

6 April 2011

Diane Cuthbert
Executive Manager Environmental Standards
Fairfield City Council
PO Box 21
FAIRFIELD NSW 1860

Dear Diane,

Re Council Resolution – Modification to Amend Stage 3 of Masterplan (MP06_0046 MOD 3)

On behalf of Bonnyrigg Partnerships, we wish to respond to the matters raised by Council in their correspondence dated 4 April 2011.

It is our view that the concerns raised by Council have already been thoroughly addressed by Bonnyrigg Partnerships through:

- Verbal discussions with Council officers at various meetings during the pre-lodgement and post-lodgement phases of the Section 75W application and Stage 3 development application (including 22 October 2010, 1 March 2011, 16 March 2011 and 24 March 2011).
- Correspondence sent to Council by Urbis on 14 March 2011 outlining the background to the proposed modifications and addressing the matters raised in Council's report to the Outcomes Committee meeting on 8 March 2011.
- A comprehensive Councillor briefing and presentation session held at Council's offices on 29 March 2011, including accompanying handouts that benchmark the current proposal against Stages 1 and 2 (copies attached).

This letter provides a consolidated response to each of the matters listed by Council in Part A of their correspondence, including the previous responses already provided in the points outlined above. These responses are outlined in detail within the main body of this letter and as summarised below:

- The Section 75W application has been prepared on a clear rationale, including improving affordability, responding to market demand, enhancing the streetscape and improving environmental performance compared to the approved Concept Plan.
- Each of the concerns raised by Council with regard to the proposed compact lots and walk-up apartments has been thoroughly addressed, clearly demonstrating that the proposed modifications will result in an improvement to the current Concept Plan.
- There is no increase to dwelling numbers or dwelling density and accordingly, there is no change to the outcomes of the studies that underpin the original Concept Plan approval and no need to amend the public benefits included within the Voluntary Planning Agreement.
- Consultation regarding the proposed changes to the Bonnyrigg Masterplan and the Stage 3 DA has already been undertaken with the broader community in November 2010, with significant support for the introduction of more traditional housing products to replace the plex-style dwellings. This consultation was in addition to Council's three week public exhibition period (January to February 2011) from which no submissions were received.

Based on the thorough responses to each of Council's issues, withdrawal of the Section 75W application as requested by Council is not warranted or appropriate. Bonnyrigg Partnerships remains committed to working with all stakeholders, including Council, and is willing to include additional

provisions within the Bonnyrigg Masterplan to address Council's concerns and ensure the appropriate location of the proposed compact lots and neighbourhood apartment buildings within any future stages of the planned renewal.

We look forward to working with the Department of Planning and Fairfield City Council to resolve the Section 75W application and facilitate the timely determination of the Stage 3 DA and the delivery of the Stage 3 dwellings.

1 Response to Part A

1.1 CLEAR RATIONALE FOR SECTION 75W APPLICATION

The applicant has lodged a Section 75W application to increase the variety of dwelling types permitted by way of the Bonnyrigg Masterplan. The proposed amendments have not been prepared in an 'ad hoc manner'. Rather, the proposed amendments have been prepared based on a clear rationale to achieve the following key objectives:

- **Improve affordability** – a target price point has been set to guide an improvement in the affordability profile of future dwellings (refer to **Figure 1**). In order to improve affordability, it is proposed to incorporate compact lots for detached and 2-attached dwellings which will still achieve the residential amenity controls outlined in the Bonnyrigg Masterplan but at a more desirable price point (refer to **Figure 2**). The key objective of improving affordability is to encourage an increased share of owner-occupiers within the dwellings to be made available for private sale (refer to **Figure 3**) and facilitate a more stable and sustainable population.

FIGURE 1 – TARGET PRICE POINT

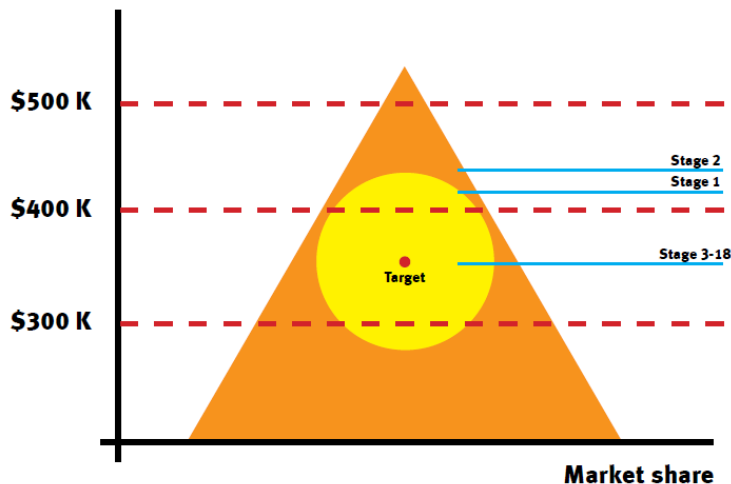


FIGURE 2 – AFFORDABILITY PROFILE

	Original Proposal 2006	Stage1 2009	Stage2 2010	Stage3 2011
4 Bed Detached	\$550k	\$495k	\$485k	\$480k
3 Bed Detached	\$465k	\$465k	\$445k	\$435k
3 Bed Duplex	\$420k	\$420k	\$420k	\$385k
2 Bed Plex	\$365k	\$325k	\$320k	N/A
Garden Apartment	N/A	N/A	N/A	\$305k

FIGURE 3 – PURCHASER PROFILE BY STAGE

	Stage 1 106 Dwellings	Stage 2 104 Dwellings	Stage 3 (Half sold) 159 Dwellings
Owner occupiers	25%	20%	60%
Investors	37%	42%	5%
Community tenants	38%	38%	35%
Total	100%	100%	100%

- **Respond to market demand** – the preliminary market research undertaken prior to the lodgement of the Concept Plan application indicated a preference for a more ‘suburban’ style dwelling and as such, it was proposed to accommodate the required residential densities primarily within plex-style dwellings. However, these dwellings have proven to be difficult to sell during Stage 1. A more ‘traditional’ building typology is required to better meet the demands of the local market, while maintaining the required dwelling densities in accordance with the Concept Plan. As such, it is proposed to introduce walk-up apartments in lieu of the 4 and 6 attached plex-style dwellings within Stage 3.
- **Improve streetscape and privacy** – the fencing treatments required to achieve satisfactory levels of privacy for the plex dwellings with primary open space in the front setback have resulted in a varied streetscape (refer to **Figure 4**). It is considered desirable to avoid reiteration of this in future stages by providing private open space to the rear of ground level dwellings. Where front fencing is required, it will be replaced with ‘superslat fencing’ which is of a high quality finish and will provide for additional privacy, while maintaining appropriate levels of visual permeability (refer to **Figure 5**).

FIGURE 4 – FENCING IN FRONT SETBACK OF PLEX-STYLE DWELLING IN (STAGE 1)



FIGURE 5 – SUPERSLAT FENCING

The plex-style dwellings have also proven to be difficult with regard to locating car parking so that it provides for appropriate security, while also avoiding detrimental impacts on the streetscape. This can generally be achieved by locating garages in small streets or car courts, however, there has been some resistance to this layout, due to the perceived risk of promoting crime and anti-social behaviour. Further, in some cases, garages have been required to be located on the primary access roads as the retention of the existing road layout did not allow for an alternate solution (refer to **Figure 6**).

FIGURE 6 – GARAGES IN SMALL STREETS (STAGE 1)

- **Enhance solar access and environmental performance** – it has proven challenging to achieve satisfactory levels of solar amenity and natural ventilation for each of the dwellings within the 4-attached plexes, while retaining the existing road layout (and site orientation) within the renewed estate. It was recognised that this challenge will be progressively more difficult to overcome with the higher density associated with the 6- and 8-attached plexes and the increased number of individual dwellings that will have a less optimal orientation. This can be seen in the following diagram (refer to **Figure 7**) where at least two and possibly four of the dwellings within an 8-attached plexes are likely to result in a failure to achieve adequate solar access.

FIGURE 7 – TYPICAL LAYOUT FOR 8 ATTACHED DWELLING



The bid scheme included 5 x 6-attached plex dwellings within Stage 3 (refer to **Figure 8**) to enable the indicative dwelling yield to be achieved. It also included a number of 4-attached plexes which required car courts to be provided, having regard to their location along Edensor Road. It is considered necessary to replace these dwellings with a new building typology (eg walk-up apartments) to maintain the approved dwelling density, while improving solar access and environmental performance of individual dwellings.

FIGURE 8 – STAGE 3 OF APPROVED BID SCHEME (2006, UPDATED IN 2009)



1.2 COMPACT LOTS AND WALK UP APARTMENTS

We have reviewed each of the matters raised by Fairfield City Council in the report presented to the Outcomes Committee meeting on 22 March 2011 with regard to the proposed compact lots. Each of these matters is addressed below:

- **There is no increase in dwelling density across the estate**

The proposed compact lots and neighbourhood apartments can be accommodated in accordance with the 2,332 dwellings approved by the original Concept Plan approval. The Land Use Map, Indicative Staging Plan and Bonnyrigg Masterplan that form part of the Concept Plan approval include density spread across the 82 hectare site. While the lifted apartments were limited to two locations within the western part of the site in close proximity to the town centre, it was always envisaged that the 4, 6 and 8 plex dwellings (mainly located at street corners) would enable higher densities to be achieved across the eastern portion of the site.

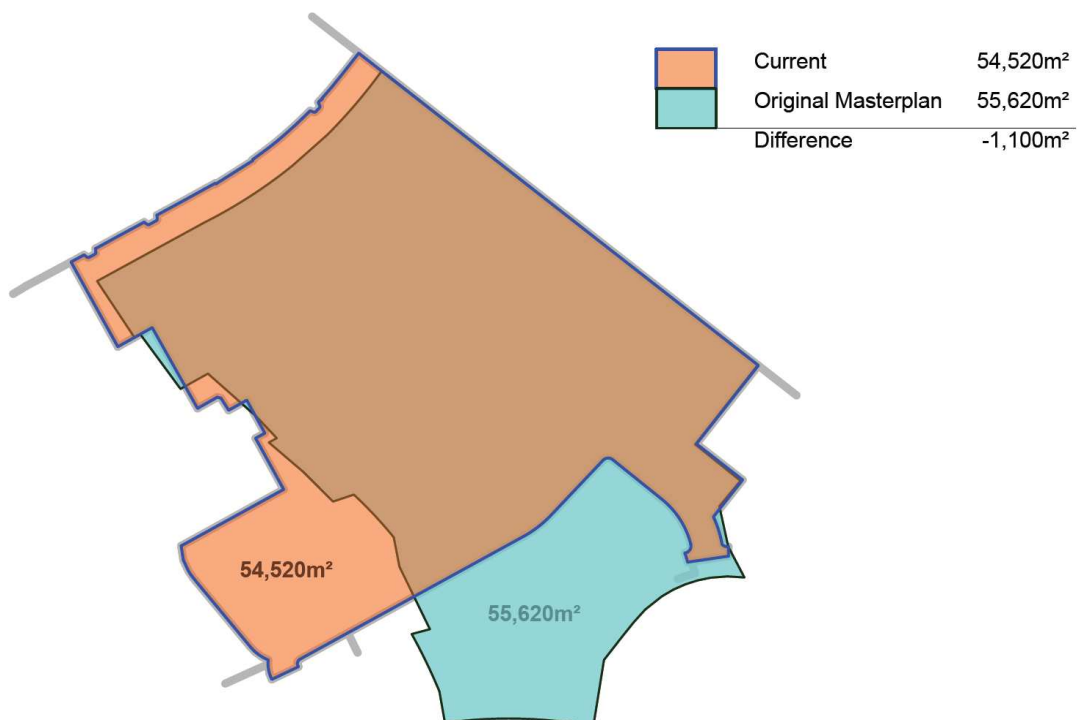
The current proposal seeks only to provide an alternate approach to achieving the same dwelling density across the estate, albeit in a different building typology. The compact lots and neighbourhood apartment buildings will allow for the replacement of plex dwellings with a more traditional building typology.

- **There is no substantive change to the dwelling density for Stage 3**

The Concept Plan approval recognised that the detailed design phase for each of the subsequent development applications could result in modifications to both the staging boundaries and the dwelling yields on a stage-by-stage basis. The approved Indicative Staging Plan includes both indicative staging boundaries and indicative dwelling yields for each stage. While the staging boundaries were not amended as part of Stage 2, the indicative dwelling yield of 110 dwellings was not achieved, with a 'shortfall' of four dwellings.

The Stage 3 development application seeks to vary from the indicative staging boundary shown on the Indicative Staging Plan. The proposed modification is required to provide an interface between Stage 3 and public open space, addressing the locational requirements for neighbourhood apartments in accordance with the amended Masterplan. However, the proposed modification to the staging boundary will result in only a minor change to the original area of this stage, as demonstrated in **Figure 9**.

FIGURE 9 – STAGE 3 BOUNDARY (CURRENT AND PROPOSED)



The indicative yield is not proposed to change significantly in Stage 3, 159 dwellings are proposed compared to the approved indicative dwelling yield of 160 dwellings. As such, there will be only a minor change to the dwelling density for Stage 3. The average dwelling density across Stages 1-3 will be maintained as shown in the following diagram and table.

FIGURE 10 – DWELLING DENSITY IN STAGES 1-3 (ORIGINAL AND CURRENT PROPOSAL)



	APPROVED			ACHIEVED/PROPOSED		
STAGE	DWELLINGS	AREA	DENSITY	DWELLINGS	AREA	DENSITY
1	106	4.03	26.3	106	3.82	27.7
2	110	3.54	31.1	104	3.53	29.5
3	160	5.4	29.6	159	5.28	30.1
TOTAL	376	12.97	29 (average)	369	12.63	29 (average)

It is expected that the minor changes to the dwelling density on a stage-by-stage basis will continue throughout the subsequent stages of the project as the detailed design phase for each development application is completed. However, the Concept Plan approval provides an absolute limit on the total number of dwellings across the estate, controlling the overall dwelling density across the estate. This is not proposed to change as a result of the current application, as outlined in the previous point.

▪ **There is no impact on the delivery of varied dwelling typologies**

The proposed neighbourhood apartment buildings will result in a number of significant benefits over the currently approved plex dwellings, including:

- Locating the approved dwelling density within areas that benefit from higher levels of amenity, adjacent to public open space.
- Improved environmental performance for individual dwellings, including better solar access, cross flow and natural ventilation.
- Increased on-street car parking adjacent to public open space, with centralised car parking and shared driveways reducing the number of potential vehicle crossovers.

While the building typology is proposed to change, the design requirements for the plex dwellings were modelled on the provisions of State Environmental Planning Policy No 65 – Design Quality of

Residential Flat Buildings. The commonalities between the plex dwellings and the proposed apartment dwellings include:

- Areas and dimensions of rooms.
- Number of bedrooms.
- Internal storage.
- Private open space (ground level courtyards and upper level balconies).
- Solar access (external and internal living areas).

The above matters are of particular relevance having regard to the matters raised by Council with regard to the appropriateness of walk-up apartments within a suburban location and a perceived risk of increased neighbourhood conflicts and/or anti-social behaviour. In response, we make the following points:

- The proposed apartment building has been designed in accordance with Safer by Design and Crime Prevention Through Environmental Design principles, including clear sightlines, avoiding areas of concealment, appropriate levels of internal and external lighting and the like. Further, back-to-base CCTV will be provided in the common stairwells, which will be monitored from the Newleaf Communities office on a 24 hour, 7 day basis.
- The number of dwellings proposed to be accessed from the ground level entries is not proposed to increase. The plex dwellings include up to four upper level apartments being accessed from a single entry point. The proposed apartment building includes a maximum of four upper level dwellings (two dwellings per level) being accessed from a communal staircase.
- The proposed apartment building will accommodate 22 dwellings, comprising 10 dwellings for private sale and 12 dwellings for social housing. The privately owned apartments will be subject to strata management through the appointed Body Corporate, while the social housing dwellings will be managed by St George Community Housing (SGCH) until 2037 in accordance with the Public-Private Partnership. Key points to understand with regard to the SGCH management approach are listed below:
 - The local allocation strategy will ensure a sustainable social mix of tenants in each apartment complex, avoiding concentrations of high and complex needs families/individuals.
 - Bonnyrigg has a much lower percentage of tenants on the estate with multiple complex needs (such as mental health, drug and alcohol issues). These needs may be more common in social housing allocations to walk-up apartments at other estates.
 - SGCH manages and delivers Housing Plus and Education Bursary Programs which provide tenants with opportunities for products and services as well as education and training to enhance employment outcomes and address multi-generational unemployment.

Overall, it is noted that the proposed modification to the Concept Plan seeks to simply transfer the dwellings within the plex buildings into a more traditional building format.

▪ **There are no changes to the predominant building heights**

The built form character described in the Bonnyrigg Masterplan is to comprise a predominant building height of two storeys, with three storey elements in certain locations, including areas adjacent to public open space and termination of certain streets.

The proposed modification is considered to be generally consistent with this approach, with the three storey neighbourhood apartments proposed to be accommodated in areas in close proximity to public open space. The Section 75W application includes some minor re-wording of the built form character statement on page 67 of the Masterplan to accommodate the new building typology, however, the underlying principles have been retained.

We have also addressed each of the specific matters raised by the Joint Regional Planning Panel (JRPP) and Fairfield City Council with regard to the proposed reduction in the minimum lot widths. Each of these matters is addressed on the following pages.

Response to Matters Raised by Joint Regional Planning Panel

▪ **Landscape character**

The Stage 3 development provides for increased landscaping within the front setback (private domain) and along the street edge (public domain) through pairing crossovers for duplexes and reducing the number of crossovers per dwelling to provide additional landscaped areas.

A comparison of the private and public domain tree planting proposed within the development applications for Stages 2 and 3 is provided in the following table:

TREES	STAGE 2	STAGE 3
Street Trees	0.95/dwelling	0.85/dwelling
Front Yard Trees	0/dwelling	0.86/dwelling

(note: figures on both stages exclude the Edensor Road Dwellings)

▪ **Streetscape – garages**

The proposed architecture has carefully considered the impact of built form on the street and specifically addressed the potential visual impact of garages on the streetscape. Each of the dwellings proposed within Stage 3 has incorporated the fundamental form elements outlined in Part 3 - Built Form Character of the Masterplan and is fully compliant with the streetscape garage design controls in Part 5 – Private Realm Guidelines.

The compact lot and duplex home designs each have garages set back a minimum of 5.5 metres from the front property boundary in accordance with the Bonnyrigg Masterplan. Further, the upper level articulation hangs over the garage between 1.31 metres and 2.28 metres to create depth to the front facade and further minimise the affect of garaging on the streetscape (refer to **Figure 11** and **Figure 12**).

FIGURE 11 – DETACHED DWELLING ON COMPACT LOT



FIGURE 12 – 2-ATTACHED DWELLING ON COMPACT LOT



▪ **Homogeneity**

The Section 75W application and Stage 3 development application seek to introduce additional dwelling typologies, providing greater diversity in built form and increased housing choice for future residents. However, Stage 3 should not be considered in isolation - the overarching principles of the Bonnyrigg Masterplan are to provide a diversity of housing across the entire estate. It is anticipated that the delivery of housing types will change on a stage-by-stage basis, taking into account a range of issues, including proximity to the town centre, public transport and public open space, market demands and the like. Each of the stages to date can be described as follows:

- Stage 1 included a greater proportion of plex-style dwellings, including 48 x 4-attached and 24 x 3-attached dwellings (comprising 68% of the 106 dwellings).
- Stage 2 provided a mixture of detached and attached dwellings, as well as introducing row housing.
- Stage 3 proposes to include walk-up apartments and detached and attached housing in both a compact and wider format.

The wider format housing product will generally be located on the southern side of the street, while the 'new' compact lots will be located on the northern side of the street, which benefit from north facing rear yards. This can be seen in the proposed Stage 3 layout/subdivision plan and dwelling mix (refer to **Figure 13**).

The streetscape treatments will ensure that the proposed detached and attached dwellings will provide an appropriately varied and attractive streetscape (refer to **Figure 14**). Further the proposed walk-up apartments will provide a new housing type while maintaining the existing built form and scale (refer to **Figure 15** and **Figure 16**).

FIGURE 13 – STAGE 3 LAYOUT/SUBDIVISION PLAN

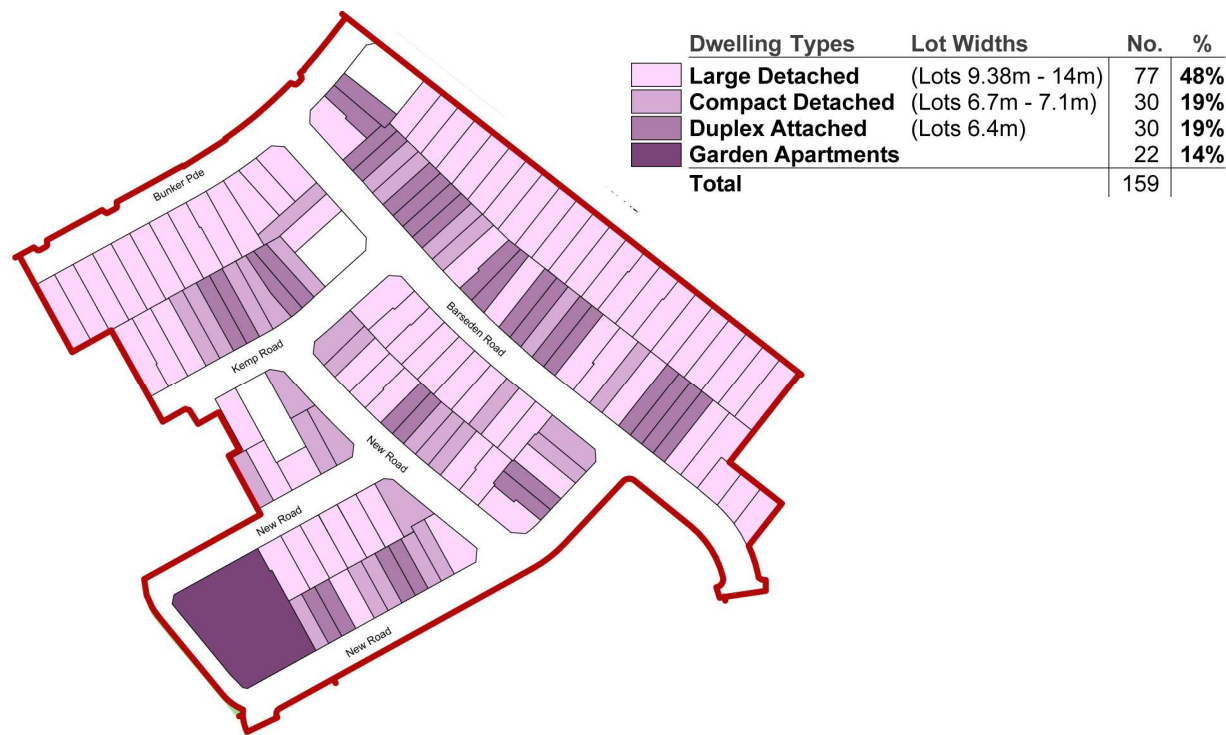


FIGURE 14 – STAGE 3 PROPOSED STREETSCAPE – DETACHED AND ATTACHED DWELLING



FIGURE 15 – STAGE 3 PROPOSED STREETSCAPE – WALK-UP APARTMENTS (SOUTHERN ELEVATION)



FIGURE 16 – STAGE 3 PROPOSED STREETScape – WALK-UP APARTMENTS (WESTERN ELEVATION)



Response to Matters Raised by Fairfield City Council

▪ **Streetscape**

The issues raised with regard to streetscape have already been addressed in response to the feedback provided by the JRPP.

▪ **Privacy**

The proposed variation to the original zero lot line requirement is specifically designed to enhance the privacy of dwellings and promote the efficient use of open space.

Zero lot lines are generally provided on the southern or western side of the dwelling, improving the environmental performance of the dwelling and minimising overlooking and acoustic impacts of adjoining dwellings and open space. Upper level windows have generally been placed to avoid overlooking of open space. Where upper level windows are required that are directed towards adjoining private open space, these windows have been designed to avoid overlooking through high level sills and/or privacy screening.

▪ **Solar access/overshadowing**

The proposed subdivision layout and dwellings within Stage 3 have been specifically designed to optimise solar access and minimise overshadowing of adjoining properties.

Large lots are generally provided with a northern orientation to the street so that solar access is maximised in the rear yard. Compact lots and duplex lots are generally provided with a southern orientation to the street, enabling maximum solar amenity to be achieved within north facing rear yards. This is a significant improvement compared to the plex product which had to be situated in prescribed locations and orientation with less than full compliance with the solar access provisions.

The proposed apartment building has been designed to provide improved cross-flow ventilation by achieving through-apartments with two balconies, providing for solar access to the north and natural surveillance of the local road network and open space to the south. All ground level dwellings are provided with well designed private open space.

▪ **Landscaping**

The issues raised with regard to landscaping have already been addressed in response to the feedback provided by the JRPP (refer to page 9).

- **Private open space**

The proposed dwellings will comply with, and in most cases substantially exceed, the private open space requirements as outlined in the Statement of Environmental Effects lodged with the Stage 3 development application.

- **Increase in dwelling yield**

This issue has been addressed previously, having regard to the similar comments made by Council with regard to the introduction of the neighbourhood apartments. There is no increase in dwelling yield or density as a result of the proposed introduction of the compact lots.

- **DCP for Narrow Lots**

While the Section 75W application included a brief reference to Council's existing DCP for narrow lots, it is considered that the proposed reduction in lot widths should be considered on its own merits (and as previously discussed). However, we note that the holistic site planning for the renewal of the estate does enable reduced lot widths to be provided in a manner which addresses streetscape, private open space, landscaping and each of the other matters identified within Council's correspondence.

Subsequent to the above report to the Outcomes Committee, we were also made aware of potential concerns raised by Councillors regarding the potential impact of the compact lots on the amount of on-street car parking that can be achieved within Stage 3 (and future stages). In order to address Council's concerns, we undertook a comparison review of the on-street car parking within Stages 1, 2 and 3 and a survey of the actual on-street car parking demand for Stage 1, which is now fully occupied.

Diagrams indicating the capacity of each stage to accommodate on-street car parking are provided as **Figure 17**, **Figure 18** and **Figure 19**. The average amount of on-street car parking will vary from stage to stage, having regard to the retention of the existing local roads and the delivery of new roads. It is clearly evident that the proposed introduction of the compact lots and walk-up apartments will not result in a reduction in the amount of car parking, taking into account:

- Reduced lot widths being achieved only on the north facing side of the street which benefit from optimal solar access.
- Provision of shared vehicle crossings for the 2-attached dwellings to enable a car parking space to be provided between neighbouring driveways.
- Opportunity to increase on-street car parking around the walk-up apartments due to the provision of common vehicle entrances and reduced crossovers compared to the plex-style format.

A car parking survey was also undertaken at various peak times (weeknights and Saturday mornings) to assess the actual demand for on-street car parking within Stage 1. The diagram in **Figure 20** clearly demonstrates that the actual demand for on-street or visitor car parking is approximately 50% of the available spaces and there is no impact on the function of these roads arising from on-street car parking, including access for emergency and/or refuse vehicles.

Overall, it is considered that each of the issues raised by Council regarding the compact lots and walk-up apartments, have been satisfactorily addressed and that the proposed additional housing types are entirely appropriate, both within Stage 3 and the future stages of the planned renewal.

FIGURE 17 – ON-STREET CAR PARKING SPACES (STAGE 1)

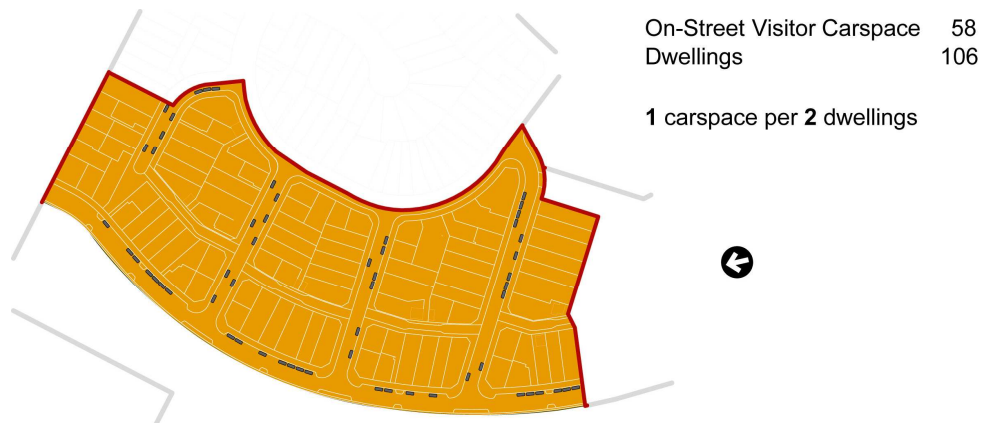
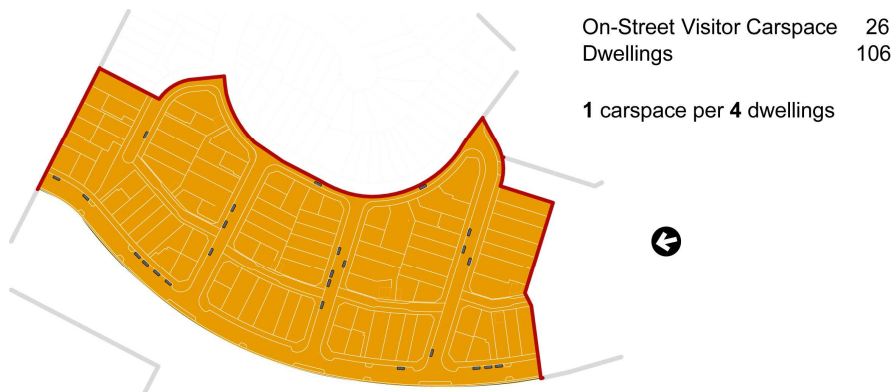


FIGURE 18 – ON-STREET CAR PARKING SPACES (STAGE 2)



FIGURE 19 – ON-STREET CAR PARKING SPACES (STAGE 3)



FIGURE 20 – CAR PARKING DEMAND SURVEY (STAGE 1)

1.3 NO INCREASE IN DWELLING DENSITY

The diagram and table presented as **Figure 10** satisfactorily demonstrated that there will be no change to the overall dwelling yield or dwelling densities as a result of the Section 75W modification or the Stage 3 development application. On this basis, there is no change to the residential population and no implications for the associated components of the VPA and/or ISDP.

While the proposed road layout for Stage 3 has amended slightly, the 'public benefits' were limited to the upgrade of the collector roads and the 50% share of local roads adjacent to public open space. The development application does not propose any changes to either of these matters and as such, there are no implications for the VPA and/or ISDP.

1.4 COMMUNITY CONSULTATION

Prior to the lodgement of the Section 75W application and Stage 3 development application, Newleaf Communities (on behalf of Bonnyrigg Partnerships) undertook consultation with existing residents and other key stakeholders. The consultation programme was undertaken between Friday 12 November 2010 and Tuesday 23 November 2010, with approximately 140 participants across each of the consultation sessions.

45 people attended the two main consultation days which were held on Friday 12 November 2001 and Saturday 13 November 2010. These days were open to the general public, with invitations issued via email and letters to the Community Reference Group, Bonnyrigg Partnerships Tenancy Group, Safety Community Committee and Private Owners Group. Flyers translated into the primary community languages (English, Vietnamese, Assyrian, Arabic, Lao and Khmer) were delivered to the entire estate, including all social and private dwellings.

An additional 95 people participated in the small-scale consultations, which included the community kitchen, yoga class, knitting group, the Bonnyrigg Public School playgroup and the Khmer, Spanish, Vietnamese, Arabic and Assyrian coffee sessions. The small-scale consultations involved residents being notified in their own language (Vietnamese, Arabic Assyrian, Arabic, Lao and Khmer) during the Community Language Ring Arouns and coffee sessions. Consultations were also conducted during these coffee sessions. Each of the Newleaf Groups was notified via word of mouth and letters. Staff also visited organised groups such as the knitting group, community kitchen etc and conducted small scale consultations.

The feedback arising from the community consultation is fully detailed in the comments register prepared during the community consultation (copy attached). The three most common comments are provided below:

1. *The bathrooms and toilets that did not have a window needed a window.*

Residents were concerned about wasting energy by having the ventilation fan on while in the bathroom or toilet. They asked for windows to be provided on zero lot line walls commenting that there were ways to ensure privacy including non see-through glass or curtains.

2. We are happy to see detached style and duplex style homes.

Many residents were pleased that their comments had been taken into consideration and that the plexes and under/overs were no longer in the Stage 3 plans (they expressed dislike for these two styles). While some believed that the zero lot property line was not ideal and would prefer more space between the houses, residents said that they would settle for the zero lot lines if it meant they could have a detached home.

3. The shower over bath and lack of shower down stairs is problematic for people with mobility issues.

Those that expressed concern valued the downstairs bedroom (particularly for elderly relatives) but asked for a shower to be provided downstairs.

Further to the above, it is understood that the development application (including the Statement of Environmental Effects which references the Section 75W application) was publicly exhibited by Fairfield City Council between January 2011 and February 2011 and **no submissions were received**.

2 Response to Part B

2.1 CURRENT PROPOSED MODIFICATIONS UNDER SECTION 75W

It is our strong view that withdrawal of the Section 75W application (as requested by Council) is not warranted or appropriate having regard to the comprehensive response to each of the matters raised by Council as outlined in Section 1. It has been clearly demonstrated by way of the Stage 3 DA that the proposed modifications will actually improve on many of the inherent challenges associated with the plex dwelling types and the approval of the Section 75W application will enable these improvements to be realised across the estate.

Bonnyrigg Partnerships remains committed to working with all stakeholders to achieve a satisfactory outcome for the ongoing renewal of the estate, including Council. Accordingly, we propose to incorporate additional provisions within the Bonnyrigg Masterplan to include more definitive criteria for the location of the proposed compact lots and neighbourhood apartment buildings including:

- Retention of existing minimum lot widths for detached dwellings with south facing rear yards.
- Increasing the proposed minimum width of lots for detached dwellings with north facing rear yards from 6.4 metres to 6.7 metres.
- Retention of existing minimum lot widths for 2-attached dwellings with south facing rear yards and reducing the minimum width lots only for dwellings with north facing rear yards.
- Providing additional criteria for the location of the proposed walk-up apartments.

We anticipate that the additional provisions will address Council's concerns by providing greater certainty with regard to the delivery of these dwelling types in the future stages of the planned renewal. We look forward to working with Council and the Department of Planning to resolve the current Section 75W application at the earliest opportunity and facilitate the timely determination of the Stage 3 DA by the Joint Regional Planning Panel.

2.2 POTENTIAL FUTURE MODIFICATIONS UNDER SECTION 75W

As discussed in the pre-lodgement meeting on 20 October 2010 and our more recent meeting on 1 March 2011, Bonnyrigg Partnerships may investigate the feasibility of pursuing an increase to the approved dwellings within the Concept Plan approval to facilitate a reduction in the amount of off-estate social housing.

The potential likelihood and likely timing for this review to proceed will depend on a range of factors, including approval from Housing NSW and a revision of the Public Private Partnership Debt and Equity Agreement between Bonnyrigg Partnerships and Housing NSW. This process is expected to take around six months and as such, will not be considered until at least Stage 4 or Stage 5.

If it is proposed to pursue a review of the masterplan via an amendment to the Concept Plan approval, a comprehensive level of assessment will be required to rigorously test the appropriateness of the proposed changes, including:

- **Transport and traffic** – the potential traffic generated by the additional dwellings would need to be assessed, having regard to the impacts on key intersections within the local road network.
- **Open space** – it is acknowledged that the quantum and quality of open space will need to be assessed, having regard to any increased demands arising from an increase in the residential population and/or a change in the demographic profile of existing/future residents. This assessment would have regard to the previous Social Infrastructure Needs Analysis undertaken by Urbis and any additional matters that need to be addressed.
- **Social impacts** – the social impacts of the proposed increase in dwellings would need to be assessed in detail, again having regard to any changes to the demographic profile and needs as identified in the original Social Impact Assessment.
- **VPA/ISDP** – following on from the above points, any mitigation measures required to address the above impacts will need to be incorporated into a revised VPA and ISDP.

We are happy to keep Council appraised of any developments with regard to the potential future review of the masterplan. However, any potential future review has no bearing on Stage 3 and is not required to facilitate the final assessment and determination of the current application. As such, there is no justification or reason for withdrawing the current Section 75W application or delaying the determination of the Stage 3 DA.

Please contact me on 8233 9931 should you wish to discuss any aspect of our correspondence.

Yours sincerely,



Jennifer Cooper
Associate Director

cc Andrew Smith – Department of Planning