



# HUNTER'S HILL COUNCIL

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Enquiries:

14 December 2016

The Hon. Rob Stokes, MP  
Minister for Planning and Environment  
GPO Box 5341  
SYDNEY NSW 2001

Dear Minister

## **Exhibition of Draft Medium Density Design Guide & Explanation of Intended Effect – Proposed Medium Density Housing Code**

There is no doubt more exemplary medium density housing is needed in New South Wales and particularly in Sydney. However the proposed code, draft design guide and certification system are not the correct delivery mechanism:

1. The one size fits all approach of the proposed code will erode local character

Lot size, floor space, height, landscaping and setback controls largely determine the local character of an area. Therefore a one size fits all form of medium density housing cannot hope to respect the individual nature of different city suburbs, peri-urban areas or regional towns. Hunters Hill local government area is known as Australia's oldest garden suburb and would like to deserve this title well past 2036.

2. Increasing housing density without consultation will erode community trust

An increase in housing density means the potential for impacts are increased and therefore the community must be allowed a voice. Locking them out of the process will only lead to ongoing dissatisfaction with the planning system.

3. Private Certification of medium density housing is far from ideal

The potential large monetary yields from medium density development make it unsuited to code assessment which enables private certification.

4. Code development is not suitable for complex applications

It is not unusual for architects, landscape architects, planners, structural engineers, civil engineers and waste management specialists to be involved in the assessment of a medium density development. Providing adequate turning circles for cars, drainage solutions, stable retaining walls, protection of existing trees and waste management solutions can all add complexity to medium density development proposals. It is not foreseeable how the endless variations of sites and existing built form can all be addressed adequately by one code for all of NSW and private certifiers striving to meet a short legislated approval timeframe.

5. The code will not deliver the benefits associated with medium density housing

Medium density housing can provide a very attractive and affordable housing option if developed well. It can result in large landscaped, communal recreation areas, rationalise waste and parking services to minimise their intrusion on the public domain and allow for a combination of dwelling types promoting mixed social groupings. However, the medium density housing proposed in the draft code which allows Torrens title subdivision of blocks 6m wide and with an area of 200sqm will not realise any of the potential benefits of well-designed and truly innovative medium density housing. It will simply enable developers to churn out, two storey individual houses on small lots – which are not suited to the aged and which lack adequate solar access, cross ventilation, waste management solutions, shade trees and privacy.

6. The proposed code undermines strategic planning and the work of the GSC

The proposed medium density housing code will actively undermine strategic planning and the work of the Greater Sydney Commission. The code links increases in housing density to lot sizes not existing or intended infrastructure. Additionally, with code approvals the cumulative impacts of development are not considered.

Increasing housing density will always be complex and controversial particularly in Sydney. It needs to be done by Council's in conjunction with their communities and the benefits of medium density housing realised through well designed and located developments.

Should you require any further information, or wish to discuss our submission please contact me on 9879 9400 or email [genmanager@huntershill.nsw.gov.au](mailto:genmanager@huntershill.nsw.gov.au)

Yours sincerely



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