

7 December 2017

17042

Anthony Witherdin
Acting Director: Regional Assessments
Department of Planning and Environment
320 Pitt Street, Sydney

Attention: Emma Butcher Planning Officer, Modification Assessments

Huntlee New Town Modification No. 8 to MP_10_0137

I write to you on behalf of Huntlee Pty Ltd in regard to the proposed S75W Modification Application (MOD 8) to the Huntlee New Town Project Approval MP10_0137. The purpose of this letter is to provide a response to the comments raised by the Department of Planning and Environment (DPE) in the email dated 4 October 2017. Responses to each of the matters raised are provided in the sections below.

1.0 Amended Proposal

1.1 Amended Plans and Reports

This response should be read in conjunction with the following amended documents:

- A revised overall Stage 1 Masterplan and staging plan prepared by Daly.Smith and Associates (**Attachment A**);
- A Landscape and Public Open Space plan, prepared by AECOM (**Attachment B**);
- An updated Bushfire Threat Assessment, prepared by MUD Environmental (**Attachment C**); and
- Huntlee Staging Plan dated 12 February 2014 (**Attachment D**).

The amended overall Huntlee masterplan has been prepared to illustrate the revised lot layout described in **Section 1.2** below and to illustrate more clearly defined substage boundaries, as requested by DPE. Amended landscape and public domain plans have also been prepared with the inclusion of lots in Substage 13.

1.2 Revised Open Space Layout

The submission prepared by Cessnock Council (Council) raised concern over the increase in the amount of open space in the proposal. In response to the issues raised in Council's submission, the amended overall masterplan (**Appendix A**) has been amended to reduce the overall amount of open space to 82.5Ha, consistent with the amount approved under the Stage 1 Project Approval. In this regard the proposal has addressed the open space issues raised by Council in their submission.

The reduction in open space has been achieved by:

- Replacing open space with an additional two lots in sub stage 12;
- Reducing the width of open space corridors running north-south through the site; and
- Increasing the size of perimeter lots in substage 10 and accordingly reducing the amount of open space.

It is noted that the amendments to the lot layout in stages 9 and 10 have resulted in 14 additional lots in this area. Accordingly, a revised lot and dwelling yield table is provided in **Section 2.3.3** below.

1.3 Subdivision of multi dwelling allotments

It is proposed to include in the modification the subdivision of multi-dwelling allotments within the Stage 1 development. The Stage 1 approval includes a number of multi-dwelling allotments that are of a size suitable to accommodate small residential flat buildings or multi dwelling developments. The dwellings to be accommodated on the multi-dwelling sites are reflected in the Stage 1 maximum dwelling yield, which is greater than the total number of allotments. The subdivision of the multi-dwelling sites will facilitate development for the purposes of single dwellings and, as outlined below, will result in an increase in the number of lots however will create a reduction in the number of dwellings that would otherwise be accommodated on these lots. The multi-dwelling lots to be subdivided are outlined below:

- Lot 69 - 1 multi dwelling site accommodating 15 dwellings: to be subdivided into 4 lots to accommodate 1 dwelling on each;
- Lot 289 - 1 multi dwelling site accommodating 10 dwellings: into 4 lots to accommodate 1 dwelling on each;
- Lot 531 - 1 multi dwelling site accommodating 6 dwellings: into 2 lots to accommodate 1 dwelling on each;
- Lot 540 - 1 multi dwelling site accommodating 4 dwellings: into 2 lots to accommodate 1 dwelling on each;
- Lot 264 - 1 multi dwelling site accommodating 7 dwellings: into 3 lots to accommodate 1 dwelling on each;
- Lot 610 - 1 multi dwelling site accommodating 4 dwellings: into 3 lots to accommodate 1 dwelling on each; and
- Lot 609 - 1 multi dwelling site accommodating 4 dwellings: into 3 lots to accommodate 1 dwelling on each.

The subdivision of the multi-dwelling lots will result in the creation of 14 new lots.

1.4 Modification to conditions

DPE has advised that the proposal to amend condition A1. Development Description to reflect the number of dwellings rather than the number of allotments is not supported. In this regard it is proposed to amend the condition to reflect both the number of dwellings and the number of allotments as per the below.

A1. Development Description

Approval is granted only to carrying out the development described in detail below:

- *Subdivision of Stage 1 of the Huntlee New Town site including:*
 - *subdivision to create **1,539 residential allotments and a maximum of 2,345 residential dwellings**, **14 13** super lots, 1 allotment for a primary school; landscaped areas,*
 - *drainage, public open space and recreation areas;*
 - *associated bulk earthworks; and*
 - *infrastructure including roads, drainage works and utility services provision.*

2.0 Response to Assessment Items

A response to each of the items raised by DPE is provided in the sections below.

2.1 Bushfire

DPE has expressed a preference for perimeter roads to be located around the development to assist in mitigating potential bushfire impacts. Notwithstanding this we note that the Rural Fire Service (RFS) and the Office of Environment and Heritage (OEH) have not raised this as an issue in their responses to the proposal. We do not consider that the provision of perimeter roads is necessary for the following reasons:

- As outlined in the Bushfire Threat Assessment, the perimeter lots have been designed to accommodate Asset Protection Zones (APZ) and as such are capable of successfully managing bushfire threat;
- Perimeter roads around the whole development site have the potential to result in poor urban design interface outcomes. The larger 'Country' Lots are located on the edge of the site to better transition the suburban nature of the development to the surrounding landscape (consistent with DCP controls 4.5.1(10) and 4.5.4(1)). While it is noted that Section 3.7 of the DCP identifies that, where possible APZs are to be accommodated in the road reserve, it is not considered to be necessary in this instance as the larger perimeter lots are required to transition the suburban nature of the development to the surrounding landscape. Perimeter roads have been used in most instances in the development;
- Modifications to Substage 3 (Mod 2) have previously been approved with lots located on the boundary of the development;
- Perimeter roads have been used in the majority of instances for the development; and

- No objection to the proposed perimeter lots have been raised by the relevant government authorities including the RFS and the OEH.

Where perimeter roads are not provided, suitably enforceable instruments (such as restrictions on title) are to be implemented on subject lots at the subdivision stage, that detail the required APZs as is the case for existing lots within substage 3.

2.2 Roads and Maritime Response

It is noted that correspondence from the Roads and Maritime Service (RMS) has confirmed that the threshold for the upgrade of Wine Country Drive / HEx Link Road (A-1) intersection (required under Condition E7(a)(iii)) is to remain at 725 dwellings however the timing threshold has been extended to 1 December 2018. While this timing threshold is acceptable to Huntlee, we do not consider that the condition should have any timing threshold. The purpose for the intersection upgrade is to cater for the increased demand in traffic resulting from the creation of dwellings. The timing threshold is artificial and does not relate to a needs basis for the timing of the upgrade. In this regard we request that DPE remove the timing threshold from the condition.

2.3 Subdivision

2.3.1 Assessment of sub-stage 13

DPE has requested an assessment of the additional lots within sub-stage 13 is provided. Sub-stage 13 was approved under the Project Application as a super lot and as such its subdivision for residential allotments has always been envisaged. The Modification seeks to subdivide super lot 13 to create 66 residential allotments which is consistent, albeit less than, the number of dwellings approved for this sub-stage as illustrated in the Huntlee Staging Plan dated 12 February 2014 (provided at **Attachment C**). The proposed lot layout and road network are also consistent with the structure shown in the 2014 Staging Plan. The proposed traffic entry and exit points to sub-stage 13 and the overall road layout are consistent with the 2014 Staging Plan and as such were assessed in the Hyder Traffic Assessment (page 29 of Appendix C to the Major Project EIA). In this regard, the proposed modification does not seek to alter the traffic arrangement or road capacity analysis undertaken and approved as part of the Project Application.

The proposed lot layout in sub-stage 13 is commensurate with the urban design principles illustrated in the 2014 Staging Plan with east-west facing street blocks that provide lots with a frontage to the riparian corridor to the east and facilitate north-south facing allotments. It is considered that the lots within substage 13 are appropriate and are consistent with the subdivision intended for this superlot.

2.3.2 Comparison of the proposed subdivision layout to Stage 1

A visual comparison of the proposed modification compared with the Stage 1 approval is provided attached to this letter. The primary changes to the lot layout are summarised below:

- The extension of the riparian corridor to the site boundary in sub stage 12;
- Reorientation of the school allotment from a north-south alignment to an east-west alignment and subsequent replanning of surrounding residential allotments;
- Removal of the road axis to the town centre through sub stage 8;
- Straightening the alignment of the east-west roads through sub-stage's 6, 7,8 and 9 (sub stage boundaries correct for proposed modification drawing);
- Reconfiguring lots in substage 10 to provide east west facing street blocks, allowing more north-south facing residential allotments;
- Reconfiguring the neighbourhood centre to provide a shared zone and more cohesive and condensed neighbourhood centre; and
- Creating overall more linear street blocks and a reinforced grid pattern.

2.3.3 Lot and dwelling yield

A revised lot and dwelling yield table has been prepared to consolidate the increase in lots resulting from the amendments to cater for open space and the subdivision of the multi-dwelling lots. The overall lot and dwelling yield is provided in **Table 1** below.

Table 1 - Lot and dwelling yield

Sub Stage name	Number of lots approved under MP10_0137	Lots changed under previous approvals	Total proposed under MOD 8 (Increase under RFI)	Total
1	208	+2 210	215 (+5)	215
2	98	+9 107	107	107
3	94	+23 117	123 (+5)	123
4	91	+33 124	126 (+2)	126
5	111	-	118 (+4)	118
5 Large lot	120		120	120
6	60	-	60	60
7	147	-	93	93
8	106	-	133 (+1)	133
9	130	-	98 (+6)	98
10	81	-	121 (+10)	121
11	118	-	82	82
12	109	-	77 (+2)	77
13	1 (superlot)	-	66	66
14 Superlot	1	-	1	1
15 Superlot	1	-	1	1
Town Centre Superlots	11	-	11	11
Town Centre lots	-	+2		2
Total residential lots	1,479	1,479	1,539	1,539
Total superlots	14	-	13	14
Total dwellings	2,345	2,345	2,345	2,345

2.3.4 Comparison of the number of north/south lots

A comparison of the number of north-south oriented lots approved under the Stage 1 Project application and proposed under Mod 8 is provided in **Table 1** below. As illustrated in the table, the overall number as well as the proportion of north-south facing lots has increased under the Mod 8 proposal.

Table 2 - Comparison of north/south facing lots

Sub-Stage Name	Stage 1 Layout	Mod 8 Layout
5 (excl large lots)	North-south facing lots =89 (80%)	North-south facing lots =84 (71%)
	East-west facing lots =22 (20%)	East-west facing lots =34 (29%)
	Total lots = 111	Total lots =118
6	North-south facing lots =12 (20%)	North-south facing lots =38 (63%)
	East-west facing lots = 48 (80%)	East-west facing lots =22 (37%)
	Total lots = 60	Total lots =60
7	North-south facing lots = 69 (47%)	North-south facing lots =37 (40%)
	East-west facing lots = 78 (53%)	East-west facing lots =56 (60%)
	Total lots =147	Total lots =93
8	North-south facing lots = 52 (49%)	North-south facing lots =74 (55%)
	East-west facing lots = 54 (51%)	East-west facing lots =59 (45%)
	Total lots = 106	Total lots =133
9	North-south facing lots = 76 (60%)	North-south facing lots =62 (63%)
	East-west facing lots = 54 (40%)	East-west facing lots =36 (36%)
	Total lots = 130	Total lots =98
10	North-south facing lots = 50 (61%)	North-south facing lots =95 (78%)
	East-west facing lots = 31 (39%)	East-west facing lots =26 (22%)
	Total lots = 81	Total lots =121
11	North-south facing lots = 66 (56%)	North-south facing lots =51 (62%)
	East-west facing lots = 52 (44%)	East-west facing lots =31 (38%)
	Total lots = 118	Total lots =82
12	North-south facing lots = 55 (51%)	North-south facing lots =43 (55%)
	East-west facing lots = 54 (49%)	East-west facing lots =34 (45%)
	Total lots = 109	Total lots =77
13	North-south facing lots = N/A	North-south facing lots =35 (53%)
	East-west facing lots = N/A	East-west facing lots =31 (47%)
	Total lots = N/A	Total lots =66

Sub-Stage Name	Stage 1 Layout	Mod 8 Layout
Total	North-south facing lots = 469 (54%)	North-south facing lots = 519 (60%)
	East-west facing lots = 393 (46%)	East-west facing lots = 329 (40%)
	Total lots = 862	Total lots = 848

2.3.5 Comparison of the number of north/south lots

A comparison of the lot sizes in each substage approved under Stage 1 and those proposed under MOD 8 is provided in **Table 2** below.

Table 3 - Lot Size comparison

Stage 1	Mod 8
Substage 5	Substage 5
Lot size range = 650m ² – 300m ²	Lot size range = 649m ² - 416m ²
Total lots = 231	Total lots = 118
Substage 8	Substage 6
Lot size range = 650m ² – 300m ²	Lot size range = 915m ² - 340m ²
Total lots = 106	Total lots = 60
Substage 11	Substage 7
Lot size range = 650+m ² - 450m ²	Lot size range = 1,282m ² - 425m ²
Total lots = 118	Total lots = 93
Substage 9	Substage 8
Lot size range = 650+m ² – 300m ²	Lot size range = 1,417m ² – 442m ²
Total lots = 130	Total lots = 133
Substage 6	Substage 9
Lot size range = 650+m ² - 300m ²	Lot size range = 715m ² – 308m ²
Total lots = 60	Total lots = 98
Sub Stage 7	Sub Stage 10
Lot size range = 650+m ² - 300m ²	Lot size range = 4,244m ² - 320m ²
Total lots = 147	Total lots = 121
Substage 10	Substage 11
Lot size range = 650+m ² - 450m ²	Lot size range = 2,736m ² – 510m ²
Total lots = 81	Total lots = 82
Substage 12	Substage 12
Lot size range = 650+m ² 450m ²	Lot size range = 1,027m ² - 425m ²
Total lots = 109	Total lots = 75
Substage 13	Substage 13
Lot size range = N/A	Lot size range = 2,591m ² – 340m ²
Total lots = N/A	Total lots = 66

3.0 Conclusion

We trust that the information contained within this letter and supporting information is sufficient for DPE to finalise their assessment of the Modification. Should you need anything else please don't hesitate to contact me on mnorman@ethosurban.com or 9956 6962.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Matt Norman', written in a cursive style.

Matthew Norman

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