

ATTACHMENT 8 - Applicant's Response to Submissions

29 October 2018

Our Ref: Response to RFI_DA 3652-2017-DA-RS

Ms Lindy Deitz
General Manager
Campbelltown City Council
PO Box 57
Campbelltown NSW 2560

Attention: Ms Emma Page

Dear Ms Deitz,

**RE: DA 3652/2017/DA-RS - RESPONSE TO PUBLIC SUBMISSIONS
PROPERTY: LOTS 8165 DP 1201937, LOT 8166 DP 1201937 AND LOT 8167 DP 1201938,
PASSIFLORA AVENUE, DENHAM COURT**

Reference is made to Campbelltown City Council's (**Council**) email dated 3 October 2018 bringing Stockland's attention to the receipt of public submissions received following the re-exhibition of the above development application (**DA**), as amended.

A formal request under the *Government Information (Public Access) Act 2009* (**GIPA Act**) was made on the 3 October 2018 to obtain copies of the public submissions made in response to the amended DA's re-exhibition. On 26 October 2018, Council forwarded copies of the redacted public submissions received during the exhibition period, which included:

- 22 public submissions in the form of a 'proforma letter' objecting to the proposal, plus a further 3 addendum public submissions
- 2 individual public submissions objecting to the proposal
- a petition objecting to the proposal, containing approximately 50 signatures.

Following community consultation undertaken by Stockland and a review of the public submission received during the re-exhibition period, the following key planning concerns have been identified:

- overdevelopment of the precinct
- dwelling designs not in keeping with the area

- traffic and car parking impacts
- impacts of rental tenancy arrangements.

A response to each of these matters is provided in more detail below for Council's consideration in finalising its own environmental assessment.

Precinct Overdevelopment

As Council would be aware, clause 6.8(2) of *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (**Growth Centres SEPP**) and control 6 of Clause 3.2 of the *Campbelltown Growth Centre Precinct Development Control Plan 2013* (**Growth Centre DCP**) provides that attached dwellings are permissible on land zoned R2 where the land the subject of the proposal:

- is within 400m of land in Zone B2 Local Centre and:
 - adjoins land in Zone SP2 Infrastructure that is set aside for drainage or educational purposes, or
 - is separated from land in Zone SP2 Infrastructure that is set aside for drainage or educational purposes only by a public road

The site is located opposite land zoned SP2 Infrastructure - Local Drainage and is wholly within 400m of land zoned B2 Local Centre. The proposal therefore satisfies the relevant locational criteria for an attached dwelling housing proposal.

In granting consent for a proposal that relies on the provisions of clause 6.8 of the Growth Centres SEPP, Council must also be satisfied that (clause 6.8(3)):


(a) the attached dwellings or multi dwelling housing will not adversely impact on the amenity of any adjoining residential properties, and

(b) the attached dwellings or multi dwelling housing will be designed and orientated to provide active frontages to and surveillance of the public recreation drainage land, and

(c) the attached dwellings or multi dwelling housing will not adversely impact on or limit solar access to adjoining residential or public open space land.

As demonstrated in the Statement of Environmental Effects (**SEE**) submitted with the proposal and Addendum SEE, the proposal does not adversely impact on the amenity of any adjoining residential property and have been orientated and designed to ensure an active frontage is provided to the adjoining SP2 Infrastructure zoned Bonds Creek Riparian Corridor. Further, the design and layout of the ground floor of each dwelling is proposed to contain either the main living or lounge space at the front, ensuring that the natural surveillance of the adjoining Bonds Creek Riparian Corridor is maximised.

The Growth Centres SEPP also nominates a minimum dwelling density of 15 dw/ha for the site. Clause 3.1.1 of the Growth Centre DCP describes the typical characteristics for development within a residential density band of 15-20 dw/ha as being:

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- predominantly a mix of detached dwelling houses, semi-detached dwellings and dual occupancies;
 - focused areas of small lot dwelling houses in high amenity locations
 - mainly suburban streetscapes, with the occasional urban streetscape in accordance with Figure 3-3 of the Growth Centre SEPP.

Both the Growth Centres SEPP and Growth Centre DCP anticipate attached dwelling housing (i.e. small lot dwelling houses) in focused areas of land zoned R2 Low Density Housing with high amenity. These locations would be reasonably characterised as those stipulated by clause 6.8(2) of the Growth Centres SEPP and as outlined above.

Having regard to this, it is noted that residential development surrounding the proposal can be characterised as being predominantly detached dwelling houses and of a 'suburban streetscape', consistent with the typical characteristics of residential development in residential density bands of 15-20 dw/ha.

The proposal does not impact on the typical characteristics of the locality and is limited to focused areas in line with the Growth Centres SEPP and Growth Centre DCP to ensure that the predominant dwelling typology and streetscape form is maintained. The proposal would provide for an 'urban streetscape' and provide for small lot housing, consistent with the Growth Centre DCP.

Currently, a total of 61 Torrens title dwellings are proposed across five vacant lots along Passiflora Avenue, with only 39 dwellings proposed under this DA. The original proposal was split into three applications on the request of Council (i.e. DA3652/2017 (39 dwellings), DA2433/2018 (22 dwellings) and DA2084/2018 (12 dwellings - Wiregrass Avenue). However, Council's renotification letter for DA3652/2017 mistakenly referred to the originally proposed 77 dwellings and six superlots, including the 12 attached dwellings proposed under DA2084/2018 which do not form part of the same Denham Park locality.

Further, it is noted that the superlots are located outside of the flame zone, as incorrectly stated in a number of submission, and the development of a medium density housing proposal in this location would not increase the risk of a bushfire hazard beyond that of a detached dwelling design.

In view of the above, the proposal is not considered to constitute overdevelopment and has been shown to be consistent with the provisions and controls under the Growth Centres SEPP and Growth Centres DCP that both permit and anticipate this form of residential development.

Medium Density Housing Design Quality and Economic Impacts

Willowdale has always had a vision to provide a variety of housing types to create a rich and diverse community. Providing high quality, architecturally designed terrace houses will contribute to this outcome and is consistent with the provisions and controls outlined in the Growth Centres SEPP and Growth Centre DCP.

The design of the proposal has been prepared by an award winning architectural firm to ensure that the design of the attached dwelling houses is in keeping with the high standard of residential housing delivered in the surrounding locality.

The design of the façade provides a consistent rhythm for the entire urban streetscape, with individual dwelling details integrated to provide fine grain changes from dwelling to dwelling. High quality materials have been selected that provide a mixture of brick and lightweight cladding finishes, consistent with the materials and finishes of surrounding detached dwelling houses. The lightweight cladding is a mixture of render, horizontal, and vertical boards. The lightweight fine grain texture is proposed to accentuate the proportion and scale of the façade.

The external colour schemes adopted were chosen to be sympathetic to the local natural bushland setting, with a number of different earthy colours selected and grouped into 2 colour schemes (Blackberry & Eucalyptus).

The architectural form provides a variety of different types of articulation, with a combination of positive and negative built form, varying soffit heights, and awnings provided to each entry. These are then wrapped on corner buildings, providing articulation to both street frontages. All dwellings have maximised glazing, ensuring sufficient natural daylight penetration into bedrooms and living areas, and providing greater connection to the adjacent open space bushland.

Details of the proposed façade treatment and its contribution to creating a vibrant and interesting streetscape are illustrated in the Figures 1 to 3.

Due to the physical borders created by the Bonds Creek Riparian Corridor and the Upper Canal, the locality of the proposed attached dwellings is not readily visible from all locations of the surrounding suburb. The lack of visibility and presence within the suburb also lends itself to not detracting from the residential character of the existing locality or from having a perceived impact on the economic values of existing residential dwellings.

In view of the above and as detailed in the submitted SEE and Addendum SEE, the design and finish of the permissible development is considered to be of a high quality and a standard that does not detract from the quality of detached residential housing previously delivered in the Willowdale estate. Stockland will retain ownership and control of the site until the dwellings are constructed and sold, ensuring that the proposed design outcomes detailed in the submitted architectural and landscaping plans are delivered accordingly.



Source: DKO Architects

Figure 1 Passiflora Avenue Streetscape Photomontage



Source: DKO Architects

Figure 2 Passiflora Avenue Streetscape Photomontage



Source: DKO Architects

Figure 3 Passiflora Avenue Streetscape Photomontage



Traffic and Car Parking Impacts

As demonstrated above, the proposed attached dwelling proposal is permissible with consent and satisfies the relevant provisions and controls stipulated in the Growth Centres SEPP and Growth Centre DCP.

The proposed delivery of a total of 61 residential dwellings under this DA and DA2433/2018 (i.e. 21 dwellings) across five superlots in this location is not considered to represent an overdevelopment of the site nor would it result in an adverse traffic and transport outcome. Consistent with the requirements of the Growth Centre DCP, all 2 and 3 bedroom dwellings are provided with the minimum car parking requirements to ensure that sufficient on-site car parking provisions are provided. Furthermore, the rear-loaded nature of this dwelling typology ensures that no on-street car parking is impacted by driveway crossovers associated with a front-loaded dwelling. This ensures that existing on-street car parking is not impacted and would be maximised for visitors within the locality.

The ability for dwellings to be rear-loaded and benefit from the access provided by Blackthorn Lane and Crowfoot Lane was established in the subdivision design and road layout previously approved by Council under DA 2433/2014. The approved subdivision also permitted the creation of superlots adjacent to an SP2 Infrastructure zone and within 400m of a B2 Local Centre zone and would have anticipated the likelihood they could be developed for attached dwellings.

Due to the subdivision layout approved under DA 2433/2014 and the orientation of existing residential development, the proposed rear-loaded dwellings would not generate any significant conflicts within Crowfoot Lane. Only four dwellings are located opposite on Blackthorn Lane, due to the existing subdivision layout, and the opportunity exists for an alternate path of travel via Ajuga Lane, should any congestion issues arise.

It is acknowledged that this form of development is denser than a single detached dwelling. However, the proposal is permissible with consent in the zone and provides for sufficient and compliant levels of on-site car parking, with no impacts on existing on-street parking provisions. The rear-loaded nature of all dwelling parking ensures that vehicle movements are contained to a low speed environment and will not adversely impact on traffic safety or conditions.

Traffic issues raised are considered to be more applicable to the wider precinct and elevated numbers of construction related vehicles (i.e. builders and trades persons). This is also exacerbated by Pennyroyal Boulevard being the main vehicular connection route for the wider precinct until Denham Court Road is upgraded and Commissioners Drive is extended through to connect. These works are expected to commence at the beginning of 2019 and once complete, will significantly alleviate traffic flows from adjoining residential precincts and provide for key pedestrian and vehicular infrastructure to service the growing community.

The proposal is therefore considered satisfactory and would not result in an adverse traffic and transport outcome.

Tenancy and Living Arrangements

The East Leppington Precinct is envisaged as providing a range of housing types and affordability options that meet the needs of a diverse and growing community. Where development relies on a

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'laneway' for garage access, the Growth Centre DCP also seeks to provide for affordable housing options as a key objective.

A key objective of Stockland's proposal was to provide an alternate housing choice for the growing and diverse Willowdale community. In this respect, the proposed attached dwelling houses offer a different housing choice and affordability option than that predominantly provided for or available.

To reinforce the delivery of housing diversity and affordability, Stockland will be targeting first home buyers, young families and downsizers though the future dwellings would be open to any purchaser. Where a future purchaser chose to rent their property, each dwelling incorporates a low-maintenance landscape design to ensure the Passiflora Avenue streetscape retains its high quality outlook. The front façade of dwellings has also been designed to minimise the potential for untidy practices that would otherwise detract from the streetscape quality.

To infer that a medium density dwelling typology would result in new community members that do not value the environment or that would not cohesively integrate with the family ethos of the immediate locality is not considered relevant in a planning context.

Having regard to the above, it is considered that the concerns raised by the community do not warrant any amendments to the proposal. Should Council remained concerned about any aspect of the development raised within its correspondence, this would be capable of being dealt with by conditions of consent.

Should you not understand any information provided to date please contact Peter McManus of GLN Planning.

Yours faithfully

GLN PLANNING PTY LTD



**PETER MCMANUS
SENIOR PLANNER**