

# Residential Release Strategy

## South-East Dubbo Urban Release Area

March 2011

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## **Executive Summary**

Council has prepared two Residential Release Strategies to guide the timing and design and the nature of residential development in Residential Urban Release Areas in the west and south-east of the City.

This Residential Release Strategy is designed to provide a greater level of detail and certainty as to the timing and level of residential development in the Urban Release Areas identified in the north-west and south-west of the City.

The Urban Release Strategy further informs the landuse zoning decisions made by Council in the Comprehensive Local Environmental Plan for the City and the Dubbo City Planning and Transportation Strategy undertaken by Stapleton Transportation and Planning in 2009 as a review of the Urban Areas Development Strategy Future Directions and Structure Plan 1996 and the Review of the Urban Areas Development Strategy in 2007.

The Comprehensive Local Environmental Plan for the City proposes to zone areas in the South and South-East of the City for residential development. This Residential Release Strategy provides the mechanism and the basis for the provision of residential development within these areas.

## 1.0 Strategic Context

## 1.1 Dubbo Urban Areas Development Strategy

Development within the urban and some environmental protection zones is guided by the Dubbo Urban Areas Development Strategy 1996 (UADS). The Dubbo Urban Areas Development Strategy is implemented through the provisions of the Dubbo Local Environmental Plan 1998 - Urban Areas.

The first review of the Dubbo Urban Areas Development Strategy was undertaken by Council in 2007 with the production of a Discussion Paper, which reviewed the five components of the Urban Areas Development Strategy namely:

- Residential Areas Strategy;
- Commercial Areas Strategy;
- Industrial Areas Strategy;
- Institutional Areas Strategy; and
- Recreational Areas Strategy.

The review of the Strategy was undertaken as an initial step to the preparation of a Comprehensive Local Environmental Plan for the Local Government Area in accordance with the Standard Instrument (Local Environmental Plans) Order 2006.

## 1.2 Dubbo Urban Areas Development Strategy, South and South-East Dubbo

The 1996 Urban Areas Development Strategy outlines the economic basis for a coordinated and logical evolution of urban development to the west of the City, where new development will 'balance' the predominant easterly spread of Dubbo.

Conservatively, the south and South-East Sub-Districts proposed to be zoned for residential development will have the potential to accommodate an additional 1,059 lots.

In order to accommodate a large future population, the land has to be assessed for capability and suitability and then 'reserved' for future growth. The 1(e) Urban Expansion zone currently achieves this requirement, however, the Comprehensive Local Environmental Plan does not contain a similar 'holding' zone for lands referred to in the Urban Areas Development Strategy as being suitable for future urban development.

In comparison to the remainder of the City, development in the south and South-East sub-districts will complete the eastward and southward phases of suburban development in Dubbo. This allows residential development to be taken to the edges of the City where environmental and landuse constraints take effect.

The Urban Areas Development Strategy also provides discussion that land on the western side of Macquarie Street in the southern precinct should be facilitated for rezoning subject to the satisfactory resolution of environmental and servicing issues.

After initial environmental assessment, the South-East Residential Urban Release Area was designated and located adjacent to existing residential zones.

Development of land zoned 1(e) Urban Expansion within South-East Dubbo was originally contingent on two processes being undertaken:

- The preparation of a detailed Structure Plan(s); and
- Preparation of a new Local Environmental Plan reflecting the results of the Structure Plan and the aspirations of the community.

Rather than preparing a detailed Structure Plan for this area, Council undertook a broader review of the Urban Areas Development Strategy Future Directions and Structure Plan document, which was prepared by Council in December 1996 to accompany the Urban Areas Development Strategy to provide a City-wide Structure Plan. The Dubbo City Planning and Transportation Strategy 2036 has been prepared by Stapleton Transportation and Planning to advance the Structure Planning for this part of the City. This Strategy underpins the future development of the West Dubbo Urban Release Area and the South-East Dubbo Urban Release Area (incorporating the Southern and South-Eastern sub-districts).

## 1.3 Dubbo City Planning and Transportation Strategy 2036

The Stapleton Strategy forms the basis for review of the Future Directions and Structure Plan document prepared in 1996 as an integral part of the Urban Areas Development Strategy. The Stapleton Strategy also provides a review of the directions taken in the Review of the Urban Areas Development Strategy undertaken in 2007.

The Stapleton Strategy forms the 'Master' Structure Plan for the future transport and planning considerations to guide development with the Urban Release Areas in the north-west, south-west and South-East of the City. The Stapleton Strategy has been used in the preparation of the Urban Release Strategy and provides the basis for the landuse decisions to be made in the formulation of the Comprehensive Local Environmental Plan for Dubbo.

The Stapleton Strategy, finalised in October 2009, "is based on the completion of 7,500 additional dwellings in Dubbo. The population forecast is based on this development occurring over a 30 year period; an additional 250 dwellings per year. This population will be housed in three sectors; the south-east sector, the south-west sector and the north-west sector" (Dubbo City Planning and Transportation Strategy 2036; 2009).

## 1.4 Role of the Residential Urban Release Strategy

The role of this Residential Urban Release Strategy for South-East Dubbo is to provide the appropriate mechanisms and controls to ensure the orderly residential development of the South-East Dubbo Urban Release Area having regard to the following:

- Location of lands;
- Environmental capability of lands;

- Effective provision of required infrastructure without undue cost to the community;
- Ability for residential development to be within close proximity to community service facilities and employment networks;
- For development to be undertaken in a staged manner reflecting market aspirations and the needs of the community; and
- Affordable housing opportunities.

This Residential Urban Release Strategy guides the implementation of the recommendations of the Urban Areas Development Strategy and Review, the Dubbo City Planning and Transportation Strategy 2036 and the Comprehensive Local Environmental Plan for Dubbo.

## 2.0 Urban Release Area Principles

#### 2.1 Introduction to the Urban Release Area

Located at the edge of the established urban area of the City are areas that have been identified for future urban development. This land (Figure 1) is currently zoned 1(e) Urban Expansion zone under Dubbo Local Environmental Plan 1998 - Urban Areas and is set aside for future residential landuse.



**Figure 1** - Outline of the extent of lands in South and South-East Dubbo considered as part of this Residential Release Strategy. (Please note, not all lands shown in Figure 1 are currently zoned for residential development or are proposed to be zoned for residential development under the Comprehensive Local Environmental Plan) (Dubbo City Planning and Transportation Strategy 2036).

The South-East Dubbo Urban Release Area consists of the Southern and South-East sub-districts under the Urban Areas Development Strategy (UADS). The Stapleton Strategy considers this land as the South-East Urban Area. This Urban Release

Strategy will continue to consider the South-East area as two separate Sub-Districts in accordance with the (UADS).

The 1(e) Urban Expansion zoning has served to protect these areas from inappropriate and/or premature development while the long term capabilities of these lands are assessed and the future development opportunities for the lands are considered.

#### 2.2 The Southern and South- Eastern Sub-Districts

Both the Southern and South-Eastern Sub-Districts are identified in the Residential Areas Strategy and are directly relevant to the Urban Release Area. The Stapleton Strategy has considered further development in the South-East, however, the Strategy does not discuss development in the Southern Sub-District. This consideration is further discussed here.

The South-East Sub-District has been further refined by the Stapleton Strategy as contained in Figure 2 below. The Residential Areas Strategy followed from a broad-scale investigation to establish the essential suitability of the area and defined the long-term roles of the Southern and South-Eastern Sub-District as providing fully serviced residential expansion opportunities in the south and South-East of the City.

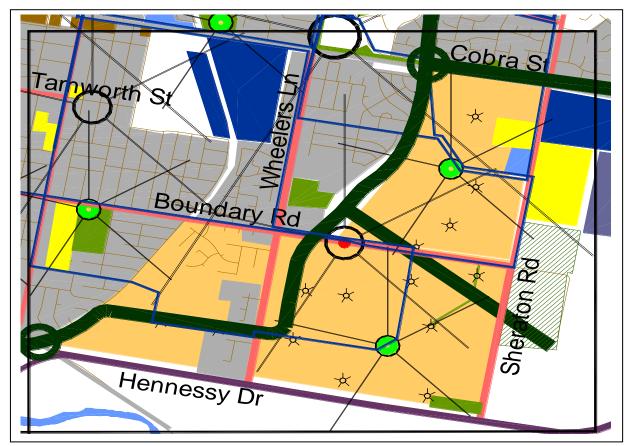


Figure 2 - South-East Sub-District Strategic Context (Dubbo City Planning and Transportation Strategy 2036)

#### **Guide to Reading Figure 2**

Thin blue line - bus routes through the area.

Thick dark line - major connector roads through the area.

Yellow areas - education establishment sites.

Large black circles - neighbourhood activity centres or focal points.

Black stars - small neighbourhood activity centres including parks or similar facilities.

The Residential Areas Strategy foreshadowed low density residential or large lot residential development in the Southern Sub-District and a combination of large low density lots or large lot residential lots situated on the fringes and regular low density lots within the remaining areas of the South-East Sub-District. This Residential Release Strategy also proposes to extend urban development to adjoining land to the south, which is also zoned 1(e) Urban Expansion under the Dubbo Local Environmental Plan 1998 - Urban Areas.

The Southern Sub-District is defined in the Residential Areas Strategy as an area, which could provide for further residential development where reasonable subject to environmental and servicing constraints. The land situated immediately to the west of the Southern Sub-District is classified as flood prone land given the proximity of the land to the Macquarie River. The existing zoning boundary between the 1(e) Urban Expansion zone and the adjoining 6(b) Private Open Space zone is the level of the 1 in 100 year flood event through the land (Flood Planning Level). It is considered that the land could sustain residential development and would not require significant alteration to be above the Flood Planning Level.

With regard to servicing, the land is situated within close proximity to urban utilities. Council is also undertaking the construction of a sewer main and pumping station to facilitate the provision of sewer to the land. This work will be undertaken prior to the rezoning of the land for residential development and ultimate development of the land for residential purposes.

The South-Eastern Sub-District is identified in the Residential Areas Strategy as an area, which could provide for varying residential densities with the general principle of large lot residential development on the fringes consistent with the current requirements of the Dubbo Local Environmental Plan 1998 - Urban Areas and low density residential development throughout the majority of the area.

The residential market targets for the South-Eastern area are predominantly 'suburban' with a level of urban fringe development. The South-Eastern sub-district (land currently zoned 1(e) Urban Expansion) has been identified as having limited environmental constraints, subject to further geological and soils testing (Residential Areas Strategy). In both sub-districts it is necessary to identify and protect existing watercourses and remnant vegetation in the event of future subdivision for suburban development and urban fringe development.

The Comprehensive Development Control Plan to be prepared for the Local Government Area will also contain further requirements for subdivision development including environmental and design considerations.

## 2.3 Comprehensive Local Environmental Plan

As previously discussed, Council is undertaking the preparation of a new Comprehensive Local Environmental Plan for the Local Government Area in accordance with the requirements of the Standard Instrument (Local Environmental Plans) Order 2006.

#### 2.3.1 Southern Sub-District

The Comprehensive LEP proposes to zone all additional lands in the Southern Sub-District currently zoned 1(e) Urban Expansion to R2 Low Density Residential. This area will have a minimum allotment size for subdivision of 600m². This area could be developed subject to rezoning of the land under the Comprehensive Local Environmental Plan after completion of the sewer pipeline and pumping station on the land in question.

A copy of the draft Comprehensive Local Environmental Plan zoning map extract detailing this area is provided here as Figure 3:



**Figure 3** - Southern Sub-District Extract draft Dubbo Local Environmental Plan 2010. Refer to Figure 1 for the approximate area.

#### **Guide to Reading Figure 3**

Light Brown – RU2 Rural Landscape. Brown – E3 Environmental Management. Light Pink – R2 Low Density Residential. Red – R3 Medium Density Residential. Green – RE1 Public Recreation. Yellow - SP2 Infrastructure.

#### 2.3.2 South-Eastern Sub-District

The Comprehensive LEP proposes to zone the majority of lands within the sub-district R2 Low Density Residential. The eastern edge of the area is proposed to be zoned R5 Large Lot Residential, which reflects the servicing characteristics and the close proximity of the land to the adjoining quarry to the east.

Land directly fronting the northern side of Hennessy Drive is proposed to have a minimum allotment size for subdivision of 4,000m<sup>2</sup>. The lot sizes then graduate to the north with an extended area having a lot size of 2,000m<sup>2</sup> and then to a minimum allotment size of 600m<sup>2</sup>. Land situated on the southern side of Hennessy Drive is proposed to have a minimum allotment size for subdivision of 6,000m<sup>2</sup>.

Land situated further to the eastern side of Wheelers Lane will have similar minimum allotment sizes, with the southern edge of the land proposed to have a minimum allotment size of 2,000m<sup>2</sup> and the balance of the land will have a minimum allotment size of 600m<sup>2</sup>.

The eastern edge of the sub-district will have a minimum allotment size for subdivision of 1.5 hectares based on the characteristics of the land and servicing requirements of the allotments.

A copy of the draft Comprehensive Local Environmental Plan zoning map extract detailing this area is provided in Figure 4:



**Figure 4** – South-Eastern Sub-District Extract draft Dubbo Local Environmental Plan 2010. Refer to Figure 1 for the approximate area.

#### **Guide to Reading Figure 4**

Light Brown -RU2 Rural Landscape. Brown -E3 Environmental Management. Light Pink -R2 Low Density Residential. Red -R3 Medium Density Residential. Green -RE1 Public Recreation. Yellow - SP2 Infrastructure.

### 2.4 Land Release Principles

#### 2.4.1 Extent of Land Release

The Comprehensive Local Environmental Plan proposes to zone 34 hectares within the Southern Sub-District for the purposes of low density residential development.

The Comprehensive LEP proposes to zone 110 hectares in the South-Eastern Sub-District for the purposes of low density residential development. A total of 94.9 hectares for large lot low density development and 49 hectares for large lot residential development is also within the South-Eastern sub-district.

Based on the figures provided above the Southern sub-district has the ability to provide for the following allotments:

Land proposed to be zoned R2 Low Density Residential could provide for 282 lots (this figure does not take into account existing allotments within the Southern Sub-District which contain a dwelling house and are zoned 1(e) Urban Expansion).

The extent of land release in the South-Eastern Sub-District incorporates the following:

- Land zoned R2 Low Density Residential is 100 hectares (600m<sup>2</sup> minimum allotment size;
- Land zoned R2 Low Density Residential (2,000m<sup>2</sup> 6,000m<sup>2</sup> minimum allotment size) is 94.9 hectares; and
- Land zoned R5 Large Lot Residential is 49 hectares (1.5 and 2 hectare minimum allotment size..

Based on the figures provided above the South-Eastern sub-district has the ability to provide for the following allotments:

Land Use Zone	No. of Potential Lots
R2 Low Density Residential	833
(600m² minimum lot size)	
R2 Low Density Residential	202
$(2,000m^2 - 6,000m^2 \text{ minimum lot})$	
size)	
R5 Large Lot Residential (1.5	24
and 2 hectare minimum lot size)	
Total Lots	1059

(Note: The analysis above is based on lands zoned R2 Low Density Residential having a total area requirement including roads and public open space of 1,200m². Lands zoned R2 Low Density residential (2,000m² minimum lot size) having a total area requirement including roads and public open space of 3,000m². Lands zoned R2 Low Density residential (4,000m² minimum lot size) having a total area requirement including roads and public open space of 5,000m². Lands zoned R2 Low Density residential (6,000m² minimum lot size) having a total area requirement including roads and public open space of 7,000m². R5 Large Lot Residential having a total area requirement including roads and public open space of 2 hectares).

This analysis shows that the combined Southern Sub-District and the South-Eastern Sub-District as the South-East Urban Release Area has the potential to provide a total of 1,059 lots. 833 of these lots could potentially be provided within lands zoned R2 Low Density Residential zone having a minimum allotment size of 600m<sup>2</sup>.

The Stapleton Strategy adopts a figure of 250 new lots (dwelling houses) being required in the City per annum. Based on the figure of 250 new lots required the South-East Residential Release Area can accommodation an additional 5 years of residential expansion.

The Stapleton Strategy shows that the average household size in Dubbo is 2.7 persons per household. The provision of 250 new lots (dwelling houses) per annum would result in the City increasing in population by 675 persons a year. This presents an annual growth rate of 1.67%. An analysis of the growth rate for the last five (5) years shows that the population of the Dubbo Local Government Area has been growing at an average rate of 0.7% per annum.

Based on the information provided above, it could be reasonably concluded that the amount of land available within the South-East Residential Release Area can conservatively cater for the future residential growth of the City for at least 10 years if all future growth was to occur in the South-East only, without any further growth and development in the main Residential Release Area of West Dubbo, which is further considered in the West Dubbo Residential Release Strategy.

#### 2.4.2 Principles for Additional Land Release

The Southern and South-Eastern Sub-Districts can provide a limited level of additional lands for residential development in comparison to the lands contained in the west of the City. The Urban Areas Development Strategy lists the main area for residential growth in the future as north-west and south-west Dubbo. The limited level of additional lands in the South-East will allow residential development to be undertaken up to the eastern and southern edges of the City where the land borders a quarry and rural buffer lands zoned RU2 Rural Landscape under the Comprehensive LEP.

The Urban Areas Development Strategy does not provide for the investigation and/or potential rezoning for the development of any additional lands in the City east of the Macquarie River. In addition, the Comprehensive LEP does not propose to zone any additional greenfield sites in the South-East of the City for residential development.

This Residential Release Strategy reaffirms the findings of the Review of the Urban Areas Development Strategy in 2007 that no additional greenfield sites are required for residential development in the City east of the Macquarie River so as to concentrate future growth in the west.

#### 2.4.3 Preferred Development Staging

The preferred development staging initially for the South-East will be for the lands bound by Hennessy Drive, Holmwood Estate and Margaret Crescent to be developed in conjunction with the lands situated along the southern end of Macquarie Street. In particular, the Hennessy Drive land has direct linkages through the existing Holmwood Estate and to Hennessy Drive. The Macquarie Street land has most urban utilities available, with direct frontage to Macquarie Street. However, development design would be required to be carefully considered in relation to the location of existing dwelling houses through these lands. The preferred development staging within the South-East is shown in Figure 5.

It should be noted that the further development of these lands is contingent on the construction of a new sewer line and pumping station situated within the Southern subdistrict lands. This work is to be undertaken by Council in the 2010/2011 financial year.

The remainder of the lands in the South-East Sub-District should not be developed until the future design, funding arrangements and scope of the Boundary Road intersection with Wheelers Lane and the extension of Boundary Road to the east to link with Sheraton Road is finalised and agreed upon by Council. This land should also not be developed until all servicing arrangements are finalised between Council and land owners.

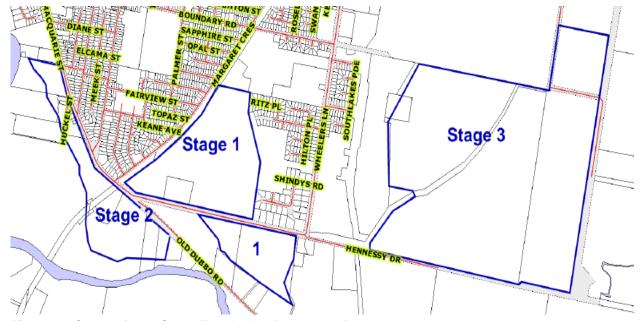


Figure 5 - Staging fronts South-East Dubbo Residential Release Area.

#### 2.4.4 Out of Sequence Release

'Leapfrogging' of lands is not to be encouraged. If the situation arises where this must be undertaken, such proposals could be considered but only on the basis of no cost to Council in terms of planning and infrastructure provision.

It should also be noted that if an owner of an allotment of land within the Urban Release Area wishes to develop prior to adjoining neighbours that is inconsistent with the preferred development staging discussed in section 2.4.3, Council must consider the request only on the basis of the following:

- There is no additional costs to Council in infrastructure provision;
- All infrastructure is provided to the land by the applicant and/or registered proprietor or where Council has agreed to provide the infrastructure;
- The land is situated within a reasonable proximity to an established residential community;
- The land is situated within a reasonable proximity to education and community facilities; and
- The land can be serviced by a public transport provider.

Any request for out of sequence release must be considered by Council prior to consideration of a Development Application for subdivision of the land.

#### 3.0 Urban Release Area Subdivision

## 3.1 Principles of Subdivision Design

All subdivision proposals for 'Greenfield' sites within the Urban Release Area must be designed in accordance with the following steps and design principles:

#### 3.1.1 Identification of Local Context

An examination of the local context should be undertaken as an initial step in designing a subdivision within the Urban Release Area. The identification of local context involves the following:

- Identification of all natural or man-made barriers that may affect the site and development;
- Identification of the location of the "Green Ring" on adjoining lands and provision of open space throughout the development;
- Specify land use activities undertaken on adjoining allotments and the impact on the subject lands; and
- Identification of external attractors such as shops, education establishments, public open space, community facilities and medical centres etc.

#### 3.1.2 Definition of Access Points

Definition of the number of access points required from a subdivision is an important factor to ensure well connected and liveable neighbourhoods are developed. The number of street and access points for development is specified in the table below:

	Size of development											
Hectares Not exceeding		3	4	5	7	9	10	14	17	20	40	60
General size of Lots	Number of street connections required											
800m	2	4	4	5	6	7	7	8	9	10	14	14
600m	2	4	5	6	7	8	8	9	10	11	16	15
400m	4	5	6	6	8	9	9	11	12	13	18	18
300m	4	6	7	8	9	10	11	13	14	15	21	21

#### Guide to reading the information above:

- Connections that have been provided by adjoining developments under construction or completed are to be utilised and can be included in the totals for access to the lots;
- O Boundaries to adjoining properties that have not commenced construction (but may have approval) are considered as part of the edge available for access and can include access points to that edge (irrespective of the proposal for the adjoining property);
- O The number of connections can be reduced if any part of the boundary adjoins an arterial road, or the edge of urban development. The reduction can be calculated as the ratio of the boundary that is unavailable for access to the total length of the boundary. Parks and the Green Ring and recreation space are included as edges requiring access; and
- O Developments of less than 1.4 hectares may have one access street but must continue any additional connections from adjoining properties, this may be three or more access points.

#### 3.1.3. Internal Connectivity

The *Internal Connectivity Index* was developed by Ewing (1996) and has been applied to estate design in the US and Europe. The *Internal Connectivity Index* is the number of street links divided by the number of intersections and the end of a cul-de-sac is counted as one intersection. A ratio of greater than 1.5 indicates that movement is not constrained within the development.

Subdivision designs must be shown to comply with the Internal Connectivity Index. Examples of how to consider internal connectivity are to be included in the Comprehensive Dubbo Development Control Plan.

#### 3.1.4 Direct Path Index

The *Direct Path Index* compares the internal part of a journey with the actual route taken in a direct line to that point. External points are chosen closest to selected destinations and internal points are chosen from a random selection of lots within the development. Hence a number of separate measurements are made.

If the average ratio between the actual route and the direct line is greater than 1.5, the design is considered inadequate and should be reviewed.

#### Internal Points

- For development of less than 80 lots, one sample lot is required for every 15 to 20 lots (start with a random number then add 25% of lots); and
- Thereafter one sample lot is required for every 100 lots (5/100; 6/200 etc).

#### External Points

External points are taken at the access street nearest to the destination to the following. There can be two access streets each serving a different part of the development:

Dubbo CBD;

- Any shopping centre closer to the development than the CBD;
- The nearest major workplace; and
- Any district shopping within 1.5km of the development (the nearest point of the development).

Walking destinations can include an 'external point' as a pathway, including:

- The nearest school (or presumed site of the school);
- Any local places within 250m of any edge of the development including those in the development (from the Strategic Concept Plan); and
- Any district places within 800m of any edge of the development including those in the development (from the Strategic Concept Plan).

Each Street/Path Distance and the Direct Line Distance between each 'external point' and each 'internal point' is measured and summarised.

The *Direct Path Index* is the sum of the Street/Path Distance divided by the sum of the Direct Line Distance. If this ratio is less than 1.5 the scheme must be redesigned.

Individual results can also be compared to provide an indication of where the greatest improvements might be made.

Examples of how to calculate the direct path index are to be included in the Comprehensive Dubbo Development Control Plan.

## 3.2 Subdivision Design and Utility Provision in the Urban Release Area

The following information specifies general design and utility provision principles for subdivision in the urban release area:

#### 3.2.1 Urban Utilities

All urban utilities must be provided on the land and serviced to service each allotment proposed as part of the subdivision including:

- a. Reticulated sewer;
- b. Reticulated water;
- Stormwater drainage system (provided in accordance with the requirements of the Dubbo Comprehensive Development Control Plan);
- d. Reticulated gas (to the requirements of the relevant service authority; and
- e. Reticulated electricity (to the requirements of the relevance service authority.

All required contributions under any Section 64 and 94 Contributions Plans applicable to the proposed development will be required to be paid at subdivision development stage.

The limitation of the provision of the R2 Low Density Residential zone in the South-Western Sub-District is based on the limitation of the provision of reticulated water and sewer to land on the western side of the Minore Hill ridgeline.

#### 3.2.2 Allotment Design

The minimum allotment size for residential subdivision must comply with the minimum allotment sizes specified in the Comprehensive Local Environmental Plan. All allotments should provide a building envelope of a specific size to ensure all design and setback requirements as will be specified in the Comprehensive Dubbo Development Control Plan are complied with.

Any residential subdivision undertaken in the urban release area should not be designed with allotments adjoining (or backing onto) an area of public or private open space zoned RE1 Public Recreation or RE2 Private Recreation under the Comprehensive Local Environmental Plan.

Solar orientation of allotments should be considered at subdivision design stage. All allotments where practicable should be designed with solar access will be required to be provided in accordance with the Comprehensive Dubbo Development Control Plan.

#### 3.2.3. Road Infrastructure

All road infrastructure should be provided to the land and to service the subdivision in accordance with the requirements of an Infrastructure Strategy.

All required contributions under any Section 64 and 94 Contributions Plans applicable to the proposed development should be required to be paid at subdivision development stage.

#### 4.0 Conclusion

The South-East Dubbo Urban Release Area incorporating the Southern and South-East Sub-Districts under the Residential Areas Development Strategy has the potential to provide for 1,059 lots in the lands to be zoned for residential development under the Comprehensive Local Environmental Plan.

Any residential development to be undertaken within these areas must be in accordance with the staging specified in Figure 5 if can be specifically demonstrated in accordance with the principles in the Strategy that other lands must be developed out of sequence.