement 3	Adopted Car Parking Requirement
Office	1 space for every 30sqm of net floor area	263sqm	9 bays	9 bays
Medical Centre	2 spaces per practitioner	7 practitioners	14 bays	14 bays
*Use Not Listed	1 space per 10sqm of net floor area	38sqm	4 bays	-
TOTAL			27 bays	23 bays

* While the LPS 3 floor space calculation for the additional Alchemy Sauna area is 4 bays, it is not proposed this additional area will increase the venues currently approved capacity limit of 20 persons at any one time. Therefore, it is reasonable for the Town to determine that, as there will be no change to venue capacity, there will be no increased demand for parking from the additional floor area and the requirement for this application is **23 bays**.

Table 3: Car parking assessment for entire Royal George Hotel

Approval	Car Parking Required	Car Parking Provided
July 2024 Change of Use	30 bays	17 bays
Current Change of Use	23 bays	-
TOTALS	53 bays	17 bays

Based on the above there is a potential 36 bay shortfall, however, the Town should support this application for the following reasons:

Parking Demand Analysis

There is a complementary relationship between the various uses that will occupy the building whereby the demand peaks occur at differing times. For example, the Office and Medical Centre uses will peak in demand during standard business hours, while the Sauna and Pilates uses have early morning (pre-8AM) and late afternoon/early evening peaks (post-5pm) when the Office and Medical centre are closed.

As part of the July 2024 approval, the Town was provided extensive usage data from Alchemy Saunas previous operations on George Street that demonstrated these demand peaks occurring in early morning and late afternoon/evening.

Opportunities for Parking Improvements

We have previously identified opportunities to improve legibility and access to on-street parking in the immediate vicinity of the Royal George Hotel. These include clear line marking to Duke Street, improved pedestrian signage and wayfinding to Silas Street car parking.



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These initiatives will significantly improve the number and usability of the on-street car parking in the entire George Street precinct.

We have had some preliminary discussions with the Town on the implementation of some of these measures and would welcome further discussion with both the Town and Council as part of this application process.

Zero Provision

Part 5.9.8.12 of the LPS 3 provides for the following provision for commercial uses within the Hotel building as follows (**Zero Provision**):

"Notwithstanding Clause 5.9.8.11, parking requirements for non-residential uses in the existing Royal George Hotel building may be reduced to zero bays where it has been demonstrated to the satisfaction of the decision maker, having regard to the advice of the State Design Review Panel, that the provision of the required parking would result in an undesirable built form outcome.

While we are not seeking to rely on this Zero Provision in the current application and would prefer to work collaboratively with the Town to implement some of the parking improvement opportunities outlined above, it is important to consider the perceived shortfall of bays in the context of this clause.

The Zero Provision shouldn't be ignored by the Town as the Scheme recognises that the existence of a State listed heritage building on the site makes it unrealistic to provide compliant parking while activating the building.

Whilst the clause requires a determination by the State Design Review Panel, this would likely be forthcoming if sought, as in reality to provide 53 bays on site would involve a multi-level decked car park at the rear of this building which would almost certainly be determined to be an undesirable built form outcome.

CONCLUSION

As demonstrated in this application, the proposed uses are entirely suitable for the site and actively seek to promote retention and reactivation of the existing heritage building. The uses proposed are consistent with the applicable planning framework under LPS 3.

Considering the above, we respectfully request the Town favourably determines the proposed application.

Yours sincerely

FOR AND ON BEHALF OF 34 DUKE STREET PTY LTD

JOEL SARACENI
DIRECTOR

- Appendix A:** Certificate of Title
- Appendix B:** Building Floor Plans
- Appendix C:** Site Plan
- Appendix D:** Change of Use Checklist