

**CITY OF GREATER GEELONG**

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Morris Edwards  
A/Manager – Planning Services  
Victorian Planning Authority  
Level 25, 35 Collins Street, Melbourne  
VIC, 3000

22 August 2022

Dear Morris,

**Re: City of Greater Geelong feedback – Small Lot Housing Code – Stage 2 Standards review**

The City welcomes the thanks the VPA for the opportunity to provide feedback on the Small Lot Housing Stage 2 – Standards review.

The City is broadly supportive of the Small Lot Housing Code which provides for a streamlined process and a diversity of housing types without requiring a Planning Permit. The City welcomes guidance provided within the practice note in relation to where each type should be located. Further, the City welcomes changes associated with dwelling façade, which avoids visual bulk and continuous rows of the one housing product.

The Small Lot Housing Code has been applied within Geelong's Growth areas including Armstrong Creek and will be applicable within the Northern and Western Growth Areas.

The Draft Creamery Road PSP has several Residential ESD Design Guidelines which are proposed to be secured on Title. The City will continue to work with the VPA to ensure there are no conflicts between the Small Lot Housing Code and the Residential ESD Guidelines/PSP. Historically, the City has received Planning Permit applications for dwellings covered by the Small Lot Housing Code as they conflict with a Developer covenant/building envelope. The City would be interested in the opportunity to address this issue and be involved in further discussions.

The City would be interested in any further changes to the Small Lot Housing Code and discussion of the attached submission. Officer feedback on the Code is attached.

We look forward to continuing to work with the VPA as this work progresses. If you have any queries in relation to this feedback please contact Strategic Planner, Claire McVilly on 5272 4844 or [cmcvilly@geelongcity.vic.gov.au](mailto:cmcvilly@geelongcity.vic.gov.au)

Yours sincerely

A handwritten signature in blue ink, appearing to read "J. Hurse".

**JESSICA HURSE**  
MANAGER

**PLANNING AND GROWTH**

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Attachment 1 below

## ATTACHMENT 1

### City of Greater Geelong Officer Feedback Planning for the Small Lot Housing Code – Stage 2 – Standards Review

#### 1. Background information - Amendment C395

Amendment C395 incorporated the Northern and Western Geelong Growth Areas (NWGGA) Framework Plan into the Greater Geelong Planning Scheme. The Framework Plan sets out a number of key objectives for PSP's in NWGGA including;

- Development of comfortable climate resilient communities
- Develop zero carbon and zero waste communities
- Build integrated water management systems around major catchments
- Support a Clever and Creative Corridor (CCC) and prioritise active transport and transit to develop 20 minute neighbourhoods
- Enable and support the delivery of smart city infrastructure
- Enable environmentally sustainable development in line with the Framework Sustainability Action Plan

Link to Framework Plan - <https://www.geelongaustralia.com.au/futuregrowth/default.aspx>

Section/Page no. of code	Recommendation	Comment/explanation/context
<b>Chapter 2 – Definitions (page 8)</b>	<p>In relation to the wall on boundary definition within Chapter 2, the following is proposed to be removed;</p> <p><b>wall on boundary</b> means <u>building on any boundary of an allot</u></p> <p><del>a) – buildings on or within 200mm of a side a side or rear bo</del></p> <p><del>b) – carports constructed on or within 1.0 metre of a side or</del>  <del>which is open on the side facing the boundary or bound</del></p> <p>As the 'within 200mm' has been removed, it is unclear if within 200mm would be considered as a wall on boundary or would revert to a side and rear setback standard.</p>	N/A – comment raised for clarity.
<b>Chapter 3 (2) - minimum street setbacks (page 9)</b>	A lane is not included as a street which implies that there is no applicable front setback required. Would this result in a lack of landscaping provided if adjacent to a laneway?	Comments raised from the City's Parks unit (including images below) relate to concerns with a lack of landscaping, particularly in rear laneway areas. It would be preferable to require the deep soil planting area for all dwelling types in the SLHC.
<b>Chapter 4 (2) – Repetition of façade design (page 18)</b>  <b>Chapter 4 (14) – Activation and passive surveillance (page 22)</b>	The requirement to vary building façade is a positive addition to the Code and provides certainty in relation to how this will be assessed by Building Surveyors. In relation to Chapter 4 (Repetition of façade design), could 2.1 be strengthened further to provide variation in roof pitch and design/colour?	N/A – general comment raised to provide further variation in building design/add visual interest to dwellings.
<b>Chapter 4 (5) – Street setbacks (page 19)</b>	The City is unclear as to the difference between Type C and C2. It is requested that the various types be defined within the glossary or within the Practice note.	N/A – C2 is mentioned, however it is unclear as to what this product seeks to achieve and difference with the original 'C'. Recommended guidance be provided at the start of the document or within the Practice note.
<b>Chapter 4 (14) – Activation and passive surveillance</b>	The City has concerns that the requirement for a habitable room at the front of the dwelling (either facing a street or POS) isn't specified clearly enough and may result in 'inactive' ground floor dwelling facades. To ensure passive surveillance and activation of the ground floor, the City has a preference for one habitable room with direct access to SPOS is provided on the ground floor for each SL dwelling type.	N/A – comment to improve passive surveillance.
<b>Chapter 4 (15.1, 15.2) – car parking (page 22)</b>	<p>This section states 'one car park must be provided on site unless the dwelling is rear-loaded'. Does this imply that if the dwelling is rear loaded, no car parking is required? It is unclear if this is what is intended from the wording.</p> <p>The car park can be provided in a garage or in an un-roofed area – would a carport be permissible?</p>	It is the City's preference to allow no car parking for Type C dwellings. Consider including a carport in this section or state that carports are not permissible.

<b>Chapter 4 (20)– Deep soil zone (Page 23)</b>	The Small Lot Housing Code provides space for canopy trees to occur for Type C within Section 20. The Type C deep soil zone is required as per 20 of the Small Lot Housing Code, however it is recommended this also be applied to other types. The Type C2 is not clear from the documents provided and it is recommended the deep soil zone also apply to this type.	<p>The City's Urban Forest Strategy 2015-2025 establishes a 25% canopy cover target for urban areas within the municipality. The Creamery Road PSP promotes the retention of existing canopy trees and sets mandatory minimum canopy cover targets specific to land use and street type (see section 5 for table 5 and 6 within the Creamery Road PSP).</p> <p>The City is working through issues related to servicing and impacts on street trees and prefers services and infrastructure to be consolidated within road reserves to allow street trees the best chance of survival and encourage further planting to meet the City's canopy targets.</p> <p>The City's Parks Unit is concerned with servicing requirements and the impacts on street trees. Photos provided from the City's Parks Unit have been provided within this submission.</p>
<b>Chapter 4 (27.1) – Bin storage (page 25)</b>	'Bin storage must be in the garage and cannot be located in the area for garage storage'. Is there enough room for garage storage and bins to be provided within each garage?	N/A – question of clarity.
<b>Chapter 4 (26) – Water Tanks (Page 25)</b>  <b>Chapter 4 (37) – Roof Reflectivity (Page 27)</b>	<p>The requirement for the water tanks requirement should be applied all types (A, B, C) to improve ESD outcomes.</p> <p>Roof reflectivity is required for Type C within the Small Lot Housing Code, however the label 'solar reflective index (SRI)' has been used rather than 'light reflective value'. To be consistent with the Creamery Road PSP, the City recommends the term 'Solar Reflective index' be used and apply to all types including A and B within the Small Lot Housing Code.</p> <p>The requirement for EV charging points may be within an amended National Construction Code and could be included as a requirement for an 'easy win' within the Small Lot Housing Code.</p>	<p>The City's Climate Change Response Plan 2021-30 establishes a target of net zero community emissions by 2035 (see link <a href="https://www.geelongaustralia.com.au/common/public/documents/8d9b3d6e2bec4ce-climatechangeresponseplanfinal.pdf">https://www.geelongaustralia.com.au/common/public/documents/8d9b3d6e2bec4ce-climatechangeresponseplanfinal.pdf</a>)</p> <p>The vision within the Draft Creamery Road PSP is to deliver a liveable, zero carbon and climate resilient community. The Draft PSP seeks to implement this vision via requiring ESD residential guidelines for residential subdivisions to include;</p> <ul style="list-style-type: none"> <li>• All new residential dwellings to be constructed to a minimum NatHERs standard of one star above the applicable National Construction Code standard</li> <li>• The roof and façade materials of all new residential dwellings to meet a minimum Solar Reflective Index (SRI) benchmark of 50 or greater</li> <li>• All new residential lots to allow for future provision of Electric Vehicle Charging Points (EVCPs), to a</li> </ul>

		<p>minimum specification of one 7kW 32Amp EVCP per dwelling</p> <ul style="list-style-type: none"> <li>• All new dwellings with up to two bedrooms to have installed a 3kW minimum capacity solar photovoltaic (PV) system. An additional 1kW capacity solar photovoltaic (PV) system is required for each additional bedroom proposed; and</li> <li>• Apartment buildings to have installed a solar PV system with a capacity of at least 25W per square metre of site coverage of 1kW per dwelling.</li> </ul> <p>The Draft Creamery Road PSP has included a requirement for no gas to be provided to future allotments within the precinct (R60). The City notes that the National Construction Code may increase the minimum NatHERS to 7 stars and will consider the implications of this with the final PSP.</p>
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## **2. Barwon Water easement requirements**

Barwon Water is the water and sewerage authority within the City and historically has requested easements. Given the small width of Type C and higher site coverage, the City recommends engagement with water authorities in relation to servicing requirements and possible easements.

## **3. Practice note**

The City looks forward to the Practice note and guidance for where the different types should be applied. Advice in relation to preferred location, lot sizes and examples of the different housing types in each type is recommended. The Creamery Road Draft PSP includes 'Integrated Development Areas' with recommended heights of up to 6 storeys. The Type C small lot housing code may be appropriate within these areas or a certain distance of activity centres/commercial areas. This type of guidance would be beneficial for the Practice Note, including 'good' and 'bad' built form outcome examples and images of the different small lot types.

**Table 14 – Canopy Coverage requirement by Land use**

LAND USE AS PER FUS	MANDATED MINIMUM CANOPY COVERAGE*	SITE AREA THE CANOPY IS TO BE CALCULATED ACROSS:
Drainage Corridors	35%	Centreline of abutting roads and/or parcel boundaries where appropriate
Drainage Reserves	10%	Site Boundary
Education Facilities (new)	30%	Centreline of abutting roads
Community Facility	35%	Centreline of abutting roads
Bulky Goods	30%	Centreline of abutting roads
Sport (Active) Reserve	30%	Centreline of abutting roads
Community Parks	50%	Centreline of abutting roads
Neighbourhood Activity Centre	25%	Centreline of abutting roads
Residential Standard	27%	Centreline of abutting roads
Integrated Development Areas (IDA)	23%	Centreline of abutting roads

**The following apply:**

- Any trees shown on [Plan 21 – Canopy Cover & Tree Retention](#) which are retained by the proposal are counted towards the canopy coverage requirements
- The diameter of a tree at maturity included in the calculation of tree canopy coverage in [Table 14 Canopy Coverage Requirement by Land Use](#) must be no less than 3m.
- The residential standard requirement from [Table 14 Canopy Coverage Requirement by Land Use](#) applies to all uses contained in the accommodation group of Clause 73.04 of the planning scheme.
- Street trees existing or proposed within the site area are counted towards the land use based canopy cover requirement.
- Only trees contained within private land which serves as part of the public realm count towards the canopy cover calculation. Examples of such spaces are car parking areas, school grounds, public open spaces and land managed by body-corporate entities (or similar)

**Table 15 – Canopy Coverage Requirement by Street type**

ROAD RESERVE WIDTH	STREET TYPE (AS PER APPENDIX 3)	MANDATED MINIMUM CANOPY COVERAGE	REQUIRED CANOPY DIAMETER
8m	Lane	20%	3–7m
10m	Micro Street	25%	3–7m
10–16m	Pedestrian Street	50%	7–20m
16m	Local Access Street (Level 1)	40%	7–20m
16m	Parking Street	40%	7–20m
20m	Conservation Interface Street	30%	10–20m
20m	Local Access Street (Level 2)	40%	10–20m
TBC	Bluestone Bridge Road (Modified Local Access Street)	25%	10–20m
20m	Clever & Creative Corridor (Evan's Road)	30%	10–20m
25m	Connector Road	40%	10–20m
21.6m	Connector Road (Modified Urban)	30%	5–20m
20m	Clever & Creative Corridor (Activity Centre)	40%	5–20m
34m	Clever & Creative Corridor (Standard)	40%	10–20m
40m	Arterial Road (Midland Hwy)	10%	5–20m



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**4. Images below from the City's Parks Unit:**

**BENTONS WAY ARMSTRONG CREEK – REAR LOADED PROPERTIES WITH NO STREET TREES DUE TO SERVICE LOCATIONS**



**AVONBURY DRIVE ARMSTRONG CREEK – 7M LOTS WITH CROSSOVERS – NO STREET TREES**



**MILLIGAN CIRCUIT, CHARLEMONT – 6.5M LOTS WITH CROSSOVER – NO STREET TREES**

