

1. Introduction

We, Developed, have been engaged on behalf of landowners at 8 Roamer Street, Heathridge (subject site) to seek development approval for a proposed single storey group dwellings. The property is zoned Residential R20/30 under the City of Joondalup Local Planning Scheme No. 3 (Scheme) and has a Lot area of 700m². The application has been assessed against the provisions of the City's Scheme No. 3, Part C of the Residential Design Codes: Volume 1 2024 (R-Codes) and the City of Joondalup's Local Planning Policy - Development in Housing Opportunity Areas Local Planning.

The subject site has an area of 700m². The lot currently contains a single house and a large garden area towards the rear of the site. The current property will be altered and retained to accommodate group dwellings. The site's 20.6m frontage faces Roamer Street through its existing driveway. The proposal proposes to retain the existing crossover. The topography of the site increases towards the rear boundary. The proposal has been designed to fit and work within the existing site constraints.



Figure 1: MNG Maps of 8 Roamer Street, Heathridge

This report provides a comprehensive planning assessment against the State and Local Government planning framework, detailing the proposal's performance against applicable objectives and requirements. It demonstrates that the development represents a high-quality built form, with a balanced land use mix, strong sustainability benefits, and an overall design that is suitable for development approval.

Based on our assessment, the following design variation has been identified:

- Element 1.1 – Private Open Space
- Element 1.2 – Trees and Landscaping
- Element 2.1 – Size and layout of Dwellings
- Element 3.3 – Street Setbacks
- Element 3.5 – Site Works and Retaining Walls
- Element 3.6 – Streetscape

We have provided justification to those proposed variations in this justification letter.

2. Assessment Variations

Planning Framework

Residential Design Codes (R-Codes) Volume 1 – Part C

The design has been assessed against the Residential Design Codes Volume 1 – Part C (R-Codes), with the proposed dwellings satisfying the relevant Design Principles, achieving positive outcomes in contextual response, streetscape presentation, site planning, and building design.

Minor variations are proposed in relation to private open space, trees and landscaping, size and layout of dwellings, street setbacks, site works and retaining walls and streetscape provisions. These variations are considered to satisfy the corresponding Design Principles and do not adversely impact adjoining properties or the streetscape.

Local Planning Policy - Development in Housing Opportunity Areas

The proposal has been assessed against the Development in Housing Opportunity Areas local planning policy with the proposed development satisfying the objectives of the subject policy.

Minor variations are proposed in relation to landscaping and internal areas of habitable spaces. Nevertheless, The proposal achieves a positive outcome with relevance to providing a high standard of urban design, facilitating compact sustainable urban form, enhances and respects the desired character of the locality and provides a neighbourhood within which the residents can identify.

The table below provides summary of the assessment undertaken against Part C of the R-Codes and the Development in Housing Opportunity Area (HOA).

DEEMED-TO-COMPLY ASSESSMENT SUMMARY – R-CODES VOL.1 PART C

1.0 THE GARDEN			3.0 NEIGHBOURLINESS		
1.1	Private open space	<input checked="" type="checkbox"/>	3.1	Site cover	<input checked="" type="checkbox"/>
1.2	Trees and landscaping	<input checked="" type="checkbox"/>	3.2	Building height	<input checked="" type="checkbox"/>
1.3	Communal open space	<input checked="" type="checkbox"/>	3.3	Street setbacks	<input checked="" type="checkbox"/>
1.4	Water management and conservation	<input checked="" type="checkbox"/>	3.4	Lot boundary setbacks	<input checked="" type="checkbox"/>
2.0 THE BUILDING			3.5	Site works and retaining walls	<input checked="" type="checkbox"/>
2.1	Size and layout of dwellings	<input checked="" type="checkbox"/>	3.6	Streetscape	<input checked="" type="checkbox"/>
2.2	Solar access and natural ventilation	<input checked="" type="checkbox"/>	3.7	Access	<input checked="" type="checkbox"/>
2.3	Parking	<input checked="" type="checkbox"/>	3.8	Retaining existing dwellings	N/A
2.4	Waste management	<input checked="" type="checkbox"/>	3.9	Solar access for adjoining sites	<input checked="" type="checkbox"/>
2.5	Utilities	<input checked="" type="checkbox"/>	3.10	Visual privacy	<input checked="" type="checkbox"/>
2.6	Outbuildings	<input checked="" type="checkbox"/>	LAND – R-CODES VOL.1 PART D		
2.7	Universal design	N/A	1.0 LAND		
2.8	Ancillary dwellings	N/A	1.1	Site area	<input checked="" type="checkbox"/>
2.9	Small dwellings	N/A			
2.10	Housing on lots less than 100m ²	N/A			

DEVELOPMENT IN HOUSING OPPORTUNITY AREAS (HOA)

Table 1	DEVELOPMENT STANDARDS	
1.	Urban Design — Public Domain Interface	<input checked="" type="checkbox"/>
2.	Urban Design — Lot Subdivision	<input checked="" type="checkbox"/>
3.	Urban Design — Multiple Dwellings – Application of Average Site Area	N/A
4.	Building Height	<input checked="" type="checkbox"/>
5.	Street Setbacks	<input checked="" type="checkbox"/>
6.	Side and Rear Setbacks — Side Setbacks	<input checked="" type="checkbox"/>
7.	Resident Parking - Location	<input checked="" type="checkbox"/>
8.	Solar Access for Adjoining Sites	<input checked="" type="checkbox"/>
9.	Access and Parking — Resident Parking	<input checked="" type="checkbox"/>
10.	Access and Parking — Crossovers	<input checked="" type="checkbox"/>
11.	Tree Canopy and Deep Soil Areas — Landscape Area	<input checked="" type="checkbox"/>
12.	Tree Canopy and Deep Soil Areas — Tree Sizes and Deep Soil Areas	<input checked="" type="checkbox"/>
13.	Tree Canopy and Deep Soil Areas — Trees	<input checked="" type="checkbox"/>
14.	Tree Canopy and Deep Soil Areas — Tree Retention	N/A
15.	Tree Canopy and Deep Soil Areas — Outdoor Living Areas	<input checked="" type="checkbox"/>
16.	Size and Layout of Dwellings	<input checked="" type="checkbox"/>
17.	Solar and Daylight Access	<input checked="" type="checkbox"/>
18.	Natural Ventilation	<input checked="" type="checkbox"/>
19.	Waste Management	<input checked="" type="checkbox"/>

3. Planning Assessment

The following justifications apply to the variations to the deemed-to-comply provisions of the R-Codes for 8 Roamer Street, Heathridge.

Design elements which have not satisfied the deemed-to-comply requirements are demonstrated compliance with the associated design principles below.

3.1. Clause 1.1 – Private Open Space

The proposal seeks to vary the minimum garden area and dimensions for Unit 2 (rear dwelling), which proposes a garden area of 18.3m² in lieu of 40m², with minimum dimensions of 1.4m in lieu of 1.5m, as prescribed under the City of Joondalup’s Development in Housing Opportunity Areas Local Planning Policy (HOA) and Clause 5.3.1 – Outdoor Living Areas of the R-Codes (Volume 1).

Design Element	Justification
<p><i>P1.1.1 Dwellings are designed to have direct access to private open space which provides for entertaining, leisure and connection to the outdoors that is:</i></p> <ul style="list-style-type: none"> <i>i. of sufficient size and dimension to be functional and usable for the intended number of dwelling occupants;</i> <i>ii. is sited, oriented and designed for occupant amenity, including consideration of solar access and natural ventilation appropriate to the climatic region; and</i> <i>iii. capable of use in conjunction with a primary living space of the dwelling.</i> <p><i>P1.1.2 Private open space allows for sufficient uncovered area to:</i></p> <ul style="list-style-type: none"> <i>i. permit winter sun and natural ventilation into the dwelling; and</i> <i>ii. provide for soft landscaping, including the planting of a tree(s) and deep soil area.</i> 	<ul style="list-style-type: none"> • The private open space remains directly accessible from the main living area, ensuring a functional and usable connection between indoor and outdoor spaces. • Proposal has been designed efficiently to maximise usable space for day-to-day activities such as outdoor seating, planting, and drying, providing an adequate level of amenity for the intended occupants. • The garden area receives adequate solar access and natural ventilation, with sufficient uncovered area to allow for soft landscaping. • The reduced dimension of 1.4m is minor and does not materially compromise the functionality or usability of the space, given that it adjoins open areas that visually and spatially expand the perceived extent of the outdoor living space. <div style="text-align: right; padding-right: 10px;"> <input checked="" type="checkbox"/> </div>

Further, consistent with the objectives of the City's Local Planning Policy for Housing Opportunity Areas, the design demonstrates a compact and efficient layout that promotes housing diversity and responsive infill development, while maintaining a high standard of residential amenity.

3.2. Clause 1.2 Trees and Landscaping

The proposal provides 14.34% of soft landscaping, which is marginally below the R-Codes requirement of 15% and the HOA requirement of 15%. Despite this, the front setback area incorporates 50.48% soft landscaping, exceeding the R-Codes requirement and ensuring the site presents positively to the street. While the primary setback area does not include the two medium trees required under the HOA, the proposal includes two trees behind the setback line, partially mitigating this shortfall and maintaining visual amenity within the site.

Design Element	Justification
<p><i>P1.2.1 Site planning allows for:</i></p> <ul style="list-style-type: none"> <i>i. site responsive and sustainable landscape design; and</i> <i>ii. the retention of existing trees on the subject site and adjoining properties.</i> <p><i>P1.2.2 Provision of trees and high quality landscaping:</i></p> <ul style="list-style-type: none"> <i>i. enhances the built form, streetscape and pedestrian amenity, as viewed from the street;</i> <i>ii. provides shade and amenity for communal streets and parking areas; and</i> <i>iii. contributes to the visual appeal, comfort and amenity of the development, in particular private open space and communal open space and outlook from habitable rooms.</i> <p><i>P1.2.3 Development provides sufficient deep soil area to sustain healthy tree and plant growth, providing for an increase in urban tree canopy over time, and assist in managing the quantity and quality of stormwater.</i></p>	<ul style="list-style-type: none"> • The design of the landscaping responds to the site context and provides a site-responsive and sustainable landscape outcome. • The proposed trees and soft landscaping enhance the streetscape, pedestrian amenity, and private open space, contributing to the visual appeal, comfort, and outlook from habitable rooms. • The inclusion of deep soil areas behind the setback line ensures that the trees can establish and mature, supporting long-term urban canopy growth and stormwater management. <div style="text-align: right; margin-top: 100px;"> <input checked="" type="checkbox"/> </div>

Although there is a minor shortfall in total soft landscaping and tree provision within the primary setback, the proposal maintains a functional, visually appealing, and sustainable landscape outcome. The variation is therefore considered acceptable in design principle terms, as the proposed landscaping and tree planting continue to provide ecological, visual, and amenity benefits while contributing positively to the streetscape and site context.

3.3. Clause 2.1 Size and Layout of Dwellings

The proposed internal layouts for Unit 2 show Bed 3 with a total internal area of 12.6m² (2.7m x 4.1m) and Bed 4 with 11.9m² (2.9m x 3.3m). These rooms meet the R-Codes deemed-to-comply requirements, which specify minimum areas of 9m² for bedrooms, but do not fully meet the HOA policy requirement for minimum room dimensions of 3m in width. Similarly, the primary living area within Unit 2 has dimensions of 3.3m x 5.3m, which satisfies the R-Codes provisions but falls slightly short of the HOA minimum living room width of 4m.

For Unit 1, the new additions (master bedroom and ensuite) propose a ceiling height of 2.4m, in lieu of the HOA requirement of 2.7m.

Both Unit 1 and Unit 2 propose storage areas that fall below the HOA minimums, Unit 1 store at 3m² in lieu of 4m² and Unit 2 store at 2.9m² with minimum dimensions of 1m x 2.91m in lieu of 1.5m x 1.5m.

Design Element	Justification
<p><i>P2.1.1 Dwellings have a primary living space that:</i></p> <ul style="list-style-type: none"> <i>i. is proportionate to the type and size of the dwelling and intended number of occupants;</i> <i>ii. has a physical and visual relationship with the primary garden area, private open space and/or public open space; and</i> <i>iii. incorporates environmental design principles, including passive solar design and appropriate daylighting and shading, appropriate for the climate.</i> <p><i>P2.1.2 Ceiling heights and room dimensions provide for well-proportioned spaces that facilitate good natural ventilation and daylighting.</i></p>	<ul style="list-style-type: none"> • The rooms remain functional, well-proportioned, and capable of accommodating furniture, natural light, and ventilation. • The reduced living area width does not compromise occupant amenity or access to the private open space and is adequate for the intended number of occupants. • The majority of the existing dwelling has a ceiling height of 2.4m. This ensures consistency across the dwelling and integration with the existing building, providing adequate daylight, natural ventilation, and functional space.

<p><i>P2.1.3 The size and layout of dwellings:</i></p> <ul style="list-style-type: none"> <i>i. is functional with the ability to flexibly accommodate furniture;</i> <i>ii. is appropriate to the intended number of occupants; and iii. ensures functional, high amenity spaces.</i> <p><i>P2.1.5 Each dwelling provides adequate, conveniently located storage for large items that are:</i></p> <ul style="list-style-type: none"> <i>i. proportionate to the size of the dwelling and intended number of occupants; and</i> <i>ii. integrated into the design of the building and/ or screened from view to ensure that it is not visually intrusive when viewed from the street.</i> 	<ul style="list-style-type: none"> • The proposed storage spaces are proportionate to the dwelling size, integrated into the building layout, and do not visually dominate the street or internal spaces. 	
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The proposal demonstrates functional, well-proportioned, and usable living spaces, providing appropriate environmental design features, adequate private open space connections, and sufficient storage relative to the intended occupancy of each unit. While the proposal does not meet certain HOA requirements, all elements comply with the R-Codes deemed-to-comply provisions and remain consistent with the underlying design principles.

The minor variations from policy are considered acceptable as they do not compromise the amenity, functionality, or environmental performance of the dwellings and are appropriate to the existing and future context of the locality.

3.4. 3.3 Street Setbacks

The proposed store for Unit 1 is positioned 0.4m from the common property boundary, which is slightly less than the 0.5m setback required under the R-Codes. The reduced setback represents a minor variation of 0.1m and does not materially affect the functionality of the space or the amenity of adjoining properties. The location of the store is such that it does not obstruct pedestrian or vehicular access along the common property, nor does it compromise sightlines, landscaping potential, or opportunities for community interaction.

Design Element	Justification
<p><i>P3.3.1 Buildings are set back from street boundaries an appropriate distance to ensure they:</i></p> <ul style="list-style-type: none"> <i>i. are consistent with the existing or future streetscape and local character;</i> <i>ii. provide sufficient space for tree planting and other landscaping, as well as community interaction;</i> <i>iii. provide adequate privacy to the dwellings;</i> <i>iv. accommodate site planning requirements such as parking and utilities; and</i> <i>v. allow safety clearances for easements for essential service corridors and sightlines.</i> <p><i>P3.3.2 Buildings mass and form that:</i></p> <ul style="list-style-type: none"> <i>i. uses design features to affect the size and scale of the building;</i> <i>ii. provide the opportunity for building articulation, such as well-defined entries, varying setbacks across the building width, verandahs, porches and balconies;</i> <i>iii. uses appropriate minor projections that do not detract from the character of the streetscape;</i> <i>iv. minimises the proportion of the façade at ground level taken up by building services, vehicle entries, parking supply, blank walls,</i> 	<ul style="list-style-type: none"> • The store remains visually integrated into the dwelling, with its scale and form proportionate to the building and adjacent structures; • The slight encroachment does not compromise privacy to adjoining dwellings or restrict access to essential service corridors; • Maintains a form and scale consistent with the local context and streetscape; • Allows for articulation and functional space planning; and • Ensures that the amenity of adjacent dwellings and common property is preserved. <input checked="" type="checkbox"/>

<p><i>servicing infrastructure access, meters and the like; and</i></p> <p>v. <i>positively contributes to the prevailing or future development context and streetscape as outlined in the local planning framework.</i></p>	
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While the proposal does not strictly meet the R-Codes setback requirement of 0.5m, the minor nature of the variation means it is acceptable in the context of the overall development and consistent with the design principles. The variation does not create adverse impacts and maintains the objectives of both the HOA and broader planning framework.

3.4. 3.5 Site Works and Retaining Walls

The proposed retaining wall along the eastern lot boundary has a height of 1.18m with a 0m setback in lieu of the 1.5m deemed-to-comply requirement. The variation is considered minor in nature and has been designed to respond appropriately to the natural topography of the site.

Design Element	Justification
<p><i>P3.5.1 Development that considers and responds to the natural features of the site and requires minimal excavation/fill.</i></p> <p><i>P3.5.2 Where excavation/fill is necessary, all finished levels respect the natural ground level at the lot boundary of the site and as viewed from the street.</i></p> <p><i>P3.5.3 Retaining walls that result in land which can be effectively used for the benefit of residents, do not detrimentally affect the amenity of adjoining properties in the opinion of the decision-maker, and are designed, engineered and landscaped having due regard to the provisions of element 3.10 Visual privacy.</i></p>	<ul style="list-style-type: none"> • The wall enables effective site retention and grading, providing functional and level areas within the property without excessive excavation or fill. • The retaining wall has been engineered and designed to minimise any adverse visual or bulk impacts to the adjoining property. • Given its modest height and location, it does not obstruct direct sun or ventilation to habitable rooms or open spaces on the neighbouring lot. • The wall is also designed to be landscaped, softening its visual impact from both the street and adjacent properties.

While the proposed setback is less than the deemed-to-comply requirement, the functional use of the lot is maintained, and the variation does not detrimentally affect the amenity or privacy of the adjoining property. The design demonstrates consideration of site constraints, natural ground levels, and future usability.

3.5. 3.6 Streetscape

The proposed front door eaves for Unit 2 have a minimum dimension of 0.8m, in lieu of the 1.2m deemed-to-comply requirement. The minor reduction in eaves projection is considered a minimal variation and does not compromise the functionality or amenity of the entry.

Design Element	Justification
<p><i>P3.6.2 The building design addresses street frontages and provides opportunity for passive surveillance and social interaction.</i></p> <p><i>P3.6.3 Dwelling and building entries are:</i></p> <ul style="list-style-type: none"> <i>i. accessible and protected from the weather; and</i> <i>ii. well-lit for safety and amenity, without opportunity for concealment, and designed to enable passive surveillance of the entry from within the lot.</i> 	<ul style="list-style-type: none"> • The eaves continue to provide adequate shelter from weather, ensuring safe and convenient access to the dwelling. • The overall façade design maintains visual connectivity with the street, providing a clear and identifiable entry point while supporting passive surveillance opportunities. <input checked="" type="checkbox"/>

Although the eaves projection is slightly reduced, the entry remains accessible, and visible from the communal street, ensuring safety and amenity without creating opportunities for concealment.

4. Conclusion

This development application seeks approval for the proposed development at 8 Roamer Street, Heathridge.

The development application is highly consistent with the objectives and planning intent of the State and local government statutory planning framework that applies to the subject site and the proposed land uses, including the following planning documents:

- City of Joondalup Local Planning Scheme No. 3
- Residential Desing Codes Vol 1
- Local Planning Policy Development in Housing Opportunity Areas

The proposed development has been planned and designed with close consideration for the requirements and intended outcomes of the objectives of the "Residential' Zone and the City's Scheme in general. The development is consistent with the sustainable urban development and balanced transport aims for the Scheme. The proposed mixed-use development will provide increased workplaces and land use diversity within the area.

The proposed development has been designed by experienced local designers and landscape architects, with expert input from sustainability, acoustic, transport, and waste management consultants. Design Review Panel expert input has also informed and improved the design.

Having regard to the detailed planning assessment and justification set out in this report, along with the high-quality plans, as well as the supporting technical reports provided, we respectfully request that the City recommends that the development application be supported and approved.

If you require any further clarification regarding the above matters, please contact the landowners in the first instance.

Yours sincerely,



Sagarika Kannan
Planning Consultant

Developed