Our Ref: 160215 LDOPE\_Harrington Estates

15 February 2016

Department of Planning & Environment 23-33 Bridge Street SYDNEY NSW 2000



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Dear sir,

## RE: SUBMISSION ON GROWTH CENTRES DCP & SEPP AMENDMENT

On behalf of Harrington Estates Pty Ltd, enclosed is our submission in response to the following plans which are currently on exhibition:

- 1. Growth Centres Amending Development Control Plan (No 2) 2015.
- 2. Planning Report amendment to precinct plans of the Sydney Growth Centres SEPP 2006.

We commend the Department of Planning & Environment on its review and proposed amendments to these plans to address anomalies and establish clearer direction for the delivery of housing in Sydney's Priority Growth Areas.

Harrington Estates has had a significant involvement within the South West Priority Growth Area with their development at Catherine Park Estate. The first stage of residential allotments and the provision of key state infrastructure is nearing completion which is the first land development in the Catherine Field Part Precinct.

## Background

The proponents, Harrington Estates Pty Ltd have a long history of land development in the locality with involvement in the delivery of over 4000 new residential homes. This includes the establishment of Harrington Park Estate, Harrington Grove and Catherine Park Estate. Through these projects Harrington Estates have established a high benchmark for quality residential development.

Harrington Estates commitment to creating unique living environments has been recognised through numerous prestigious awards including industry awards for excellence in development, with Harrington Grove recently being awarded 'Australian Residential Development of the Year 2014' by the Urban Development Institute of Australia.

Harrington Grove features approximately 1,500 new homes and community facilities in a Community Title residential development, which also contains significant tracts of the critically endangered Cumberland Plain Woodland threatened ecological community. Over half of the Harrington Grove residential development has been constructed and large areas of Cumberland Plain Woodland have been rehabilitated and restored to a high environmental standard.

Catherine Park Estate is a new residential community planned within the South West Growth Centre and is estimated to have over 1,750 new homes and a local neighbourhood centre. This will also include the provision of key state infrastructure such as the construction of strategic transport corridors connecting to the future Leppington Centre.

Accordingly, Harrington Estates has a proven track record in delivering excellence in development and creating highly desirable places where people want to live.

#### Submission Comments on Proposed SEPP & DCP Amendments

As long standing and reputable developers of the Growth Centres, Harrington Estates appreciate the opportunity to provide comment on the proposed amendments. In reviewing the proposed amendments Harrington Estates would like the opportunity to specifically address the provisions which have particularly impacted our experience.

Please see below comments in relation to each of the following proposed amendments.

#### 1. SEPP Amendment - Semi Detached Minimum Lot Size

Harrington Estates note the proposed amendment to remove the minimum lot size applicable to parent lots and replace this with a minimum lot size that is applicable only to newly created lots.

Under the existing minimum lot size requirements, it is understood that the minimum lot size for semi-detached dwellings is  $300m^2$  for the parent allotment in both the 15 and 20 dwellings per hectare density areas.

The proposed amendment will remove a minimum lot size for the parent allotment and apply a minimum lot size standard for the new lots created for the semi-detached development, as follows:

- 200m² minimum in 15 dwellings per hectare
- 150m² minimum in 20 dwellings per hectare

In light of the above, the area of the parent allotment in the 15 dwellings per hectare area is now effectively 400m² where it is currently 300m². In the 20 dwellings per hectare area the new minimum lot size standard for semi-detached housing is essentially the same as the current standard. Notwithstanding, the proposed amendment will provide greater clarity in how to apply minimum lot size standards to semi-detached development.

Accordingly, the amendment is regarded a clear and effective way of addressing the true intent of this provision and as such Harrington Estates would like to express support for this proposal.

# 2. DCP Amendment - 40% Maximum Lot Type in 20dw/ha or less

The DCP provision requiring a maximum of 40% of any one Lot Type has been an issue of contention for some time. Harrington Estates has experienced firsthand various forms of interpretation of this provision and has submitted formal requests to amend this control to the Department and Council.

Under the DCP amendment, it is now proposed to limit the number of allotments in a single street block with a frontage less that 10m to 40% in density areas 20 dw/ha or less.

Harrington Estates express support for the Department on its intention to address this issue. The application of this amendment will in most cases assist with addressing misinterpretations associated with current lot type provisions and provide a clear way of providing greater flexibility in dwelling diversity.

However, we believe there are some circumstances where interpretation of this control may not be entirely straight forward.

The below case study has been chosen to illustrate potential issues with the proposed new control reflecting lot mix.

## Case Study

Figure 1 illustrates a small parcel of land containing 10 small lot housing allotments with 8 of these lots having a width below 10m. The site is surrounded by major roads, open space and a basin, and vehicle access is obtained from a local road. Importantly the parcel is detached from the larger street block and divided by a local street.

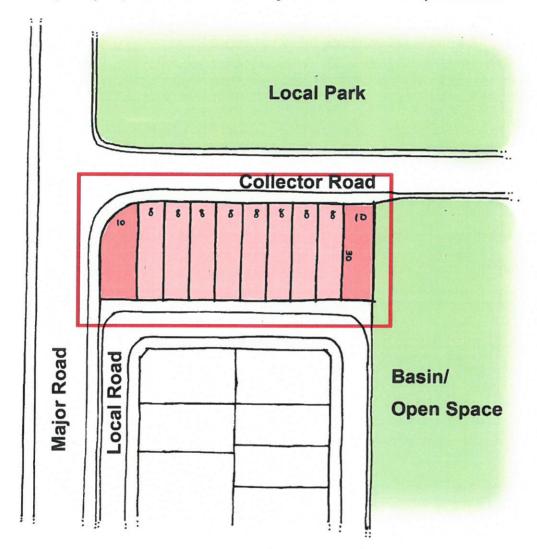


Figure 1: Case Study

In the above case study the highlighted portion of the subdivision could reasonably be interpreted as a street block in its own right. The above example demonstrates efficient subdivision design allowing for smaller lots that are oriented towards a local park and close to transport corridors. Although this example exhibits good principles of subdivision design, if interpreted as a street block, it would result in a non-compliance as 80% of lots have a frontage below 10m.

The proposed provision as it stands could unintentionally restrict the allocation of small lot housing within a subdivision layout. It is unlikely that this is the intent of proposed amendment and as such it is recommended that the proposed amendment be reworded to enable clarity in assessing a DA.

The current lot mix control provision states the following:

"Lots subdivided using Subdivision approval Pathways B1 or B2 (Integrated Housing) for attached or abutting dwellings are exempt from this control".

It is suggested that this be retained in the proposed provision to address this issue. Alternatively, this may be in the form of an exclusion for smaller street blocks and street blocks that are located in areas of higher local amenity.

## Conclusion

This submission is supportive of the proposed amendments to the SEPP and DCP Amendment. It is acknowledged that the Department of Planning & Environment has been highly active in facilitating new urban growth throughout the Priority Growth Areas, and we congratulate the Department on its excellent achievements to date.

The proposed amendments will provide greater clarity on important provisions that greatly impact the delivery of housing within the Priority Growth Areas. The amendments will remove misinterpretation and allow for clearer planning for the local Councils, developers and property owners.

Notwithstanding, further refinement of the DCP Amendment - 40% Maximum Lot Type in 20dw/ha or less is recommended in order to support opportunities for quality housing on smaller allotments and responsive subdivision design that makes use of areas of higher local amenity.

Should you require any further information or wish to make arrangements for a meeting, please feel free to contact the undersigned.

Yours faithfully

DESIGN+PLANNING

**GUY EVANS** 

ASSOCIATE DIRECTOR