APPENDIX 2



lot206_126-coolibah_26022020





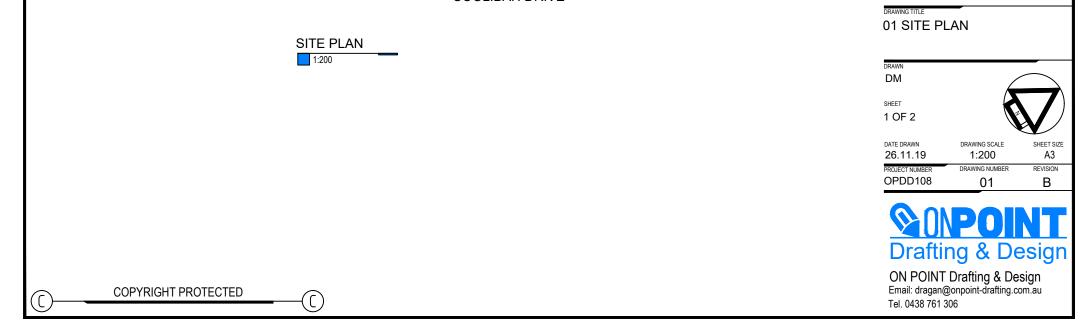
PROJECT DETAILS 126 COOLIBAH DRIVE GREENWOOD

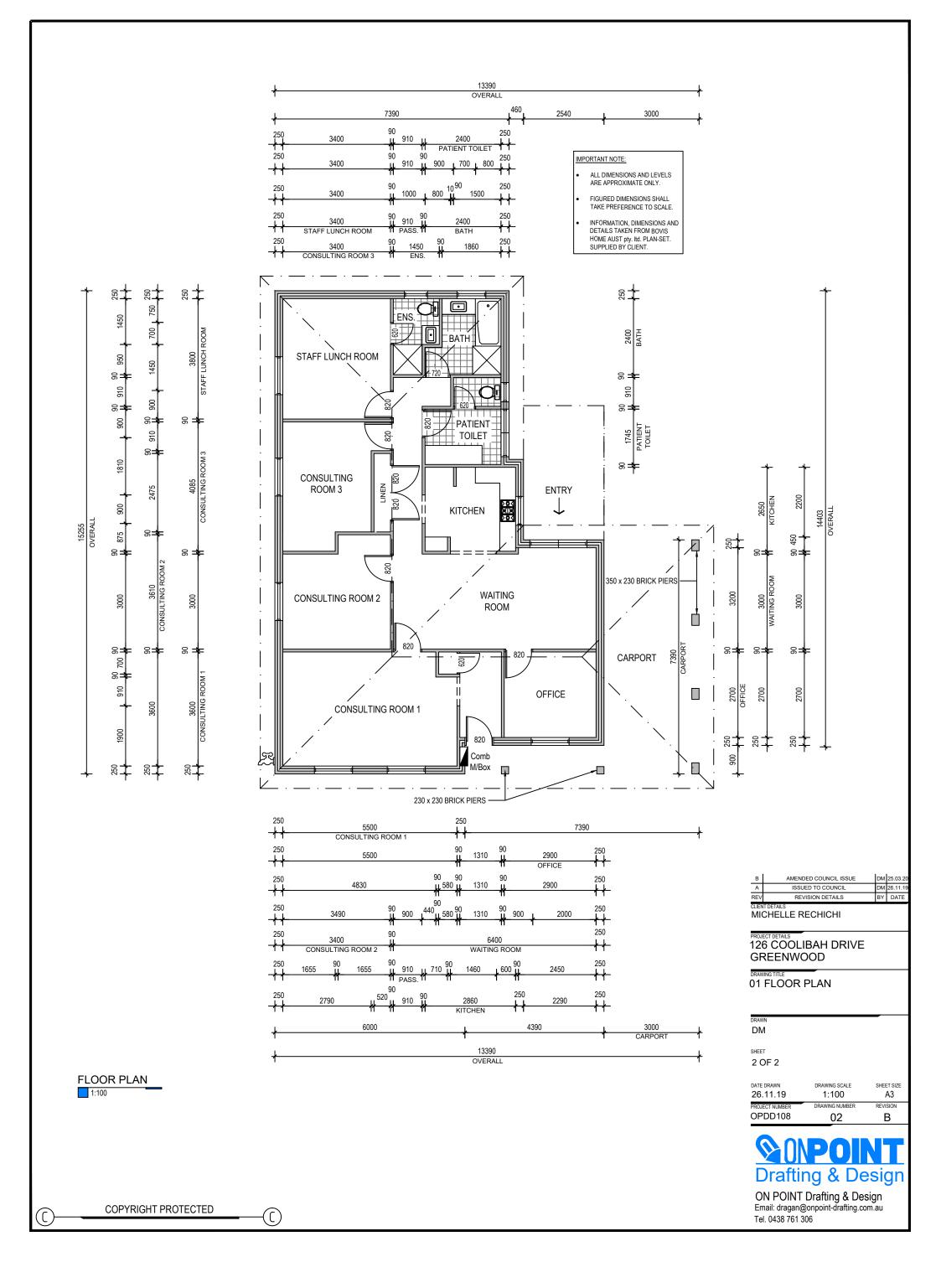
AMENDED COUNCIL ISSUE

ISSUED TO COUNCIL REVISION DETAILS

DM 25.03.2 DM 26.11.1 BY DATE

COOLIBAH DRIVE





24 January 2020

Planning Department City of Joondalup 90 Boas Avenue Joondalup 6027

To whom it may concern,

126 COOLIBAH DRIVE, GREENWOOD PROPOSED CHANGE OF USE (CONSULTING ROOMS)

Urbanista Town Planning has prepared a planning justification letter in relation to a proposal to increase the number of consulting rooms at the subject site at No. 126 Coolibah Drive, Greenwood, from one consulting room to three (the number of concurrent practitioners not exceeding two at any one time). No development or works requiring or subject to planning approval are proposed as part of planning approval application.

PROPOSAL & BACKGROUND

The proposal is for a conservative intensification of the existing approved land use as "consulting rooms" from one health practitioner to two health practitioners as per the City's Local Planning Scheme No. 3. The land use itself is proposed to remain the same, and as before no development requiring planning approval is proposed. This application for planning approval forms part of a condition of sale. Given the proposal, the primary applicable planning framework document is the City's Consulting Rooms Local Planning Policy.

SUBJECT SITE

Property Description

The subject site is located at 126 Coolibah Drive Greenwood. The site has a land area of ~808.7sqm and currently contains a single storey building which operates as consulting rooms for an alternative health practice. The building has operated as a medical / health practice since it was first constructed in the late 1970s. More recently the site was approved to operate as "consulting rooms" under the City's scheme. The site slopes upward by about ~3.0m or so from the front to the rear of the property.





Aerial Image of Subject Site at 126 Coolibah Drive, Greenwood. Source: © WALIA 2019.

PLANNING FRAMEWORK

City of Joondalup Consulting Rooms Local Planning Policy

The City's Consulting Rooms Local Planning Policy forms the primary planning framework document applicable to this planning approval application. An assessment and justification of the proposal with this policy has been provided in this letter. The objectives of this local planning policy are as follows:

- To provide development standards for consulting rooms that assist in facilitating appropriate development in close proximity to local users of the facility.
- To ensure the location, design and siting of consulting rooms does not have a negative impact on residential amenity by way of inappropriate built form, parking or traffic.
- To prevent the conglomeration of consulting rooms in residential areas.

The proposal is considered to achieve these objectives insofar as the use of the land as consulting rooms is approved, the use of the land in a manner similar to what is approved (consulting rooms) has occurred since the 1970s, and the proposal itself is not considered to contribute in any meaningful way to any negative or adverse impact to the local area with respect to loss of amenity. Further discussion is provided subsequently in this letter.

City of Joondalup Local Planning Scheme No. 3

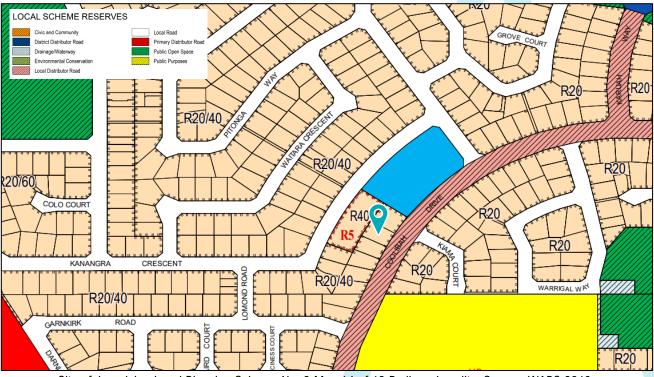
The City of Joondalup's Local Planning Scheme No. 3 (LPS No. 3) is a statutory Scheme that provides guidance for the development and use of land and buildings in the City. The subject site is zoned "Residential" with a split density of R20/40 in accordance with the City's Local Planning Scheme. The use "consulting rooms" is a A (advertising) use under LPS No. 3. "Consulting rooms" has the following definition:

consulting rooms means premises used by no more than 2 health practitioners at the same time for the investigation or treatment of human injuries or ailments and for general outpatient care;

The "Residential" zone has the following objectives:

- a) To provide for a range of housing and a choice of residential densities to meet the needs of the community.
- b) To facilitate and encourage high quality design, built form and streetscapes throughout residential areas.
- c) To provide for a range of non-residential uses, which are compatible with and complimentary to residential development.

The proposed development is considered to be consistent with the objectives of the zone and respectful of and responsive to the development standards established by the scheme. The figure shown below provides an extract of the current Scheme Map for of the City's LPS No. 3.



City of Joondalup Local Planning Scheme No. 3 Map 14 of 18 Padbury Locality. Source: WAPC 2019.

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PLANNING ASSESSMENT & JUSTIFICATION

City of Joondalup Consulting Rooms Local Planning Policy

An assessment and justification of the proposal in relation to the City's Consulting Rooms Local Planning Policy has been provided in the table below, with justification (in relation to the proposed car parking shortfall) provided accordingly. The proposal is considered to be consistent with the development standards or objectives established by the City's planning framework.

	Development Standard		Proposed / Comment			
5.1	Location					
a	In order to avoid the adverse cumulative impacts of non-residential development in a residential area, a consulting room that would contribute to the concentration of these uses along a street or located in close proximity to another consulting room will generally not be supported.		Meets development standard	~		
b	Not applicable		-	—		
5.2	Building Setbacks and Fencing					
a	Not applicable		No change to building setbacks nor fencing is proposed. Existing building is approved.	_		
5.3	Building Height					
a	Not applicable		No change to building height is proposed. Existing building is approved.	-		
5.4	Building Design					
a	Not applicable		No change to external building design, the subject of requiring planning approval, is proposed. Existing building is approved.	_		
5.5	Parking and Access					
5.5.1 a	Car parking bays are to be provided in accordance with the following table:		9 car parking have (ovicting) are proposed	~		
	(Consulting Rooms — 5 bays per practitioner)	10 bays (2 x 5)	8 car parking bays (existing) are proposed	×		
5.5.2 a	(Car park location)		Car parking location meets the requirements of this LPP. Nethertheless, car parking location is existing, no change is proposed.	~		
5.5.2 b	(Car park design)		Car parking design meets the general requirements of Australian Standard AS 2890.1 and AS 2890.2. Nethertheless, car parking design is existing, no change is proposed.	~		
5.5.2 c	(Vehicle Access)		No change to the vehicle access means is proposed.	_		

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	Development Standard	Proposed / Comment			
5.5.2 d	(Pedestrian Access)	An existing footpath is provided to the car park location from the building entrance. Nethertheless, pedestrian access is existing, no change is proposed.	~		
5.5.3 a	Bicycle parking is to be provided in accordance with the following table and relevant Australian standards.(Consulting Rooms — 2 spaces)2 spaces	The applicant will accept as a condition of approval the installation of a single bicycle rack with the provision for the parking of two bicycles. The bicycle rack will be located in a convenient location near the primary entry to the facility.	~		
5.6	Landscaping				
a a	(% landscaping)	The amount of softscape landscaping area exceeds 8% of the total site. Landscaping is existing.	~		
a b	(Size)	The size of landscaped areas meet the site requirements. Landscaping is existing.	✓		
ac	(Shade trees)	More than three trees are provided on the site, associated with parking. Landscaping is existing.	~		
a d	(Verge)	The verge is reticulated and currently maintained. It comprises of grassed softscape area. The planning approval application meets this development standard. No change to the verge landscaping is proposed.	~		
5.7	Hours of Operation				
a	The days and hours of operation are to be in accordance with the following: Days Operating Hours Monday to Friday 8[:]00 am to 6[:]00 pm [sic] Saturday 9[:]00 am to 5[:]00 pm Sunday Not permitted	Future tenant will be subject to these hours of operation, which are expected to be conditioned as a standard condition of planning approval.	š≡		
5.8	Building Height				
a	Applications for new consulting rooms, or applications where the existing consulting room use is proposed to be intensified, will be advertised for public comment for a period of 14 days by way of letters to adjoining and nearby landowners.	Noted. Not performance-based development standard.	-		

Justification of the two-bay car parking shortfall has been provided accordingly below.

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Car Parking Justification

It is considered that the two-bay car parking shortfall is indistinguishable in respect to the performance of the site, and is otherwise supportable for the following reasons.

- The car parking is existing, and meets the applicable development standards, including the Australian Standards.
- The site is capable of accommodating two more bays of car parking in the location indicated in purple in the image below, without compromising or altering the ability to achieve the development standards applicable to car parking, including the Australian Standards.
- Given the unusual layout of the site with those bays in purple being under the roof-line of the building

 for the purposes of functionality, and to minimise the impact of parking on the street, these bays have
 not been indicated as car parking spaces on the plans. Should this satisfy the City, they may be indicated
 on the plans. The intention is that these spaces are used in the unlikely event that all of the rear car parking is full. It is considered that the design adequately communicates this information.



- Means of multi-modal access to the site are convenient. Bus route 445, which provides a regular halfhourly bi-directional service between Whitfords Train Station and Warwick Train Station, runs along Coolibah Drive. The nearest bus stop is less than 50m from the site. The applicant also proposes the installation of bicycle parking for two bicycles.
- The current eight bays of car parking, assuming staff (receptionist) and practitioners drive and park onsite, allows for three separate vehicles with waiting clients to be on the site at any one time. There are no ancillary businesses or services which would motivate a client to leave their vehicle parked on-site for any extended period of time, and after a consultation a client is expected to expediently leave the site. The parking for such five vehicles is considered to be appropriate as a result, noting the availability of additional parking options, detailed above. The spacing of appointments will be sufficient so-as-to prevent an unnecessary burden on car parking and car-parking demand.

• The car-parking rate provided by the City has inherent overheads and accounts for a high usage scenario, whereby there are both no means of parking in the immediate area, nor alternative means of access to the site. The car-parking rate may likely not reflect reality, nor the actual car-parking demand which will be induced by the proposed land use.

As demonstrated in the justification provided above, the proposed development is considered to achieve the intent of the City's Consulting Rooms Local Planning Policy, in providing car parking of a standard and design that will sufficiently service the site. Resultantly the support of the City is welcomed.

CONCLUSION

Based on the information presented in this submission Urbanista Town Planning respectfully requests that the City welcome and support the proposal for a change the intensity of the land use of 126 Coolibah Drive Greenwood — from one consultant, to two.

As demonstrated, considering the current site, the locality, the history and operation of the site it is considered that the design meets the development standards, and intent and objectives in the case of the car parking shortfall, of the City's planning framework — namely the Consulting Rooms Local Planning Policy — and is wholly appropriate and supportable.

The applicant looks forward to working with the City to reach a timely solution in planning approval for the subject application.

Should you have any question in relation to the details provided in this submission, please contact Daniella Mrdja on <u>6444 9171</u> or <u>daniella@urbanistaplanning.com.au</u>.

Daniella Mrdja — Director Urbanista Town Planning

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