

Planning and Regulatory. G.Mansfield
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Dear Ms Gibson

**NOTIFICATION OF MODIFICATION TO CONCEPT PLAN APPROVAL FOR DAN
LAND 290 & 302 MINMI ROAD FLETCHER (MP06_0031 MOD2)**

I refer to your email of 5 January, 2016 advising that City Plan Services (CPS) has submitted a response to submissions report and inviting Council to comment. I also refer to our subsequent telephone conversation of 14 January, 2016 regarding this matter.

It is confirmed that an engineering officer who made a significant contribution to Council's previous submission is on leave until 28 January, 2016. Therefore, his comments will be forwarded to the Department as soon as they become available after his return from leave. In the meantime, the following comments are offered for your consideration:

1. LOCAL PLANNING STRATEGY

Council's Local Planning Strategy (LPS) provides the strategic direction for the future growth and development of Newcastle.

The LPS supports the concept of small lot housing in appropriate locations. A specific action for residential lands under Section 4 Strategic Directions of the LPS is to:

'New release areas apply residential density based upon the principles of the Residential Growth Precincts. Minimum lot size map for urban release areas should enable small lot subdivision around commercial centres based upon the principles of the Residential Growth precincts, in particular the SAFE criteria.'

The Residential Growth Precinct Maps (Appendix B) of the LPS apply density precincts based upon walkable catchments to commercial centres (SAFE criteria). It applies a five minute walkable catchment for moderate growth. While the subject land is currently not identified within a moderate growth precinct, a specific action for residential lands under Section 4 Strategic Directions is to:

'Investigate whether moderate growth precinct is warranted around existing commercial centres at Fletcher.'

In this regard, the subject land is located within reasonable proximity to the commercial centre (i.e.1 Britannia Blvd). If the subdivision design can provide adequate pedestrian connections to this centre then the land proposed for small lot housing would appear to be within a five minute walkable catchment. Achieving a moderate growth by small lot housing as opposed to medium density housing is considered appropriate.

2. SUBDIVISION DESIGN

While in principle the concept of small lot housing is supported it is essential that the subdivision design itself can support acceptable building outcomes in the future. The subdivision design for small lots is considered more important than with larger allotments where design issues can generally be readily addressed by virtue of the larger land area. This issue has been highlighted under the LPS by another action for residential lands to:

'Review subdivision section of DCP to facilitate small lot subdivision/housing in new release areas.'

This project has not yet commenced. However, this principle is already being applied by Council for small lot housing similar to the subject proposal. For example the adjoining Sanctuary estate to the east produced design guidelines for the nominated small lot housing as part of that development approval. Likewise, the Concept Approval MP 10_0090 for the Minmi East development (Coal and Allied) required preparation of design guidelines for small lot housing.

It is suggested that similar style guidelines would be desirable to ensure appropriate building outcomes in the future.

Council's previous submission raised many issues with the original proposal which highlights the need to consider closely the subdivision design for small lot housing. Some of these issues do not appear to have been adequately addressed under the amended plan by ADW Johnson, Ref MP-001, Ver E, dated 26 October 2015. In particular, multiple allotments would require direct vehicular access to Minmi Road. A possible solution to this (as proposed under the design guidelines for MP 10_0090) is to enable access to the rear of the lots via an internal street. A similar approach would appear reasonable by including a rear access laneway between the lots. This would improve vehicular access safety, minimise traffic disruption, improve streetscape appearance and enable improved landscape outcomes along Minmi Road.

While not directly related to the small lots it would also appear that there are still a number of problematic 'battle-axe' style allotments. The current design requires excessively long access driveways in some cases, creating isolated lots with potentially poor amenity. It also results in a number of side boundaries adjoining the open space areas, resulting in poor public access to open space and therefore lack of amenity gain that these areas provide the future residents. Many of these issues may be eliminated by better use of perimeter style road design. For example extending Roads 1 & 2/3 along the frontage of the open space area could improve access and amenity for the allotments and enables improved public access to open space, improved neighbourhood amenity gain, along with improved surveillance

(safety). Improved access to the common open space areas of the estate supports the principle of small lot housing that generally has limited private open space.

3. SECTION 94 CONTRIBUTION PLAN 2013

The proposed development is within the catchment area for the Western Corridor Contribution Plan 2013. The plan levies contributions for residential dwellings on a per lot basis; any additional lots created as part of the proposed modification will be required to pay a contribution under this plan.

4. TRAFFIC AND PARKING IMPACTS AND SAFETY

4.1 External Road and Pedestrian Connectivity.

The CPS response to this issue is unsatisfactory. The amended concept plan does not include, as required by conditions B10 (b) and (c), details of the road and pedestrian connection between the residential estates.

4.2 .Additional Traffic Impacts

The GHD traffic report satisfactorily demonstrates the additional lot numbers (35) and road layout will not adversely impact on the external road network. Council concurs with the proposed roundabout at Highland Way and the recommendation to extend the 60 km/h speed zoning.

4.3. Traffic (Road) Safety

In regard to Council's concern regarding the provision of direct access to Minmi Road for Lots 19 to 34 and 1 to 11, the response provided by CPS does not adequately address this issue stating only the proposal is consistent with existing development and recommending extension of the speed limit zone.

The existing development (Highland County) has created road safety issues that Council does not want to replicate in future development; therefore Council has been consistently denying direct access to Minmi Road for developments since the Highland County development has been approved. Therefore, the amended layout is not consistent with recent development approvals in the area and is not supported.

If you require further clarification of any matter raised in this letter, please contact me on (02) 4974 2767 or gmansfield@ncc.nsw.gov.au .

Yours faithfully



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PRINCIPAL PLANNER (DEVELOPMENT)