

To: Fraser McNutt – Barker & Associates

From: Katherine Hu, Associate Urban Designer – Barker & Associates Limited (B&A)
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Date: 23 March 2026

Re: Urban Design Response on Draft Decision- Ashbourne [FTAA-2507-1087]

Introduction

We have been asked to provide a response to the Draft Decision and Draft Conditions, dated 11 March 2026, with a focus on urban design matters relevant to the required changes to the residential subdivision. This memorandum should also be read in conjunction with the updated Boundary Treatment Plan, the Residential Design Guide, and all other updated information and drawing sets.

Ashbourne Draft Decision

The Draft Decision states¹:

Overall, the Panel is satisfied that the matters set out in section 81 of the FTAA have been addressed appropriately and that the purposes of the FTAA are achieved by this decision, including:

- a. **Approval** of the solar farms;*
- b. **Approval** of the residential subdivision to the extent that it is not located on HPL and is amended to address the boundary interface issues that we have identified; and,*
- c. **Decline** of the retirement village.*

The Draft Decision identifies several required changes to the residential subdivision, together with corresponding amendments to the application, including:

- the removal of all residential subdivision located on land mapped as highly productive²;
- amendments to the size of lots that interface with the rural residential area to the west of the Peakdale Drive access, and with the southern boundary, so that these lots average 1,500m² (ranging between 1,200m² and 1,800m²), with an 8m rear yard setback, a 3m side yard setback, a 4m wide landscape buffer and a solid 1.5m high fence in the rear or side setback, and 25% site coverage³; and
- amendments to the Residential Design Guide to address the site coverage, rear and side setbacks, and landscape buffer development standards for the larger lots⁴.

In addition to the above development controls associated with the larger lots, the Draft Conditions also introduce several amendments to other Development Controls that are not specifically addressed in the Draft Decision and are beyond the scope of the larger lots. These changes include applying front yard setback

¹ Draft Decision, Paragraph 734.

² Draft Decision, Paragraph 727.

³ Draft Decision, Paragraphs 445 – 449.

⁴ Draft Decision, Paragraphs 448.

controls along any JOAL and requiring at least one specimen tree within the front yard setback of each lot accessed by a JOAL⁵.

Removal of residential subdivision on HPL

As a result of the removal of the portion of the residential subdivision located on HPL, changes have been made to Lots 276–318, Road 5 and Road 6, as shown on the updated Scheme Plan Revision G, prepared by Maven and dated 03/2026.

A total of 43 lots are created. This includes 13 lots of less than 450m² with the remaining 30 lots at least 450m² in area or greater (up to 811 m²). The updated LUC Plans Revision F, prepared by Maven and dated 03/2026, also demonstrate that all these lots can accommodate their assigned typologies.

A total of five rear lots (Lots 306, 307, 308, 309 and 316) and two JOALs (Lots 3022 and 3032) are proposed, and some of the new lots are of an irregular shape – in part reflecting the awkward site geometry now created through the removal of the area mapped as highly productive relative to the gridded subdivision pattern, generally aligned north-south, established through the lodged substantive application.

As demonstrated in the updated LUC Plans Revision F, prepared by Maven and dated 03/2026, all 43 lots are of sufficient size, shape and area to ensure each allotment can achieve an appropriate sense of spaciousness and privacy from adjoining allotments. The two new JOALs are also of sufficient width and design for the number of lots they serve (two lots each). However, from an urban design perspective, it is unfortunate that this part of the residential subdivision has been lost, as it has resulted in a less coherent and less efficient layout outcome that is now almost completely detached from the greenway aspect of the proposal and has reduced the number of lots in proximity to the proposed commercial centre.

Changes to residential subdivision for the larger lots

As shown on the updated Scheme Plan Revision G, prepared by Maven and dated 03/2026, all residential lots that interface with the rural residential area to the west of the Peakdale Drive access, and with the southern boundary, have an average lot size of 1,500m², ranging from 1,295m² to 2,119m². The updated LUC Plans Revision F, prepared by Maven and dated 03/2026, also identify the typologies associated with these lots.

Amendment to Development Controls and Residential Design Guide

Several amendments have been made to the Development Controls associated with the larger lots, as requested by the Draft Decision and Draft Conditions. These amendments have been incorporated into the updated Boundary Treatment Plan and the updated Residential Design Guide, both prepared by Barker & Associates and dated 03/2026. These amendments include adopting 25% site coverage of the net lot area, 30% permeability of the net lot area, an 8m rear yard setback, and a 3m side yard setback for the larger lots.

It is not proposed to adopt the 4m wide landscape buffer and the 1.5m high solid fence requirement for the larger lots, on the basis that the proposed 2m/3m wide landscape buffer is considered more than sufficient, and that a 4m wide buffer is not necessary to achieve visual screening and softening of the lots (see Landscape Memo, prepared by Greenwood and dated 20/03/2026). The Applicant has increased the size of the 2m landscape buffer proposed adjoining the Eldonwood subdivision and the southern organic

⁵ Draft Condition, Condition 119.

farm to 3m for consistency across the Site. Changes have been made to the Boundary Treatment Plan or the Residential Design Guide in this regard.

We also understand that the Applicant is not proposing to accept the additional changes to the Development Controls relating to the application of front yard setback controls along any JOAL, and the requirement for at least one specimen tree within the front yard setback of each lot accessed by a JOAL in full. These changes go beyond the larger lots and are not specifically discussed in the Draft Decision, and they are not consistent with the suggestion in Mr Munro's Response to Minute 4, dated 5 December 2025.

In Mr Munro's Response to Minute 4, dated 5 December 2025, he has confirmed that he had no concerns regarding the layout and creation of rear lots and JOALs. The additional measures were suggested for the JOALs serving 5+ dwellings, with his reasons noting treating larger JOALs more like a front boundary can provide some additional assurance in terms of passive surveillance, visual amenity and visual interest⁶.

In our view, the rationale is less compelling for smaller JOALs serving only a limited number of dwellings and are more limited in scale, intensity and visual prominence. These smaller JOALs do not impact on public streetscape amenity and therefore in these circumstances, additional controls are not necessary.

Similarly, we do not consider it appropriate to apply these controls to lots that do not obtain access from a JOAL, even if they are located adjacent to one. Those lots are not oriented toward the JOAL in the same way as lots that directly rely on it for access, and therefore the JOAL does not function as their primary frontage. Applying front yard setback and specimen tree requirements in these cases would unnecessarily constrain the future built form and site design of those lots, without a corresponding urban design benefit.

Overall, all proposed JOALs are of sufficient width and design for the number of lots they serve. In that context, applying the additional setback and specimen tree requirements to every lot adjoining any JOAL would be unnecessarily restrictive and would go beyond what is reasonably required to achieve a good urban design outcome.

It is also proposed to remove the 6m / single-storey building height control for the larger lots along the southern boundary, as a result of the increased lot sizes and rear yard setback. The 6m / single-storey height control, together with the associated landscaping treatment and 5m building line restriction, was originally proposed to allow for a lower density built form along this boundary. However, given that all lots along this boundary are now significantly larger in size (being no less than 1,295m²), with an 8m rear yard setback and a 3m side yard setback, we note that the 6m / single-storey height control that had been proposed as an alternative method of addressing the concerns raised by Mr Munro is no longer necessary.

[Attachment 1 – Boundary Treatment Plan](#)

[Attachment 2 – Residential Design Guide](#)

⁶ Mr Munro's Response to Minute 4, dated 5 December 2025, Paragraph 12.