

14 July 2026

City of Greater Geraldton
PO Box 1
GERALDTON WA 6531

Attention: City Growth

Dear Planning Team,

PROPOSED SHORT STAY ACCOMMODATION – 6 WIGLEY PLACE, TARCOOLA BEACH

I write in relation to a development application seeking to the establishment of three short stay accommodation buildings upon 6 Wigley Place, Tarcoola Beach. The Property is zoned Residential R20 and therefore development is governed by the Residential Design Codes (R-Codes) as well as the requirements of Local Planning Scheme No.1 (the Scheme) and related planning policy.

Figure 1: Aerial photograph of property



Justification against the relevant principles pertaining to the application have been included as follows. Justification for the attached ancillary accommodation on the front of the property has been included in case the short stay use ceases and the landowner wishes to convert back to a house with an ancillary accommodation unit.

OVERVIEW OF PROPOSAL

Grouped Dwelling

The application seeks to establish a grouped dwelling arrangement:

- Proposed Lot 1 - the renovation of the existing dwelling to also include an attached ancillary accommodation unit on the western (front) portion of the existing property; and
- Proposed Lot 2 - the construction of a new dwelling on the eastern (rear) portion of the lot.

The significant renovation of the property will produce a high standard of development and ensure that the expectations of a residential area in view of appearance and amenity are maintained.

Short Stay Accommodation Use

The proposed development comprises two dwellings and one ancillary accommodation unit, all of which are intended to operate as Unhosted Short-Term Rental Accommodation (STRA). For the purposes of this assessment, the accommodation units are referred to as SSA Unit 1, SSA Unit 2 and SSA Unit 3, as identified on the accompanying development plans.

The accommodation is intended to cater for short-term stays of less than three months and may be marketed through established booking platforms such as Airbnb, Booking.com and similar accommodation services.

To ensure the use remains low impact and compatible with the surrounding residential environment, each accommodation unit will accommodate a maximum of four guests at any one time. In addition, each booking will be limited to a maximum of two vehicles, with all parking provided on-site in accordance with the City's Short Term Rental Accommodation Policy.

A detailed Unhosted STRA Management Plan accompanies this application and outlines the operational procedures, guest management measures, complaint handling process, parking controls, waste management arrangements and emergency contact details that will apply to the ongoing management of the premises.

Assessment of Grouped Dwelling / Ancillary Accommodation

PART 5.1.2 STREET SETBACK

Compliant as there is no change to the front of the existing dwelling that would effect front setback provisions.

PART 5.1.3 LOT BOUNDARY SETBACKS

Assessment and Variation (as relevant)

Lot 1 – compliant setback of extension to the existing dwelling. 1m required, 1m proposed.

Lot 2 – southern boundary setback required to be 1.5, proposed is 1.7m, compliant. The rear setback is required to be 1.5m. at the closest point the dwelling wall is 1m from the rear boundary. Variation of the R-codes is required.

Design Principles – Section 5.1.3 of R-Codes

P3.1	Buildings set back from lot boundaries or adjacent buildings on the same lot so as to: • reduce impacts of building bulk on adjoining properties; • provide adequate sunlight and ventilation to the building and open spaces on the site and adjoining properties; and • minimise the extent of overlooking and resultant loss of privacy on adjoining properties.
P3.2	Buildings built up to boundaries (other than the street boundary) where this: • makes more effective use of space for enhanced privacy for the occupant/s or outdoor living areas; • does not compromise the design principle contained in clause 5.1.3 P3.1; • does not have any adverse impact on the amenity of the adjoining property; • ensures sunlight to major openings to habitable rooms and outdoor living areas for adjoining properties is not restricted; and • positively contributes to the prevailing or future development context and streetscape as outlined in the local planning framework.

Response to Design Principles

The proposed variation appropriately satisfies the Design Principles of Clause 5.1.3 of the R-Codes for the following reasons:

- The variation is minor in nature, comprising a reduced setback of 1.0m in lieu of 1.5m for a limited section of the rear wall only. The building footprint angles away from the rear boundary, resulting in the setback increasing progressively to approximately 4.9m, thereby substantially reducing any perception of building bulk.
- The proposed design does not adversely impact the privacy of adjoining properties. The upper-floor rear elevation contains no major openings. The only opening within this elevation serves an ensuite bathroom and will be fitted with obscure glazing, preventing overlooking into neighbouring properties.
- The development will not adversely affect access to natural light or ventilation for adjoining properties due to the limited extent of the variation and the building's orientation and setback profile.
- The proposal maintains an appropriate level of residential amenity for adjoining landowners and will not adversely affect the use or enjoyment of neighbouring properties.
- The variation relates to a rear boundary adjoining a property already utilised for short-stay accommodation purposes, further reducing the potential for any adverse amenity impacts arising from the proposed development.
- The proposed design achieves an efficient and functional building layout while remaining consistent with the objectives of the R-Codes and the broader character and development expectations of the locality.

Accordingly, the proposal is considered to satisfy the relevant Design Principles and warrants support notwithstanding the minor variation to the deemed-to-comply setback requirement.

5.1.4 Open space

Compliant

5.1.5 Communal Open Space

N/A

5.1.6 Building Height

Compliant

5.2.1 setbacks of carports and garages

N/A

5.2.2 Garage Width

N/A

5.2.3 Street Surveillance

Compliant

5.2.4 Street walls and fences

N/A

5.2.5 Sightlines

Compliant

5.2.6 Appearance of retained dwelling

The existing dwelling will undergo substantial external refurbishment, including new paintwork, contemporary finishes and associated upgrades that will significantly enhance its visual presentation. The proposed works will modernise the appearance of the dwelling and improve its contribution to the streetscape, ensuring it aligns with contemporary residential development expectations within the locality. Given the age and dated appearance of the existing dwelling, the proposed upgrades represent a positive improvement that will enhance the overall amenity and visual character of the area.

5.3.1 Outdoor living Areas

Compliant

5.3.2 Landscaping

Compliant

5.3.3 Parking

Compliant

5.3.4 Design of carparking spaces

Compliant

5.3.5 Vehicular Access

Compliant – note design due to avoiding existing mature trees at the front of the property

5.3.6 Pedestrian Access

N/A

5.3.7 Site works

Compliant

5.3.9 Stormwater Management

Compliant

5.4.1 Visual Privacy

Compliant

5.4.2 Solar access for adjoining sites

Compliant

5.4.3 Outbuildings

N/A

5.4.4 External Fixtures

Compliant

5.5.1 Ancillary Accommodation

The proposed ancillary accommodation has a floor area of 79.253m², representing a variation of 9.253m² from the maximum 70m² prescribed by the R-Codes.

The variation is considered appropriate in the circumstances of this proposal. The accommodation has been designed as a mirror image of the existing dwelling, utilising the established building footprint and retaining the original width and proportions of the existing residence. This design approach significantly reduces the extent of demolition and reconstruction that would otherwise be required, providing a practical and sustainable redevelopment outcome while preserving the established character of the property.

Although this application seeks approval for the use of the building as Short Stay Accommodation, the building has also been designed so that it is capable of being lawfully used as Ancillary Accommodation should the short stay use cease in the future. Retaining this flexibility provides a long-term planning benefit and avoids the need for future structural alterations to comply with the ancillary accommodation provisions.

Importantly, the additional 9.253m² does not increase the planning impacts of the development. The building remains modest in scale, maintains a residential appearance, and complies with the relevant development standards relating to setbacks, site coverage, open space, privacy and overshadowing. The proposal will not adversely affect the amenity of adjoining properties, nor will the modest increase in floor area alter the appearance or intensity of development on the site.

The redevelopment of the existing dwelling will substantially improve the presentation of the property to the street while retaining the mature vegetation that contributes positively to the existing streetscape. The finished floor levels, existing vegetation and natural fall of the land further reduce the visual prominence of the development when viewed from the highway.

Having regard to the objectives of the R-Codes, the proposed variation is minor in nature, does not compromise the intended function of ancillary accommodation, and will not result in any adverse planning outcomes. Accordingly, the variation is considered appropriate and is respectfully supported.

Local Planning Policy - Short Term Rental Accommodation

In accordance with 5.1.1 Matters to be Considered

a) Effective Ongoing Management

A comprehensive Unhosted STRA Management Plan accompanies the application. The Management Plan establishes operational procedures relating to guest behaviour, noise management, complaint resolution, emergency contacts, property maintenance, waste management, maximum occupancy and parking controls.

b) Appropriate Location and Compatibility

The site is located within Tarcoola Beach, one of Geraldton's most desirable coastal residential areas, with direct access to beaches, recreational opportunities and nearby commercial services. The proposed use is low intensity in nature, with each accommodation unit limited to a maximum of four guests, ensuring compatibility with surrounding residential development.

c) Access and Car Parking

All parking is provided on-site in accordance with Policy requirements. Vehicle access is designed to safely accommodate guests while retaining significant established vegetation at the front of the property.

5.1.2 Initial Approval Period

The applicant acknowledges that the first development approval for STRA on the site may be limited to a maximum period of 24 months in accordance with the Policy.

5.1.3 Maximum Occupancy

The Policy identifies a preferred maximum occupancy of six guests per STRA within the Residential Zone.

Each accommodation unit limited to a maximum occupancy of four guests. The maximum occupancy therefore remains well below the threshold contemplated by the Policy.

5.1.4 Occupancies Greater Than Six Guests

Not applicable. No accommodation unit will accommodate more than four guests.

5.2 Location

5.2.1 Appropriate Location

The subject site is situated within close proximity to Tarcoola Beach and other coastal attractions that contribute to Geraldton's tourism appeal. The location exhibits the characteristics identified by the Policy as suitable for visitor accommodation.

5.2.2 Activity Centre Proximity

While the site is not located within an activity centre, it benefits from an established network of local roads, footpaths and active transport connections that provide access to surrounding facilities and recreational destinations.

5.2.3 Tourism Attractors and Transport Options

The property benefits from:

- Close proximity to Tarcoola Beach and the coastline;
- Access to nearby retail and commercial facilities;
- Established pedestrian connections and local road infrastructure;
- Convenient access to the Geraldton city centre and regional attractions.

These attributes make the site an attractive location for visitor accommodation and support the suitability of the proposed use.

5.2.4 Residential Areas

The Policy notes a general presumption against larger Unhosted STRA developments accommodating between seven and twelve guests within suburban residential areas.

The proposal does not constitute a large-scale STRA development. Each accommodation unit is limited to four guests, resulting in a low-intensity operation that is consistent with maintaining residential amenity. The proposed occupancy levels, parking controls and management measures ensure that the development will not generate unreasonable impacts on surrounding properties.

5.2.5 Management Plan Requirements

The submitted Unhosted STRA Management Plan addresses all matters required by the Policy, including:

- a) Management of guest behaviour, noise and amenity impacts;
 - b) Procedures for receiving and responding to complaints from neighbouring properties;
 - c) Waste management arrangements and servicing requirements;
 - d) Day-to-day property management, guest access arrangements, emergency contacts and after-hours assistance;
 - e) Emergency management procedures and other site-specific risk management measures.
- The proposal therefore fully satisfies the management requirements of the Policy.

5.4 Access and Car Parking

5.4.1 On-Site Parking

All parking associated with the development is accommodated entirely within the site. No verge parking is proposed or required.

5.4.2 Parking Provision

The Policy requires a minimum of two parking bays for accommodation accommodating up to six guests.

Each accommodation unit will accommodate a maximum of four guests and is allocated two on-site parking bays. Accordingly, the development complies with the parking requirements of the Policy.

5.4.3 Tandem Parking

N/A to application.

5.4.4 Vehicle Access and Parking Construction

All vehicle access arrangements, crossovers and parking areas will be constructed to the satisfaction of the City.

5.4.5 Unsealed Roads

Not applicable. The property does not front an unsealed road.

5.5 Further Information

The applicant acknowledges and will comply with all relevant legislative requirements outside the planning framework, including:

- Registration of the premises on the State STRA Register;
- Installation and maintenance of compliant smoke alarms;
- Installation and maintenance of residual current devices (RCDs); and
- Compliance with any Environmental Health requirements relevant to the operation.

Conclusion

The proposed development fully satisfies the objectives and development requirements of Local Planning Policy Short Term Rental Accommodation. The proposal represents a low-intensity, well-managed visitor accommodation use within a desirable coastal location and incorporates appropriate management controls, occupancy limits and parking provisions to ensure that the amenity of the surrounding residential area is maintained.