



08 August 2022

Mr Morris Edwards
Acting Manager – Planning Services
Victorian Planning Authority
Level 25, 35 Collins Street
MELBOURNE VIC 3000

By email only: communications@vpa.vic.gov.au

Dear Morris,

Re: Draft Amendment GC206 - Small Lot Housing Code update

On behalf of the Dennis Family Corporation, thank you for the opportunity to review and provide feedback on the updated *Small Lot Housing Code, June 2022* and draft Amendment GC206 that is currently out for public consultation. The Dennis Family Corporation (DFC) is recognised as one of Australia's leading privately owned residential land developers, managing several significant master planned communities across Victoria and South-East Queensland and with extensive history and experience in developing greenfield communities throughout the Melbourne growth corridors. We welcome the opportunity to contribute to the ongoing review of the Small Lot Housing Code (SLHC).

Pre-Consultation

Firstly, we would like to acknowledge and congratulate the VPA on the level of engagement with stakeholders from the building and development industry, including ourselves, that has been undertaken prior to this public consultation stage occurring. Key players from both industries that we have engaged with on the matter have identified that due to the extensive engagement and discussions that occurred prior to this public consultation process commencing, numerous matters have been considered and resolved and that on the whole, they are generally comfortable with the proposed improvements to the SLHC.

As such our submission will focus more on the ongoing implementation of the code from a land developers perspective to facilitate housing under the SLHC, rather than the technical aspects associated with the design amendments to the Type A and B standards and the introduction of the new Type C standard.

Greenfield Design Standards

With housing affordability becoming a major issue in the marketplace and the desire for a diversity of residential housing to service a wide demographic, we are pleased to note the amendments to SLHC standards should provide greater certainty in the delivery of Type A and B SLHC product. In addition, the introduction of the new Type C standard will assist in industry's ability to provide a more affordable housing product in an appropriate built form outcome whilst

avoiding the need for planning permits and ensuring delivery of housing to the market in a timely and efficient manner.

We recognise the need that for the successful delivery of SLHC product (particularly the new Type C offering) appropriate consideration needs to be given to ensuring the provision of high amenity streetscapes that create appropriate urban amenity to support denser living, increased street tree coverage and the promotion of active streets as public spaces. We eagerly await the preparation and development of the SLHC Design Guidance Note to provide guidance on achieving the above key outcomes.

However, to be able to ensure the delivery of high amenity and innovative solutions to achieve appropriate streetscape outcomes to support the SLHC, the reality is that quite often, local government will continue to employ and implement existing greenfield service infrastructure delivery standards and design requirements. Greenfield design standards and the delivery of SLHC product are not mutually exclusive in growth areas and greater flexibility in how the design, provision of servicing infrastructure (water, sewer, electricity, etc), on-street car parking, waste collection and streetscape treatments need to be considered. We believe this flexible approach is required even more so with the proposed introduction of the new Type C standard.

Our initial discussions with a variety of service delivery agencies have recognised the need to consider alternate delivery standards to ensure streetscapes and trees can take hold and grow in the public realm and not be encumbered and impacted by the location of underground infrastructure. No doubt the VPA will engage further with local government, servicing agencies and other key stakeholders on this matter in the preparation of the SLHC Design Guidance Note, to ensure that housing product delivered through the SLHC is appropriately supported through appropriate master planning and flexible infrastructure delivery.

Expanded Use and Implementation of the SLHC

We would encourage the VPA to engage with growth area Council's and consider mechanisms within the planning system whereby expanded use and implementation of the SLHC may be appropriate. In our view, considerable benefits could be made through allowing the SLHC to be utilised within Residential Zones that are subject to an alternative structure plan mechanism, although noting such an expansion should be limited in application to the designated growth area Council's.

The pre-condition to such an expansion of the Code could be that these sites would have to be adjacent to an established or planned PSP area, accessible to public transport and town centres and adhere to the concepts of the 20 Minute Neighbourhoods espoused in Plan Melbourne. Furthermore, the existing structure plan mechanism in place must address third party notice and appeal rights in a manner consistent with the provisions of the Urban Growth Zone.

The ability to implement the expanded SLHC would be restricted to municipalities that the code already applies to, which in our view would help streamline the delivery of suitable greenfield and infill land in a manner which will help achieve the density targets of Plan Melbourne and reduce the resource burden placed upon each Council.

Once again, we congratulate the extent of work and engagement that the VPA has undertaken to date in reviewing the SLHC. We would appreciate being kept informed in relation to the next steps associated with the code review process and Amendment GC206 and look forward to being involved in contributing to the preparation of the SLHC Design Guidance Note.

Should you have any queries in relation to this submission, please do not hesitate to make contact via joseph.nasr@denniscorp.com.au or on 0408 517 406.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized 'J' and 'N' followed by a horizontal line.

Joseph Nasr
Manager - Planning
Dennis Family Corporation