

05 July 2017

Director, Codes and Approval Pathways NSW Department of Planning and Environment GPO Box 39 SYDNEY NSW 2001

Dear Sir/Madam

Submission - Review of Complying Development in Greenfield Areas

Campbelltown City Council has reviewed the Background Paper and Explanation of Intended Effects for a proposed new Greenfield Housing Code, and provides the following comments:

1. Codes SEPP Amendments

The documentation exhibited by the Department outlines a discussion of possible amendments to the Codes SEPP to promote an increased uptake of complying development in greenfield areas. As such, this submission is provided on the basis that the proposed amendments to the Codes SEPP will be released for consideration and comment by Council prior to any amendments to the Policy taking place.

2. Reducing Complexity

Council supports the broad objective of reducing complexity in the planning system by consolidating SEPPs in order to make the planning system easier to navigate. It is therefore questionable why new stand-alone provisions to promote complying development in Greenfield areas are required, given that:

- a) the same amenity and design quality considerations apply to greenfield development and established residential areas.
- relaxed development standards for residential development in greenfield areas does not address the greater potential for amenity impacts between adjacent residences on reduced lot sizes given the more compact nature of development.
- an increased uptake of Complying Development in greenfield areas would potentially result in a replication of standardised housing products and monotonous built form for new suburbs.
- d) the proposed Code relies upon a new definition of 'greenfield areas', which introduces additional complexity given the requirement for users to interpret the E.P & A. Regulations and other SEPPs.

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ARARIC

للحصول على خدمة ترجمة مجانية، يرجى إحضار هذه الوثيقة إلى البلدية أو الاتصال بخدمة الترجمة الهاتفية على الرقم 450 131 وأطلب منهم الاتصال بالبلدية نيابةً عنك.

SPANISH

Para contar con los servicios gratuitos de un intérprete, traiga este documento al Municipio o llame al Servicio Telefónico de Intépretes al 131 450 y pida que contacten a su Municipio.

TAGALOG

Para sa walang bayad na Serbisyo ng Pagsasalin, dalhin ang dokumentong ito sa Konseho o tawagan ang Telephone Interpreting Service sa 131 450 at pakiusapan silang tawagan ang inyong Konseho.

SAMOAN

Mo Auaunaga o Faamatalaupu e le totogiina, faamolemole aumai lenei pepa tusia i le Ofisa o le Malo (Council) poo le vili i le Auaunaga o Faamatalaupu i Telefoni i le 131 450 ma fai i ai la latou faafesootaia lau Ofisa o le Malo.

HIND

निञ्चलक दुभाषिया सेवा के लिए, कृपया यह पत्र कांऊसिल के पास ले जाएं या दूरमाष दुभाषिया सेवा को 131 450 पर फोन करें और कहें कि वे आपकी कांऊसिल से संपर्क करें।

CHINESE

要獲得免費的傳譯服務,請攜帶本文件到市議會或致實 131 450 電話傳譯服務處,並請他們代您聯絡市議會。

LAO

ເມື່ອກໍເອົານາຍບາສາໄດຍບໍ່ຕ້ອງເສັບຄ່າບໍຣິການ, ກະຣຸນາ ນຳເອົາເອກກະສາເນີນກວາ ຫ້ອງການຜະຊານ ຫລື ໄທຣະສັນ ຫາ ບໍຣິການ ນາຍພາສາ ທາງໄທຣະສັນ ຕາມປີ 131 450 ແລະ ຂໍໃຫ້ພວກເຂົາດິດຕໍ່ຫ້ອງການເທສຍານຂອງຫານ.

ITALIAN

Per avvalervi di un servizio interpreti gratuito, portate i presente documento al Comune oppure telefonate al Servizio telefonico interpreti (TIS) al numero 131 450 chiedendo che vi metta in contatto con il Comune.

GREEK

Για δωρεάν Υπηρεσία Διερμηνέων, παρακαλείσθε να φέρετε αυτό το έγγραφο στη Δημαρχία ή να τηλεφωνήσετε στην Τηλεφωνική Υπηρεσία Διερμηνέων στο 131 450 και να ζητήσετε να επικοινωνήσουν με τη Δημαρχία σας.

VIETNAMESE

Để nhận được Dịch vụ Thông dịch miễn phí, hãy dem tài liệu này đến Hội đồng Thành phố hoặc gọi đến Dịch vụ Thông dịch qua Điện thoại (TIS) số 131 450 và nhờ họ liên lạc Hội đồng Thành phố của quý vi.

CROATIAN

Za besplatne usluge tumača, molimo donesite ovaj dokument u općinu ili nazovite Telefonsku službu tumača (Telephone Interpreter Service) na 131 450 i zamolite da za Vas nazovu općinu.

POLISH

W celu otrzymania bezplatnej pomocy ze strony Służby Tłumaczy, prosimy przynieść ten dokument do Rady Miejskiej (Council) lub zadzwonić do Telefonicznej Służby Tłumaczy na numer 131 450 poprosić o połączenie ze swoją Radą.

FRENCH

Pour un service d'interprétariat gratuit, veuillez apporter ce document à la mairie. Vous pouvez également téléphoner au service d'interprète au 131 450 et lui demander de contacter votre mairie.

BANGLA

বিনামূল্য দোভাষী সেবা ব্যবস্থার জন্ম, দয়াকরে এই দলিলাদি বা কাশজপুর পরিষদে (কাউন্সিলা নিয়ে আসুন অথবা 131450 নামারে টেলিফোন দোভাষী সেবা ব্যবস্থায় ফোন করুন এবং ভাদেরকে আপনার পরিষদের (কাউন্সিল) সাথে মোগায়োগ করুজে সম্বর্ণ

TONGAN

Ki ha NgÇue Fakatonulea ta'etotongi, kÇtaki 'o 'omai e tohi ni ki he Kaunisoló pe telefoni ki he 'Ofisi Fakatonulea Telefonii 'i he 131 450 'o kole kenau fetu'utaki ki ho'o Kaunisoló.

KHMER

ដើម្បីទទួលយកពីខ្ទប់ពីបកឬ្រកាសាដោយឥគគិតថ្ងៃ សូមយកឯកសារ នេះទៅសាលាសង្កាត់ ឬទូរស័ព្ទទៅកិច្ចបំពីបកប្រែកាសាតាមទូវស័ព្ទលេខ 131 450 រូបស្នើសុំឲ្យគេទាក់ខងជាមួយសាលាសង្កាត់របស់លោកអ្នក។ For these reasons, Council raises concerns that the proposed policy changes may be inconsistent with the broad objective of simplifying the operation of the Codes SEPP and promoting better design outcomes for new residential areas.

3. Development Controls

The Background Paper states that the proposed development standards for building envelopes will ensure that the setbacks, building depths, widths and heights provide the appropriate scale and massing to the streetscape and preserve amenity considerations such as solar access.

Whilst Council agrees with the intent of these controls, it is considered that the proposed numerical standards would likely result in diminished design and amenity outcomes having regard to the following concerns:

a) Solar Access / Setbacks

The proposed building setbacks from boundaries, including zero boundary setbacks, do not account for orientation of buildings and associated potential for overshadowing. This is considered a critical factor that needs to be accounted for in the formulation of these controls, particularly having regard to the compact nature of residential development resulting from reduced lot sizes. For this reason, it is considered that the Department should only consider relaxing setback requirements for the northern boundaries of a site, and/or where an acceptable level of solar access is attained for respective properties.

b) Rear setback

The cumulative negative impact of undersized rear yards is a major concern in the development of new neighbourhoods given the close proximity of buildings on smaller lot sizes. As such, the proposed 3m rear setback is considered insufficient considering the important function of this space to provide for landscaping, mature vegetation, solar access, ventilation and private open space. For these reasons, the Department is requested to consider increased rear setback controls to restore the important function of backyards in the urban landscape for new neighbourhoods.

c) Exempt Development

The Code does not account for the impacts of exempt development, such as garden sheds and pathways. As such, concerns are raised that the design outcomes envisaged by the proposed standards, such as private open space and landscaped areas, will not be attained in practice.

d) Trees

Council agrees in principle with the requirement to plant trees for new developments, however there needs to be a correlation between the size of the tree planted and the size of the space that it is planted within. In this respect, strong concerns are raised that the limited space available within yards will be insufficient to accommodate any substantial planting given the potential negative impacts resulting from overshadowing, displacement of limited private open space, dropping of branches, and invasiveness of root systems.

e) Garages

Concerns are raised that permitting double garages on narrow lots (less than 15m) will adversely impact upon the built form and design quality of the streetscape, reduce casual surveillance opportunities to the streetfront, displace on-street parking availability, increase hard surfaces and stormwater runoff, and diminish green space along the streetfront that may be available for tree planting. Additionally, it is considered that where double garages are permitted, the maximum double garage door width should be restricted to 6 metres.

For the reasons outlined above, Council requests the Department to review the proposed changes to the Codes SEPP to ensure good design and amenity outcomes for new neighbourhoods are not compromised for faster approval times.

Thank you for the opportunity to make this submission and if you require any further information or explanation please contact Jeff Burton, Senior Strategic Planner on (02) 4645 4842.

Yours sincerely

Graham Pascoe

Acting Manager Environmental Planning