MethodPlanning

23 June 2026

Our Ref: 3142 - 15

City of Victoria Park

Via City of Victoria Park web portal

Dear Sir/Madam

RE: DEVELOPMENT APPLICATION – NO. 64 (LOTS 1 AND 2) HARVEY STREET, BURSWOOD – TWO (2) GROUPED DWELLINGS

Method Planning represents Sage by Atrium and the homeowner in presenting this Development Application for a proposed the registered proprietor in presenting this Development Application for two (2) grouped dwellings at No. 64 Harvey Street, Burswood (subject site).

The following submission sets out the site and local context, the design objectives and proposed design elements, and an assessment of the proposal against the relevant provisions of the local planning framework and the Residential Design Codes Volume 1 (R-Codes), including identification and justification of any variations sought.

1. THE SITE

The subject site is located at No. 64 Harvey Street, Burswood, within the Town of Victoria Park, and has a total area of 675m² with a frontage to Harvey Street of 13.42m and side boundaries of 50.31m.

Harvey Street forms part of an established, predominantly single and grouped dwelling residential precinct of early-to-mid 20th century character, located within easy walking distance of the Victoria Park town centre and café strip. The site is approximately 900m from the Victoria Park train station, 1.3km from Crown Perth and the broader Burswood entertainment and recreation precinct (including Optus Stadium and The Camfield), and approximately 2km from the Swan River foreshore. The locality therefore benefits from excellent access to public transport, retail, employment and recreational amenity, consistent with the State and Town's strategic objectives of directing increased housing diversity and density toward well-located, well-serviced areas.

The streetscape is undergoing a gradual transition from older, single storey character dwellings toward two storey grouped dwelling (villa/duplex) redevelopment, consistent with the R40 density coding applying to the site and much of the surrounding precinct. This pattern is evidenced by existing grouped dwelling development within the immediate street (including at No. 20 Harvey Street) and by the redevelopment potential of other R40 coded lots along Harvey Street, several of which (including Nos. 35 and 52 Harvey Street) have already been identified by the market for redevelopment under the current density coding. The proposal responds appropriately to this established and emerging pattern of development.

Please see **Figure 1 – Site Context** and **Figure 2 Aerial Photo** over page

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Figure 1 – Site Context

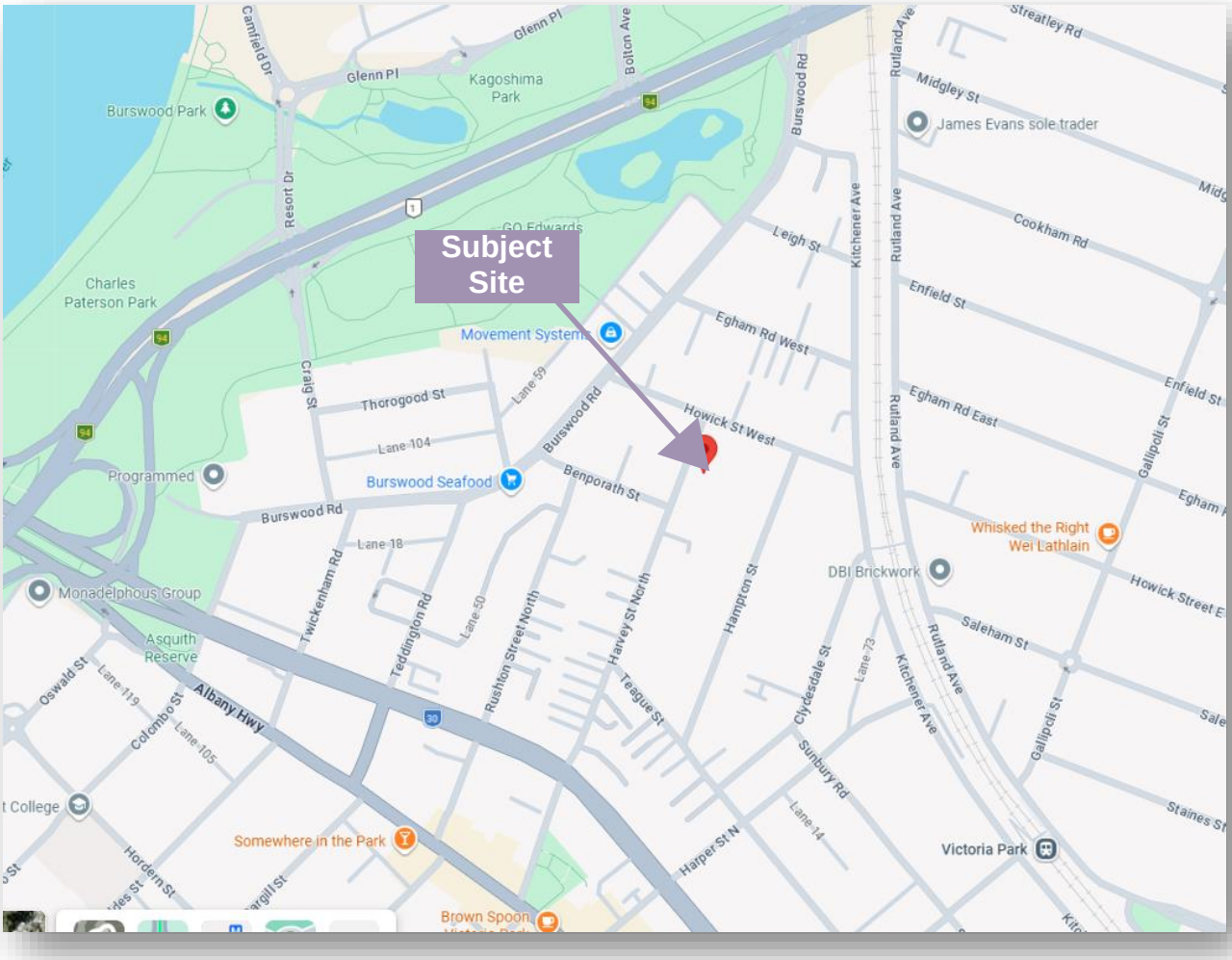


Figure 2 – Aerial Photo



Plates 1 – Site Frontage



Plates 2 – 5 - Surrounding Streetscape





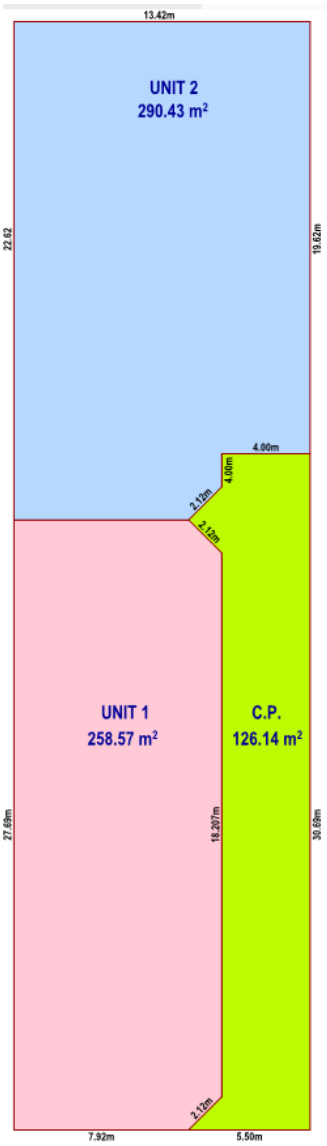


2. PROPOSED SURVEY-STRATA SUBDIVISION

It is proposed that, following practical completion of the two grouped dwellings, the site be subdivided by way of survey-strata into two (2) lots, generally in accordance with **Attachment 1 – Proposed Survey-Strata Plan**, and summarised in **Table 1 & Figure 3** below.

Table 1 – Lot Areas & Figure 3 – Subdivision Layout

Lot	Site Area
Lot 1	259m²
Lot 2	290m²
Common Property	126m²
Total	**675m²**



Site Lot Area Analysis

Under R-Codes Vol.1, Part D (Site Area), Table D1, land coded R40 requires an average site area per dwelling of 220m² and a minimum site area per dwelling of 180m² for single houses and grouped dwellings. On this basis, the subject site, at 675m², could theoretically accommodate up to three (3) dwellings under the maximum density permitted by the coding.

The applicant has elected to propose only two (2) grouped dwellings. The resultant average site area per dwelling of 350m² substantially exceeds both the average (220m²) and minimum (180m²) site area requirements under Part D, by margins of approximately 59% and 94% respectively. This is a deliberate, contextually responsive design outcome. Rather than maximising yield to the full extent permitted by the R40 coding, the proposal provides a more generous allocation of site area per dwelling than required, enabling larger floor plans, increased private open space and articulation, and a built form outcome that better responds to the predominantly low-scale character of Harvey Street while still delivering the increased housing diversity intended by the R40 coding.

As the proposed lots are to be created by way of survey-strata subdivision (rather than green title subdivision), no minimum lot frontage applies to the individual strata lots; the relevant test is instead satisfaction of the parent lot's frontage and access requirements together with the Part D site area requirements addressed above. A single, consolidated point of vehicle access and common property accessway/driveway is proposed to serve both dwellings from Harvey Street, in a configuration consistent with comparable grouped dwelling development approved within the street (including at No. 20 Harvey Street).

3. .DESIGN OBJECTIVES

The design objectives focus on delivering a contemporary, functional two-storey residence that maximises internal living space while maintaining strong connections to outdoor areas. Emphasis is placed on open plan living, natural light penetration, and seamless integration between indoor and alfresco spaces.

The design also responds to site constraints, including boundary conditions, retaining walls, and existing infrastructure, while ensuring compliance with planning requirements such as open space provisions and streetscape integration. Materials and roof forms are selected to create a cohesive and modern architectural outcome that complements the surrounding residential context.

4. PROPOSED DEVELOPMENT

The proposed development consists of a two x two-storey grouped dwellings designed to meet the requirements of the R40 density coding and associated planning controls as follows:

<u>Unit 1 - Ground Level</u>

- Primary entry via a covered porch.
- Open plan dining, living and kitchen, with raised alfresco and outdoor living looking over the street.
- Laundry with drying court and toilet with shower.
- Bedroom 4 and double garage with direct internal access to the dwelling at the rear.

<u>Unit 1 - Upper Level</u>

- Primary bedroom (bedroom 1) suite including walk-in robe and ensuite, with balcony overlooking Harvey Street.
- Two secondary bedrooms with robe recesses at the rear with shared bathroom.
- Standalone powderoom.

- Central sitting/activity area.
- Linen and storage provisions.

Unit 2 - Ground Level

- Primary entry via a covered porch.
- Laundry and toilet with shower.
- Bedroom 4 with walk in robe.
- Open plan dining, living and kitchen (plus scullery) , with alfresco and outdoor living at the rear.
- Double garage with storage and direct internal access to the dwelling at the front.

Unit 2 - Upper Level

- Primary bedroom (bedroom 1) suite including walk-in robe and ensuite, with balcony overlooking the internal accessway and Harvey Street.
- Two secondary bedrooms with robe recesses at the rear with shared bathroom.
- Standalone powderoom and bathroom.
- Sitting/activity area with balcony access.
- Linen and storage provisions.

Figure 4 – Proposed Development Streetscape Perspective

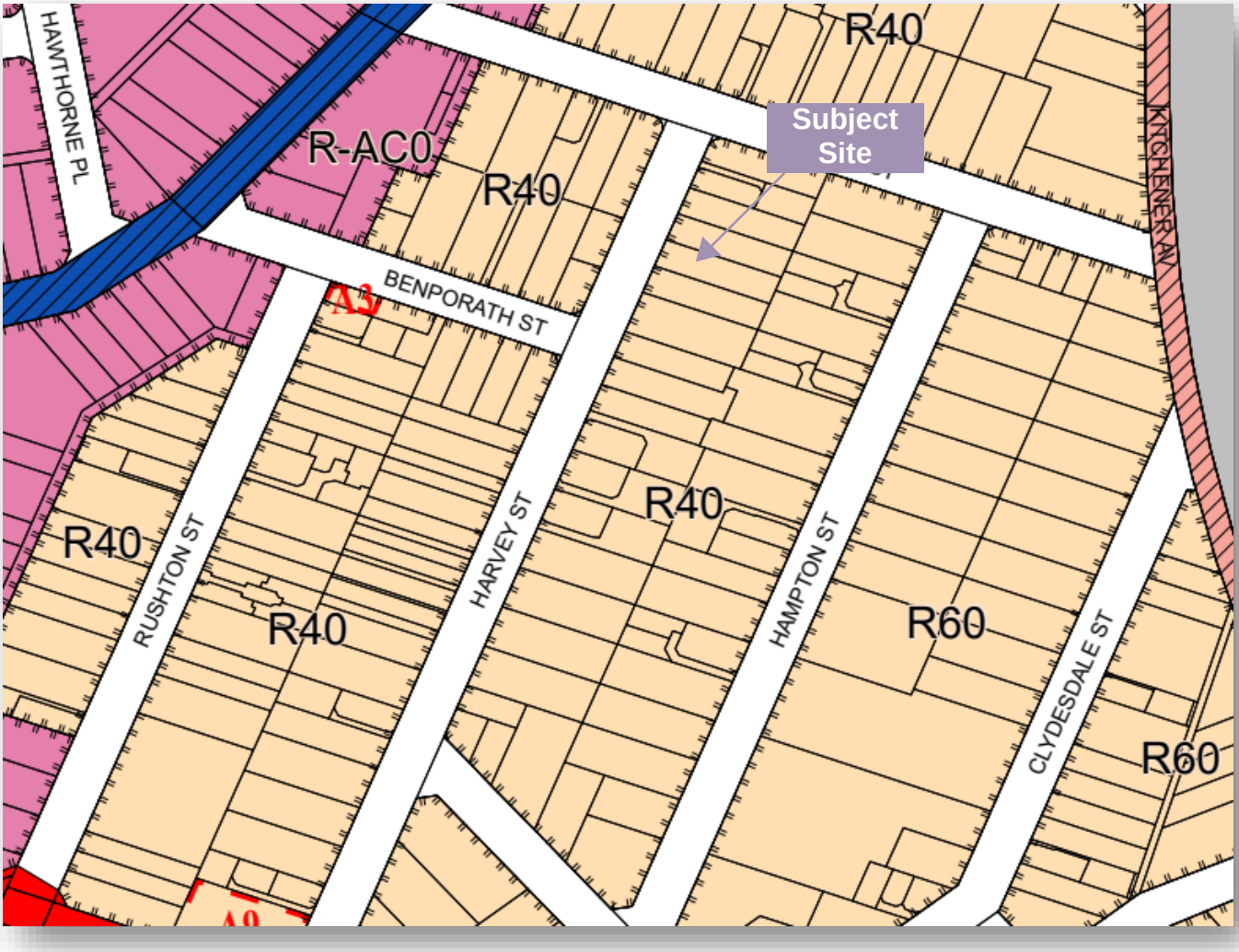


5. PLANNING CONTEXT

Table 2 – Planning Context

Address	No. 64 (Lots 1 and 2) Harvey Street, Burswood
Zoning	Residential R40
Heritage	Not heritage listed
Other Site Considerations	Existing dwelling to be demolished. Established street tree planting to the Harvey Street verge
Planning Framework	Town of Victoria Park Local Planning Scheme No. 2 (gazetted 18 December 2024). Residential Design Codes Volume 1 (State Planning Policy 7.3), as amended. Local Planning Policy No. 25 – Streetscape. Local Planning Policy No. 42 – Vehicle Access for Residential Development

Figure 4 – Zoning Context



6. PLANNING OUTCOMES

a) Town of Victoria Park Local Planning Scheme No. 2

The subject site is zoned Residential under Local Planning Scheme No. 2, with a density coding of R40. The proposed two grouped dwellings are a permitted form of development within the Residential zone and are consistent with the R40 density coding applying to the site. The proposal is also consistent with the Scheme's broader objective of facilitating a range of housing types and densities to meet the current and future housing needs of the Town's community, reflecting the directions of the Town's Local Planning Strategy 2022 on which Local Planning Scheme No. 2 was based.

b) Local Planning Policy No. 25 – Streetscape

Local Planning Policy No. 25 – Streetscape (LPP25) applies to all residential development within the Town and seeks to ensure new development presents an attractive and consistent streetscape outcome, having regard to setbacks, garage and carport presentation, fencing and landscaping. The policy requires a minimum primary street setback of 3.0 metres and an average setback of not less than 6.0 metres, consistent with the standard applied to comparable grouped dwelling development within Harvey Street.

The objectives of the policy are as follows:

- *To preserve or enhance streetscape character, by ensuring that development is sensitive to the streetscape and in keeping with the established and desired character of the locality.*
- *Development should reinforce desired built form characteristics for the locality and should ensure that the appearance of development is of high quality and contributes positively to the streetscape.*
- *Sustainable designs and innovative designs are encouraged, however regard is still to be given to maintaining design compatibility with the existing and desire streetscape character.*
- *All development is to promote safety and security for occupants and the community by have regard to Crime Prevention Through Environmental Design (CPTED) principles.*

c) Local Planning Policy No. 42 - Vehicle Access for Residential Development

The development meets the vehicle access provision of clause 5.3.5 of the R-Codes Volume 1 where the desired effect is a maximum of one access point to a primary street, and is at least 2.8m wide as per LPP 42.

d) Local Planning Policy No. 46 - Sustainable Development

The proposed development responds to the principles of energy efficiency and environmental sustainability through the following design elements:

- Building layout with open plan living areas and alfresco spaces oriented to maximise natural light and opportunities for passive solar gain.
- Provision of shading elements, including eaves and covered alfresco areas, to reduce heat gain to habitable spaces.
- Use of standard construction materials, including concrete slab and insulated walls and ceilings, to improve thermal performance.
- No unreasonable impact on adjoining properties in terms of solar access, with built form and boundary treatments designed to minimise overshadowing.

- Landscaping and outdoor areas designed to support passive cooling, with opportunities for waterwise planting and microclimate control.
- Inclusion of water efficiency measures, such as flow regulators and dual flush systems, to support broader sustainability outcomes.

e) Residential Design Codes Volume 1 – Part D (Site Area)

Refer to the site lot area analysis at Section 2 above. The proposed survey-strata subdivision, providing an average site area of 350m² per dwelling, substantially exceeds the average (220m²) and minimum (180m²) site area requirements applying to single houses and grouped dwellings on R40 coded land under R-Codes Vol.1, Part D, Table D1.

f) Residential Design Codes Volume 1 – Part C (Grouped Dwellings, R30 and above)

Following the amendments to the R-Codes that came into effect on 10 April 2024, grouped dwelling development on land coded R30 and above (including the subject R40 coded site) is assessed against Part C of R-Codes Volume 1, rather than the low-density provisions of Part B that continue to apply to single houses on R40 and below coded land. The proposal has been designed to satisfy the deemed-to-comply standards of Part C in respect of, among other matters;

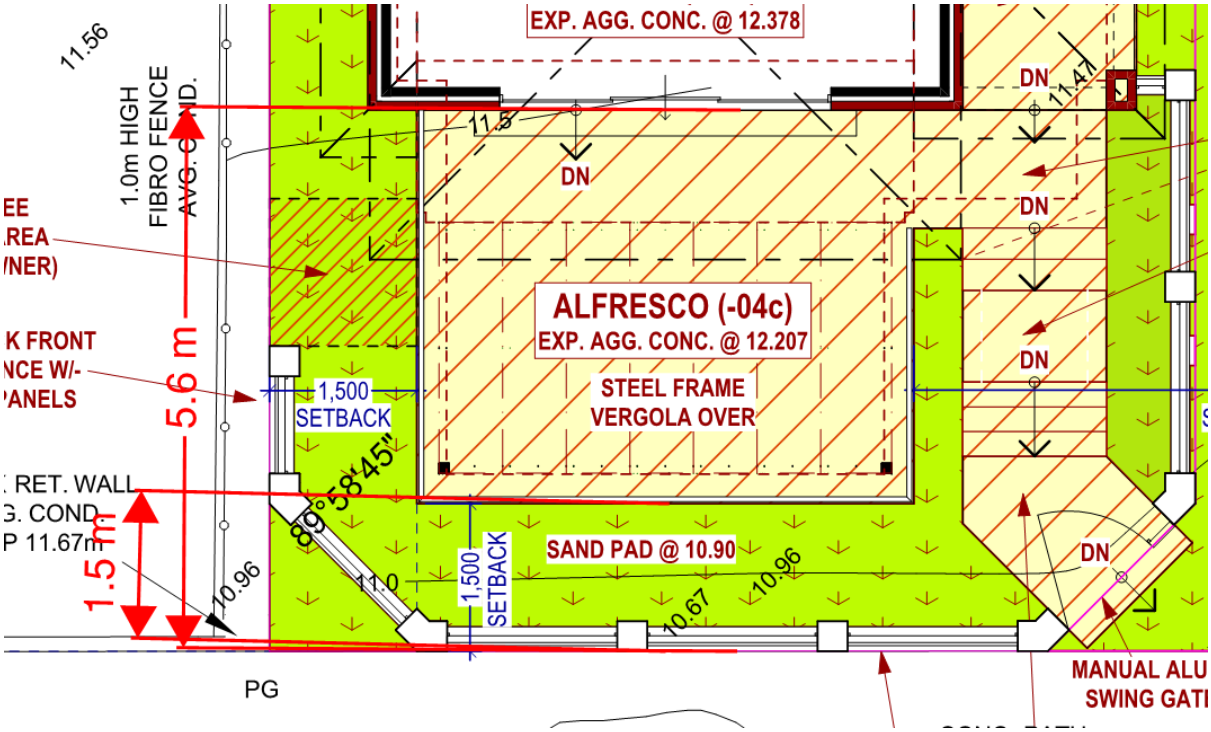
- Site cover.
- building height.
- Outdoor living areas.
- General visual privacy.
- Parking.
- Landscaping.

Given the modest scale of the proposal (two dwellings only), provisions specific to larger grouped dwelling developments, including visitor parking and communal open space requirements that are generally triggered at higher dwelling numbers, are not applicable.

Two variations to the deemed-to-comply standards of Part C are identified and addressed below by way of a Design Principles assessment, consistent with the assessment pathway provided for under the R-Codes.

Primary Street Setback

The deemed-to-comply primary street setback standard under Part C, read together with LPP25, requires a minimum setback of 3.0 metres and an average of 6.0 metres. The proposed development provides a setback of 1.5m to alfresco area and 5.6m to the main building, a minor variation consistent with that previously supported by the Town for the comparable grouped dwelling development at No. 20 Harvey Street. See **Figure 5 below**:



This variation is considered to satisfy the relevant design principles for the following reasons:

- The dwellings are well articulated at ground and upper floor level, with variation in materials, recessed entries and upper floor setbacks reducing the apparent building bulk presented to the street;
- The reduced setback does not result in an unreasonable loss of streetscape amenity, having regard to the established pattern of comparable setbacks within the street, including the Town's previous support for an equivalent variation at No. 20 Harvey Street;
- Compliant landscaping is provided within the (reduced) primary street setback area, softening the presentation of the dwellings to the street; and
- The variation does not compromise safe sightlines, vehicle manoeuvring or pedestrian access to or from the site.
- The development has significant areas of outdoor living, habitable room windows and 2 balconies that provide passive surveillance of the street and are consist with CPTED principles.

Site Works

There is significant excavation proposed on site meaning stepping of the site has been achieved without exceeding site works requirements when measured from the site boundary, see NGL levels in the plans.

Visual Privacy – Upper Floor Major Opening

The deemed-to-comply visual privacy standard under Part C requires unscreened major openings and balconies at upper floor level to be set back a minimum of 7.5 metres from the relevant side boundary, in order to limit direct overlooking of adjoining properties. An upper floor balcony is proposed with a setback of 2.7 metres to the northern side boundary, a variation again consistent with that previously supported by the Town for the comparable grouped dwelling development at No. 20 Harvey Street.

This variation is considered to satisfy the relevant design principles for the following reasons:

- The balcony is oriented away from the adjoining property's outdoor living area and habitable room windows, limiting any practical overlooking impact, most impact is on then open front setback area;
- Fixed screening and/or planter treatment is provided to the balcony balustrade to further limit oblique sightlines toward the adjoining property, consistent with the design principles of the R-Codes;
- The variation does not affect solar access, ventilation or outlook to the adjoining property; and
- A comparable variation has previously been supported by the Town for the adjoining streetscape character at No. 20 Harvey Street, providing a clear and relevant local precedent.

g) Consistency in Decision-Making

In considering the variations sought above, it is important that the Town applies its policies and makes decisions in a consistent manner. The State Administrative Tribunal (SAT) emphasises consistency in planning decisions where facts and circumstances remain substantially the same, often citing Riede and Town of Vincent [2007] WASAT 209 in support of orderly planning outcomes. While not strictly bound by precedent, consistency is considered necessary for a healthy planning system and fair decision-making, and is applied where circumstances have not materially changed, having regard to a comparison of facts and degree.

In this instance, the Town has previously supported comparable setback and visual privacy variations for grouped dwelling development within the same street, at No. 20 Harvey Street, and the R40 density coding has been in place over Harvey Street for a sustained period, during which several lots (including Nos. 35 and 52 Harvey Street) have been identified by the market for grouped dwelling redevelopment. There has been no demonstrable change in the relevant policy framework or in the character of the streetscape that would warrant a departure from the Town's previous, consistent approach to comparable proposals in this street.

7. CONCLUSION

The proposed development provides a high quality and innovative design; and provides for the changing needs of a growing Burswood population. The development is consistent with the objectives and key requirements of the statutory planning framework and does not present any negative impacts to neighbours or the streetscape. The development application is therefore appropriate for approval.

Thank you for your time and consideration of this proposal. Should you have any queries or questions do not hesitate to contact me on 0421567180 or trent@methodplanning.com.au . We look forward to hearing from you soon.

Yours faithfully



TRENT DURWARD
Director, Method Planning