



15<sup>th</sup> July, 2026

Att: Planning Department  
(Lot 392, #4 Redwood Avenue, Karnup WA 6176)

## DA Cover Letter & Justification

**(Lot 392) #4 Redwood Avenue, Karnup WA 6174**  
**Proposed Commercial Development (Two Office Space Tenancies)**

On behalf of the owners, Indi Dakota Pty Ltd, we are pleased to submit this Development Application for a high-quality, two-storey commercial development at the above-referenced property.

The primary purpose of this development is to establish a permanent office location for Madora Bay Settlements, a well-regarded local real estate settlement agency owned and operated by the owner.

To maximize the efficiency of the land and respond proactively to local planning objectives, the building has been designed to accommodate two separate, low-impact commercial tenancies.

The design of the proposed structure has been carefully considered to align with the strategic vision of the locality. Following preliminary feedback received from the City's planning department (via Tom Faulds), which indicated that a single-storey format would not be supported, the architectural team has designed a distinct two-storey profile.

This built form directly satisfies the mandatory minimum height thresholds outlined within the *Singleton Village Neighbourhood Activity Centre Detailed Area Plan*. By incorporating a two-storey design, the proposal actively supports the framework's intent to foster a vibrant, cohesive urban streetscape and optimized built form density within the activity centre precinct.

While the proposal cleanly satisfies the overarching-built form and design objectives of the *Detailed Area Plan*, the subject site presents acute physical constraints due to its highly irregular configuration and modest lot geometry.

Table No. 4 of the City of Rockingham Town Planning Scheme No. 2 (TPS2) dictates a provision of 20 parking spaces based on the statutory metric of 1 bay per 20m<sup>2</sup> of Net Lettable Area (NLA). However, literal compliance with this numeric standard is physically impossible without fundamentally undermining the core design and urban planning principles of the precinct.

As demonstrated in the accompanying architectural plans, the integration of 9 compliant parking bays already consumes approximately 50% of the entire ground floor footprint. To achieve a total of 20 bays, the entire ground level would need to be reallocated as an open-air vehicle parking zone. This outcome would force all functional commercial floor space onto the upper level, creating a blank, inactive ground-floor street interface.

Such a result directly contradicts the pedestrian-oriented, active frontage goals championed by the City for the *Singleton Village Neighbourhood Activity Centre*.

Pursuant to the discretionary powers available to Council under TPS2, a variation is respectfully requested to permit a total provision of 9 car parking bays in lieu of the statutory 20-bay requirement. This parking shortfall will not result in adverse localised impacts and is robustly justified by the following operational and contextual factors:

- **Low-Intensity Operational Profile:** Tenancy 1 will be occupied by **Madora Bay Settlements**, operating strictly within standard business hours (9:00 AM to 4:00 PM, Monday to Friday). The business maintains a highly stable, low-density staffing arrangement consisting of just three (3) core personnel.
- **Minimal Customer Traffic:** Due to the heavily digitalised, administrative nature of modern conveyancing processes, physical client visitation to the office is exceptionally low. The agency averages just one client appointment per day, with an average dwell time of less than 30 minutes.
- **Complementary Tenancy Profile:** Tenancy 2 will be subject to strict commercial leasing covenants targeting professional services or administrative occupants with an identical, low-intensity staffing and visitor profile to ensure the parking demand remains balanced.
- **Proximity to High-Frequency Public Transport:** The site is excellently positioned to leverage alternative transport networks, sitting a walkable **286 metres from Bus Stop 27634 on Mandurah Road**, which offers high-frequency public transit connections. This proximity supports employee commuting alternatives and reduces single-occupancy vehicle dependency, aligning with the **City of Rockingham's Local Planning Strategy** objectives for sustainable trip reduction.

The proposed 9 bays provide a balanced, design-led solution that fully satisfies the real-world operational demands of both tenancies while preserving an attractive, active, and high-quality architectural interface at the pedestrian level.

We believe the proposal represents a sensitive and highly compliant development that fulfills the intent of the *Singleton Village Neighbourhood Activity Centre Detailed Area Plan* while respecting the unique physical geometry of the lot.

We look forward to working constructively with the City of Rockingham throughout the assessment process. Should you require any further information, clarifications, or amendments to the enclosed plans, please do not hesitate to contact the undersigned.