



**CITY OF
PARRAMATTA**

ATTACHMENT EXCLUDED FROM MAIN AGENDA

**Ordinary Council Meeting
Monday, 26 February 2024**

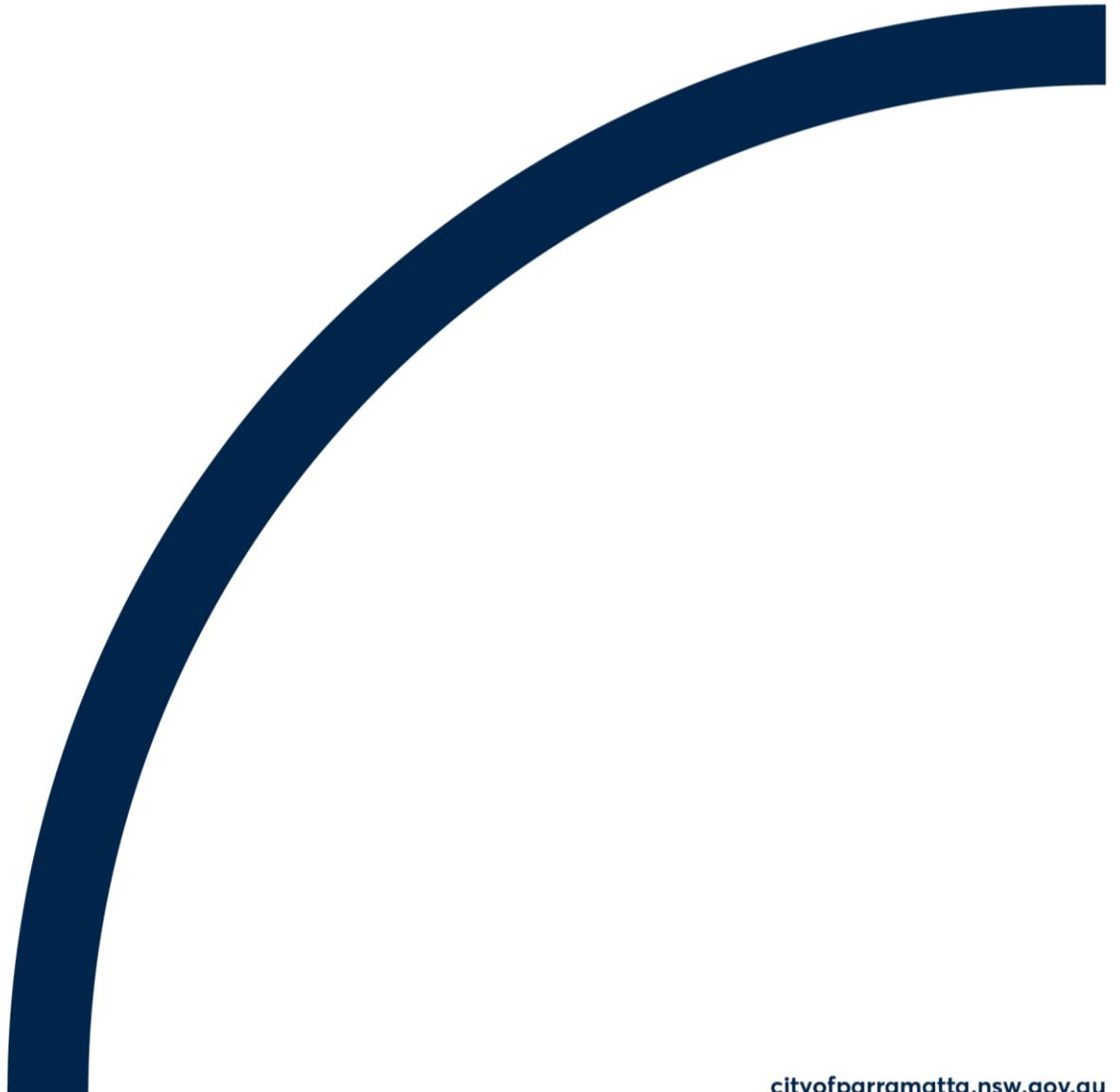


TABLE OF CONTENTS

ITEM	SUBJECT	PAGE NO
13.5	Submission on the NSW Government's Low and Mid-Rise Housing Reforms	
	Attachment 1 Attachment - Submission on Low & Mid-Rise Housing.....	4



Changes to planning controls to support the delivery of low and mid- rise housing

Submission on the exhibited Explanation of Intended Effect
released by the Department of Planning, Housing and
Infrastructure

February 2024

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CONTENTS

1. Executive summary	3
2. Key issues and recommendations	5
3. Impact on Council positions and policies	21
4. Feedback on EIE questions	24
5. Conclusion	27
Appendix 1 - Current permissibility within Heritage Conservation Areas and Special Character Areas	28
Appendix 2 – Dual occupancy design Issues	37

1. Executive summary

This submission has been prepared by Council officers from the City of Parramatta Council for consideration by the Department of Planning, Housing and Infrastructure (DPHI) by the 23 February 2024 closing date of the public exhibition on the low-and mid-rise housing reforms.

The submission was provided to the Department with the understanding that due to the timing of the Council reporting cycle the report on the low-and mid-rise housing reforms would be presented at the Council Meeting on 26 February 2023 for endorsement, and that the final Council endorsed version would be forwarded following this meeting.

Council requests the following:

A two-year deferred commencement to enable Council to pursue programmed solutions. Council's justification for this exemption includes:

- Council acknowledging the need to deliver greater housing diversity to assist in addressing national housing supply and affordability issues and Council's strong leadership and collaborative partnerships are critical to meet this challenge.
- Council having a compelling performance record for determining rezoning applications exceeding the housing target of 23,660 by 1,800 dwellings within the first two-and-a-half years of the 2021-2026 period; and Council is on track to rezone land to permit another 48,000 dwellings (almost 8,000 above the 2026-2036 target).
- Council planning for further strong housing growth with a number of precinct-scale proposals being considered and has brought forward the programmed 'missing middle' investigations and rezonings of suitable areas to deliver medium density housing proximate to rapid transport and services, adding this will assist the State Government's to meet the 5-year housing target set by the Federal Government.
- Council having a strong track record for delivering housing is based on quality local planning and design controls that are responsive to the local context that would be strengthened with alternate governance arrangements that increase the City's planning powers to influence city shaping policy changes for both high density precinct-scale developments and infill missing middle housing.

If Council is not granted a deferred commencement, then the following concerns are to be addressed:

- The reforms are not reflective of best practice strategic planning that consider changes to planning controls at the precinct level, informed by studies and analysis with community and relevant statutory authority input. These broad-brush reforms are predicated on a 'one-size-fits-all' development assessment-led approach and will destabilise long standing local planning frameworks, particularly where local planning controls will be overridden because they are less permissive than the proposed State controls. Under the reforms, planning controls for a site will now be contained in various state and local statutory instruments and local guidelines, increasing the complexity and confusion for landowners.
- The reforms are intended to address housing supply, however no research or evidence has been presented demonstrating that this approach is an effective method to deliver affordable, low and mid-rise housing types within infill settings, that are appropriate for a range of contexts and environmental constraints.
- The standardised approach to planning controls coupled with the non-refusal development standards do not consider local character or conditions, all of which are necessary to ensure good amenity and design outcomes for both individual dwellings and localities.

- The mismatch between the proposed FSR and height of building controls will result in buildings that are bulky, setbacks to boundaries insufficient for the scale, and significant impacts upon deep soil and tree canopy loss contributing to reduced amenity and heat island effects.
- Overriding existing local heritage protections for heritage conservation areas and special character areas by allowing new housing types and greater densities within these precincts will significantly compromise their special character and heritage values and integrity.
- E1 Local Centres and MU1 Mixed Use zoned centres included in the 800 metres walking distance be restricted to those containing a full line supermarket of approximately 4,000-4,500m² accompanied by population-serving retail and commercial space, and have access to rapid transport services and adequately serviced by public transport.
- The reforms exacerbate existing infrastructure shortfalls particularly community infrastructure and open space; and a holistic review of local infrastructure provision is required to enable the real cost increases in providing infrastructure to be recognised including the development contribution caps and rates, and stormwater management service levies.
- Region shaping strategic plans should be released prior to these housing reforms taking effect to enable an examination of the intended outcomes of the reforms in the context of housing and job targets, environmental and liveability directions, and infrastructure and services delivery.

It is advised that in response to the reforms, Council is also accelerating work it is pursuing regarding the Dual Occupancy Codes SEPP with a submission from Council being prepared for the Minister for Planning, the Minister for Fair Trading and NSW Building Commissioner and Government Architects requesting changes to the Codes SEPP in accordance with the design principles set out in **Appendix 2**, and outlining Council concerns with the Complying Development process.

Council also urgently seeks a meeting with the Minister for Planning and Minister for Local Government to discuss the two-year deferred commencement request and governance measures that could be put in place to permit Council to work towards making a contribution to the housing capacity required to meet the National Blueprint target in an efficient manner.

2. Key issues and recommendations

2.1. Housing diversity and theoretical housing growth

Council recognises the importance of housing diversity and that in Parramatta there has been significant growth in high density dwellings in the LGA between 2016 to 2021 compared to medium density which has remained relatively stable¹. Council also recognises that without policy intervention and supporting amendments to the planning framework, based on current development trends, housing supply in the City of Parramatta will likely continue to focus on the delivery of high-density dwellings.

Council officers have modelled the controls as exhibited and applying a "highest and best" development yield, a theoretical dwelling capacity of 32,971 low rise housing dwellings forms are created and 46,994 mid-rise dwellings. The total potential capacity created from both low- and mid-rise development across the LGA is nearly 80,000 dwellings creating substantial capacity. It equates to 21% of the 376,000 dwellings the State Government is committed to delivering by 2029.

Based on an occupancy rate of 2.62 persons per dwelling², the net increase in dwellings of 80,000 (which excludes any growth expected from existing Planning Proposals) would result in an additional 209,508 residents. If a 10% take up rate is adopted, the net increase of 79,9965 dwellings across the City would result in an additional 20,950 residents.

While Council supports the intent of the proposed reforms in delivering greater housing diversity, the proposed reform seeks to apply a one-size-fits-all approach without regard for critical place-based considerations that are required to ensure effective planning.

In the remainder of this Section, Council has identified a number of issues with the reforms and makes recommendations to address these issues grouped under the themes of,

- Local context, built form capacity and heritage matters (**Section 2.2**)
- Environmental issues (**Section 2.3**)
- Strategic economic matters (**Section 2.4**)
- Social planning and housing affordability matters (**Section 2.5**)
- Infrastructure issues (**Section 2.6**)
- Transport matters (**Section 2.7**)

¹ <https://housing.id.com.au/parramatta/housing-and-approvals>

² 2021 average household size in City of Parramatta, <https://profile.id.com.au/parramatta/household-size>

2.2. Local context, built form capability and heritage matters

There are three key urban design and heritage risks with the proposed reforms:

1. The standardised approach to planning controls coupled with the 'non-refusal' development standards do not consider local character or conditions, all of which are necessary to ensure good amenity and design outcomes for both individual dwellings and localities.
2. The mismatch between the proposed FSR and height of building controls means buildings will be bulky, setbacks to boundaries insufficient for the scale, and significant impacts upon deep soil and tree canopy loss contributing to reduced amenity and heat island effects.
3. Overriding existing local heritage protections for HCA's and special character areas by allowing new housing types and greater densities within these significant precincts will undermine the recognised heritage values and integrity.

These are further detailed in the tables below as well as in Figures 1 to 4.

Built Form and Site Capacity Testing – general

Council testing shows:	Rationale
Issue #1: Floor space ratio can not be accommodated within the height limit for most housing types.	<ul style="list-style-type: none"> o This issue will be compounded on sloping sites, notably small or large sites, or sites that must design to the flood planning level. o This will impact on amenity with reduced landscape outcomes, compromised privacy, increased impact on neighbours and/or result in attempts to vary the height limit. Any inconsistency between height & FSR will create redevelopment uncertainty and delays to approval process.
Issue #2: A net increase in the number of dwellings will not necessarily result from the reforms	<ul style="list-style-type: none"> o Instead, the reforms will simply increase bulk on the site and result in two potential built form outcomes – narrow/tall buildings or narrow/long buildings. o The former will result in a disproportionate massing to the street, and the latter will greatly reduce internal amenity, rear setbacks and deep soil zones
Issue #3: In-Fill Affordable Housing SEPP bonus can apply to all low to mid-rise housing types, however this has not been adequately addressed in the EIE.	<p>Noting there is an observed mismatch between height and FSR in the EIE, the In-fill Affordable Housing bonus should be factored into testing, including:</p> <ul style="list-style-type: none"> o Clarity on how a floorspace bonus is accommodated in low-rise housing types noting additional height under the Housing SEPP is only applicable to RFBs and shop-top housing. o Clarity on how 10-15% of the gross floor area (not 10% of dwellings) is to be applied and managed, especially in low-rise housing types.
Issue #4: Allow Council to set standards to reflect street character	These include street setbacks, street wall heights, rear setbacks and deep soil; and will ensure new buildings 'fit' within the local context

Figure 1: Cumulative impact of the proposed reforms when applied to a hypothetical block.



Existing Context
Existing front & rear building setbacks allows street trees and deep soil - 42% green space in example. Buildings face the street and are set back from side boundaries.

Application of Parramatta Controls
CoP controls requires front & rear building setbacks, allows street trees and deep soil - 36% green space in example. Buildings required to face the street and comply with side setbacks.

Speculative Application of the EIE
High FSR increases site coverage & landscaped areas/tree canopy - 14% green space in example. More dwellings will face side boundaries; and setbacks to side boundaries will be minimal, reducing privacy.

Built Form and Site Capacity Testing – Mid-rise housing: Residential Flat Buildings

Council testing shows:	Rationale
<p>Issue #1 There is a significant mismatch between the proposed FSRs and heights for mid-rise housing.</p>	<ul style="list-style-type: none"> 3:1 is too high to achieve the proposed height of 21m (6 storeys) for most site types in Parramatta. Higher FSRs are more likely on small lots. As lots get larger the FSR should decrease as more space is needed between multiple buildings or wings of a buildings. This has not been considered. 2:1 is too high to achieve the proposed height of 16m (5 storeys) particularly as further from a centre detached building forms, which require additional site area for setbacks are typical.
<p>Issue #2: The misalignment of the height and FSR controls for mid-rise housing, coupled with overly high FSRs and the elimination of a minimum site and minimum site width.</p>	<ul style="list-style-type: none"> Results in clause 4.6 variations to height which will not only slow down the approval process but could result in building heights significantly higher than proposed in the EIE. Impacts on the achievement of amenity with reduced landscape outcomes, compromised privacy through overly deep floor plates with snorkel windows, increased neighbour impacts and/or attempts to vary the height limit. Further delays to the approval process by having to consider applications on sites that are not feasible for such development. A looser fit between FSR and height is required for sloping sites and areas that must respond to flood planning levels.
<p>Issue #3: The EIE notes that changes will be made to some of the Apartment Design Guide provisions for mid-rise housing.</p>	<ul style="list-style-type: none"> The proposed side setbacks are not supported as it results in stepped building forms and inefficient floor plates. Contradictions between side setbacks and separation create confusion. A 3m separation for blank walls facing side boundaries is a common solution on small sites and could be explored subject to overshadowing impacts.
<p>Issue #4: A distinction between types that relate to different urban forms and contexts is needed.</p>	<ul style="list-style-type: none"> For example, a street edge aligned and attached (nil side setback) building in proximity to a centre versus a free-standing building in a local neighbourhood. This would enable a better fit with context. Attached housing has greater floor space capacity, which is appropriate for delivering more housing closer to centres.

Figure 2: Precinct planning in Telopea – Existing Council controls v’s the non-refusal standards in the Reforms for mid-rise housing (RFB).

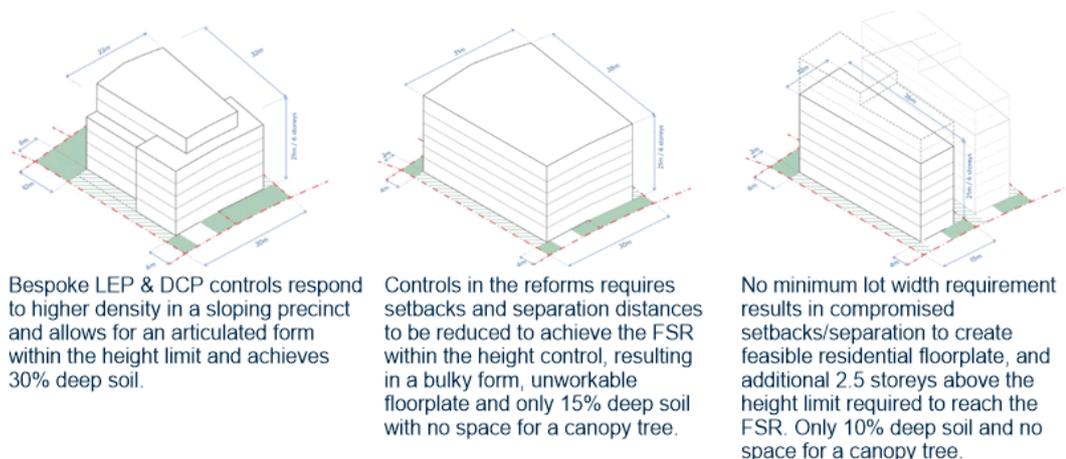
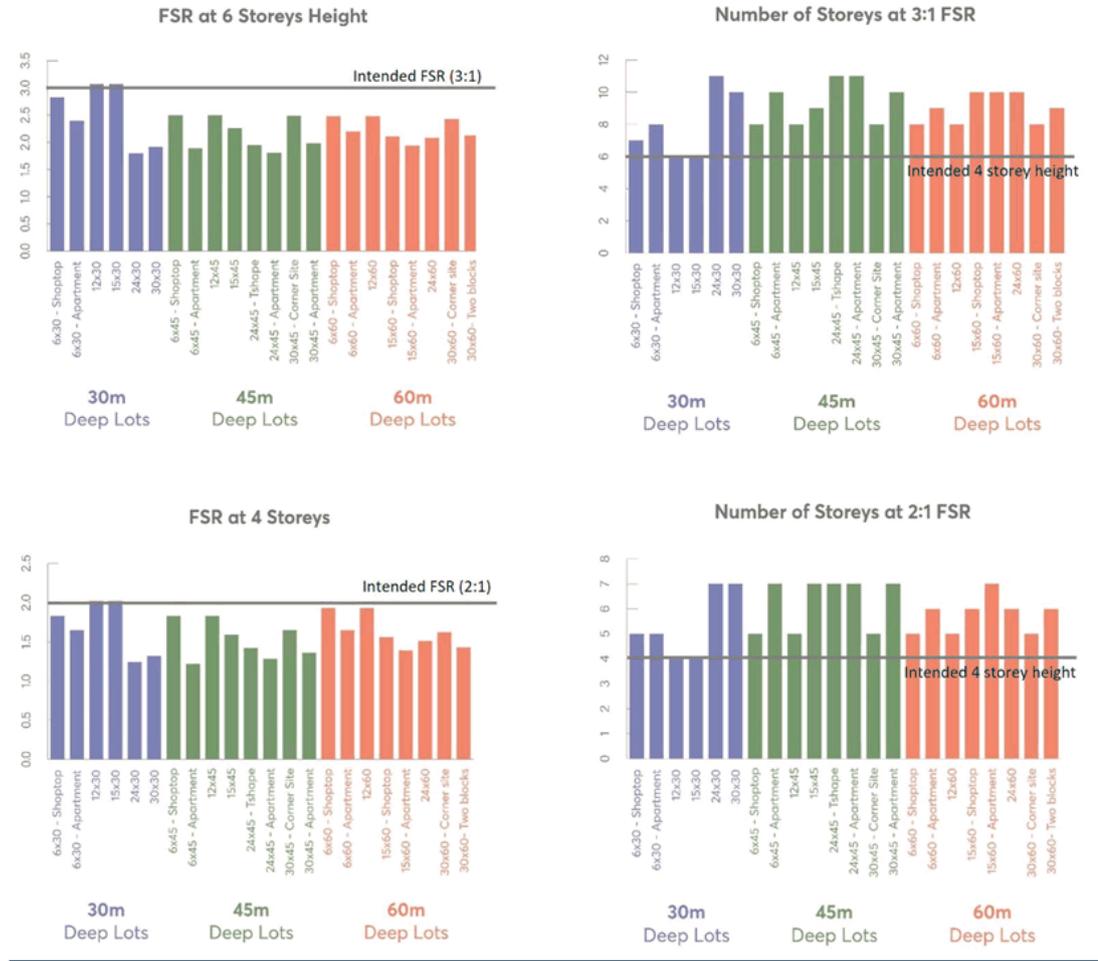


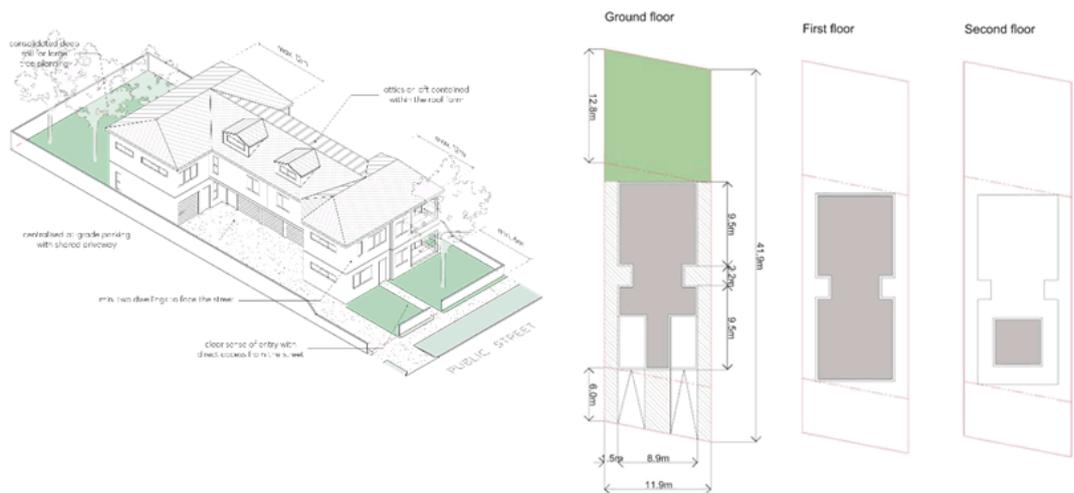
Figure 3: Alignment of proposed EIE FSR and Height testing – observed mismatch for most building types in the EIE, with an RFB example below



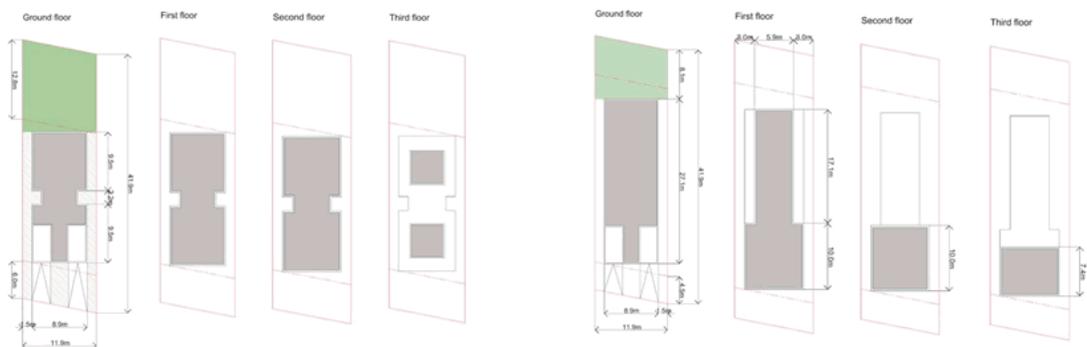
Built Form and Site Capacity Testing – Low Rise Housing: MANOR HOUSES

Council testing shows:	Rationale
<p>Issue #1: There is a mismatch between the proposed FSRs and heights for manor houses</p>	<ul style="list-style-type: none"> Development will need to be 3-storeys plus attic (not 2 storey as proposed by the reforms) to accommodate an FSR of 0.8:1 and meet PDPCP setback, landscaping/deep soil requirements. An FSR of up to 0.6:1 within a 9.5m building height would offer diversity and supply (at least 4 units to a lot) while also enabling a better calibration between controls and respond to prevailing low-scale nature of existing R2 areas.
<p>Issue #2: The proposed lot width of 12 metres is too narrow.</p>	<ul style="list-style-type: none"> On sites that are 12m wide, hardscaping to facilitate parking would occupy most of the site's landscape area, or basement parking would need to be built to the boundary and utilise stackers - potentially making redevelopment expensive/unfeasible. Maintain a minimum lot width of 15m (as per current low-rise medium density housing code and Parramatta DCP) to allow flexibility in how parking solutions are provided and reduce impact of parking on the streetscape.

Under Council's controls of 0.6:1 an 9m, the 0.6:1 FSR can be contained within the 9m height limit in a two-storey development with attic:



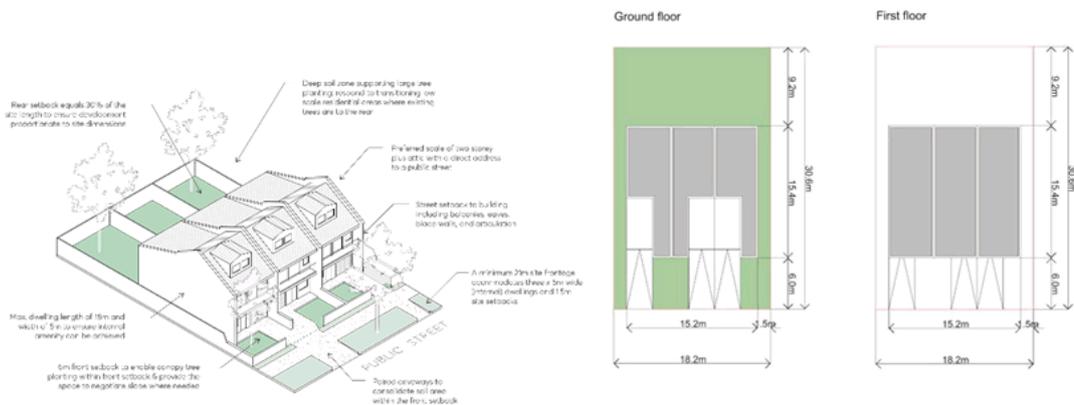
Under the EIE provisions of 0.7:1 FSR and 9.5m height and using PDPCP or CDC setback controls, the 0.8:1 FSR cannot be realised within the 9.5m height limit.



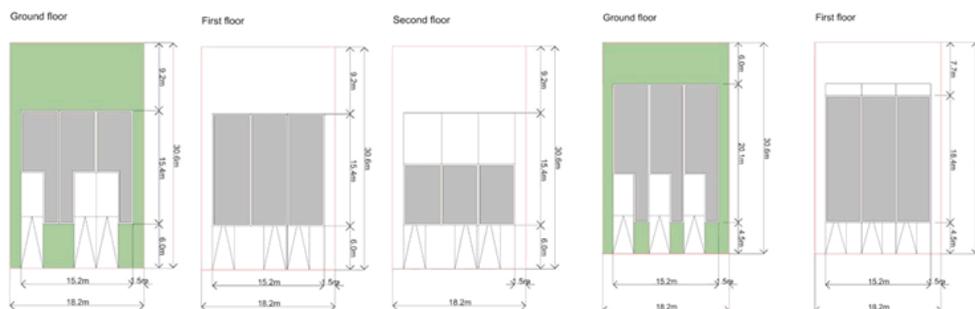
Built Form and Site Capacity Testing – Low Rise Housing: TERRACE HOUSING

Council testing shows:	Rationale
Issue #1: There is a mismatch between the proposed FSRs and heights for multi dwelling housing (terraces).	<ul style="list-style-type: none"> Consider lowering the FSR to 0.6:1 within a 9.5m building height. This will not reduce dwelling numbers but will enable a better calibration between controls.
Issue #2: The proposed lot width of 18 metres is too narrow.	<ul style="list-style-type: none"> Dwelling numbers for terraces are linked to site frontage. Narrow but deep sites will not deliver more dwellings as PDCP controls do not allow terrace housing to be located behind another; and the 18m lot width may only create long narrow dwellings with poor internal amenity and high site coverage. Consider maintaining a minimum lot width of 21m (as per CDC and PDCP existing controls) to allow a minimum internal dwelling width of 5m and encourage habitable rooms on the street. Consider providing specific design guidance for carparking and vehicular access to ensure it will not dominate the streetscape.
Issue #3: Lot sizes do not align with deep soil requirements	<ul style="list-style-type: none"> The minimum requirements in the EIE are considered too low in the context of Parramatta where sites 600m² and greater are shown to be able to accommodate a minimum 30% deep soil.

Under Council's controls of 0.6:1 FSR and 11m height, there is no reliance on a third storey/ attic to meet the FSR:



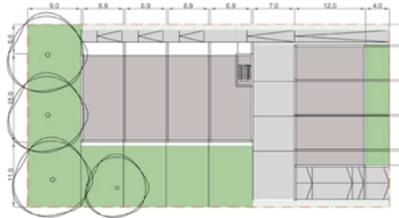
Under EIE provisions of 0.7:1 FSR and 9.5m height, and using PDCP or CDC setback controls, the resulting long narrow dwellings will struggle to meet internal amenity requirements for daylighting and solar access, and driveways & garages dominate.



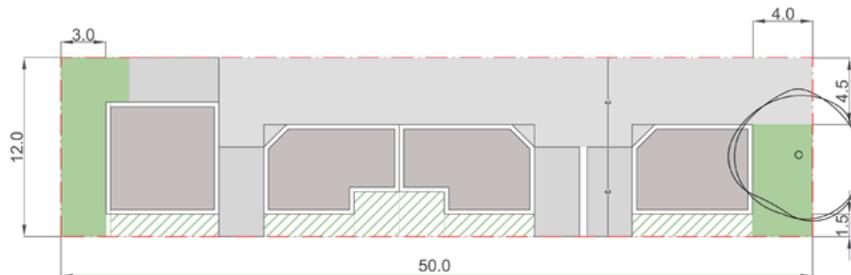
Built Form and Site Capacity Testing – Low Rise Housing: MULTI DWELLING HOUSING (TOWNHOUSES & VILLAS)

Council testing shows:	Rationale
<p>Issue #1: The proposed lot width of 12 metres is too narrow.</p>	<ul style="list-style-type: none"> ○ A 12m minimum frontage will not accommodate a vehicle driveway, usable residential floor plates, and private open space. This will significantly limit residential amenity. ○ Reducing the site frontage results in more land used for driveways and less for dwelling capacity. ○ Consider increasing the minimum lot width to 24m. Wider sites, where two existing dwelling houses are amalgamated, provide greater residential amenity within the site and allow the amenity of neighbours to be preserved. ○ Amalgamated sites also offer opportunities for greater deep soil/ landscaping to be delivered and a better frontage, where more dwellings can face the street.

Under Council’s controls, the 24m minimum lot frontage enables adequate residential amenity and does not impact neighbouring sites’ amenity:



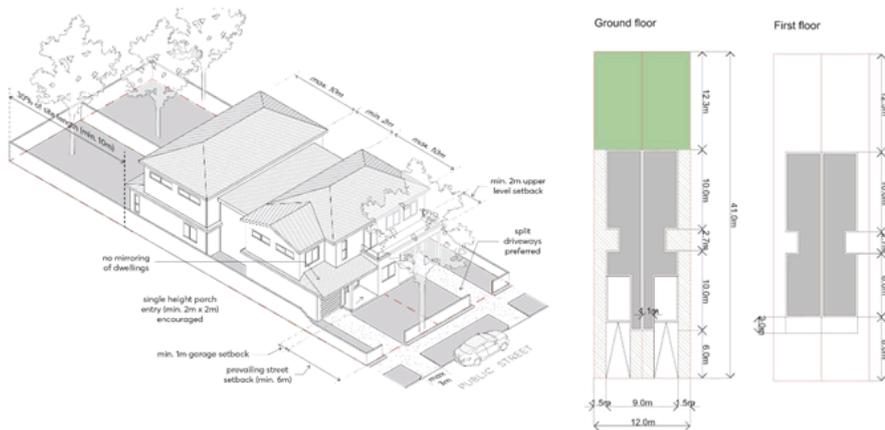
Under EIE provision of a 12m minimum lot frontage, and using PDCP or CDC setback controls, the resulting long narrow dwellings will struggle to meet internal amenity requirements for daylighting and solar access, and driveways and garages will dominate.



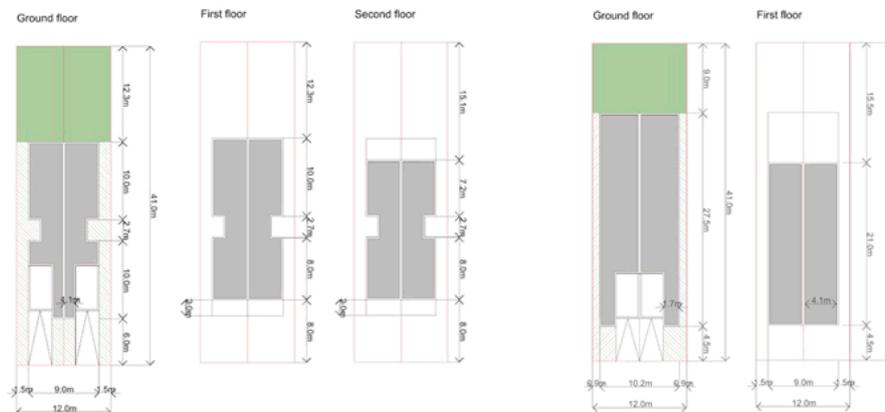
Built Form and Site Capacity Testing – Low Rise Housing: DUAL OCCUPANCIES

Council testing shows:	Rationale
<p>Issue #1: There is a mismatch between the proposed FSRs and heights for dual occupancies</p>	<ul style="list-style-type: none"> An increase in FSR and height for dual occupancies does not permit an increase in dwelling numbers, it simply increases massing. Given some sites may be appropriate for more than one housing typology, a lower FSR of 0.5:1 with a height of 9.5m for dual occupancies is recommended.
<p>Issue #2: The proposed 12m minimum lot width and site area of 450m² are too low to ensure high amenity and design outcomes for both individual dwellings and the wider streetscape.</p>	<ul style="list-style-type: none"> A reduced site width will push development to the site boundaries, create longer or taller narrow buildings, while reducing the amount of space for landscaping / trees (including street verge.) A minimum site width of 15m and minimum site area of 600m² as per PLEP 2023 is recommended.

Under Council's controls of 0.5:1 FSR and 9m height, there is no reliance on a third storey/ attic to meet the FSR while still meeting setback and landscaping requirements.



Under EIE provisions of 0.65:1 FSR and 9.5m height, and using PDCP or CDC setback controls, the resulting long narrow dwellings will struggle to meet internal amenity requirements for daylighting and solar access, and driveways and garages dominate.



Built Form and Site Capacity Testing – Low and Mid Rise Housing: TREE CANOPY TARGETS AND DEEP SOIL TARGETS

Council testing shows that the proposed EIE landscaping provisions are problematic.

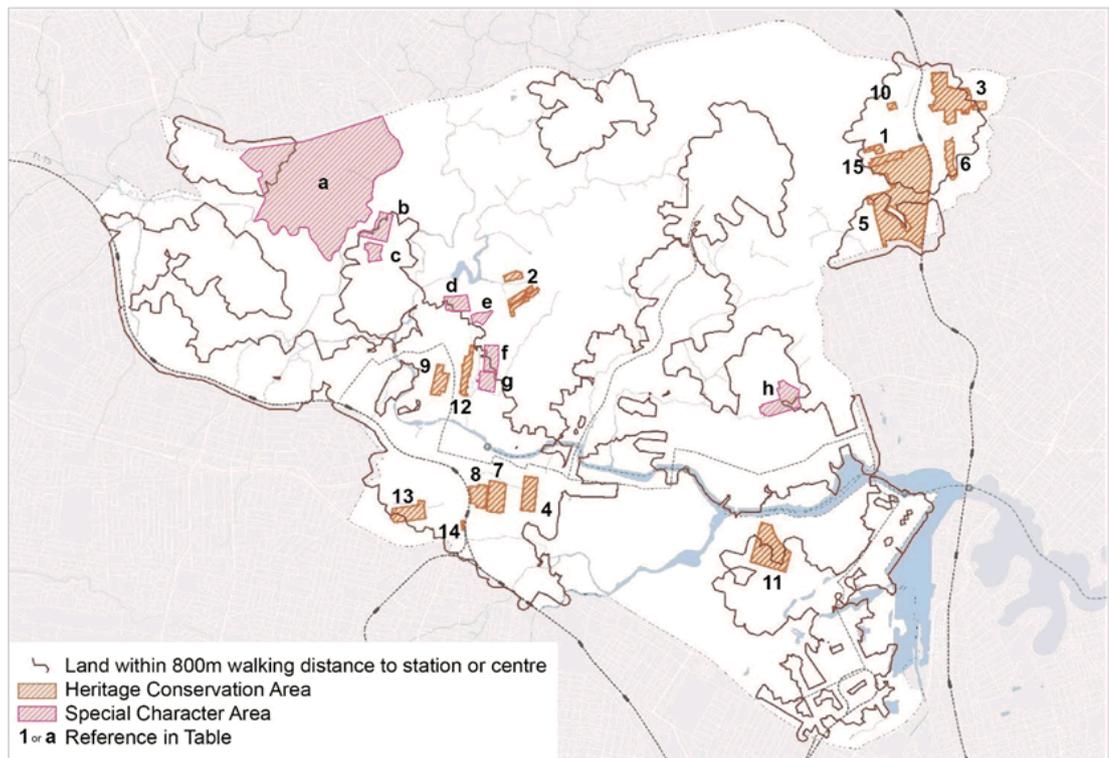
Issue	Rationale
<p>Issue #1: Proposed deep soil targets are not sufficient to meet tree canopy targets and are not supported by testing.</p>	<ul style="list-style-type: none"> ○ Deep soil targets should generally be higher than tree canopy targets to support medium and large tree planting. Further testing is needed before these reforms come into effect. ○ For low-rise housing, recommended to align minimum deep soil targets to 30% of the site area as per PDCP 2023. ○ For mid-rise housing, the 7% deep soil target in the Apartment Design Guide is generally half the minimum tree canopy minimum target of 15% for sites less than 1,500m² in the reforms. The workability of the new controls with the ADG is questioned; further testing by the Department is needed before these reforms come into effect to resolve these inconsistencies.
<p>Issue #2: Proposed tree planting rates are not sufficient to meet tree canopy targets and are not supported by testing.</p>	<ul style="list-style-type: none"> ○ The EIE’s minimum tree planting rates (including tree size) for dual occupancies are not adequate in delivering the proposed tree canopy targets in the EIE. One small tree provides 25m² canopy coverage, which is half the 15% canopy coverage required for dual occupancies on 300m² sites or less. This inconsistency is similarly present across all five typologies in Appendix B and C of the EIE. ○ Small trees are inadequate in meeting proposed tree canopy targets in the EIE for all housing typologies under the reforms. Larger trees of 13m height (as per PDCP 2023) are required to provide tangible ecological benefits, improve amenity, and reduce interference with facades, roof lines and the like.
<p>Issue #3: No minimum dimensions for deep soil zones.</p>	<ul style="list-style-type: none"> ○ For low-rise housing, a minimum dimension for deep soil zones has not been identified. ○ Minimum dimensions for deep soil zones (as observed in the ADG and PDCP 2023) are required to ensure the delivery of sufficiently sized areas that can accommodate root growth for large and medium sized trees.
<p>Issue #4: Misalignment of zone canopy targets and canopy targets required in the private realm</p>	<ul style="list-style-type: none"> ○ Currently LGA-wide tree canopy coverage in Parramatta (21%) is half the State Government’s 40% target for residential zoned land under the Greener Neighbourhoods Guide 2021³. ○ Council’s analysis of canopy data has indicated that development on R2 land has contributed to 95% of the LGA’s loss of tree canopy coverage from 2010 to 2022. This will be accelerated by the expected increase of privately certified CDCs for low-rise housing in the R2 zone, in alignment with the State Government’s reforms. ○ This is further discussed in Section 2.3 - Environmental matters.

³ [Greener neighbourhoods guide \(nsw.gov.au\)](https://www.nsw.gov.au/greener-neighbourhoods-guide)

Impacts on Heritage Items, Heritage Conservation Areas, and Special Character Areas

- The City of Parramatta contains significant post-colonial heritage. Heritage items and Heritage Conservation Areas (HCAs) have been identified through various studies undertaken by Council since the 1990s, and their listing within the PLEP 2023 is a formal recognition of their value and contribution to maintaining the history and character of neighbourhoods. The HCAs are identified and described in **Figure 4** below and Table 1 of **Appendix 1**.
- Council's PDCP 2023 also identifies and protects Special Character Areas (SCAs). SCAs are well defined precincts that have been identified as having a special character and level of residential amenity that should be preserved. These areas have developed over a short period and retain a consistency of design, subdivision pattern, built form, and scale. The SCAs are identified and described in **Figure 4** and Table 1 of **Appendix 1**.
- The EIE indicates that the expanded permissibility and non-refusal standards will apply to Heritage Items and HCAs, overriding any protection provided under an LEP. Similarly, the reforms will also apply to SCAs, overriding any local provisions within the LEP or DCP, given the SCA zoning aligns with the residential zones impacted by the reforms. The type and scale of development under the proposed reforms threatens the heritage fabric, setting, and character of Heritage Items, HCAs, and SCAs. Most of the heritage items and development within HCAs and SCAs in the areas impacted by the reforms include smaller buildings, such as houses. The setting of these small buildings is often defined by the streetscape, tree planting, and private landscape area that cumulatively contribute to character and amenity.

Figure 4: Heritage Conservation Areas and Special Character Areas within Parramatta



* Table contained in **Appendix 1**.

Heritage Items and Heritage Conservation Areas

- The retention of landscape setbacks and street tree planting is critical in heritage conservation areas (see **Figure 5**). The City of Parramatta has a total of 15 HCAs. Dual occupancy will be permitted in 14 HCAs, and 13 of the HCAs are within 800m of a station or centre and therefore will have dual occupancy townhouses, terraces, and manor houses permissible in all or part of the HCA.

Figure 5: Examples of the local heritage conditions in the Parramatta LGA defined by streetscape, tree planting and private landscape.



- The proposed reforms will deliver development contrary to this setting and threaten the heritage value and character of these items and areas. The impacts include.
 - Built form testing has indicated that the proposed non-refusal standards will result in larger developments on small, narrower lots.
 - The increased site coverage to result from the 'mismatched' height and FSR will result in reduced landscaping and setbacks, providing a contrasting development scale and amenity to heritage items and buildings within HCAs resulting in a stark contrast in the built form and scale of development and deliver an inconsistent streetscape with conflicting character.
- It is requested that HCAs be excluded from the proposed reforms, and that Council determine the suitability of these areas to accommodate any expansion in housing permissibility via a detailed study. The proposed reforms affect a significant amount of land within the City due to the number of stations and centres within the City. It is not necessary to apply these controls to the relatively small area of the LGA covered by HCA's.

Special Character Areas

- As explained above, Special Character Areas (SCAs) protect precincts within the City that retain a consistency in their built form and scale contribute to by the dominant subdivision pattern, building envelopes (i.e. setbacks), and landscaping. SCAs present a level of residential amenity that should be preserved. As shown in **Figure 4** and **Table 1** of **Appendix 1**, the City of Parramatta has a total of 8 SCAs. Dual occupancy will be permitted in part of, or all of, the 8 SCAs; and townhouses, terraces, and manor houses (in addition to dual occupancy) will be permitted in part of, or all of, the 7 SCAs as they are within 800m of a station or centre.
- Many of the SCAs contain tree lined streets, large lots with wide frontages, ample tree canopy and landscaping which all contribute to their character. PDCP 2023 contains specific DCP controls for each SCA to ensure new development is compatible with the identified character and reinforces the special attributes and qualities of the area; and to ensure development maintains the level of residential amenity currently enjoyed and positively contributes to the distinctive characteristics of each area. The proposed reforms threaten the integrity of these areas for the same reasons as explained above in relation to HCAs and Heritage Items.
- It is requested that like HCAs, the SCAs be excluded from the proposed reforms, and that Council determine the suitability of these areas to accommodate any expansion in housing permissibility via a detailed study.

2.3. Environmental matters

There are five key environmental risks associated with these policy reforms:

- **Decline in tree canopy** and associated local biodiversity.
- **Increases in urban heat**, this already effects Western Sydney disproportionately.
- **Homes built which may not cope with future climate**, “Future Proofing Residential Development in Western Sydney 2022”⁴ undertaken by the Western Sydney Regional Organisation of Councils (WSROC), included recommendations to amend the Building and Sustainability SEPP, these amendments have not been carried out.
- **Net Zero**: These reforms represent a missed opportunity to undertake a holistic approach to achieving the NSW Government’s Net Zero Cities Action Plan⁵ targets and reducing longer term living costs for residents.
- **Increased flood risk** due to reduction of deep soil and greater run-off.

2.4. Strategic economic issues

There are two key economic risks associated with these policy reforms:

- **Exacerbating employment deficits**: The policy reforms put additional housing pressures on large swathes of Sydney – including Parramatta – with no accompanying reforms to preserve, add to or intensify employment lands. It is expected that – barring intervention of some kind – the trend for population growth in Western Sydney will continue to outstrip jobs growth, and reforms of this nature will only exacerbate this current trend.
- **Limiting development of local centres**: Parramatta is challenged by an undersupply of retail floorspace, particularly supermarkets and other daily necessities. The proposed reforms may have unintended consequences of curtailing future local centre expansion and redevelopment potential, particularly in areas where dual occupancies are currently prohibited. Allowing new subdivision on residential-zoned land next to existing centre zoning effectively limits the scope of future expansion of commercial uses within a centre. Without fine-grained analysis, the reforms may also impact viability of future traffic and transport improvements within centres. Rezoning around local centres should be done holistically, encompassing residential and commercial uses and any infrastructure improvements needed to support those centres.

2.5. Social planning issues

There are two key social planning issues emerging from the reforms:

Potential impacts on housing affordability

- Housing affordability is a key challenge in City of Parramatta. In 2021, 26% of rental households and 19% of mortgage households experienced housing stress⁶. In the 5 years ending June 2023, median house rents have increased by an average of 4.7% p.a in the City of Parramatta compared to an increase of 4.2% p.a in Greater Sydney. In the same period, median unit rents have increased by an average of 3.7% p.a in the City of Parramatta compared to an increase of 2.7% p.a in Greater Sydney. The cost of housing in Parramatta has meant that key workers have moved out of the local government area. Between 2016 and 2021, 9 per cent of key workers left Parramatta for more affordable areas, which was one of the highest rates nationally⁷.
- To give an example of the shortfall of affordable housing in the private rental market, **Table 1** demonstrates that key workers – who are essential for the functioning of any city – are priced out of most housing across Sydney, including in Parramatta.

⁴ Outdated building codes could put lives at risk - WSROC

⁵ NSW Net Zero Cities Action Plan

⁶ <https://housing.id.com.au/parramatta/housing-stress#>

⁷ <https://urbanism.sydney.edu.au/tracking-the-housing-situation-commuting-patterns-and-affordability-challenges-of-essential-workers/>

Table 1: Rental affordability for key workers in Greater Sydney

Weekly salary	Occupation & career stage	% of Greater Sydney with affordable median rent ⁸		
		1 bedroom	2 bedroom	3 bedroom
\$1,950	Teacher (5 years)	32%	22%	12%
\$1,650	Police constable (5 years) Social worker Ambulance officer (2 years)	25%	15%	5%
\$1,550	Registered nurse / midwife (5 years)	23%	13%	2%
\$1,250	Enrolled nurse (5 years)	10%	2%	0%
\$1,150	Aged and disability carer, Educational aide	6%	1%	0%
\$1,050	Child carer, delivery driver	3%	0%	0%
\$960	Cleaner	2%	0%	0%

- The aim of the reform is to improve affordability; however, the opposite is likely because land impacted by the reforms will effectively receive a density uplift due to increased land use permissibility and development potential and land values may actually increase, potentially raising housing prices due to speculative property exchanges particularly in the short-term.

Lost opportunity to secure more Affordable Rental Housing

- Without embedding mechanisms to support the delivery of Affordable Rental Housing (i.e., contributions to a centralised fund or dedicated units within mid-rise RFBs) the increase in supply will not be accessible to the households currently experiencing housing stress and therefore have little to no impact in addressing the housing affordability crisis. Progressing the reforms in advance of any scheme will result in a lost opportunity for this housing stock to contribute to the supply of affordable rental housing and genuinely address the housing affordability crisis.

2.6. Infrastructure

Infrastructure issues emerging from the reforms are:

- Increasing population growth outside the areas identified within Council's Local Strategic Planning Statement (LSPS) along with its corresponding Local Housing Strategy (LHS) means there will be constraints on the ability to deliver additional community infrastructure and green open space as Council's Community Infrastructure Strategy (CIS) 2020 is aligned with the targets and growth planned for within the LHS and respective Development Contribution Plans.
- Without significant intervention, the proposed reforms will have permanent, long-term impacts on local infrastructure demand. This potential population growth has been considered against the community infrastructure benchmarks below in **Table 2**.
- The anticipated growth in population will place additional pressure on regional infrastructure which includes schools and hospitals (many of which are already operating above capacity and constrained). **Table 3** shows the demand on regional infrastructure anticipated.

Source: NSW Government, Department of Communities and Justice, taken from Gilbert, C., Nasreen, Z., and Gurran, N. (2023) Tracking the housing situation, commuting patterns and affordability challenges of essential workers: a report prepared for HOPE Housing, Sydney: The University of Sydney and HOPE Housing.

Table 2: Community infrastructure demand resulting from the estimated population growth

Type of infrastructure	Benchmark ⁹	Demand based on 2021 LGA population of 256,908 people ¹⁰	Additional demand generated by proposed reforms at 100% take up rate (209,508 people)	Additional demand generated by proposed reforms at 10% take up rate (20,950 people)
Library (District Level)	1:20,000-35,000 people 39m ² per 1,000 people + 20% for circulation	7.3 – 12.8 libraries 12,023.3m ²	6 - 10.5 libraries 9,805m ²	0.6 – 1 library 980.5m ²
Community Space	80m ² per 1,000 people	20,552.64m ²	16,760.64m ²	1,676m ² (estimated 1 community centre)
Parks	1 ha per 1,000 people	256.91ha	209.51ha	20.95ha
Sportsfields	1ha per 1,000 people	256.91ha	209.51ha	20.95ha
Natural areas and other open space	1ha per 1,000 people	256.91ha	209.51ha	20.95ha

Table 3: Regional infrastructure demand resulting from the estimated population growth

Type of infrastructure	Additional population	Additional infrastructure
Schools (primary and secondary)	3,059 school aged children (5 to 17 years) ¹¹	122 classrooms ¹²
Public hospitals	20,950 residents	53 hospital beds ¹³

2.7. Transport

There are three key transport issues emerging from the reforms:

- **Transport network:** The EIE does not demonstrate if and how consideration was made to existing capacity/service frequency at stations, nor what analysis was done to support the scale of density and population proposed. There is also no demonstrated consideration of active transport's role in connect people to local services and transport nodes.
- **Impacts on local roads/parking:** The reforms do not consider impacts on existing regional/local road networks from additional traffic and inevitable increased usage and reliance on on-street parking (given some of the proposed non-refusal car parking rates are lower than those in PDCP 2023). These issues will be further exacerbated by another likely impact of the reforms, which is increased and/or expanded driveway access points, further limiting on-street parking. A possible outcome for many local roads in R2 zones is functional conversion to one-way streets due to parking on both sides of the street. No consideration of these issues is evident in the EIE.

⁹ Benchmarks used in City of Parramatta's Community Infrastructure Strategy 2020
<https://www.cityofparramatta.nsw.gov.au/sites/council/files/2020-09/01%20CIS%20-%20Introduction.pdf>

¹⁰ 2021 Enumerated Population, <https://profile.id.com.au/parramatta/population>

¹¹ In City of Parramatta, 14.6% of the population are school aged children (5 to 17 years). With this percentage applied to the estimated 20,950 additional residents, it is estimated that 3,059 will be school aged children.

<https://profile.id.com.au/parramatta/service-age-groups>

¹² Based on an average class size of 25 students.

¹³ To maintain provision at Australia's 2021–22 average – 2.5 beds per 1,000 population.

<https://www.aihw.gov.au/reports/hospitals/australias-hospitals-at-a-glance/contents/access-to-hospitals>

- **Approach used for accessibility criteria:** Transport access should not be the single criteria for determining urban densification. Land should also have an 800m walking distance to a local centre (supported by active transport networks) to provide for the daily needs of the community. As discussed elsewhere in this submission, access to both transport and retail services are critical to delivering liveable and sustainable places. Council recommend the Department reassesses the criteria to determine where the reforms apply through this lens.

3. Impact on Council positions and policies

Council has several committed projects that are underway to deliver additional housing diversity and supply whilst maintaining the highest design quality and amenity. These projects are guided by the planning priorities and actions within Council's 20-year planning framework of the LSPS. The projects allow Council to implement a localised approach to reviewing permissibility, built form, and development scale to ensure any changes are responsive to site constraints and local considerations. The intended outcome of these projects is to deliver housing supply and diversity in suitable locations that are complementary to existing development patterns and infrastructure provision.

3.1. Missing Middle Study

The State Government recognises that ***“Councils are in the best position to investigate and confirm which parts of their local government areas are suited to additional medium density opportunities”*** in its current Greater Sydney Region Plan¹⁴ and Central City District Plan¹⁵.

Planning Priority 7 of Council's LSPS focuses on the need to provide for a diverse range of housing types and sizes via multiple actions. These include:

- the delivery of Housing Diversity Precincts which propose a mix of low and mid-rise housing (including the types proposed in the EIE such as manor houses, terraces, townhouses, and dual occupancy) (A44);
- reviewing medium density residential zones (A42); and
- monitoring and updating the Local Housing Strategy to ensure a diverse housing supply (A41).

As well, in its letter dated July 2020, the Department of Planning conditioned its approval of Council's Local Housing Strategy requiring Council to, in part, *demonstrate initiatives to achieve housing diversity...in the right locations* (Condition 5) and to *preserve future opportunity in the Parramatta to Epping and Parramatta to Norwest future mass transit corridors...for greater housing choice* (Condition 11).

To those ends, Council has programmed a 'missing middle' investigation and rezoning of suitable areas to deliver medium density housing as local infill development to support housing diversity. Key dates relating to this are included below:

- On 20 November 2023, Council resolved to bring forward the above LSPS and LHS actions if a commitment on Parramatta Light Rail 2 was made by the State Government. This resolution was made in response to the Minister for Planning and Public Spaces letter dated 30 October 2023 regarding the need for councils to deliver more low and mid-rise housing.
- The Lord Mayor wrote to the Minister with this position on 21 December 2023 and would ensure that greater density is located in accessible areas around transport.

This is in keeping with the State Government's policy position on Transit Orientated Development and Council's position in the LHS (Action L19).

¹⁴ Greater Sydney Region Plan – A Metropolis of Three Cities Page 61 https://greatercities.au/sites/default/files/2023-07/Greater%20Sydney%20Region%20Plan%20-%20A%20Metropolis%20of%20Three%20Cities_March2018.pdf

¹⁵ Central City District Plan – 'More housing in the right locations' Page 40 https://greatercities.au/sites/default/files/2023-07/Central%20City%20District%20Plan_March2018.pdf

The 'Missing Middle' investigation and rezoning would consider the local context of the City and the unique opportunity to delivered tailor precinct planning around Parramatta Light Rail Stage 2 stations to change housing permissibility and development standards. Applying the 'blanket' changes proposed under the reforms risks sterilising these precincts should new development commence under the reforms. This would result in the lost opportunity to deliver a localised planning response aimed at achieving the same outcome – greater housing diversity.

In addition, the scope of the Missing Middle study could also include the areas along the North-West Transit Way and explore the land 800m around each transit way stop. This is in keeping with the State Government's policy position on Transit Orientated Development and Council's position in the LHS (Action L19 and Department approval letter cited above). The precinct review could also include consideration of land zones including E1 and MU1 to co-locate transport and retail services provided within a centre.

Considering the above, Council requests a two-year deferred commencement to enable Council to pursue programmed solutions, the justification being:

- Housing delivery targets are being exceeded in the City
- A 'Missing Middle' investigation and rezoning is programmed to deliver the intended outcomes of the reforms which will bring housing diversity in a strategic planned approach
- Council's housing diversity criteria for larger sites, as per the LSPS and LHS, ensure planning proposals can delivery housing diversity
- There is a unique opportunity to precinct plan around new transit infrastructure across the City

3.2. Dual Occupancy Code SEPP Advocacy

Council resolved on 22 May 2023 to pursue an advocacy program to address concerns with the design of dual occupancy developments that are approved via the complying development certification process under the provisions of the Codes SEPP. Council's concerns relate to the design controls in the Codes SEPP and problems with the complying development process which are resulting in poor outcomes.

This resolution followed the State Government's decision to not support Council's proposed expanded dual occupancy prohibition area sought as part of the consolidated Parramatta LEP 2023 (as explained in detail in **Appendix 2**). A review of development outcomes identified the following issues for dual occupancy being delivered under both the DA and CDC approval pathways:

- Excessive bulk and scale.
- Dominant garages and driveways.
- Insufficient landscaping, tree planting, and deep soil.
- Poor street frontage design.
- Poor guidance for sloping sites and corner sites.

These are covered in detail in **Appendix 2**.

Council updated its DCP controls in response to these design issues as outlined in **Appendix 2** to improve the design outcome of dual occupancy development resulting from the Development Application process. The controls were informed by detailed design testing and analysis that considers site constraints and typical lots. To ensure good design is delivered under both approval pathways, amendments to the Code SEPP to improve controls and design outcomes is required.

The Department have advised that no changes are proposed to the Code SEPP under the current reforms. However, Council is aware that the NSW Government Architect is also proceeding with a Pattern Book to provide building designs for low and mid-rise housing typologies to support the reforms, with low-rise proposals consistent with the Pattern Book design able to be approved via the Complying Development process to accelerate housing delivery. Draft designs are expected to be on exhibition in mid-2024, and the Pattern Book will be available for use in late 2024 to early 2025.

Given these reforms are expected to come into force mid this year and the upcoming Pattern Book introduction, it has become more urgent to communicate Council's position on its concerns with the Code SEPP, and therefore will accelerate this work and forward a submission to the Minister for Planning, Minister for Fair Trading, NSW Building Commissioner and Government Architect which:

- identifies the changes Council recommends be made to the Codes SEPP in accordance with the design issues detailed in **Appendix 2**.
- requests that deficiencies in the operation of the Complying Development process be addressed by the State Government to ensure that poor development outcomes resulting from these processes are avoided.

The submission will make it clear that Council is seeking amendment to the Codes SEPP, improvements to the Complying Development Certification process and this inform any future Pattern Book or alternate controls for dual occupancy development.

4. Feedback on EIE questions

4.1. Council feedback on Infrastructure Needs

Section 4.4 of the EIE says the DoP are seeking feedback on:

“Council’s preferred approach to identifying and addressing additional infrastructure needs that arise as a result of the proposed changes. The aim is to ensure that the delivery of local infrastructure occurs at a rate that will keep up with the anticipated growth needed to address the housing crisis”. (p. 35).

Key points:

- Whilst additional low and mid rise housing delivered by the proposed provisions in the reforms will allow councils to collect more revenue as more dwellings are built, the housing growth from the proposed provisions will occur predominantly in the R2 and R3 zones and sporadically across the LGA, as opposed to coordinated growth via precinct planning. This presents challenges for Council.
- The reforms as modelled could see a theoretical increase in population of up to 210,000 additional residents. This is new growth on top of that discussed in Council’s Local Strategic Planning Statement (LSPS) along with its corresponding Local Housing Strategy (LHS), and that accounted for in Council’s Community Infrastructure Statement (CIS). Council’s existing 7.11 and 7.12 Contribution Plans align with these Strategies and reflect Council’s understanding of the community’s infrastructure needs.
- A holistic review of local infrastructure provision is required to enable the real cost increases in providing infrastructure to be recognised including the development contribution caps and rates and that have not been reviewed since introduced 15 years ago.
- Key elements of this review should include reviewing the appropriateness of current 7.11 and 7.12 rates (including indexing against present day costs and modern infrastructure category benchmarks, and re-evaluating apportionment), considering different spatial cost paradigms (e.g. greenfield vs. brownfield Councils), and re-examining infrastructure categories (including Essential Infrastructure classification).

Rationale:

- The 1% levy under the Section 7.12 framework has remained unchanged since it was originally introduced in 2008.
- Section 7.11 cap of \$20,000 per dwelling has been in place since 2008/2009 with no indexation having been introduced during this 15-year period, decreasing the real value of the cap.
- 7.11 infrastructure levies are significantly impacted by apportionment, and Council therefore will require other funding sources to match any gap that cannot be legitimately captured via development contributions.
- LGA wide needs analysis studies for each facility type category required. These studies would inform changes to Council’s Community Infrastructure Strategy.
- Councils do not have access to all relevant housing data to quickly respond and support better planning, short-term rental accommodation data, build-to-rent housing data (State Government approvals), and Affordable Rental Housing data (State Government approvals).

4.2. Council feedback on town centres within 800m walking distance precincts

Section 4.2 of the EIE (Page 30) states that the Department are seeking:

“Input from councils to determine which E1 and MU1 centres contain an appropriate level of goods, services and amenities, to be included in the 800 metres walking distance station town centre precincts.”

Key points:

- A minimum area of 6,000m² for E1 and MU1 zones is necessary for a centre to accommodate a full line supermarket of approximately 4,000-4,500m², accompanied by population-serving retail and commercial space.
- Proximity to an E1 and MU1 centre is not considered appropriate as the only criteria to satisfy to be suitable for low-rise and mid-rise housing. Centres suitable for low and mid-rise development should satisfy both criteria - i.e. be within 800m to a station AND to a centre with retail and services (not less than 6,000m² in size).
- Applying a 'blanket' one-size-fits all approach to land use and density surrounding E1 and MU1 centres may have the unintended consequence of restricting future centre expansion and redevelopment potential.
- Integrated planning at the precinct scale based on fine-grain analysis that takes into consideration the local planning context would determine the suitable uses and density to support centres as well as account for the necessary traffic and transport (both public and active) to make these centres viable and productive. Council is best placed to undertake this work.

Rationale:

- Council has identified 24 MU1 and E1 zones of 6,000m² or greater within or adjacent to the LGA (see **Figure 6**). A significant portion are located within low-density suburbs containing illegible street layouts with steep gradients and are poorly serviced by public transportation.
- Therefore, Council is of the view that areas suitable for low and mid-rise development should satisfy both criteria - i.e. be within 800m to a station AND to a centre with retail and services; not either/or¹⁶. If this approach is applied, there are 16 MU1 and E1 zones of 6,000m² or greater within or adjacent to the LGA that *are also* located on a rapid transport node (see **Figure 7**).
- Applying a 'blanket' one-size-fits all approach to land use and density surrounding E1 and MU1 centres may have the unintended consequence of restricting future centre expansion and redevelopment potential (particularly in areas where dual-occupancy dwellings are currently prohibited). The strata subdivision for low rise and mid-rise housing will 'lock in' that development type adjacent to the E1 or MU1 land. A best practice planning process that looks at the future of these centres in an integrated way can allow for appropriate future expansion.
- Even with a refined criteria regarding what a centre is (i.e. E1 or MU1 with 6,000m²) there are anomalies that arise that make one-size-fits-all policy approaches limited in their suitability and why a place-based approach that accounts for local contexts is necessary in order to implement policy changes¹⁷.
- Finally, should the Department reconsider the access criteria for where the reforms are to apply, Council does not support the term 'accessible area' in the Housing SEPP being used to guide where low and mid-rise housing should be located. This definition was adopted with consideration to social and affordable housing types (such as boarding houses) within the Housing SEPP and is not considered suitable for the housing types and tenure proposed under the reforms.

¹⁷ For example, Collett Park Shops in North Parramatta is an E1 centre that is 6,000m², however, there is no supermarket. While it satisfies the zone/size requirement, the retail offered does not satisfy the intention of the criteria to provide for daily needs of residents. This area is not suitable for expanded housing permissibility.

Figure 6: 24 MU1 and E1 centres of 6,000m² of greater within or adjacent to the LGA

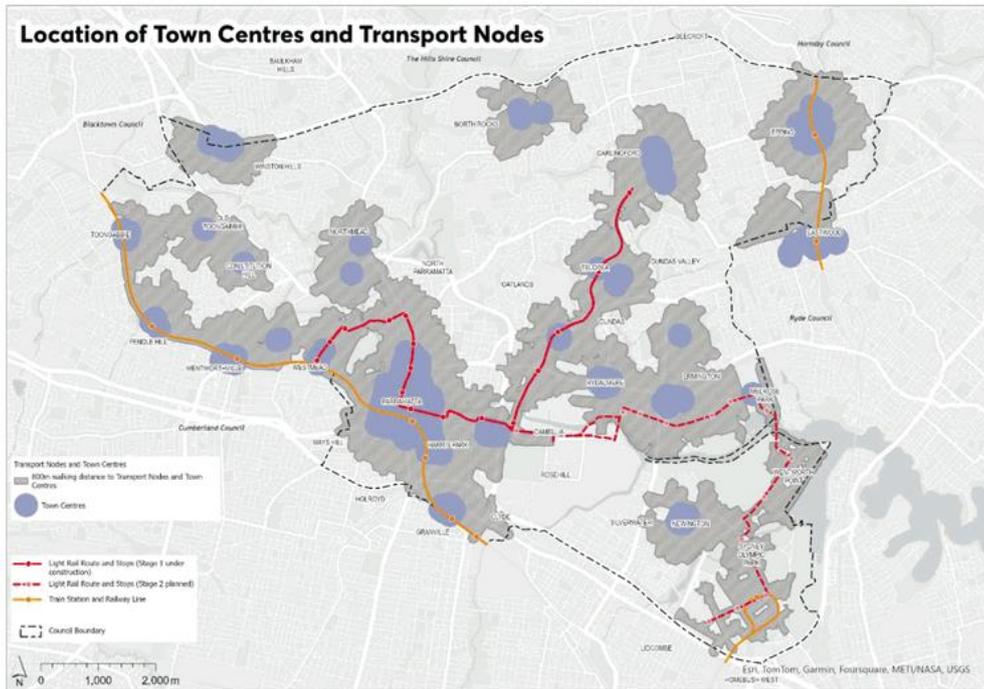
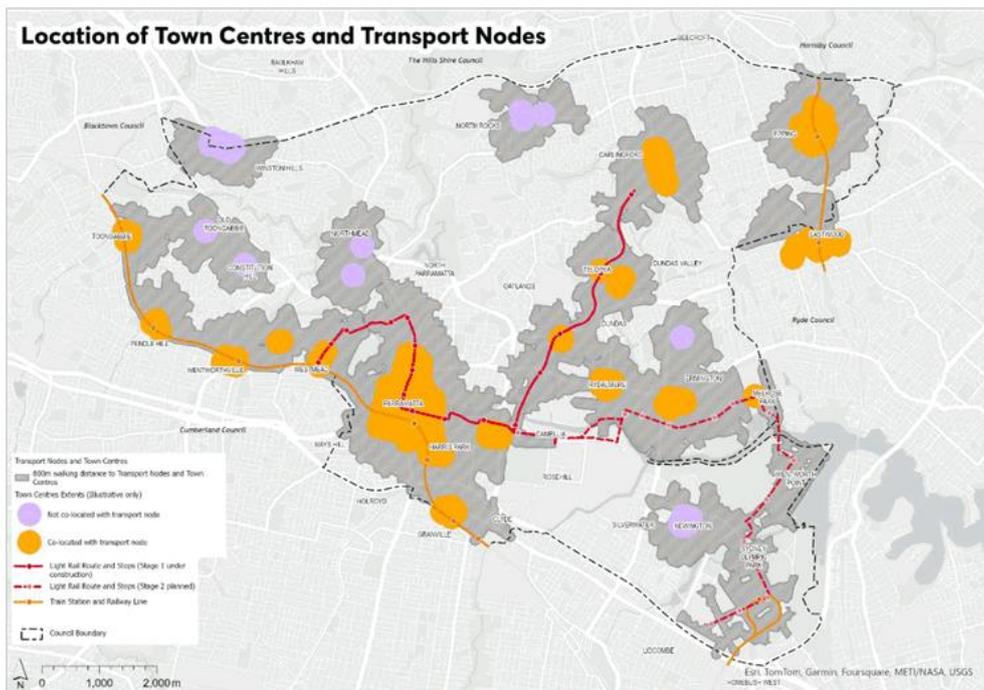


Figure 7: 16 MU1 and E1 centres of 6,000m² of greater within or adjacent to the LGA AND within the 800m walking distance of a centre and station



5. Conclusion

A two-year deferred commencement from the proposed changes outlined in the Low-and Mid-Rise Housing Reforms package is sought from the Department to enable Council to pursue programmed solutions including the 'missing middle' investigation and rezoning project. Justification for this position is,

- Council acknowledging the need to deliver greater housing diversity to assist in addressing national housing supply and affordability issues and Council's strong leadership and collaborative partnerships are critical to meet this challenge.
- Council having a compelling performance record for determining rezoning applications exceeding the housing target of 23,660 by 1,800 dwellings within the first two-and-a-half years of the 2021-2026 period; and Council is on track to rezone land to permit another 48,000 dwellings (almost 8,000 above the 2026-2036 target).
- Council planning for further strong housing growth with a number of precinct-scale proposals being considered and has brought forward the programmed 'missing middle' investigations and rezonings of suitable areas to deliver medium density housing proximate to rapid transport and services, adding this will assist the State Government's to meet the 5-year housing target set by the Federal Government.
- Council having a strong track record for delivering housing is based on quality local planning and design controls that are responsive to the local context that would be strengthened with alternate governance arrangements that increase the City's planning powers to influence city shaping policy changes for both high density precinct-scale developments and infill missing middle housing.

Council seeks a meeting with the Minister for Planning and Minister for Local Government to discuss the two-year deferred commencement request and governance measures that could be put in place to permit Council to work towards making a contribution to the housing capacity required to meet the National Blueprint target in an efficient manner.

Ongoing collaboration will be the most effective way to work towards sustainable, balanced and well-considered approaches to improving the supply of low-and mid-rise housing that are well-designed, affordable and appropriately located in our City.

Appendix 1 - Current permissibility within Heritage Conservation Areas and Special Character Areas

Table 1: Current permissibility* of Heritage Conservation Areas and Special Character Areas within the City of Parramatta

Development in Heritage Conservation Areas (HCAs) is limited through height and FSR controls. The proposed changes would impose height and FSR controls which are out of character and could compromise the preservation of HCAs.

HCA	Zoning	*Current PLEP 2023 permissibility	Current development pattern	**Proposed additional permissibility under low-and mid-rise housing reforms									
Boronia Avenue #1	R2	Dual occupancies currently prohibited Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.	Single detached dwellings, tree lined streets, large lots with wide frontages, ample tree canopy and landscaping with a small number of secondary dwellings (Granny Flats) approved.	Dual occupancies, manor houses, terraces and townhouse development. <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m
R2 Zone	Current Controls	Proposed Controls											
FSR	0.5:1	0.7-0.8:1											
Height	9m	9.5m											
Burnside Homes #2	R2 SP2 E1	Dual occupancies currently prohibited. R2 Zone: Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation. E1 Zone: Boarding houses, hostels, seniors housing, residential flat buildings, and shop top housing are currently permissible types of residential accommodation.	This area contains a number of significant buildings that currently accommodate educational establishments. There is also a portion of R2 zoned land and E1 across large lots that currently provide non-residential uses (i.e. cafe, community facilities, places of public worship).	Dual occupancies <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>Nil – 0.5:1</td> <td>0.65:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	Nil – 0.5:1	0.65:1	Height	9m	9.5m
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FSR	Nil – 0.5:1	0.65:1											
Height	9m	9.5m											

HCA	Zoning	*Current PLEP 2023 permissibility	Current development pattern	**Proposed additional permissibility under low-and mid-rise housing reforms									
East Epping #3	R2	Dual occupancies currently prohibited. Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.	Single detached dwellings, tree lined streets, large lots with wide frontages, ample tree canopy and landscaping.	Dual occupancies, manor houses, terraces and townhouse development. <table border="1"> <tr> <td>R2 Zone</td> <td>Current Controls</td> <td>Proposed Controls</td> </tr> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m
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Height	9m	9.5m											
Elizabeth Farm #4	R2	Dual occupancies currently prohibited. Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.	Single detached dwellings, tree lined streets, large lots with wide frontages and landscaping.	Dual occupancies, manor houses, terraces and townhouse development. <table border="1"> <tr> <td>R2 Zone</td> <td>Current Controls</td> <td>Proposed Controls</td> </tr> <tr> <td>FSR</td> <td>Nil</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>Part 6m & part 9.5m RL 11-14m</td> <td></td> </tr> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	Nil	0.7-0.8:1	Height	Part 6m & part 9.5m RL 11-14m	
R2 Zone	Current Controls	Proposed Controls											
FSR	Nil	0.7-0.8:1											
Height	Part 6m & part 9.5m RL 11-14m												
Epping/Eastwood #5	R2	Dual occupancies currently prohibited. Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.	Single detached dwellings, tree lined streets, large lots with wide frontages, ample tree canopy and landscaping.	Dual occupancies, manor houses, terraces and townhouse development. <table border="1"> <tr> <td>R2 Zone</td> <td>Current Controls</td> <td>Proposed Controls</td> </tr> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m
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Essex Street #6	R2	Dual occupancies currently prohibited. Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.	Single detached dwellings, tree lined streets, large lots with wide frontages, ample tree canopy and landscaping. Essex Street HCA also includes existing secondary dwellings on several lots. Recent changes are evident however, the historical character, streetscape pattern of the area remains.	Dual occupancies, manor houses, terraces and townhouse development. <table border="1"> <tr> <td>R2 Zone</td> <td>Current Controls</td> <td>Proposed Controls</td> </tr> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m
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HCA	Zoning	*Current PLEP 2023 permissibility	Current development pattern	**Proposed additional permissibility under low-and mid-rise housing reforms																		
Experiment Farm #7	R2 E1	<p>Dual occupancies currently prohibited.</p> <p>R2 Zone: Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.</p> <p>E1 Zone: Boarding houses, hostels, seniors housing, residential flat buildings, and shop top housing are currently permissible types of residential accommodation.</p>	<p>This area contains a mix of single detached dwellings on large lots and 3- to 4-storey RFB development.</p>	<p>Dual occupancies, manor houses, terraces and townhouse development in the R2 zoned portion.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>Nil</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>6m</td> <td>9.5m</td> </tr> </tbody> </table> <p>The south-western portion of the HCA is currently zoned E1.</p> <table border="1"> <thead> <tr> <th>E1 Zone</th> <th>Current Controls</th> <th>Proposed controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>Nil</td> <td>3:1</td> </tr> <tr> <td>Height</td> <td>6m</td> <td>21m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	Nil	0.7-0.8:1	Height	6m	9.5m	E1 Zone	Current Controls	Proposed controls	FSR	Nil	3:1	Height	6m	21m
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E1 Zone	Current Controls	Proposed controls																				
FSR	Nil	3:1																				
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Harris Park West #8	R2 E1	<p>Dual occupancies currently prohibited.</p> <p>R2 Zone: Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.</p> <p>E1 Zone: Boarding houses, hostels, seniors housing, residential flat buildings, and shop top housing are currently permissible types of residential accommodation.</p>	<p>This area contains a mix of residential development including 3-to-4 storey RFB development and businesses i.e. restaurants and local shops. The subdivision pattern and cottages which offer unique historical character remains unchanged.</p>	<p>Dual occupancies, manor houses, terraces and townhouse development in the R2 zoned portion.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>Nil</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>6m</td> <td>9.5m</td> </tr> </tbody> </table> <p>The western and southern portion of the HCA is currently zoned E1,</p> <table border="1"> <thead> <tr> <th>E1 Zone</th> <th>Current Controls</th> <th>Proposed controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>Nil</td> <td>3:1</td> </tr> <tr> <td>Height</td> <td>6m-9.2m</td> <td>21m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	Nil	0.7-0.8:1	Height	6m	9.5m	E1 Zone	Current Controls	Proposed controls	FSR	Nil	3:1	Height	6m-9.2m	21m
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HCA	Zoning	*Current PLEP 2023 permissibility	Current development pattern	**Proposed additional permissibility under low-and mid-rise housing reforms																		
North Parramatta #9	R2 R3	<p>Dual occupancies currently prohibited.</p> <p>R2 Zone: Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.</p> <p>R3 Zone: Dwelling houses, secondary dwellings, dual occupancies, boarding houses, group homes, hostels, multi-dwelling housing, attached dwellings, semi-detached dwellings, seniors housing, are currently permissible types of residential accommodation.</p>	<p>This area contains a mix of single detached dwellings and 2-3-to-storey RFB development. Some of the buildings are occupied by businesses.</p> <p>Recent changes are evident however, the historical character, streetscape pattern of the area remains.</p>	<p>Church Street North SEPP includes rezoning of the southern portion of the North Parramatta Heritage area from R2 and R3 to MU1, this would allow, dual occupancies, manor houses, terraces, townhouses, RFBs and Shop top housing development.</p> <table border="1"> <thead> <tr> <th>MU1 Zone</th> <th>Current Controls</th> <th>Proposed controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>Nil</td> <td>3:1</td> </tr> <tr> <td>Height</td> <td>9.2m</td> <td>21m</td> </tr> </tbody> </table> <p>The remainder of the HCA which remains R2 will permit dual occupancies, manor houses, terraces and townhouse development.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>05:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table>	MU1 Zone	Current Controls	Proposed controls	FSR	Nil	3:1	Height	9.2m	21m	R2 Zone	Current Controls	Proposed Controls	FSR	05:1	0.7-0.8:1	Height	9m	9.5m
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FSR	05:1	0.7-0.8:1																				
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Rosebank Avenue #10	R2	<p>Dual occupancies currently prohibited.</p> <p>Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.</p>	<p>Single detached dwellings, tree lined streets, large lots with wide frontages, ample tree canopy and landscaping.</p> <p>Immediately outside of the HCA boundary, there are newly developed 4-storey RFB.</p>	<p>Dual occupancies, manor houses, terraces and townhouse development.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>05:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	05:1	0.7-0.8:1	Height	9m	9.5m									
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Silverwater Prison Complex #11	SP2	N/A	Conservation zone associated with prison facilities	N/A as zoning not impacted under the reforms																		

HCA	Zoning	*Current PLEP 2023 permissibility	Current development pattern	**Proposed additional permissibility under low-and mid-rise housing reforms																		
Sorrell Street #12	R2 R3	<p>Dual occupancies currently prohibited on R2 land.</p> <p>R2 Zone: Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.</p> <p>R3 Zone: Dwelling houses, secondary dwellings, dual occupancies, boarding houses, group homes, hostels, multi-dwelling housing, attached dwellings, semi-detached dwellings, seniors housing, are currently permissible types of residential accommodation.</p>	Contains small single storey cottages and contains legacy 3- to 4-storey RFB development	<p>Dual occupancies, terraces, townhouses and manor houses in the R2 zoned portion.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table> <p>RFBs in the portion zoned R3.</p> <table border="1"> <thead> <tr> <th>R3 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.6:1</td> <td>3:1</td> </tr> <tr> <td>Height</td> <td>11m</td> <td>21m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m	R3 Zone	Current Controls	Proposed Controls	FSR	0.6:1	3:1	Height	11m	21m
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South Parramatta #13	R2	<p>Permits detached dual occupancies through precinct specific LEP and DCP controls (drafted circa 2017). Attached dual occupancies not appropriate due to heritage fabric, and not permitted under the LEP/DCP (discussed further below).</p> <p>Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.</p>	Single detached dwellings and detached secondary dwellings, tree lined streets, large lots with wide frontages.	<p>Dual occupancies, manor houses, terraces and townhouse development.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.4:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>7.5m</td> <td>9.5m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.4:1	0.7-0.8:1	Height	7.5m	9.5m									
R2 Zone	Current Controls	Proposed Controls																				
FSR	0.4:1	0.7-0.8:1																				
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Tottenham Street #14	R2	<p>Dual occupancies currently prohibited.</p> <p>Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.</p>	Contains small group of single detached dwellings alongside the railway line.	<p>Dual occupancies, manor houses, terraces and townhouse development.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m									
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HCA	Zoning	*Current PLEP 2023 permissibility	Current development pattern	**Proposed additional permissibility under low-and mid-rise housing reforms									
Wyralla Avenue #15	R2	Dual occupancies currently prohibited. Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.	Single detached dwellings, tree lined streets, large lots with wide frontages, ample tree canopy and landscaping.	Dual occupancies, manor houses, terraces and townhouse development.									
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Special Character Area (SCA)	Zoning	*Current PLEP 2023 permissibility	Current development pattern	**Proposed additional permissibility under Low-and mid-rise housing reforms									
Area bound by Brickfield, Belmore, Buller and Albert Streets, North Parramatta (f)	R3 R4	<p>R3 Zone: Dwelling houses, secondary dwellings, dual occupancies, boarding houses, group homes, hostels, multi-dwelling housing, attached dwellings, semi-detached dwellings, seniors housing, are currently permissible types of residential accommodation.</p> <p>R4 Zone: Dwelling houses, secondary dwellings, dual occupancies, boarding houses, hostels, multi-dwelling housing, attached dwellings, semi-detached dwellings, seniors housing, residential flat buildings and shop top housing are currently permissible types of residential accommodation.</p>	Contains 2-to-3 storey apartments, single detached dwellings and tree lined streets.	RFBs in the portion zoned R3.									
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Hillside Estate, Ermington (h)	R2	Dual occupancies, dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.	Existing attached dual occupancies, single detached dwellings, large lots with wide frontages.	<p>Development of terraces, townhouses and manor houses.</p> <table border="1" data-bbox="1442 1126 1771 1275"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m																					
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Special Character Area (SCA)	Zoning	*Current PLEP 2023 permissibility	Current development pattern	**Proposed additional permissibility under Low-and mid-rise housing reforms																		
Thomas and Lombard Streets, Northmead (c)	R2 E1	<p>R2 Zone: Dual occupancies, dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.</p> <p>E1 Zone: Boarding houses, hostels, seniors housing, residential flat buildings, and shop top housing are currently permissible types of residential accommodation.</p>	Single detached dwellings and detached secondary dwellings, tree lined streets, large lots with wide frontages.	<p>Development of terraces, townhouses and manor houses.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>E1 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>1.5:1</td> <td>2:1</td> </tr> <tr> <td>Height</td> <td>12m</td> <td>16m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m	E1 Zone	Current Controls	Proposed Controls	FSR	1.5:1	2:1	Height	12m	16m
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Jeffery Avenue, North Parramatta (d)	R2	Dual occupancies, dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.	Single detached dwellings, tree lined streets, large lots with wide frontages, ample tree canopy and landscaping.	<p>Development of terraces, townhouses and manor houses.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m									
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Height	9m	9.5m																				
Sutherland Road, North Parramatta (e)	R2	<p>Dual occupancies are permitted except for areas shown as prohibited on Council's Dual Occupancy Map.</p> <p>Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.</p>	Single detached dwellings, tree lined streets, large lots with wide frontages, ample tree canopy and landscaping.	<p>Subdivision of dual occupancy on eastern edge of SCA.</p> <p>Development of terraces, townhouses and manor houses.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m									
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Special Character Area (SCA)	Zoning	*Current PLEP 2023 permissibility	Current development pattern	**Proposed additional permissibility under Low-and mid-rise housing reforms									
Sylvia Gardens, Northmead (b)	R2	Dual occupancies currently prohibited. Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.	Single detached dwellings, tree lined streets, large lots with wide frontages, ample tree canopy and landscaping.	<p>Subdivision of dual occupancies. Development of terraces, townhouses and manor houses.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m
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Winston Hills (a)	R2	Dual occupancies currently prohibited. Dwelling houses, secondary dwellings, group homes, hostels and seniors housing are currently permissible types of residential accommodation.	Single detached dwellings, tree lined streets, large lots with wide frontages, ample tree canopy and landscaping.	<p>Subdivision of dual occupancies. Development of terraces, townhouses and manor houses.</p> <table border="1"> <thead> <tr> <th>R2 Zone</th> <th>Current Controls</th> <th>Proposed Controls</th> </tr> </thead> <tbody> <tr> <td>FSR</td> <td>0.5:1</td> <td>0.7-0.8:1</td> </tr> <tr> <td>Height</td> <td>9m</td> <td>9.5m</td> </tr> </tbody> </table>	R2 Zone	Current Controls	Proposed Controls	FSR	0.5:1	0.7-0.8:1	Height	9m	9.5m
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*Note. Permissibility within Table strictly relates to permissible types of residential accommodation and does not include other permissible uses listed within the R2 Zone of the Land Use Table of Parramatta LEP 2023.

**proposed permissibility of terraces, manor houses, townhouses within the R2 Zone, and mid-rise apartment blocks in R3 zone, are subject to being in 800m walking distance to a station and E1 or MU1 centre, and subject to additional development standards.

Appendix 2 – Dual occupancy design Issues

The information in this Appendix collates the design issues with dual occupancy developments that were identified by Council during the preparation of the Harmonisation DCP.

Further background information is outlined in this submission in Section 3.2 and the Council Report for the 26 February 2023 Business Paper.



DUAL OCCUPANCY DEVELOPMENT DESIGN ISSUES

DUAL OCCUPANCY APPROVAL PATHWAYS

1. Development Application *assessed by Council*

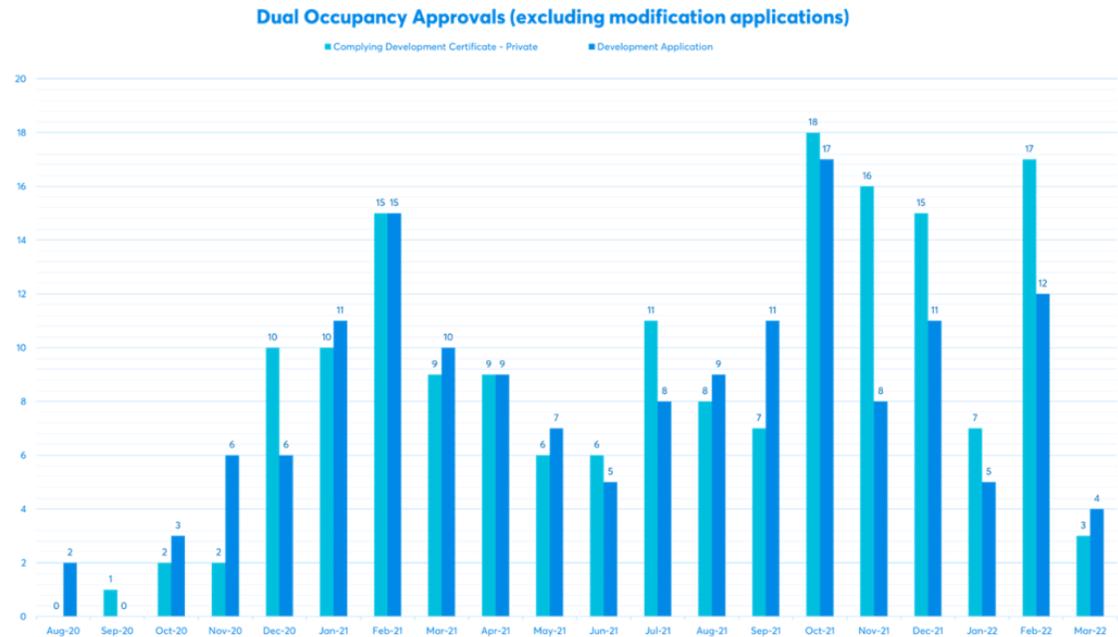
- Assessed using LEP and DCP controls
- Merit assessment done on a site-by-site basis

2. Complying Development Certificate *issued by Private Certifiers (or Council)*

- Assessed using Part 3B Low Rise Medium Housing Code of the Exemption and Complying Development Codes SEPP
- Circumvents Council's DA process - Council has no ability to influence the design and development outcome.

Since Part 3B came into effect in July 2020 approximately **50% of dual occupancies are approved via CDC** and **50% approved via the DA process**.

DA vs CDC APPLICATIONS



Note: Part 3B of Codes SEPP came into effect in July 2020 – graph shows steady increase in CDC applications following its effect

COMPLYING DEVELOPMENT PROCESS

Council has no involvement in the CDC process

- No ability to inform the development outcome.
- Therefore, **Council does not have the ability to mitigate impacts.**

No merit assessment via CDC process

- **Certifier ticks off relevant criteria.**
- Assessment is done on a site-by-site basis, regardless of context.
- Cumulative impact not a consideration under the CDC process (unlike the DA process).

No community consultation via CDC process

- Certifiers only required to notify 7 days prior to work starting.
- No consultation - **notification is for information purposes only.**
- Community does not have the ability to raise site-specific impacts and the process does not allow for site specific impacts to be mitigated.

On 12 September 2022, Council resolved to advocate for changes to the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 to improve design outcomes for dual occupancy development as part of the LGNSW Annual Conference.

KEY LEP CONTROLS FOR R2 LOW DENSITY ZONE

- **Minimum site area:** 600sqm
- **Minimum street frontage:** 15m
- **Key built form controls:** 0.5:1 FSR + 9m HOB i.e. 2 storeys
- **Type – attached vs detached:**
 - **Detached** dual occupancy only permitted if the land contains:
 - a heritage item; contains 2 street frontages or is a corner lot; or located in South Parramatta Conservation Area.
 - **Attached** dual occupancy permitted elsewhere.
- **Testing of dual occupancy development responds to above controls and delivers FSR of 0.5:1**



1. DUAL OCCUPANCIES KEY ISSUES & OBSERVATIONS

DUAL OCCUPANCIES - KEY ISSUES

As observed through:

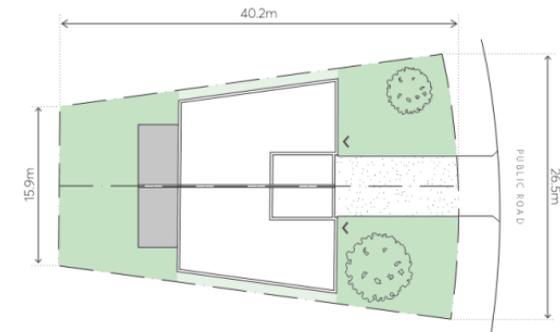
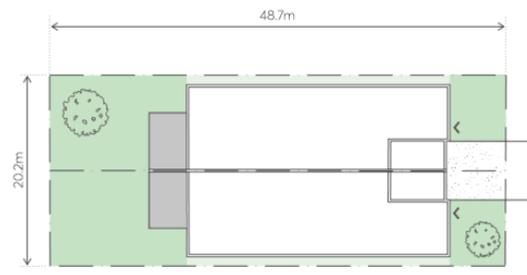
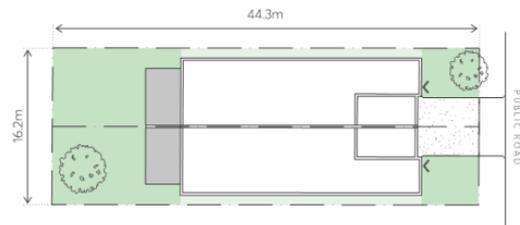
- site visits, and
- a review of recent DA and CDC applications

These issues are present in dual occupancies that have been approved through both the CDC and DA pathways.

The following recommended controls aim to address these issues to improve the built form outcomes for DA applications.

- 1. buildings that appear very overscaled for their site and context,**
- 2. dominant garages and driveways,**
- 3. insufficient landscaping and deep soil to support tree planting,**
- 4. poor street frontage design including a lack of articulation and poorly defined entries, and**
- 5. a lack of tailored guidance for sloping sites and corner lots.**

KEY TEST SITES



SMALL SITE

FOUND IN REGULARLY GRIDDED AREAS

15m x 40m (600m²)

LARGE SITE

FOUND IN REGULARLY GRIDDED AREAS

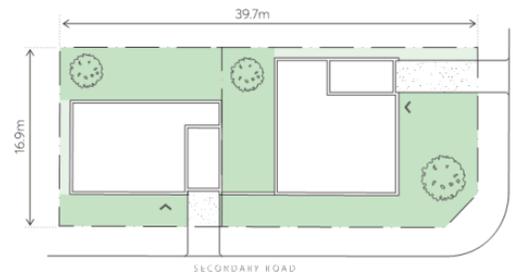
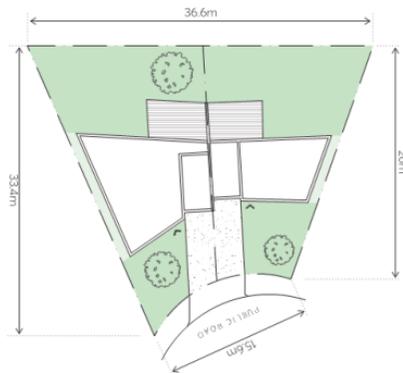
20m x 50m (1000m²)

TAPER TO REAR SITE

FOUND ON CURVILINEAR STREETS

26m at street x 40m length (850m²)

KEY TEST SITES



TAPER TO FRONT SITE

FOUND IN CUL-DE-SACS

16m at street x 35m length (680m²)

CORNER SITE

CONTEXT VARIES

16m at street x 40m length (640m²)



2. PARRAMATTA DCP 2023 DESIGN RESPONSE

ISSUE - BUILDING BULK & SCALE

- All levels of a dual occupancy **built up to the front setback**.
- Dominant **vertical articulation**.
- **Lack of separation** between neighbouring lots.

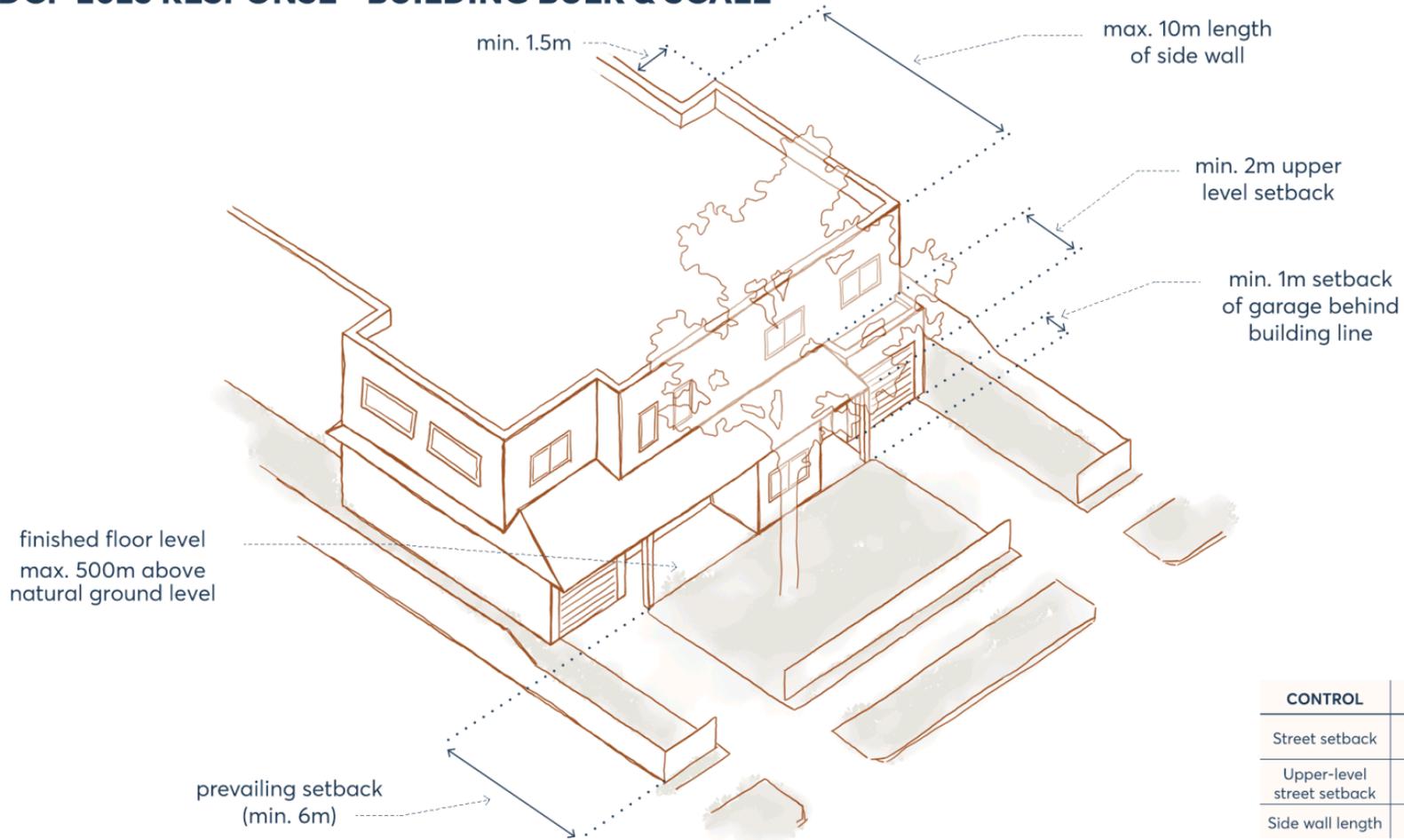


IMPROVED RESPONSE

- Building **sets back upper storey**.
- **Garages set back** from building line.
- Building **facades step** to avoid long length of walls.

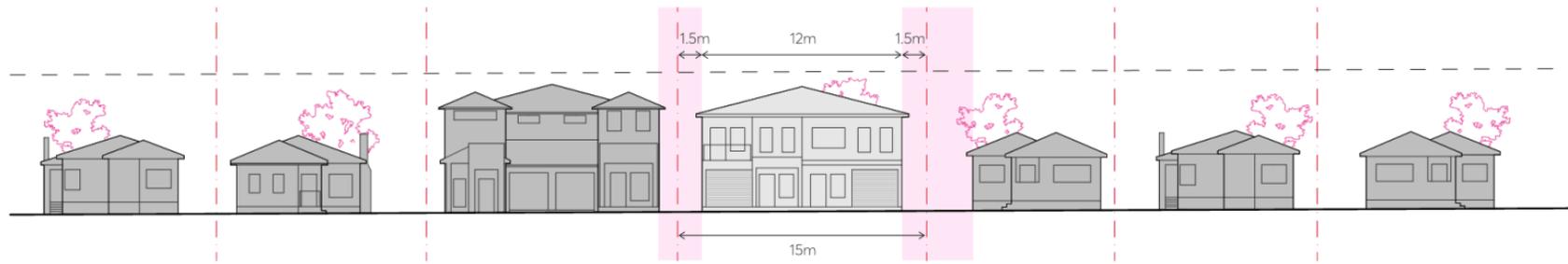


PDCP 2023 RESPONSE - BUILDING BULK & SCALE

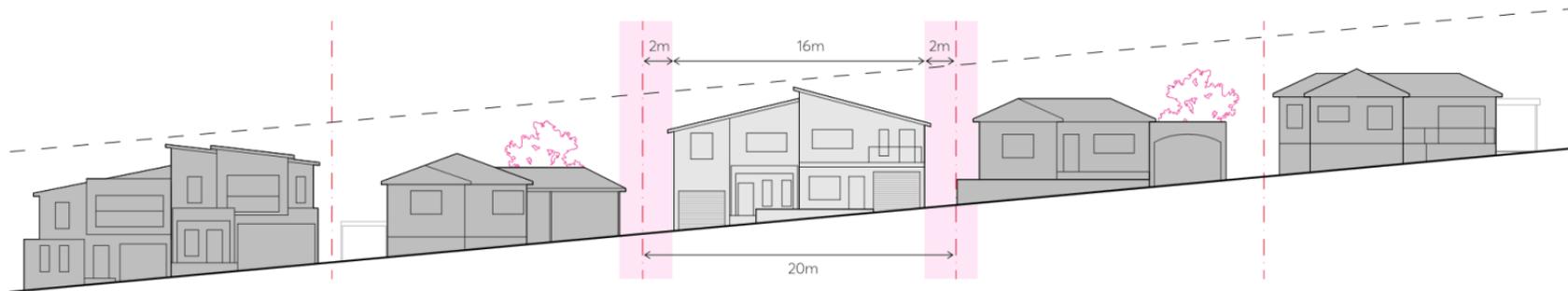


CONTROL	CDC SEPP	PDCP 2023
Street setback	Average (min. 2-5m)	Prevailing (min. 6m)
Upper-level street setback	-	Min. 2m
Side wall length	-	Max. 10m

PDCP 2023 RESPONSE - BUILDING BULK & SCALE



STREET ELEVATION - SMALL SITE



STREET ELEVATION - LARGE SITE

CONTROL	CDC SEPP	PDCP 2023
Side setback	Min. 0.9-2.5m	Min. 1.5m
Building width	based on lot width	80% of frontage width

ISSUE - DOMINANT GARAGES & DRIVEWAYS

- Excessive widths to garages and driveways.
- Third-storey semi-undergrounded garages.
- Shared driveways at different finished ground levels.
- Retaining walls or fencing along the centreline of driveways.



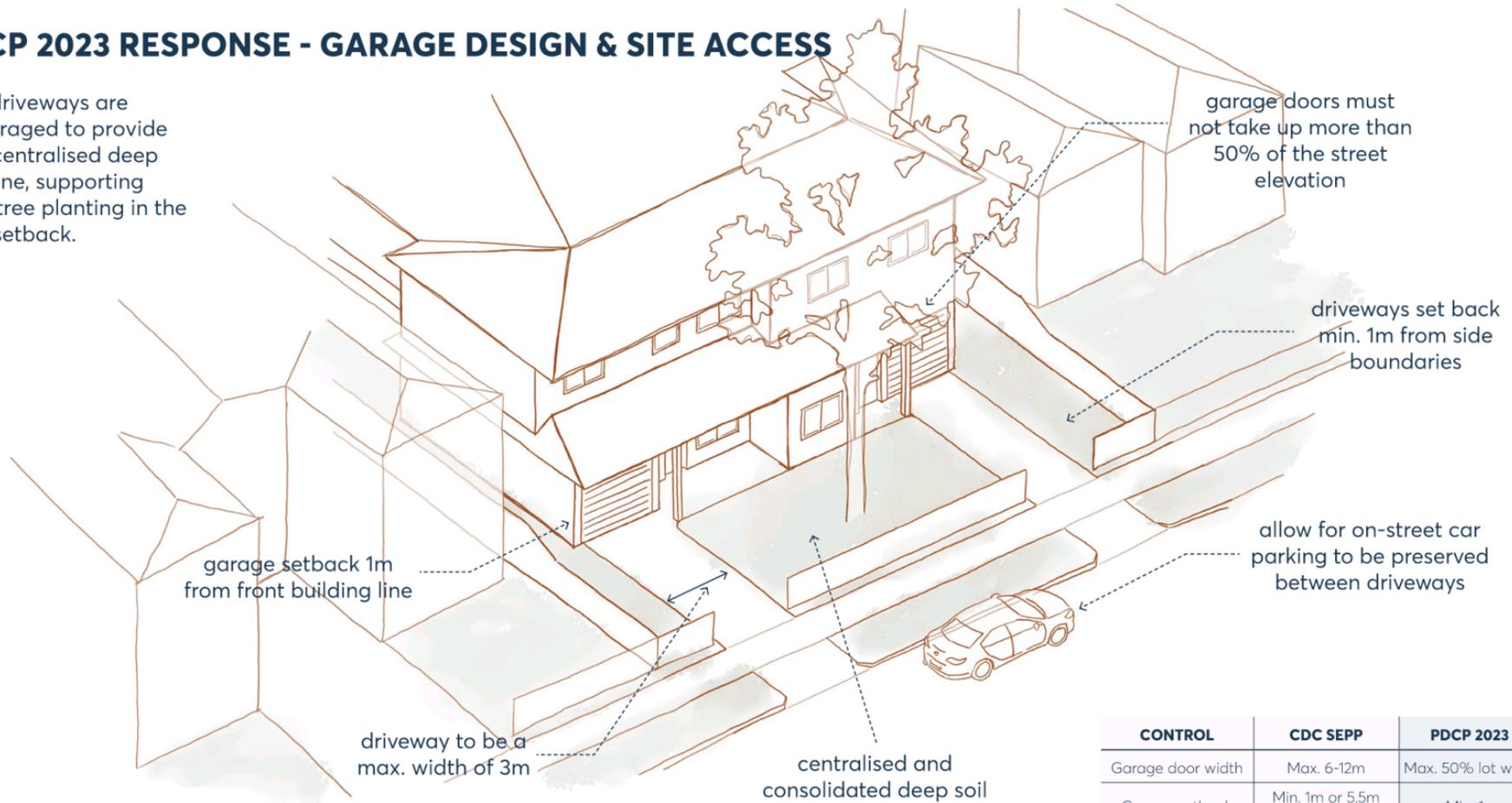
IMPROVED RESPONSE

- Split driveways minimise apparent appearance of hardscaping.
- Centralised landscaping area can be utilised to soften building from the street.
- Split driveways utilised to better negotiate sites sloping along the street.



PDCP 2023 RESPONSE - GARAGE DESIGN & SITE ACCESS

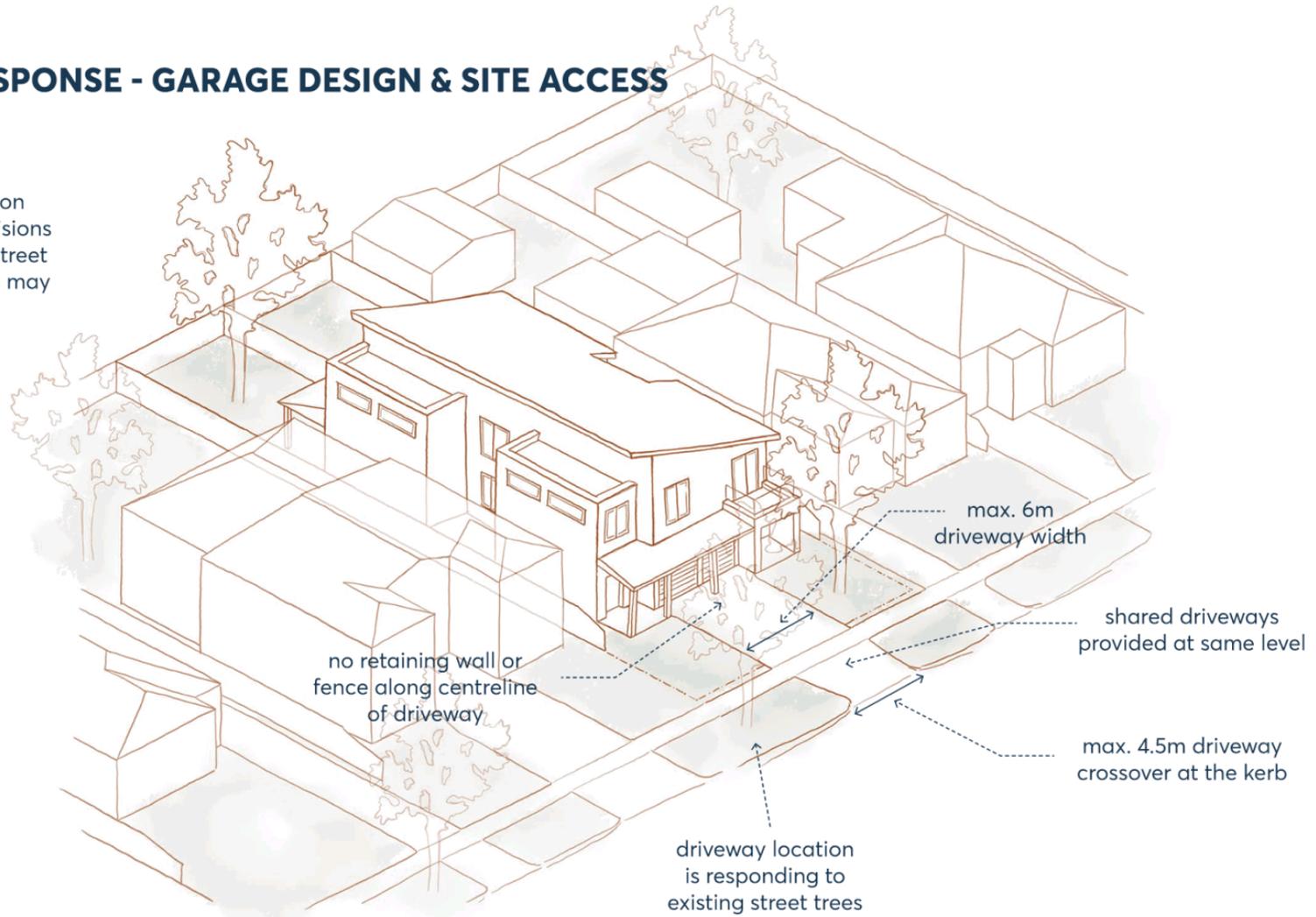
Split driveways are encouraged to provide for a centralised deep soil zone, supporting large tree planting in the front setback.



CONTROL	CDC SEPP	PDCP 2023
Garage door width	Max. 6-12m	Max. 50% lot width
Garage setback	Min. 1m or 5.5m from boundary	Min. 1m
Driveway width	-	Max. 3m (split), max. 6m (shared)

PDCP 2023 RESPONSE - GARAGE DESIGN & SITE ACCESS

Where split driveways are not possible due to constrained site width, on street car parking provisions or location of existing street trees, shared driveways may be used, provided:



ISSUE - INSUFFICIENT LANDSCAPING, TREE PLANTING & DEEP SOIL

- Front yards dominated by **hardscaping**.
- Landscaping reduced to **small boundary planters** or **strips of lawn**.
- **Lack of tree planting** or apparent tree removal.
- **Separate driveways and pedestrian paths** that reduce potential for deep soil.

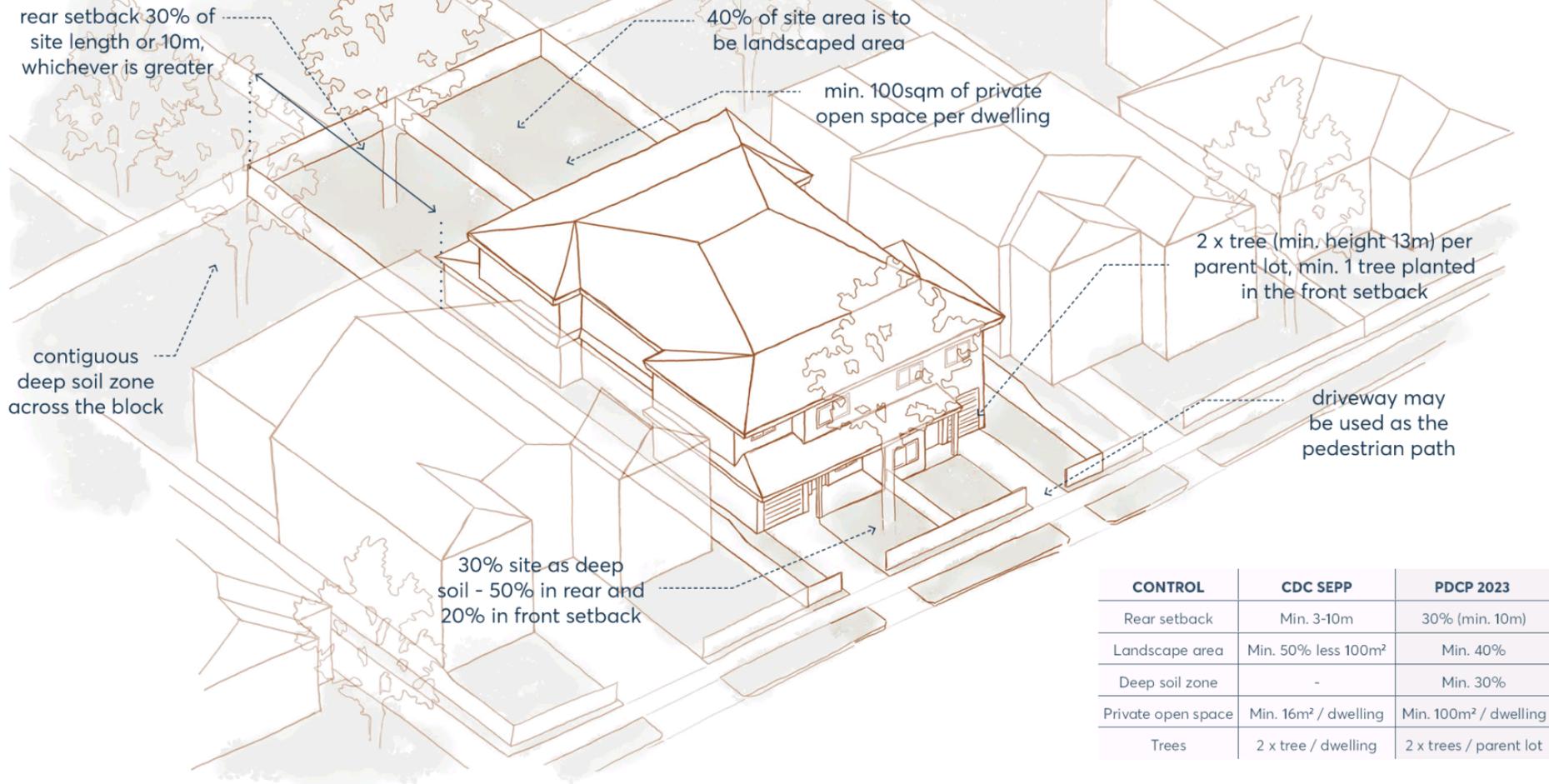


IMPROVED RESPONSE

- Centralised & **consolidated space for deep soil** planting.
- Existing **mature trees retained**.
- **Driveway used as pedestrian path**, or pervious surfaces used.



PDCP 2023 RESPONSE - LANDSCAPING, TREE PLANTING & DEEP SOIL



CONTROL	CDC SEPP	PDCP 2023
Rear setback	Min. 3-10m	30% (min. 10m)
Landscape area	Min. 50% less 100m ²	Min. 40%
Deep soil zone	-	Min. 30%
Private open space	Min. 16m ² / dwelling	Min. 100m ² / dwelling
Trees	2 x tree / dwelling	2 x trees / parent lot

ISSUE - POOR STREET FRONTAGE DESIGN

- **Poorly defined dwelling entries**
- Lack of habitable rooms looking onto the street.
- **Poor or arbitrary articulation** of street facades.
- **Mirrored designs** that do not respond to their context.

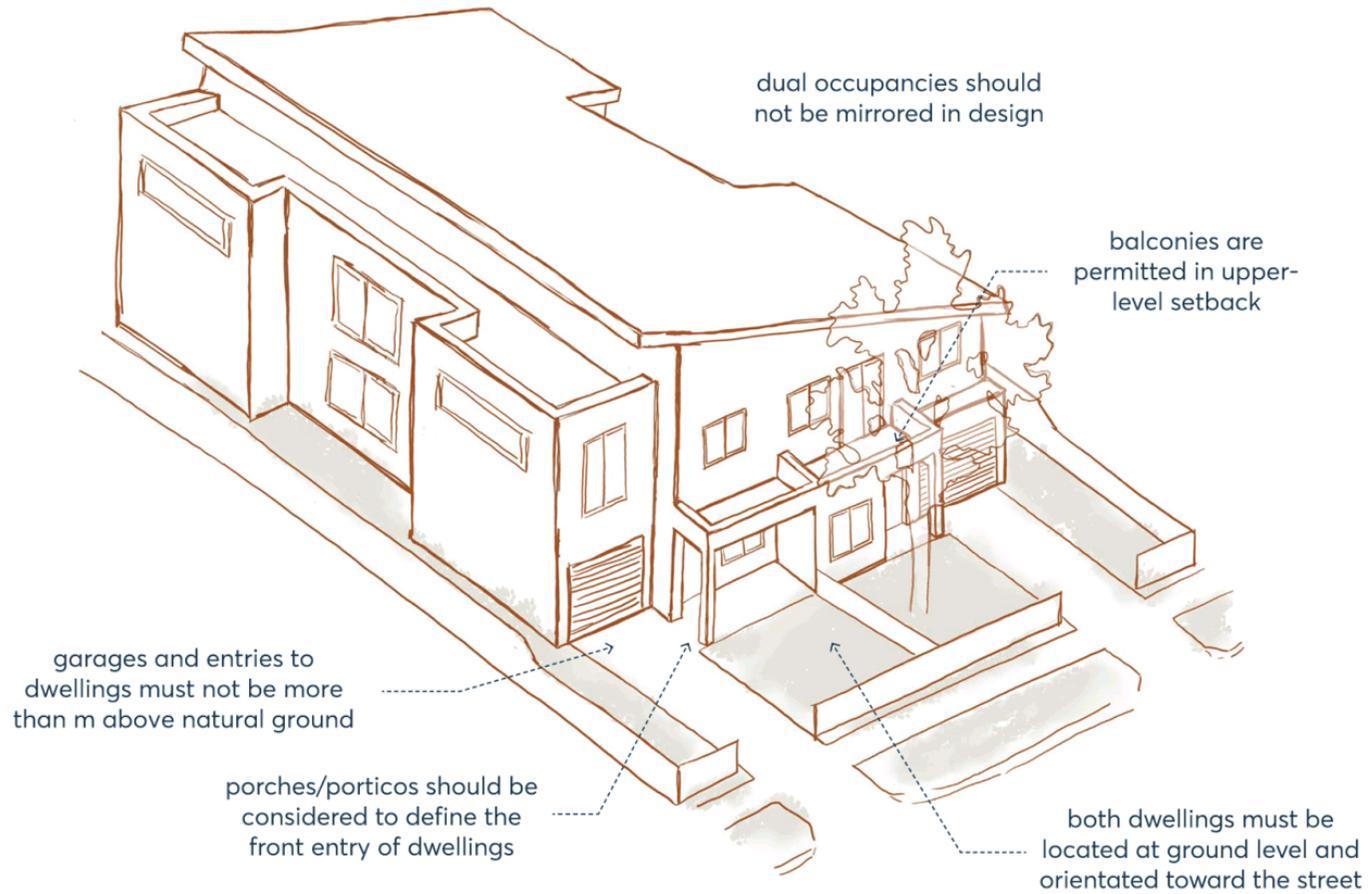


IMPROVED RESPONSE

- **Varied roof form** used to break up mass of building.
- Dwellings better **separated by recess** over blade wall.
- **No mirroring** in the building form.
- **Porches/porticos** utilised to define dwelling entry.



PDCP 2023 RESPONSE - STREET FRONTAGE DESIGN



ISSUE - LACK OF GUIDANCE FOR SLOPING SITES & CORNER LOTS

Sloping Sites

- Dual occupancies on sloping sites presenting as **three-storeys at the street.**
- **Large sets of externalised stairs** leading to dwelling entry that is above the street level.
- **Odd building proportions** where dwelling is stepped (1-storey at street plus 2-storeys above).



Corner Lots

- **Excessive bulk** along the long side of a corner site.
- **No sense of address** to secondary street of corner lots.



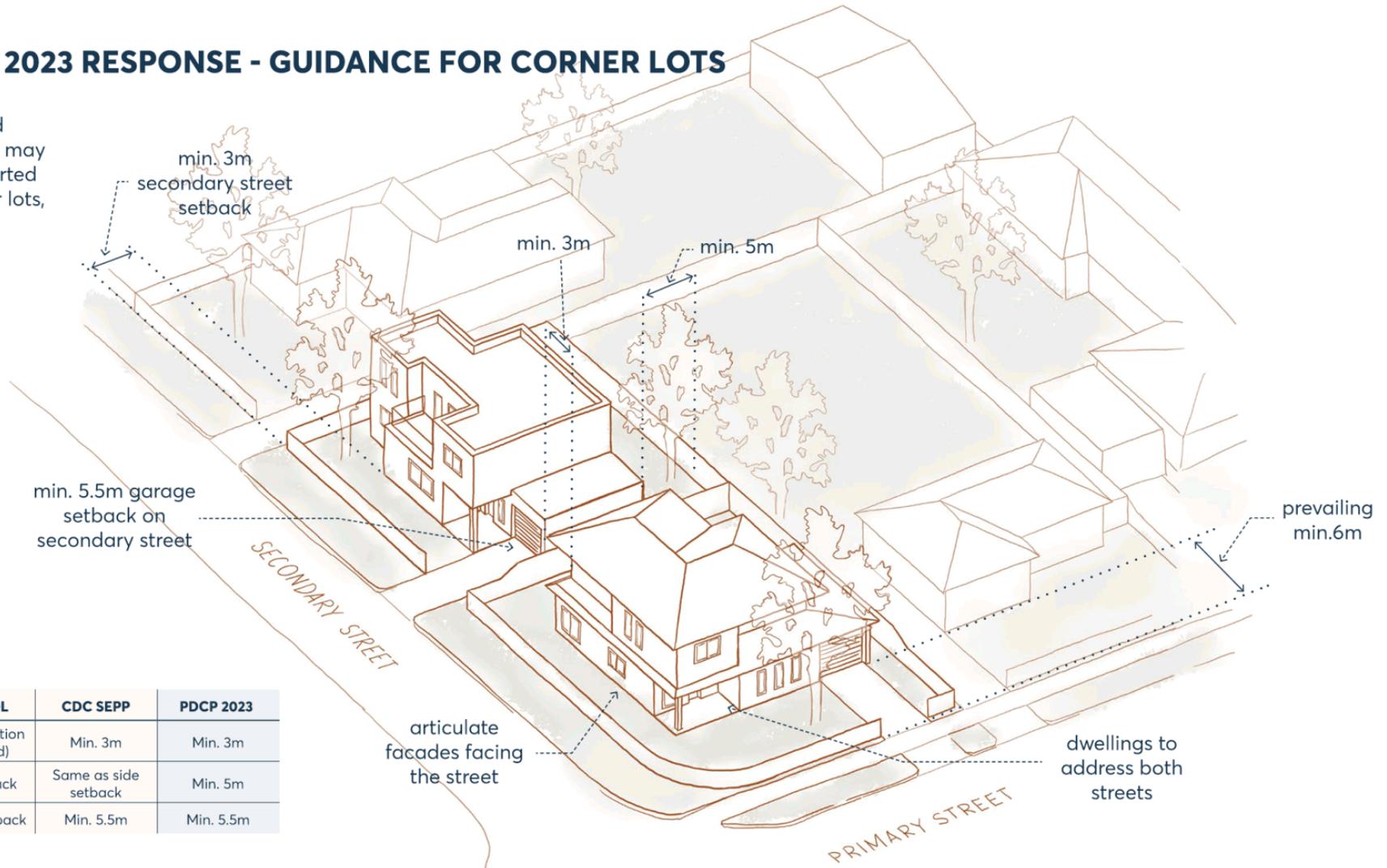
PDCP 2023 RESPONSE - GUIDANCE FOR SLOPING SITES

Sloping sites may utilise the topography to provide semi-undergrounded garages, provided:



PDCP 2023 RESPONSE - GUIDANCE FOR CORNER LOTS

Detached dwellings may be supported on corner lots, provided:



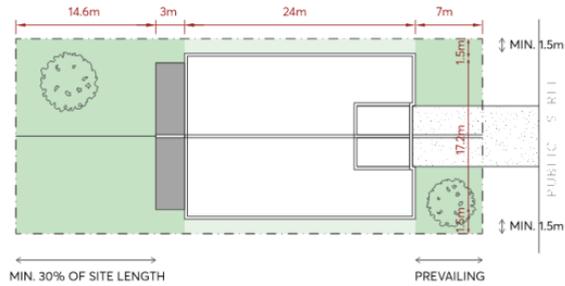
CONTROL	CDC SEPP	PDCP 2023
Min. separation (detached)	Min. 3m	Min. 3m
Rear setback	Same as side setback	Min. 5m
Garage setback	Min. 5.5m	Min. 5.5m



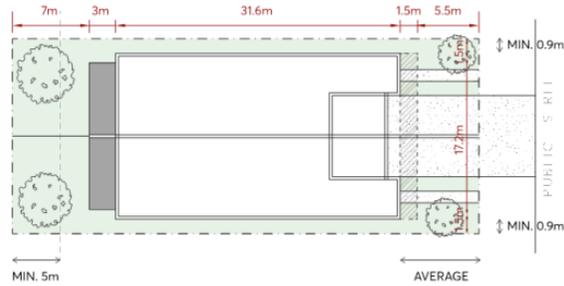
3. BUILDING ENVELOPE OUTCOMES

APPLICATION OF CONTROLS

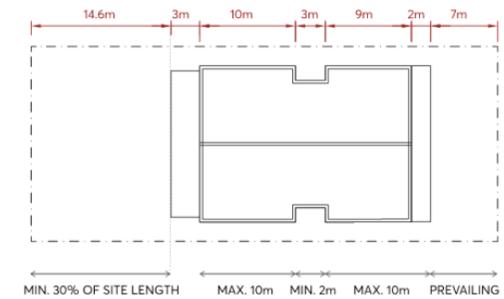
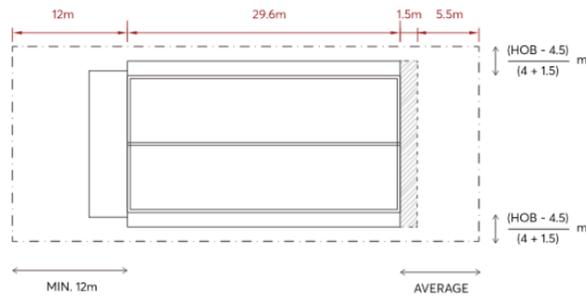
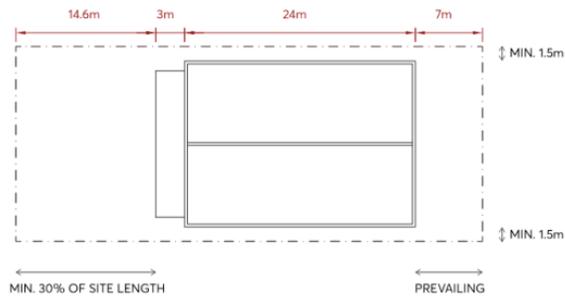
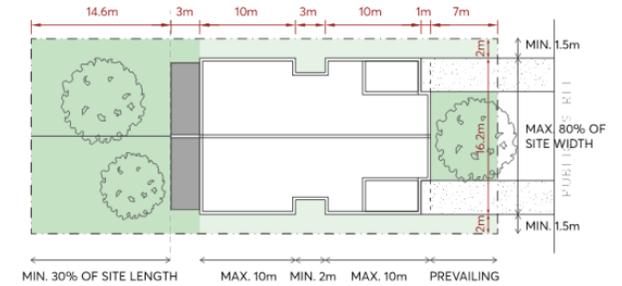
PARRAMATTA DCP 2011



COMPLYING DEVELOPMENT



PARRAMATTA DCP 2023



SUMMARY OF KEY RECOMMENDATIONS

ISSUE	Parramatta DCP 2011	Complying Development	Parramatta DCP 2023
Bulk & Scale	Minimal controls. 	Setback controls that step away from side and rear boundaries. 	Addressed through setback controls that offer a proportionate response to every site. 
Landscape & Deep Soil	40% landscaping and 30% deep soil requirement 	Min. 50% of site area minus 100m² . No controls for deep soil. 	40% landscaping and 30% deep soil , with greater requirements to support more trees in the front setback. 
Garages & Driveways	Garages to be set back 300mm from the front building line. 	Garages to be set back 1m from the front building line. 	Specifies preference for split driveways and maximum gradient of driveways in the front setback. 
Interface with the Street	Minimal controls 	No specific controls 	Specifies how dwellings are to address the street and the modulation requirements to help articulate the facade. 
Sloping Sites & Corner Lots	No specific controls 	No specific controls 	Specific guidance to control outcomes on sloping sites and corner lots. 