7 April 2014

GOOGONG

The Secretariat
Joint Regional Planning Panel
(Southern Region)
jrppenquiry@jrpp.nsw.gov.au

Dear Sir/Madam,

QCC DA186-2013 SUBMISSION TO THE JRPP MEETING – 10 APRIL, 2014 (GOOGONG DA3)

This submission is being made by Googong Township Pty Ltd (GTPL) in regards to DA186-2013 in the Queanbeyan Local Government Area. Queanbeyan City Council (QCC) has prepared a report to the Joint Regional Planning Panel that makes objections to the above mentioned DA and recommends partial refusal of what we believe to be the key element of the proposal.

The objections raised by QCC in their assessment have all been raised with GTPL during the assessment period. In each case the issues have been addressed by GTPL through comprehensive submissions and argument in response to a number of RFI's. QCC's assessment does not appear to seriously consider GTPL's responses nor present them for consideration to the JRPP.

In their assessment report to the JRPP QCC argues that the proposed Community Titled lots less than 170m2 are not permitted under the Queanbeyan LEP, that the application is contrary to proper planning processes and approval of the application would set an undesirable precedent. We do not agree with QCC's position on these matters and outline our arguments below for consideration by the JRPP.

Furthermore QCC state in their assessment (at page 24) that "*Council has not formed a view on the particular merits or otherwise of the proposed creation of lot sizes smaller than what is currently envisioned for Googong Township in order to achieve higher lot yields and smaller, cheaper housing".* Despite this the report devotes significant time to criticising the merits of the application. We also do not agree with these criticisms and outline our arguments on each of the main items below for consideration by the JRPP.

GTPL has a strong working relationship with QCC and has been able to agree on outcomes for the first two DA's for subdivision which were subsequently approved by the JRPP. In this case it is evident and unfortunate that QCC and GTPL have not been able to agree. GTPL looks to the JRPP to assess the arguments put forward by both parties to make a sound planning decision on the application.

Permissibility, Process and Precedence

Permissibility

1. QCC has raised objections to the permissibility of community titled lots less than 170m2 in its assessment. These objections are clearly rebutted in the attached (Attachment 1) advice from property, planning and community scheme legal experts Holding Redlich.

In summary we would argue the key points are as follows;

2. The Queanbeyan LEP states (Clause 4.1(4)) that the minimum Lot size clause does not apply to lots in a community scheme.

3. The NSW Standard LEP instrument includes an optional clause 4.1AA that is designed to control lot sizes in community title schemes. QCC chose not to include this clause in the Queanbeyan LEP.

4. QCC is endeavouring to interpret the Clause 4.1(4) to only apply if the application for subdivision is of land that is already in a Community Title Scheme. Their own assessment acknowledges (page 37) that this interpretation "… *can be said to be lacking in planning logic*."

5. The advice from Holding Redlich argues strongly that Clause 4.1(4) applies whether the lot being subdivided is already within a community scheme or not.

6. Even if one were to accept QCC's view, the application could easily be modified to ensure that the sequence of creation of community scheme and subdivision of lots conforms with their interpretation of the clause. We have attached revised plans of subdivision that do exactly that for your consideration at Attachment 2.

7. It is of significant note that QCC now proposes to amend the LEP to adopt a clause 4.1AA. We note that as part of this process the Department of Planning and Infrastructure has written to QCC stating they should "*give consideration to the potential to accommodate lots smaller than 170m2 in certain locations where appropriate*".

Process

8. QCC argues that the proper process to permit lots less than 170m2 under a Community Title Scheme would be to amend the Queanbeyan Residential and Economic Strategy 2006-2013 (the Strategy) the Local Planning Agreement (LPA), the LEP and the DCP first. (Refer page 61 of QCC's assessment report)

9. This application does not seek anything that is inconsistent with the Strategy or the LPA. This is discussed further in the arguments about merits below.

10. As above it is our view and the view of our legal counsel that the application is consistent with the requirements of the LEP.

11. The application has been assessed against the requirements of the Googong DCP. GTPL provided a full assessment of the application against the standards and objectives of the DCP. Where no controls existed for the assessment of compact lots and housing an assessment was carried out against controls for larger lot housing. This demonstrated that the proposed housing met the amenity standards and/or objectives of small lot housing approvable under the DCP.

12. GTPL has not disregarded Councils position about following due process. To provide some further background, GTPL presented to QCC on the 24th June 2013 at a pre-lodgement meeting. At this meeting, GTPL identified:
    - The areas and the components of the Development Application
    - Development assessment issues and the desire to pursue development control amendments
    - The strategy for ensuring GTPL retains control of the master planning and design process.

    At this meeting QCC highlighted a number of concerns, the main being that 3 superlots proposed for future community title subdivision were outside the 200m. GTPL removed these lots as we agreed these were outside the scope of the master plan and needed further discussion with Council.

13. Given the above it is difficult to see how the application is not following proper process.

<u>Precedence</u>

14. Whilst QCC may not like the correct interpretation of Clause 4.1(4) that is not a reason to refuse the application. There is already precedence in other jurisdictions to interpret the clause as GTPL has, and Holding Redlich confirm in their advice that this is common practise.

15. Such precedence will only last as long as it takes QCC to amend the LEP to function as it wants it to rather than as how it is currently drafted.

16. GTPL is proposing to exemplify the approach to the provision of affordable housing with the construction of 6 homes on lot 785 that are on lots less than 170m2.

17. A further 6 dwellings (type 11 studios on lots 782, 783, 784) are also on lots less than 170m2 and are proposed in key passive surveillance locations on laneways.

18. In proceeding with this application it is GTPL's intention to use the demonstration homes to influence the Development of QCC's policies in the future. This is a significant investment by GTPL that will benefit QCC in the development of its future policies by providing real life examples of quality small lot housing within the Queanbeyan LGA.

19. GTPL is happy to work with QCC to assist in the development of amended LEP and DCP Clauses that more clearly guide the development of small lot housing at Googong.

Merits

Yield

20. This application does not seek to increase the yield at Googong. Rather it seeks to demonstrate a wider mix of lot sizes (albeit via community schemes) and therefore wider range of house types and prices at the affordable end of the market.

21. It is drawing an extremely long bow to suggest that the approval of 14 community title lots less than 170m2 sets a precedence that threatens total yield for Googong.

22. Small lot affordable housing is only attractive to a small but important percentage of the market. Assuming the type of housing proposed in this application is ultimately permitted across the Googong Township, it would be our intention, based on market demand and affordable housing commitments, that houses on lots less that 170m2 would make up around 3-4% of the total yield.

23. Despite the above we wish to note the following extracts of the Strategy to the JRPP.

    - *The Queanbeyan Residential and Economic Strategy 2006-2031 identified Googong is developed to accommodate 5,550 dwellings*
    - *Approximately 300 hectares of residential release area land providing up to 4,000 dwellings is identified in North Tralee, Environa and South Tralee with a small amount of housing provided on the lower slopes of Poplars*

    Over the past 7 years since the Strategy was adopted only 337 lots have been delivered at Googong. In the same period there have been no lots delivered in Tralee, Environa or South Tralee. One would suggest that Queanbeyan is well behind on its targets to meet the Strategy objectives.

    We also note that the review and endorsement of the strategy by the Department of Planning in 2007 recommended that *"The Googong site should be considered favourably for residential development on the basis that it is largely unconstrained". The Department goes on further to suggest that Googong could accommodate "up to 7,000 dwellings".*

    It's also relevant to note that mechanisms are already in place to accommodate additional dwellings at Googong should they ever be proposed. Clause 29.8 of the Googong Local Planning Agreement states,

    "Council acknowledges that the Development Contributions to be provided by the Developer under this Agreement may exceed the demand for public infrastructure generated by 5,550 dwellings. If more than 5,550 Dwellings are permitted in the Googong Urban Release Area, the Parties will negotiate in good faith for the adjustment of the Development Contributions to be provided under this Agreement.

    GTPL does not understand why QCC perceives additional density and yield as a negative proposition given Googong infrastructure carries additional service capacity and there is likely to be supply (and subsequently demand) pressures across the Queanbeyan LGA.

Density

24. QCC appears to take the view that lots less than 170m2 are outside the objectives of the zoning and strategic location for density. GTPL opposes this view due to the fact that the land within the 200m core contemplates an:
    - Increase in building height to 12m
    - Increase in FSR to 1.5:1

    Density much higher than what is proposed could be achieved given these height and FSR controls
    .
25. By way of context the JRPP should be aware that at 5550 total dwellings the average density at Googong (based on residential land and local road areas) is about 12.4 dwellings per hectare. This is well below the targets for sustainable development of most jurisdictions.

26. The Growth Centres definitions of the types of development and their characteristic densities is as follows;

DPI Guidelines	Low Density	Medium Density	High Density
Density dwellings/ha	12.5 -20	20-40	40+

*Source - Growth Centres Development Code 2006

The density of the area comprising the small lots, accounting for half road widths around lots 782, 783, 784 and 785, is 26.5 dw/Ha well within the range of medium density development that would be expected near a neighbourhood centre.

27. The planning of NH1A has consistently shown around 1220 dwellings, as stated several times to QCC over recent years. Even with 57 lots less than 170m2 (noted as 'inadvertently included' in QCC's commentary) the total yield for NH1A sits below this at 1210 dwellings, so the claim that GTPL is seeking unreasonable yield increase is disingenuous.

Affordability

28. GTPL supports QCC's view that the delivery of affordable housing is provided for within the VPA obligations. GTPL will continue to honour this commitment.

29. The diagram at Attachment 3 shows the types of dwellings and price points that can be achieved on lots less than and greater than 170m2. The diagram illustrates that meeting the affordable housing thresholds is only just possible using dwelling types suited to lots greater than 170m2. To limit choice of lots to be greater than 170m2 limits the house and land product choice available thereby encouraging monotony in housing and streetscape form.

30. Furthermore what GTPL is seeking to provide Queanbeyan residents with is an offer significantly below the affordability thresholds stipulated by the government. GTPL have provided QCC a number of times with an assessment of the borrowing capacity of

Queanbeyan residents. GTPL again provide this at Attachment 4. It clearly demonstrates that the average Queanbeyan resident would be in mortgage stress they purchased a home that was at the top of the affordable housing thresholds.

31. QCC consistently repeats in its report to the JRPP that the developer is seeking a 'backdoor' method of increasing density, in an implied critique that it is taking more from the project than has been agreed. GTPL and its constituent companies CIC Australia and Mirvac have demonstrated leadership across Australia in the frontline of delivery of compact affordable housing, and have learned that successful new communities have very wide choice of housing, particularly including options for lower income earners. Reducing the land and building components of cost to produce apartment sized homes has been highly successful in many of their new communities, and it is this that is driving the inclusion of the smallest homes in Neighbourhood 1, not the desire for higher yield.

    In Adelaide for example, CIC at Lightsview has won the 2011 UDIA National Award for Affordable Housing, and the 2014 UDIA National Award for Master Planned Development, with the type of quality housing and mix that is intended for Googong.

Use of Community Scheme

32. QCC discredits the use of community title due to it being a way of side stepping the LEP and therefore it is not an appropriate use of the Community Land Development Act 1989. GTPL is unaware of any precedent or requirement anywhere across the Country where a developer has been asked to justify the use of community title legislation. The advice from Holding Redlich at Item 25 further reinforces this point.

Conclusion

We believe we have demonstrated that the application is consistent with and permissible under the relevant planning instruments, plans and policies.

We note that this application includes only 12 lots less than 170m2, 6 of which are for demonstration purposes.

As noted above and with the support of Council we have already commenced work on a submission to Council and DPI to set out proposed amendments to the LEP and DCP to better define the controls around the development of small lot housing thereby addressing Councils concerns whilst allowing innovative and affordable, quality small lot housing.

If State Government planning policy is pushing so hard for good affordable housing choices, and that call is repeated almost daily due to lack of achievement through the planning and development system, why should a willing developer with an impressive ability to actually deliver very affordable housing have a complying application refused and be further delayed by planning uncertainty?

We note that Council has not provided relevant conditions of consent for the housing based on their view that the lots on which the housing sits are not permissible. Given the strong position on permissibility outlined by Holding Redlich we request that Council be requested to urgently provide suitable conditions of consent for the housing included within the application to avoid further delays to the approval of the housing.

We therefore seek approval by the JRPP of the application as submitted.

If the JRPP is not in a position to approve the application as submitted, or as amended by the plans at Attachment 2, we would appreciate a decision which;

- Approves all lots and housing on lots greater than >170m2.
- Defer the approval of lots less than 170m2 pending confirmation of Holding Redlich's advice regarding the interpretation of the LEP.

We note that QCC has assigned GTPL 5 mins to present to the JRPP at the meeting on 10 April 2014. Given the number and complexity of issues involved we believe this time will be insufficient and we seek your agreement to allow a more appropriate time frame of say 20 minutes.

Should you have any queries on this letter please do not hesitate to contact the undersigned.

Yours sincerely,

GOOGONG TOWNSHIP PTY LTD

Malcolm Leslie

Project Director

cc. QCC – Chelsea Newman

Attachments

1. Holding Redlich Advice
2. Draft Deposited Plans (Community Plan created before any lot less than 170m2)
3. Housing Price Points compared to Affordable Housing Thresholds
4. Affordability for Average Queanbeyan Households

HOLDING REDLICH

7 April 2014

Mr Michael Nolan
Googong Township Pty Ltd
Level 3, 64 Allara Street
CANBERRA ACT 2600

By email: Michael.Nolan@cicaustralia.com.au

Partner Robert Moses
Direct Line (02) 8083 0422
Email robert.moses@holdingredlich.com
Our Ref RCM 13640162

Dear Michael

Planning Advice – Googong Township – subdivision

1. We have reviewed the planning assessment report (**Report**) prepared by Queanbeyan City Council (**Council**) that has been submitted to the Joint Regional Planning Panel (**JRPP**) to assist with its determination of development application DA 186-2013.

2. Our advice has been sought on the Council position that the proposal for the subdivision of land for lots that are less than the minimum lot size (including the Type 11 dwellings in Stage 3B) contravenes the *Queanbeyan Local Environmental Plan 2012* (**LEP**). We understand that this advice may be provided to the JRPP to assist with its deliberations.

3. The issue appears to be whether clause 4.1(4) of the LEP applies to lots initially "created" by a strata plan or community plan or whether the clause only applies to lots once those lots are within a strata or community scheme. For the reasons set out below, the clause applies to both circumstances and the Stage 3B proposal does not contravene the LEP.

4. However, in order to meet Council's concerns in relation to the clause, you have amended the subdivision plans to demonstrate a particular sequence for registration and thereby come within the Council's view as to the operation of clause 4.1(4). These changes do not materially affect the development the subject of the application but are unnecessary in our view.

5. Depending on the view taken by the JRPP as to the operation of clause 4.1(4), different conditions will be required to be imposed on any consent that is granted so as to legally implement the subdivision. We set out those conditions below.

6. We have attached the proposed amended plans which show the following lots as consolidated in each proposed community plan:

Proposed super lot	Lots to be consolidated
782	3, 3E and 4D 6, 6E and 5D 14, 14E and 13D

783	12, 12E and 11D
784	2, 2E and 3D 26, 25E and 25D
785	7, 8 and 9 13, 13E and 14D

7. The plans then provide for separate community plans of subdivision that subdivide those consolidated lots into lots as originally proposed.

8. In our view this process is specifically contemplated by the terms of the LEP and do not contravene clause 4.1(4).

9. We are of the view that this sequencing of plans is strictly not necessary. Clause 4.1(4) of the LEP states:

> *"This clause does not apply in relation to the subdivision of individual lots in a strata plan or community title scheme."*

10. The Council has stated in the Report that the applicant's interpretation requires the insertion of the words "land to create" prior to the word "individual" into the definition to support its meaning. We do not agree. In our view the language of the clause is sufficiently clear so as to apply to strata or community schemes that are to be or have been created. Our interpretation is also consistent with our experience in how other consent authorities and Planning and Infrastructure interpret and implement this clause.

11. If the Council's view is taken, for example for strata schemes, the clause is unlikely to have any work to do as it is highly unusual that you would further subdivide an "individual" strata lot in a strata scheme. It is not unusual of course in a community development scheme to undertake further subdivisions of community development lots and that is why councils have the option of adopting clause 4.1AA in their standard instrument plans. The Council has not done so in this case.

12. It is important to note that in relation to strata and community title schemes:

    (a) "initial" strata lots can be created by the registration of a strata plan or strata plan of subdivision (for staged strata);

    (b) "subsequent" strata lots (ie lots created by subdividing existing strata lots) are created by the registration of a strata plans of subdivision (as noted above this is unusual);

    (c) "initial" community development lots are created by a community plan; and

    (d) "subsequent" community development lots (ie lots created by subdividing existing community development lots) are created by a community plans of subdivision.

13. It appears that the Council agrees that clause 4.1(4) applies to a community scheme that is already in existence, i.e. land where a community plan has been registered under the *Community Land Development Act 1989* (**CLD Act**) and it is on this basis that you have proposed the amended plans.

14. To subdivide a community development lot into one or more further community development lots, a *community plan of subdivision* must be registered. This is the only way that this can be done because the relevant land to be subdivided is already subject to the CLD Act by virtue of the registration of the community plan.

15. If Council's view is tested, it means that a person can apply to subdivide land by a community plan to create Lot 1 community property and then one large residue or super lot. At issue is whether such "residue" or "super" lots in a community plan are "individual" lots in a community title scheme" for the purpose of clause 4.1(4) of the LEP.

16. If the residue or super lot is an "individual" lot in a community scheme and given that those lots can be further subdivided by one or more community plans of subdivision, that process comes within clause 4.1(4) (on Council's view of the clause).

17. However, in our view and given the processes referred to above, it could not have been intended by the legislative drafter that in order to utilise clause 4.1(4) that a person would have to sequence its subdivision plans in this manner. That is why clause 4.1AA is offered to councils for inclusion in the standard instrument plans.

18. Clause 4.1(4) must be interpreted in accordance with its ordinary meaning, with regard being had to the purpose of the provision in accordance with section 33 of the *Interpretation Act 1989*. In our view the meaning of the clause is quite clear, in that any lot that is a lot within a community plan or to be created by a community plan is an "individual lot" in the relevant community title scheme. Further, the fact that the lot may be a residue or super lot capable of further subdivision is not relevant to the meaning of the clause.

19. There is no support for the view that clause 4.1(4) operates in a more restricted manner being that it does not apply to residue or super lots or even the initial community development lots. Assuming that it does not apply to the initial lots that are created, clause 4.1(4) certainly relates to subsequent lots and Council cannot pick and choose which proposed community plans of subdivision the clause applies to. The clause does not refer to residue lots, super lots or proposed end uses of lots and the absence of such restrictions indicates that a wider meaning must be given to the clause.

20. Had the Council wanted to control lot sizes in community title schemes, it would have requested that clause 4.1AA of the Standard Instrument – Principal Local Environmental Plan be adopted. Clause 4.1AA(2) states:

> *"This clause applies to a subdivision (being a subdivision that requires development consent) under the* Community Land Development Act 1989 *of land in any of the following zones: ..."*

21. It is clear that this clause refers to subdivisions effected by the registration of:

    (a) community plans and community plans of subdivision; and

    (b) neighbourhood plans and precinct plans,

    that subdivide land under the CLD Act.

22. This is not consistent with the Council's interpretation that clause 4.1(4) only applies once a community title scheme is created. Clause 4.1AA clearly imposes restrictions on all subdivisions under the CLD Act and the omission of this clause evidences an intention that the exception in clause 4.1(4) would apply with respect to all such subdivisions.

23. It is also noteworthy that Council now proposes to amend the LEP to adopt clause 4.1AA, a position inconsistent with its current position concerning the effect of clause 4.1(4).

24. The Report also refers to the proposed Type 11 Dwelling subdivisions as being subdivisions carried out under sections 196B – 196L of the *Conveyancing Act 1919* (**Conveyancing Act**). While these sections of the Conveyancing Act allow for the registration of deposited plans that create lots in stratum, the actual plan of subdivision that will be registered in these circumstances will be a deposited plan being a community plan or community plan of subdivision.

25. As a final matter we note that the Report discusses the "use and purpose" of community title schemes. We confirm that the CLD Act does not impact on the legal interpretation of the provisions of the LEP and in particular clause 4.1(4). Further it is a matter for you as the applicant to determine what titling structure best suits your development. The CLD Act is a tool to assist with the implementation of that titling decision. The issues raised in the Report concerning cost structures and other matters are commercial matters that cannot be used by the consent authority as a legitimate planning reason to refuse to grant consent.

Recommended conditions

26. If the JRPP agrees with our view that clause 4.1(4) applies to the subdivision of land by a community plan (ie the "initial" subdivision), the amended plans are not required and the JRPP can refer to the existing plans in the relevant consent condition.

27. If the JRPP agree with the Council's interpretation of clause 4.1(4), we recommend that the following condition be imposed:

> *"For the purposes of sections 80(4)(b) and 80(5) of the Act, development consent is only granted for the Subdivision of Stage 3B once the Stage 3B Community Plans have been registered.*
>
> *For the purpose of this condition:*
>
> *"Stage 3B Community Plans" means a subdivision of land generally in accordance with the following plans: DP CT1, DP CT2, DP CT3 and DP CT4.*
>
> *"Subdivision of Stage 3B" means a subdivision of land generally in accordance with the following proposed community plans of subdivision: DP CT1A, DP CT2A, DP CT3A and DP CT4A."*

28. The condition is legal for the following reasons.

29. Sections 80(4) and 80(5) of the *Environmental planning and Assessment Act 1979* (NSW) (**EP&A Act**) state:

> *"(4) Total or partial consent*
>
> *A development consent may be granted:*
>
> *(a) for the development for which the consent is sought, or*
>
> *(b) for that development, except for a specified part or aspect of that development, or*
>
> *(c) for a specified part or aspect of that development.*

(5) The consent authority is not required to refuse consent to any specified part or aspect of development for which development consent is not initially granted under subsection (4), but development consent may subsequently be granted for that part or aspect of the development."

30. The JRPP in imposing the suggested condition is:

(a) under section 80(4)(b) of the EP&A Act, granting consent except for a specified part or aspect of the development, being the further subdivision of Stage 3B by the proposed community plans of subdivision;

(b) not required to refuse that aspect of the development in accordance with section 80(5) of the EP&A Act; and

(c) entitled to place a control on when that further consent may be issued and no further development application is required – see *Patrick Autocare Pty Ltd v Minister for Infrastructure, Planning and Natural Resources* [2004] NSWLEC 687.

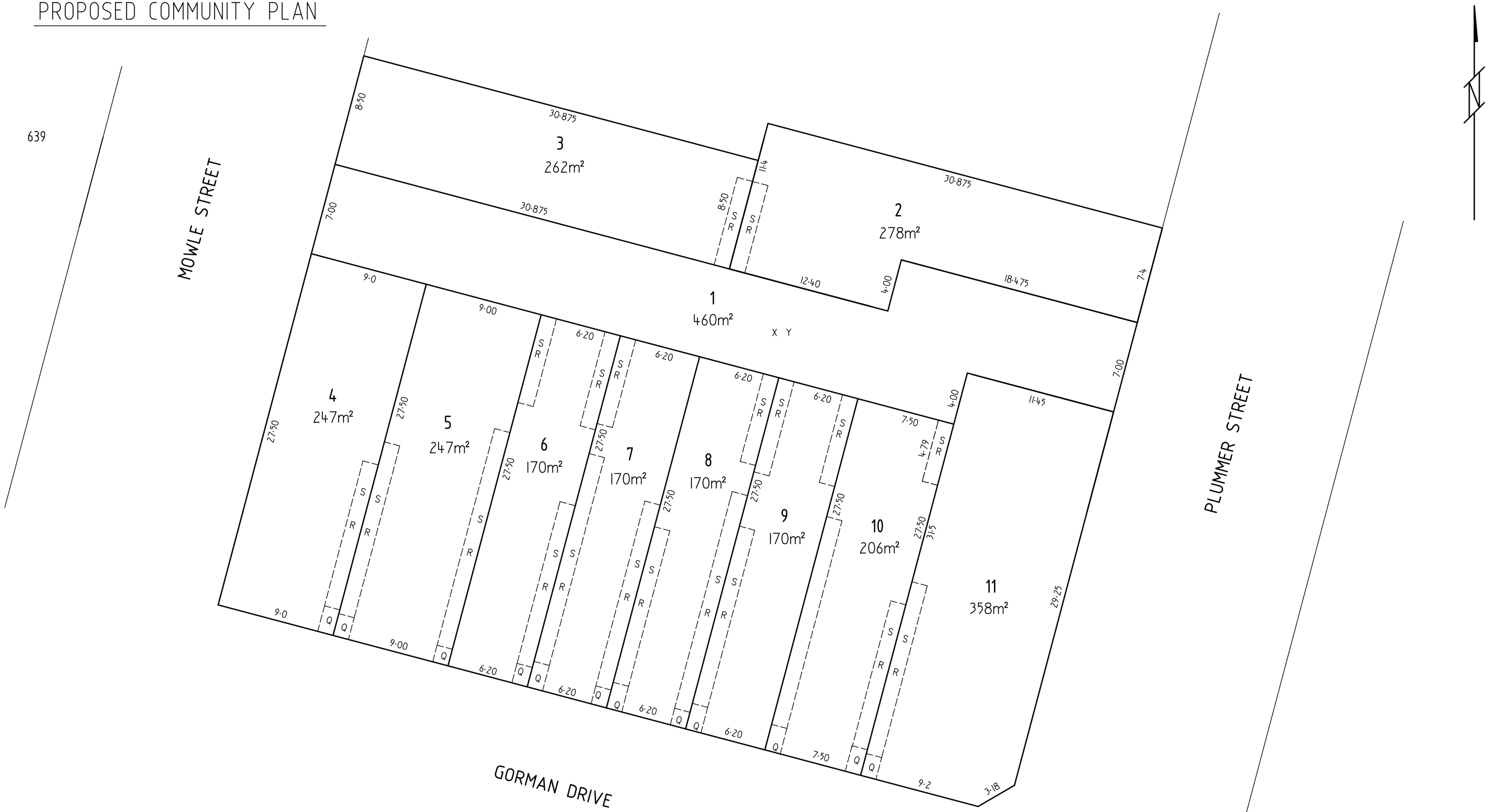
Please do not hesitate to contact us if you have any questions about this advice.

Yours sincerely

Holding Redlich

Holding Redlich

PROPOSED COMMUNITY PLAN



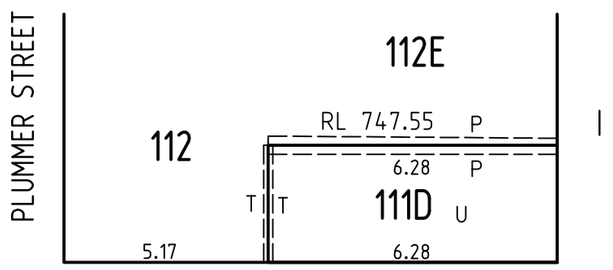
DIMENSIONS ARE APPROXIMATE AND SUBJECT TO
SURVEY AND FINAL DESIGN
EASEMENT LOCATIONS ARE INDICATIVE ONLY AND
THE WIDTH OF EASEMENTS WILL BE DETERMINED AS APPROPRIATE

D STRATUM LOT LIMITED IN HEIGHT TO AHD
E STRATUM LOT LIMITED IN DEPTH TO AHD
P EASEMENT FOR SUPPORT
Q RIGHT OF ACCESS
R EASEMENT FOR REPAIRS
S EASEMENT FOR OVERHANG
T EASEMENT FOR SUPPORT
U EASEMENT FOR SUPPORT
V EASEMENT FOR REPAIRS (LIMITED IN HEIGHT)
W EASEMENT FOR OVERHANG (LIMITED IN HEIGHT)
X EASEMENT FOR DRAINAGE OF WATER
Y EASEMENT FOR SERVICES

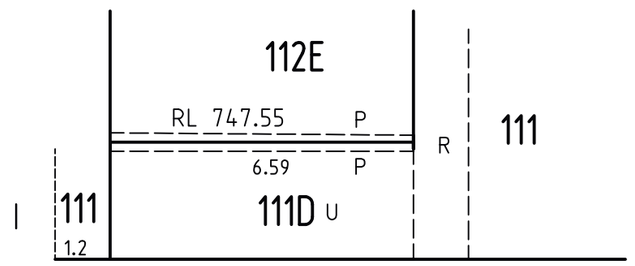
Table of mm

Surveyor: Date of Survey: Surveyor's Ref:	PLAN OF SUBDIVISION OF LOT 5 DP STAGE 3B	LGA: QUEANBEYAN CITY Locality: GOOGONG Subdivision No: Lengths are in metres. Reduction Ratio 1:200	Registered	DP CT1

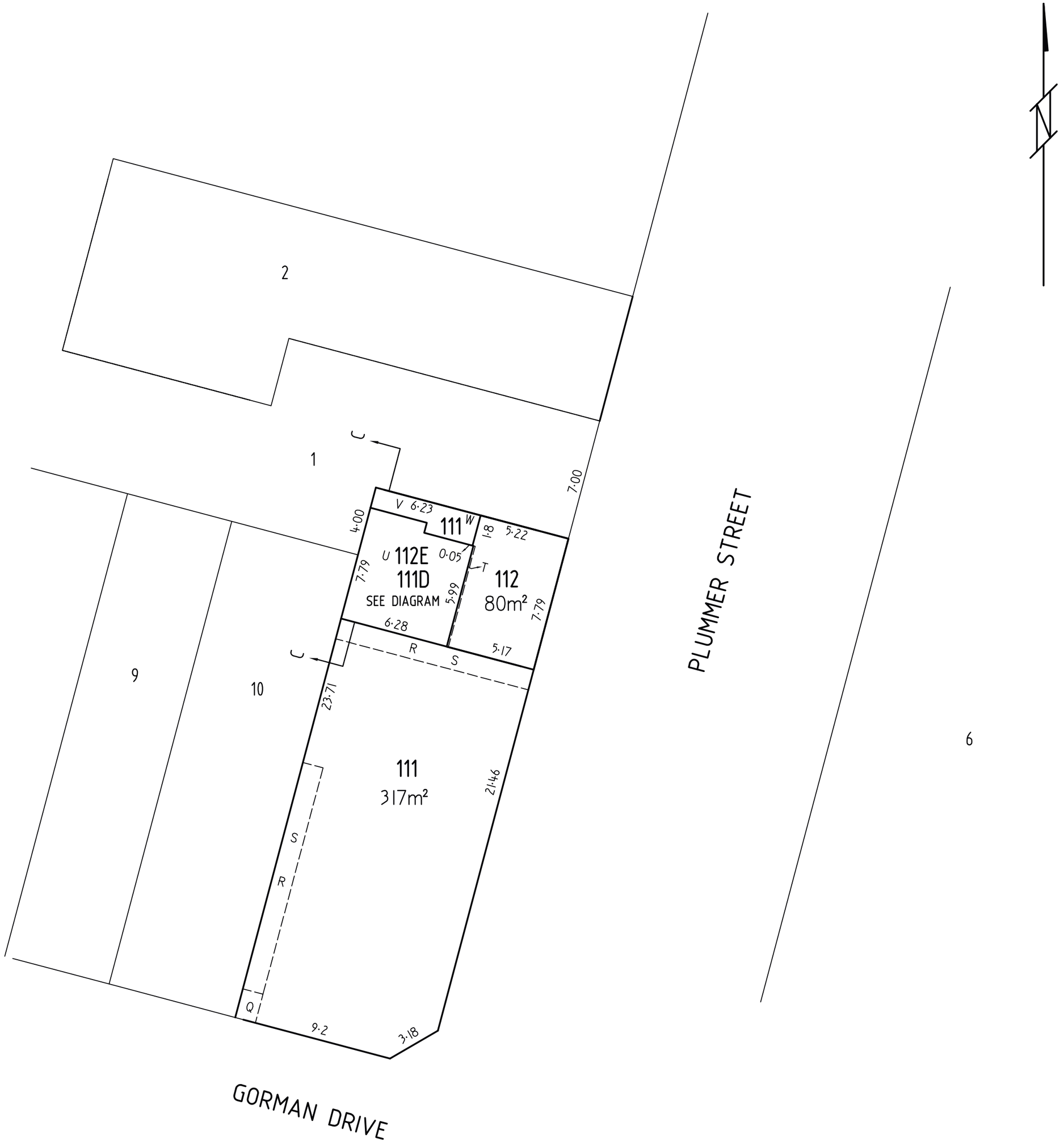
PROPOSED COMMUNITY PLAN OF SUBDIVISION



STRATUM SUBDIVISION ELEVATION DIAGRAM
NOT TO SCALE



STRATUM SUBDIVISION SECTION C-C DIAGRAM
NOT TO SCALE



DIMENSIONS ARE APPROXIMATE AND SUBJECT TO
SURVEY AND FINAL DESIGN
EASEMENT LOCATIONS ARE INDICATIVE ONLY AND
THE WIDTH OF EASEMENTS WILL BE DETERMINED AS APPROPRIATE

D STRATUM LOT LIMITED IN HEIGHT TO AHD
E STRATUM LOT LIMITED IN DEPTH TO AHD
P EASEMENT FOR SUPPORT
Q RIGHT OF ACCESS
R EASEMENT FOR REPAIRS
S EASEMENT FOR OVERHANG
T EASEMENT FOR SUPPORT
U EASEMENT FOR SUPPORT
V EASEMENT FOR REPAIRS (LIMITED IN HEIGHT)
W EASEMENT FOR OVERHANG (LIMITED IN HEIGHT)

Surveyor: Date of Survey: Surveyor's Ref:	PLAN OF PROPOSED SUBDIVISION OF LOT 11 DP CT1	LGA: QUEANBEYAN CITY Locality: GOOGONG Subdivision No: Lengths are in metres. Reduction Ratio 1:200	Registered	DP CT1A

Table of mm

PROPOSED COMMUNITY PLAN SHEET 1

DIMENSIONS ARE APPROXIMATE AND SUBJECT TO SURVEY AND FINAL DESIGN
EASEMENT LOCATIONS ARE INDICATIVE ONLY AND THE WIDTH OF EASEMENTS WILL BE DETERMINED AS APPROPRIATE

Surveyor: Date of Survey: Surveyor's Ref:	PLAN OF SUBDIVISION OF LOT 784 DP STAGE 3B	LGA: QUEANBEYAN CITY Locality: GOOGONG Subdivision No: Lengths are in metres. Reduction Ratio 1:500	Registered	DP CT2

Table of mm

PROPOSED COMMUNITY PLAN SHEET 2

DIMENSIONS ARE APPROXIMATE AND SUBJECT TO SURVEY AND FINAL DESIGN
EASEMENT LOCATIONS ARE INDICATIVE ONLY AND THE WIDTH OF EASEMENTS WILL BE DETERMINED AS APPROPRIATE

Q RIGHT OF ACCESS
R EASEMENT FOR REPAIRS
S EASEMENT FOR OVERHANG
X EASEMENT FOR DRAINAGE OF WATER
Y EASEMENT FOR SERVICES

Surveyor: Date of Survey: Surveyors Ref:	PLAN OF SUBDIVISION OF LOT 784 DP STAGE 3B	LGA: QUEANBEYAN CITY Locality: GOOGONG Subdivision No: Length are in metres Scale 1:300	Registered	DP CT2

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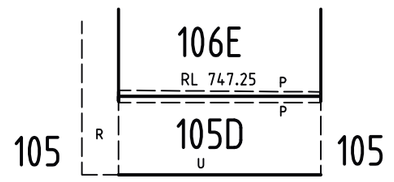
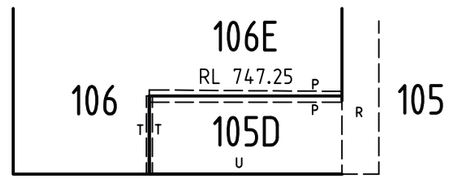
PROPOSED COMMUNITY PLAN OF SUBDIVISION



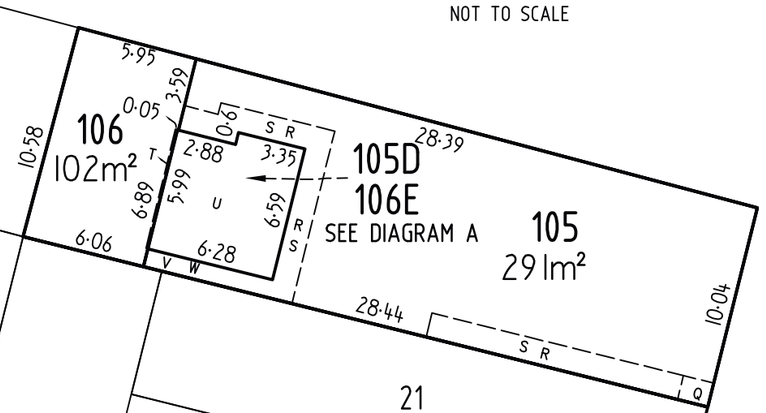


STRATUM SUBDIVISION ELEVATION DIAGRAM A
NOT TO SCALE

STREET 32

23

PLUMMER STREET



23
24
25
26
27
28
29
30
31
32
33
SEE ABOVE RIGHT

1

21
20
19
18
17
16
15
14
13
12
SEE ABOVE RIGHT

CARAGH STREET

DIMENSIONS ARE APPROXIMATE AND SUBJECT TO SURVEY AND FINAL DESIGN
EASEMENT LOCATIONS ARE INDICATIVE ONLY AND THE WIDTH OF EASEMENTS WILL BE DETERMINED AS APPROPRIATE

Q RIGHT OF ACCESS
R EASEMENT FOR REPAIRS
S EASEMENT FOR OVERHANG
X EASEMENT FOR DRAINAGE OF WATER
Y EASEMENT FOR SERVICES

PLUMMER STREET

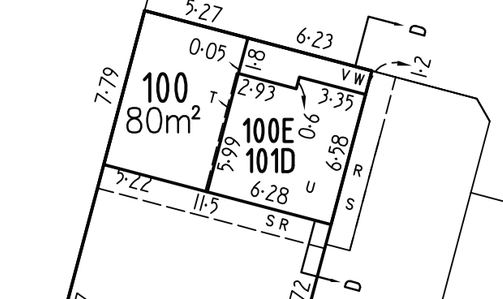
32
SEE BELOW LEFT
33
34
35
36

1

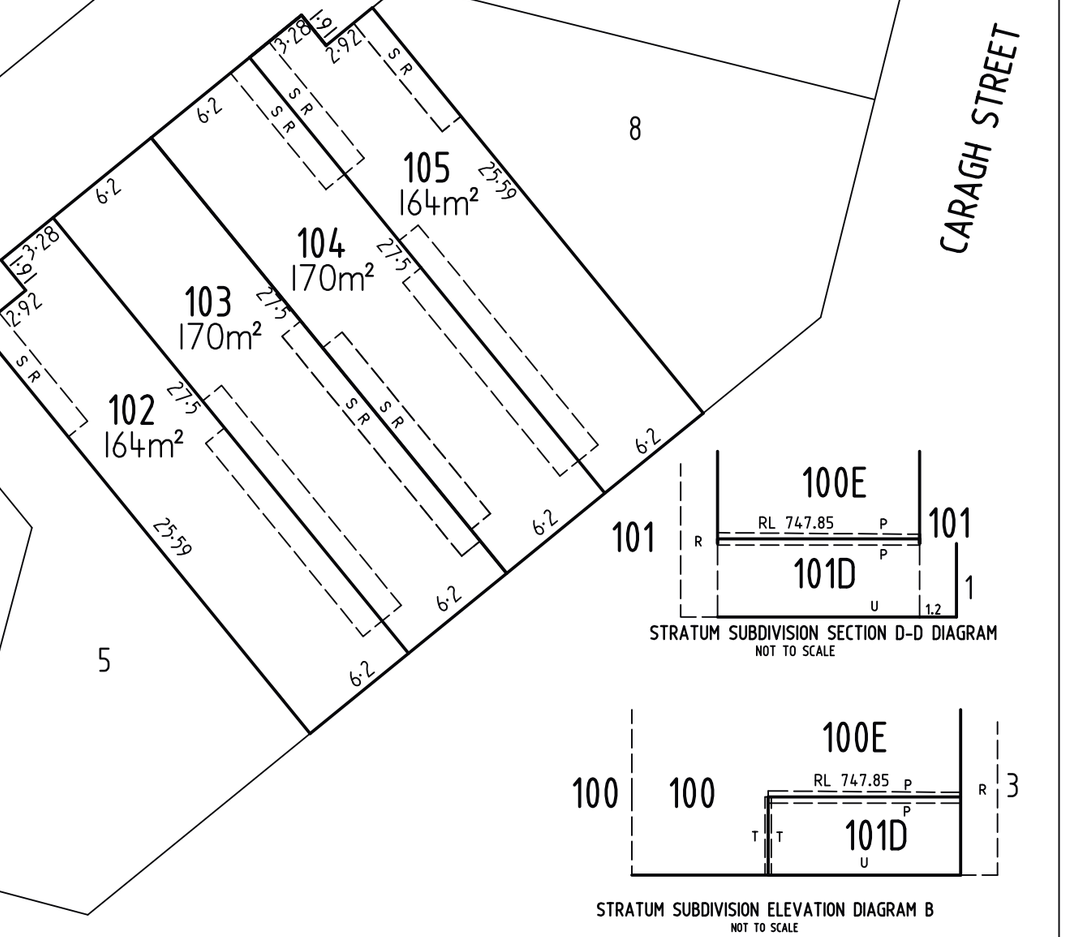
13
SEE BELOW LEFT
12
11
10
9
8

CARAGH STREET

SEE DIAGRAM B



3
4
5



STRATUM SUBDIVISION SECTION D-D DIAGRAM
NOT TO SCALE

STRATUM SUBDIVISION ELEVATION DIAGRAM B
NOT TO SCALE

GORMAN DRIVE

Surveyor: Date of Survey: Surveyors Ref:	PLAN OF PROPOSED SUBDIVISION OF LOT 2, LOT 6, LOT 7 & LOT 22 DP CT2	LGA: QUEANBEYAN CITY Locality: GOOGONG Subdivision No: Length are in metres Scale 1:300	Registered	DP CT2A

Table of mm

PROPOSED COMMUNITY PLAN

DIMENSIONS ARE APPROXIMATE AND SUBJECT TO SURVEY AND FINAL DESIGN

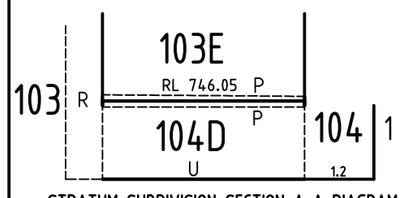
EASEMENT LOCATIONS ARE INDICATIVE ONLY AND THE WIDTH OF EASEMENTS WILL BE DETERMINED AS APPROPRIATE

Q RIGHT OF ACCESS
R EASEMENT FOR REPAIRS
S EASEMENT FOR OVERHANG
X EASEMENT FOR DRAINAGE OF WATER
Y EASEMENT FOR SERVICES

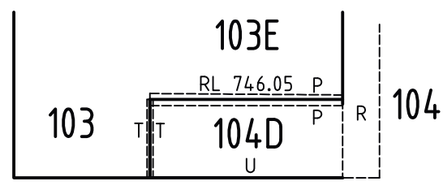
Surveyor: Date of Survey: Surveyor's Ref:	PLAN OF SUBDIVISION OF LOT 782 DP STAGE 3B	LGA: QUEANBEYAN CITY Locality: GOOGONG Subdivision No: Lengths are in metres. Reduction Ratio 1:200	Registered	DP CT3

Table of mm

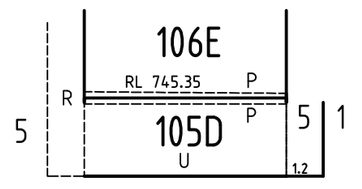
PROPOSED COMMUNITY PLAN OF SUBDIVISION



STRATUM SUBDIVISION SECTION A-A DIAGRAM
NOT TO SCALE



STRATUM SUBDIVISION ELEVATION DIAGRAM C
NOT TO SCALE



STRATUM SUBDIVISION SECTION B-B DIAGRAM
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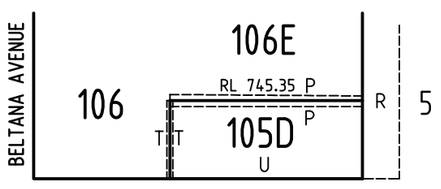


STRATUM SUBDIVISION ELEVATION DIAGRAM B
NOT TO SCALE

STRATUM SUBDIVISION SECTION C-C DIAGRAM
NOT TO SCALE

STRATUM SUBDIVISION ELEVATION DIAGRAM A
NOT TO SCALE

DIMENSIONS ARE APPROXIMATE AND SUBJECT TO SURVEY AND FINAL DESIGN
EASEMENT LOCATIONS ARE INDICATIVE ONLY AND THE WIDTH OF EASEMENTS WILL BE DETERMINED AS APPROPRIATE

Q RIGHT OF ACCESS
R EASEMENT FOR REPAIRS
S EASEMENT FOR OVERHANG
X EASEMENT FOR DRAINAGE OF WATER
Y EASEMENT FOR SERVICES

Surveyor: Date of Survey: Surveyor's Ref:	PLAN OF PROPOSED SUBDIVISION OF LOT 3, LOT 4 & LOT 11 DP CT3	LGA: QUEANBEYAN CITY Locality: GOOGONG Subdivision No: Lengths are in metres. Reduction Ratio 1:200	Registered	DP CT3A

Table of mm

PROPOSED COMMUNITY PLAN

DIMENSIONS ARE APPROXIMATE AND SUBJECT TO
SURVEY AND FINAL DESIGN
EASEMENT LOCATIONS ARE INDICATIVE ONLY AND
THE WIDTH OF EASEMENTS WILL BE DETERMINED AS APPROPRIATE

- D STRATUM LOT LIMITED IN HEIGHT TO AHD
- E STRATUM LOT LIMITED IN DEPTH TO AHD
- P EASEMENT FOR SUPPORT
- Q RIGHT OF ACCESS
- R EASEMENT FOR REPAIRS
- S EASEMENT FOR OVERHANG
- T EASEMENT FOR SUPPORT
- U EASEMENT FOR SUPPORT
- V EASEMENT FOR REPAIRS (LIMITED IN HEIGHT)
- W EASEMENT FOR OVERHANG (LIMITED IN HEIGHT)
- X EASEMENT FOR DRAINAGE OF WATER
- Y EASEMENT FOR SERVICES

Surveyor: Date of Survey: Surveyor's Ref:	PLAN OF SUBDIVISION OF LOT 1 DP STAGE 3B LOT 785 SUBDIVISION	LGA: QUEANBEYAN CITY Locality: GOOGONG Subdivision No: Lengths are in metres. Reduction Ratio 1:300	Registered	DP CT4

Table of mm

PROPOSED COMMUNITY PLAN OF SUBDIVISION

DIMENSIONS ARE APPROXIMATE AND SUBJECT TO SURVEY AND FINAL DESIGN
EASEMENT LOCATIONS ARE INDICATIVE ONLY AND THE WIDTH OF EASEMENTS WILL BE DETERMINED AS APPROPRIATE

- D STRATUM LOT LIMITED IN HEIGHT TO AHD
- E STRATUM LOT LIMITED IN DEPTH TO AHD
- P EASEMENT FOR SUPPORT
- Q RIGHT OF ACCESS
- R EASEMENT FOR REPAIRS
- S EASEMENT FOR OVERHANG
- T EASEMENT FOR SUPPORT
- U EASEMENT FOR SUPPORT
- V EASEMENT FOR REPAIRS (LIMITED IN HEIGHT)
- W EASEMENT FOR OVERHANG (LIMITED IN HEIGHT)
- X EASEMENT FOR DRAINAGE OF WATER
- Y EASEMENT FOR SERVICES

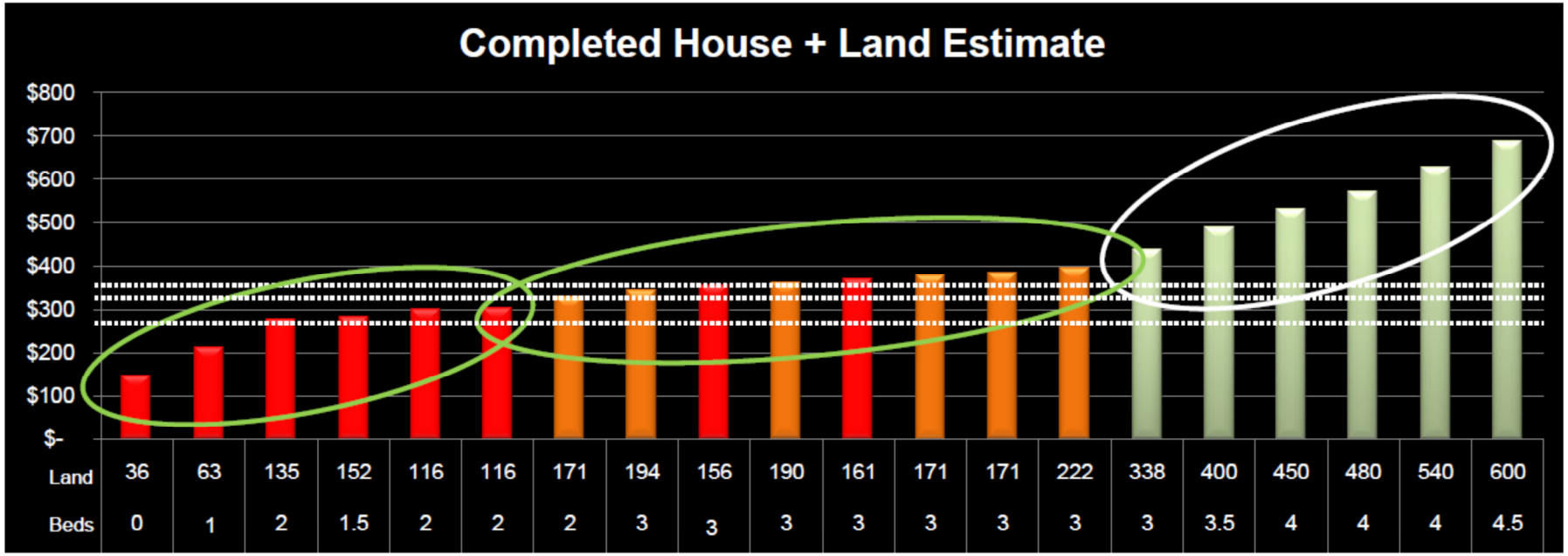
STRATUM SUBDIVISION ELEVATION DIAGRAM
NOT TO SCALE

Surveyor: Date of Survey: Surveyor's Ref:	PLAN OF PROPOSED SUBDIVISION OF LOT 7 & 9 DP CT4	LGA: QUEANBEYAN CITY Locality: GOOGONG Subdivision No: Lengths are in metres. Reduction Ratio 1:300	Registered	DP CT4A

Table of mm

Attachment 3 – Housing Price Points compared to Affordable Housing Thresholds

Aspirations



Greater than 330m2
Less than 330m2 & greater than170m2
Less than 170m2

Affordability Thresholds

3 bedroom - $373,000

2 bedroom - $340,000

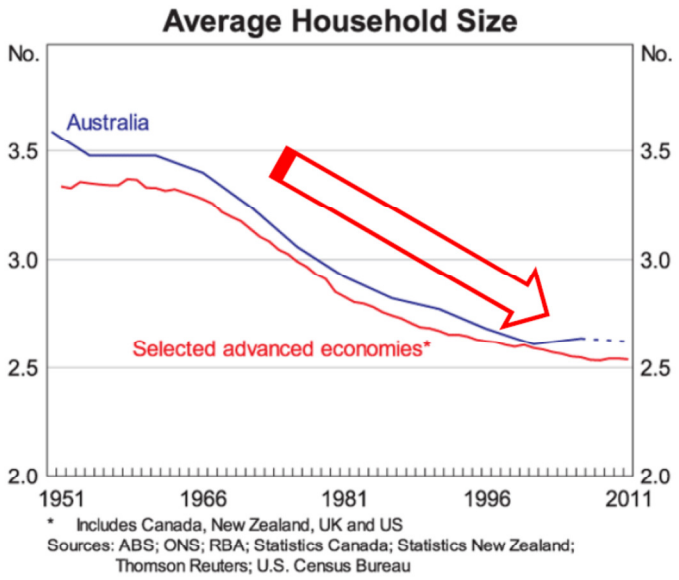
1 bedroom - $290,000

Attachment 4 – Affordability for Average Queanbeyan Households

Challenges - cost

Household size has diminished since 1982 (over 50% now singles & couples)

Home price to income has nearly doubled.



Less people, paying more. Housing less affordable.

Challenges for borrowers

30% x $1,657 = $500 p/w (household)

30% x $ 842 = $250 p/w (single person)