



Submission to Department of Planning and Environment West Schofields Precinct Masterplan

PREPARED FOR MIRVAC HOMES (NSW) PTY LTD

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0 EXECUTIVE SUMMARY

The Department of Planning and Environment (DPE) and Blacktown City Council (BCC) have created the West Schofields Precinct masterplan for urban development. The precinct includes a high level of amenity and will aid in the production of the required continual supply of housing in the North West of Sydney and Sydney as a whole.

This submission has been prepared on behalf of Mirvac to ensure that the West Schofields land release represents an exemplary development outcome. This will result in both social and economic viability and the production of a diverse range of housing meeting the needs of the growing population of Sydney's North West.

Mirvac currently holds a controlling interest in part of the precinct and is well placed to immediately begin the process of producing a significant and diverse housing supply to the precinct.

Mirvac's comments can be summarised in regards to the following documents:

BCC Growth Centre Precincts – Main Body DCP Amendments

- Attached dwellings should be permitted in the R2 Low Density Residential zone in areas with a dwelling density of 15-25 dwellings per hectare to enable a diversity of product.
- The minimum lot size for a secondary dwelling should be reduced from 450m² to 400m². This aligns with the minimum lot size of 200m² for a dwelling house with an integrated DA. This will aid in addressing housing affordability without compromising streetscape.
- There should be a number of minor changes to the existing DCP. These generally include changes of wording around zero lot lines, side & rear setbacks and garages & car parking. These proposed changes would help to create affordable, liveable and orderly housing estates.

BCC Growth Centre Precincts: Schedule 9 – West Schofields Precinct

- The current wording around residential structure and specifically density bands implies that these bands are controlled by the location of the PMF which contrasts with the Dwelling Density Map. Mirvac strongly recommends that the dwelling density maps take precedence over the current wording.
- That a consistent approach to provisions relating to the creation and maintenance of public laneways be provided. This would aid in ensuring uniformity in titling and minimum standards of laneways across Western Sydney.
- That a Collector Roads width of 20m be adopted as per the existing DCP. This would retain constancy across all precinct releases. Furthermore, Mirvac recommends that the Collector Road alignment be moved to the existing Durham Road which already encompasses a 20m wide road corridor. The collector road link through 14 Durham Road is not required for flood evacuation purposes, having a similar level of flood immunity to Durham Road itself and excessively burdens this lot.
- Remove Section 6.2 of Schedule 9 of the DCP relating to 'wet flood proofing' as these controls will add \$53,710 to the costs of a family home which detrimentally effects housing affordability.

Reports and Mapping

- That DPE work with Blacktown City Council to finalise and exhibit the Section 7.11 contribution plans as soon as possible. Developers and landowners are currently being asked to commit to a land use outcome without certainty. Either party cannot fairly comment on the underlying viability of dwelling types and densities proposed without having visibility of contribution amounts.
- That a component of the RE1 land within lot 32 DP12076 be swapped with the approximately same sized area in lot 34 in DP 12076. This new location would accommodate community access and provide a better built form design outcome surrounding the area.

1 INTRODUCTION

This submission has been prepared on behalf of Mirvac for the exhibited draft masterplan for the West Schofields Precinct. Mirvac is one of Australia's largest residential developers and holds a controlling interest in delivering part of the West Schofields Precinct. Mirvac is in a strong position to commence works on delivering affordable, high quality homes and amenity to the public as soon as the precinct is gazetted, subject to consideration of the below concerns to ensure the economic and social viability of the Precinct Release.

1.1 West Schofields Precinct

The West Schofields Precinct Masterplan has been created by the Department of Planning and Environment (DPE) in collaboration with Blacktown City Council (BCC). West Schofields provides an important part of the continual supply of housing in the North West of Sydney and Sydney as a whole. The precinct is bordered by Garfield Road to the north, Railway Terrace and Eastern Creek to the east, Townson Road and Stonecutters Ridge Golf Course to the south, and Bells Creek to the west. It is approximately 5km from Schofields town centre.

The West Schofields Precinct Masterplan and supporting documents put on exhibition, indicate the intention to provide a high level of amenity and connections to the surrounding existing release areas of Schofields and Riverstone including the new rail links in these areas. The map showing the North West Growth Centre and West Schofields is included below.

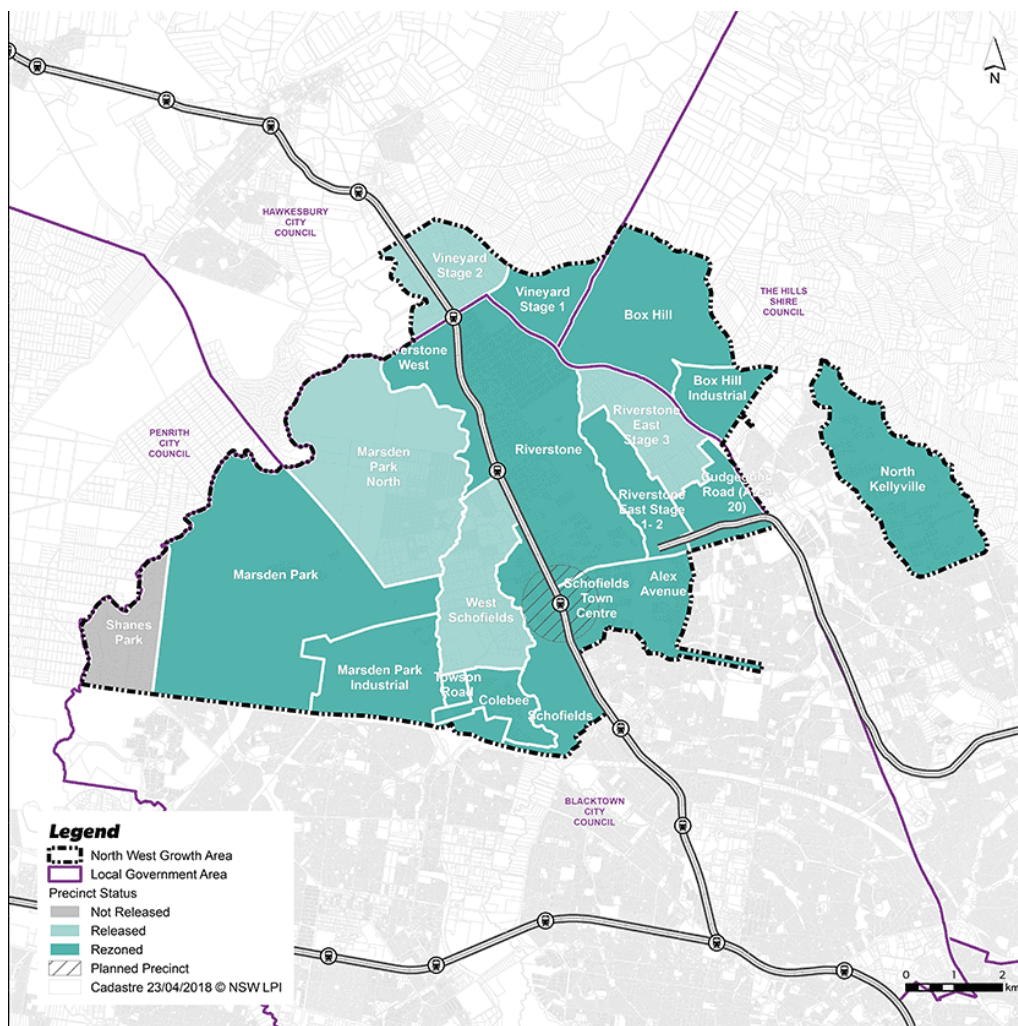


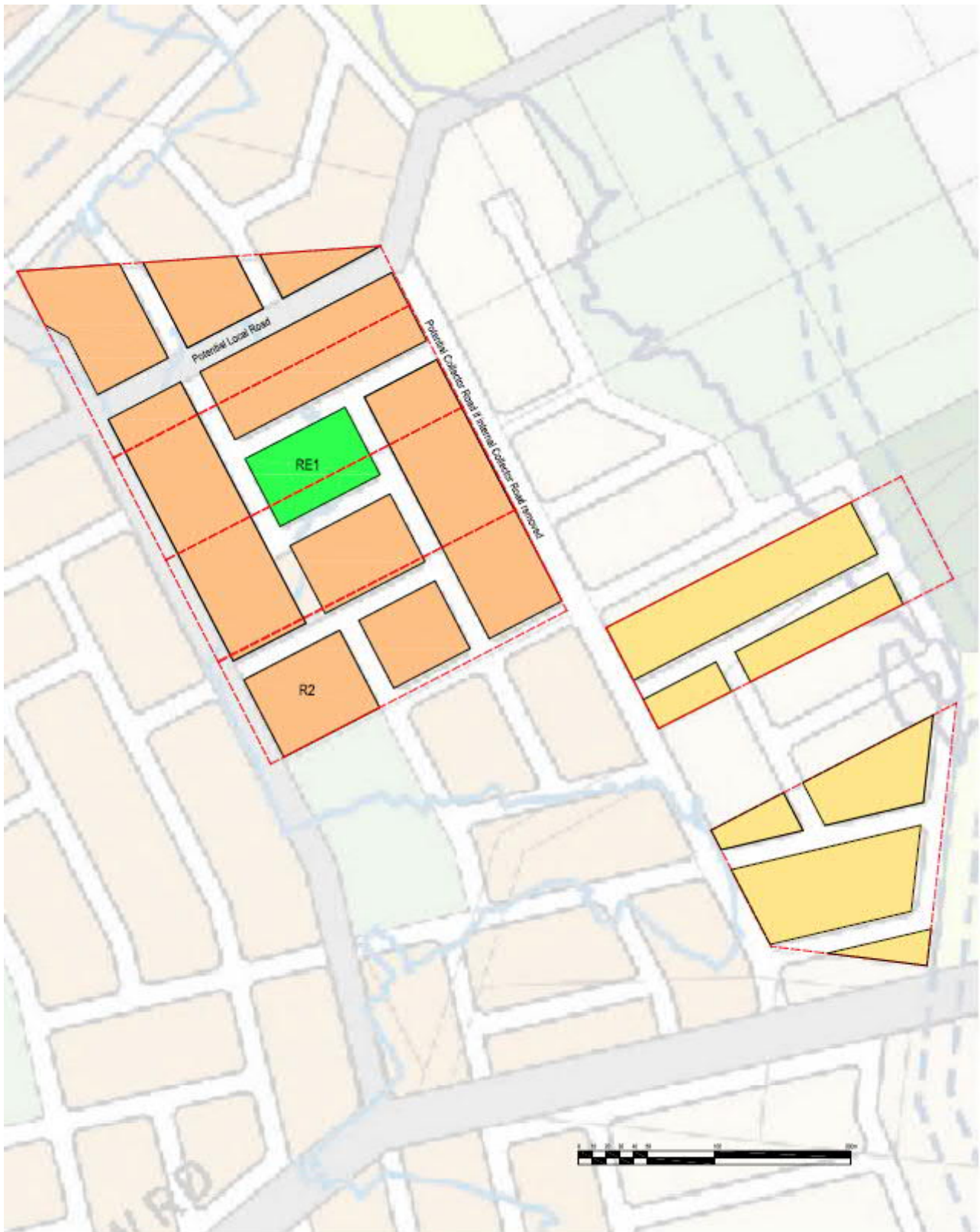
Figure 1.1: Plan of North West Growth Area

1.2 Subject Land

Of the approximately 576 hectares in the Precinct, Mirvac has currently secured interest in 6 x parcels on Durham Road as per the below ownership plan with a total area of 12.7 hectares (31.6 acres). The parcels are also shown on the Indicative Layout Plan (ILP) on the following page.



Figure 1.2 Land under Mirvac interest



West Schofields

Draft Layout
26.09.18

**Mirvac
Design**
architects
planners
interior designers

Figure 1.3 Mirvac interests overlaid in Indicative Layout Plan.

2 KEY ISSUES

We note the information placed on exhibition for the West Schofields Precinct planning. This submission reviews this exhibited material and makes comment on the documents named:

- BCC Growth Centre Precincts: Main body DCP Amendments;
- BCC Growth Centre Precincts: Schedule 9 – West Schofields Precinct
- Reports and Mapping

2.1 BCC Growth Centre Precincts – Main Body DCP Amendments

The following issues are called to the DPE's immediate attention in relation to the proposed Main Body DCP Amendments:

2.1.1 Amendment 4 – Table 3.1 Typical characteristics of residential net densities:

It is proposed to amend 15-20dw/Ha to 15-25dw/Ha in the above table and we note our support of this proposal.

We also recommend that the wording under 'Typical Characteristics' beside 15-25dw/Ha be amended to read as per the below (noting the sections we have added as shown in **bold**):

- *Predominantly a mix of detached dwelling houses, semi-detached dwellings, **attached dwellings**, dual occupancies and some secondary dwellings,*
- ***Incorporates some laneways and shared driveways,***
- *Focused areas of small lot dwelling houses in high amenity locations*
- *At 20dw/Ha, the occasional manor home on corner lots **and mutli-dwelling housing site**,*
- *Single and double storey homes,*
- *Mainly suburban streetscapes, the occasional urban streetscape (see Figure 3-2)*

Reason:

Attached dwellings should be permitted in the R2 Low Density Residential zone in areas with a dwelling density of 15-25 dwellings per hectare in order to enable diversity in housing product. As there is now a minimum and maximum density control, specifically permitting attached dwellings will not lead to greater dwellings yields due to the maximum density cap. This meets the intent of the proposed modifications (Amendment 7) to clause 4.2 of the Blacktown City Council Growth Centres Development Control Plan in relation to innovative dwelling design.

We also note that the proposed amendments in the above wording removes any ambiguity with the uses included in Table 3.2 Minimum Lot Size.

2.1.2 Amendment 5 – Table 3.2 Minimum lot size table:

We propose the following amendments to Table 3.2 Minimum lot size table in relation to the controls for R2 Low Density Residential:

- Dwelling Band 15-20 dw/Ha:
 - Secondary Dwelling to be reduced to 400m² (from 450m²)
 - Reason: A secondary dwelling control of 400m² aligns with the minimum lot size of 200m² for dwelling house with an integrated DA. Mirvac have created a Multi-generational home design that creates an affordable path to home ownership whilst allowing families to age in place. The proposed changes to the DCP allow the Multi-generational home to be delivered at West Schofields, without compromising the intent of the control. More detailed information on the Multi Gen home is provided in **Attachment 1**. In summary the Multi-generational product will offer the following:
 - Addresses housing affordability with a house design that starts small and evolves with the changing needs and budget of the family,
 - Adopts an innovative approach to meeting the need for more affordable and flexible housing,
 - 'Multi-Gen' is one of several Mirvac initiatives to address housing affordability and social change,
 - 'Multi-Gen' will allow buyers to own their homes with less debt and upgrade when they are ready,
 - 'Multi-Gen' encourages owners to invest more of their own "sweat equity" in their home,
 - 'Multi-Gen' is a response to changing household composition - adult children living at home; grandparents living within the family unit; down-sizing couples,
 - The 'Multi-DUO' offers flexibility for family accommodation or to generate income,
 - 'Multi-Gen' buyers can upgrade and expand their home without a change of address,
 - Streetscape is not compromised throughout the life journey as all growing occurs behind the façade.
- Dwelling Band 15-25 dw/Ha:
 - Secondary Dwelling to be reduced to 400m² (from 450m²)
 - Reason: As per above

2.1.3 Proposed amendments to the existing DCP:

Through Mirvac's experience in developing other sites under the existing BCC Growth Centre Precincts DCP the have been a number issues have been experienced in attempting to create affordable, liveable and orderly housing estates.

In the following sections we have proposed several minor changes, many of which have been discussed and agreed with BCC but will remove any ambiguity for the future development in West Schofields.

2.1.3.1 Clause 3.1.2 Zero Lot Lines

Mirvac is very supportive of the use of zero lots and has evolved many housing products to meet this market that have been used in developments both in BCC and in numerous other Council's.

In relation to the BCC Growth Centre Precinct DCP we note the wording of Clause 3.1.2 Point 17:

17. Where a zero lot line is nominated on an allotment on the subdivision plan, the adjoining (burdened) allotment is to include a 900mm easement for single storey zero lot walls and 1200mm for two storey zero lot walls to enable servicing, construction and maintenance of the adjoining dwelling. No overhanging eaves, gutters or services (including rainwater tanks, hot water units, air-conditioning units or the like) of the dwelling on the benefitted lot will be permitted within the easement. Any services and projections permitted under Clause 4.4 (6) within the easement to the burdened lot dwelling should not impede the ability for maintenance to be undertaken to the benefitted lot.

Mirvac's concern with the clause as written is that the type of dwelling to be built is not known at the time of a land subdivision. It is recommended to simplify this wording to state that all easements are to be 900mm wide. A standard easement width of 900mm does not create a conflict with the side setback of the future dwelling of 900mm for a single storey or 1.2m for a double storey home. We believe that the easement width should not restrict the development options for the burdened lot which would occur if land lots were created with 1.2m wide easements. As the purpose of the easement is to allow access for maintenance purposes, this purpose can be achieved with a 900mm wide easement.

The wording of this clause also is conflicting with respect to the ability to have services and projections within the easement. One part of the wording states that no overhangs will be permitted within the easement, but the last part of the clause allows services and projections within the easement as long as they do not impede the ability of the benefitted lot to be maintained. We believe that the latter wording should be retained to allow minor overhangs (up to 450mm for eaves as per wording in Clause 4.2.4(6)). This will still allow the benefitted lot to access and maintain their dwelling from within the easement.

The therefore propose this clause to be reworded to read (noting deletions shown as ~~strikeouts~~ and additions in **bold**):

17. Where a zero lot line is nominated on an allotment on the subdivision plan, the adjoining (burdened) allotment is to include a 900mm easement ~~for single storey zero lot walls and 1200mm for two storey zero lot walls~~ to enable servicing, construction and maintenance of the adjoining dwelling. ~~No overhanging eaves, gutters or services (including rainwater tanks, hot water units, air-conditioning units or the like) of the dwelling on the benefitted lot will be permitted within the easement.~~ Any services and projections permitted under **Clause 4.2.4(6) up to 450mm wide** within the easement to the burdened lot dwelling should not impede the ability for maintenance to be undertaken to the benefitted lot.

2.1.3.2 Clause 4.2.4 Side & Rear Setbacks

As per the above proposed amendments we note that the wording of parts 6 & 7 retain similar wording and we recommend the following changes for the same reasons as per above.

6. For dwellings with a minimum 900mm side setback, projections permitted into side and rear setback areas include eaves (up to 450 millimetres wide), fascias, sun hoods, gutters, down pipes, flues, light fittings, electricity or gas meters, rainwater tanks and hot water units.
7. No overhanging eaves, gutters or services (including rainwater tanks, hot water units, air-conditioning units or the like) of the dwelling on the benefited lot will be permitted within the easement. Any services and projections permitted under Clause 4.2.4 (6) within the easement to the burdened lot dwelling should not impede the ability for maintenance to be undertaken to the benefited lot.

We proposed the following amendments to point 7 (noting deletions shown as ~~strikeouts~~ and additions in **bold**):

7. ~~No overhanging eaves, gutters or services (including rainwater tanks, hot water units, air-conditioning units or the like) of the dwelling on the benefited lot will be permitted within the easement.~~ Any services and projections permitted under Clause 4.2.4(6) **up to 450mm wide** within the easement to the burdened lot dwelling should not impede the ability for maintenance to be undertaken to the benefited lot.

2.1.3.3 Table 4.4 Summary of key controls for lots with frontage width $\geq 9\text{m}$ and $\leq 15\text{m}$ for front accessed dwellings

The section of this table referring to 'Garages and Car parking' is replicated below:

Garages and car parking	<p>Lots $\geq 9\text{m}$ and $< 12.5\text{m}$:</p> <p>Where front accessed, single width garages only.</p> <p>Rear lane or side street accessed double garages permitted.</p> <p>Max. carport and garage door width not to exceed 3m (single) or 6m (double)</p>	<p>Lots $\geq 12.5\text{m}$ and $\leq 15\text{m}$:</p> <p>Front or rear accessed single, tandem or double garages permitted</p> <p>Triple garages are not permitted.</p>
	<p>1-2 bedroom dwellings will provide at least 1 car space.</p> <p>3 bedroom or more dwellings will provide at least 2 car spaces.</p>	

This specifies that homes on lots with width greater than or equal to 9m but less than 12.5m can only have a single garage if accessed from the front. We note that Mirvac currently have double storey designs that successfully achieve all controls on all lot widths but have a double garage. We also note that BCC has approved homes with a double garage on these lot widths.

We therefore request that the above wording be altered to read '**Where front accessed single storey homes single width garages only. Where front accessed double storey homes single or double garages permitted**'.

Reason: By only allowing a double width garage on a double storey home only the design still addresses the concerns regarding garage dominance in the streetscape. Examples can be provided upon request.

2.2 BCC Growth Centre Precincts: Schedule 9 – West Schofields Precinct

The following issues are called to the DPE's immediate attention in relation to the proposed Schedule 9 addition to the DCP:

2.2.1 Section 4.1 Residential Structure:

This section includes the following wording:

4.1 Residential structure

Refer to Section 3.1 of the BCC Growth Centre Precincts DCP – Residential density and subdivision.

The maximum total number of dwellings proposed for this precinct will occur via density capping. Three density bands are proposed (see Figure 11):

- R2 Low Density Residential zone with a minimum 15 dwellings per hectare and a maximum 20 dwellings per hectare (dw/ha) on land between the 1:100 chance per year flood level and the PMF
- R2 Low Density Residential zone with a minimum 15 dw/ha and a maximum 25 dw/ha above the PMF
- R3 Medium Density Residential zone with a minimum 25 dw/ha and a maximum 35 dw/ha above the PMF.

We note that the above wording implies that the Density Bands are controlled by the location of the PMF (i.e. first point referring to a density between 15 dwellings per hectare and 20 dwellings per hectare between the 1:100 year flood level and the PMF). However, the proposed Dwelling Density Maps do not match the line of PMF. In addition, a substantial portion of the land between the ARI 100 year and PMF flood levels is also above the 500 year levels identified in the Flooding, Water Cycle Management and Riparian Corridor Assessment. The wording of this clause puts substantial restriction on lands with a flood risk well below the accepted planning standards in New South Wales and with a small probability of occurrence during the lifetime of any buildings proposed as a result of the urban development of this area.

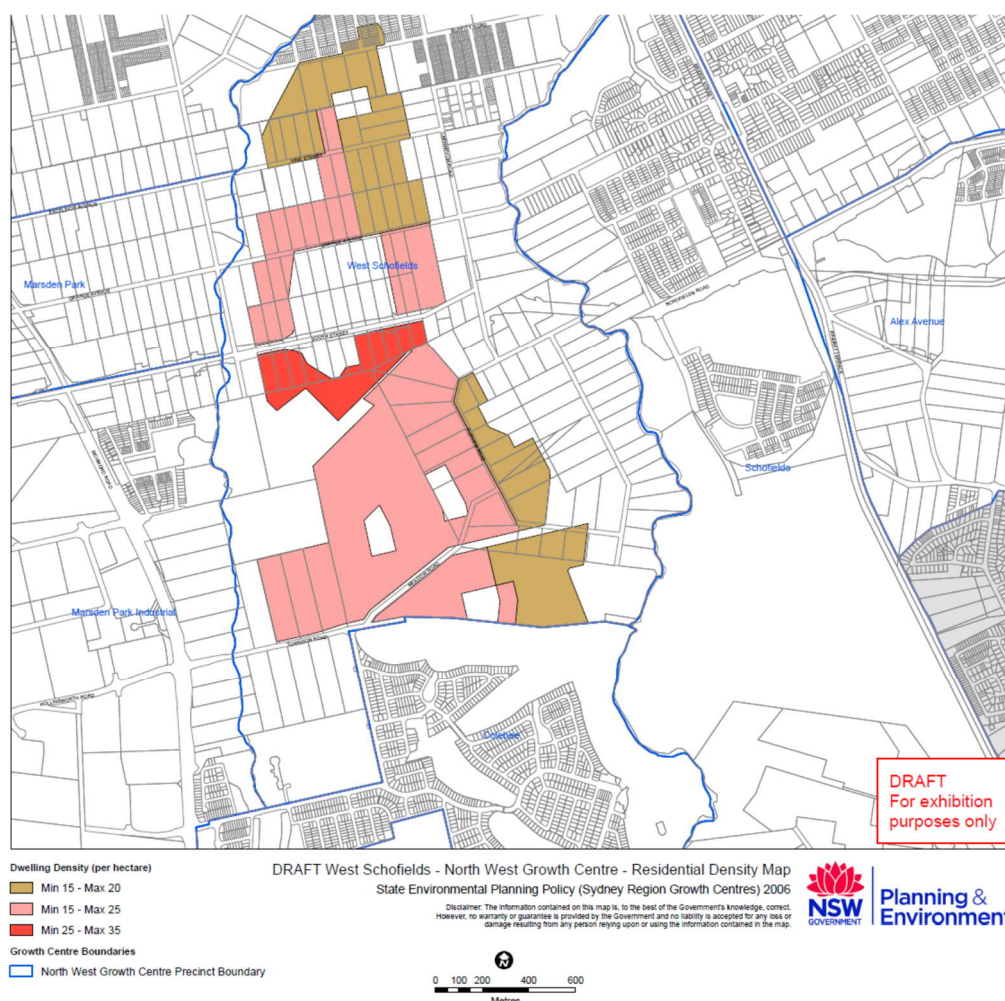


Figure 2.1: DRAFT West Schofields – North West Growth Centre- Residential Density Map

Mirvac supports the dwelling densities currently shown on the density map. The wording suggested in Clause 4.1 renders the site unviable to develop and restricts the potential of housing supply. We therefore recommend that the Dwelling Density Maps take precedence and the wording in Part 4.1 of Schedule 9 be amended to read:

The maximum total number of dwellings proposed for this precinct will occur via density capping. Three density bands are proposed (see Figure 11):

- *R2 Low Density Residential zone with a minimum 15 dwellings per hectare and a maximum 20 dwellings per hectare as shown on the plan,*
- *R2 Low Density Residential zone with a minimum 15 dw/Ha and a maximum 25 dw/Ha as shown on the plan,*
- *R3 Medium Density Residential zone with a minimum 25 dw/Ha and a maximum 35 dw/Ha as shown on the plan.*

2.2.2 Section 4.4 Movement network and design:

Rear Lane

To date, Blacktown City Council have not supported the creation and maintenance of public laneways in the release areas under their control within the North West Growth Centre. This is in contradiction to the wording in proposed Schedule 9 of the BCC DCP and within the existing BCC DCP under Section 3.4.2 Laneways and as per Figure 3-16 Laneway Principles.

The density bands over 20 dwellings per hectare would require at least some rear-loaded product to meet density targets. If a public laneway is not used this can lead to unsatisfactory titling arrangements that put the laneways into private ownership, creating additional waste management concerns, potential unsafe and unclear public access movements for the public, and lessening the attractiveness of alternative housing product that is typically more affordable than standard detached dwellings. Public laneways have been successfully used in other Growth Centre Councils such as Liverpool and Camden.

We would seek some dialogue between the Department and Blacktown City Council aimed at enabling a consistent approach to the titling and standards applied to laneways across Western Sydney.

Collector Road

Figure 15 of proposed Schedule 9 of the DCP shows a cross section for the Collector Road as being a total of 22m wide. This contradicts the Typical Collector Road cross section in the existing DCP (being Figure 3.11) which is only 20m wide.

We recommend that the Collector Road section width of 20m is adopted as per the existing DCP to retain consistency across all precinct releases. The 20m reserve maintains the functional use intended for this road status while limited life cycle cost impacts for the local council.

We also recommend that the Collector Road alignment be moved to the existing Durham Road as it is already a constructed 20m wide road corridor, rather than reconstructing this and another Collector Road in an alternate location. The collector road link through 14 Durham Road is not required for flood evacuation purposes, having a similar level of flood immunity to Durham Road itself and excessively burdens this lot.

2.2.3 Section 6.2 Built form controls for residential development on land between the 1:100 chance per year flood and the Probable Maximum Flood Levels:

This section of the DCP requires residential development between the 1:100 chance per year flood level and the PMF to meet the controls outlined in the "Reducing Vulnerability of Buildings to Flood Damage – Guidance on Buildings in Flood Prone Areas" (Hawkesbury-Nepean Floodplain Management Strategy Steering Committee, June 2006). The requirements of the building controls in this document ('wet flood proofing') dictate construction materials and techniques for homes under the PMF, which will incur additional costs.

The additional costs to be incurred by the stringent building controls ('wet flood proofing') proposed will add to the overall cost to deliver a home and subsequently further impact housing affordability. This is a significant extension of flood planning controls in New South Wales, where the ARI 100 year flood level has long been the accepted standard for restriction of development for flood purposes, as stated in the New South Wales Flood Manual.

This control is likely to add significant cost to construction as well as lessening the attractiveness of the land for sale, by burdening it with additional requirements. We are concerned that this is unduly restrictive, given the low frequency of the events that may adversely affect properties that lie between the ARI 100 year and PMF flood levels. This is especially the case where the controls apply to lands that are located above the ARI 500 year flood line and the PMF flood level, where the probabilities that these controls will need to be called upon within the lifetime of any future dwelling houses would be very small.

The Flood Evacuation Report (Static, 3 July 2018) defines the Probable Maximum Flood (PMF) in the below except:

Probable Maximum Flood (PMF) The PMF is the largest flood that could conceivably occur at a particular location, usually estimated from Probable Maximum Precipitation (PMP) and, where applicable, snow melt, coupled with the worst flood-producing catchment conditions.

Generally, it is not physically or economically possible to provide complete protection against this event.

The PMF defines the extent of flood-prone land – that is, the floodplain. The extent, nature and potential consequences of flooding associated with a range of events rarer than the flood used for designing mitigation works and controlling development, up to and including the PMF event, should be addressed in a floodplain risk management study.

The very definition of a PMF states ***“Generally, it is not physically or economically possible to provide complete protection against this event”***. The same report concedes ***“this event is very rare (in the order of 1 in 100,000 years)”***. Due to the unlikely frequency of the PMF and the additional cost impacts to the public to cater for this request it is not a control that should be mandated by DPE. This control has the potential of stopping all development in this area. The cumulative impacts of SIC payment contributions, Section 7.11 contributions, recent BASIX changes and now this excessively conservative approach to housing construction product selection exacerbates home affordability for large segments the public.

There is no doubt that human life and safety must always be considered as paramount in the design of masterplans. Mirvac supports regulation change in the public interests where the tangible benefits to be gained for the public far outweigh the impact imposed. The PMF is a catastrophic extreme event. Our focus in designing around a PMF should be safe egress opportunities in time of flood. The “wet flood proofing” building controls suggested do not impact on evacuation, rather they seek to flood proof for a 1 in 100,000 year event. The impact to the home owner and housing supply far outweighed the potential impact to remedy homes over a 100,000 year period. We therefore strongly recommend that this Section on controls based on the PMF be removed from the exhibited material.

Mirvac’s construction and estimating teams have evaluated the impact of these controls on the build cost of a standard home and found that these controls will add \$53,710 to the costs of a family home. This represents a substantial increase and detrimentally effects housing affordability. Mirvac is happy to provide further details in regard to this costing if requested.

There are no DCP sections that discuss the possibility to fill land below the PMF and the impact this will have on the floodplain, for example lots highlighted in Figure 1 from the Watercycle Management and Flooding technical study.

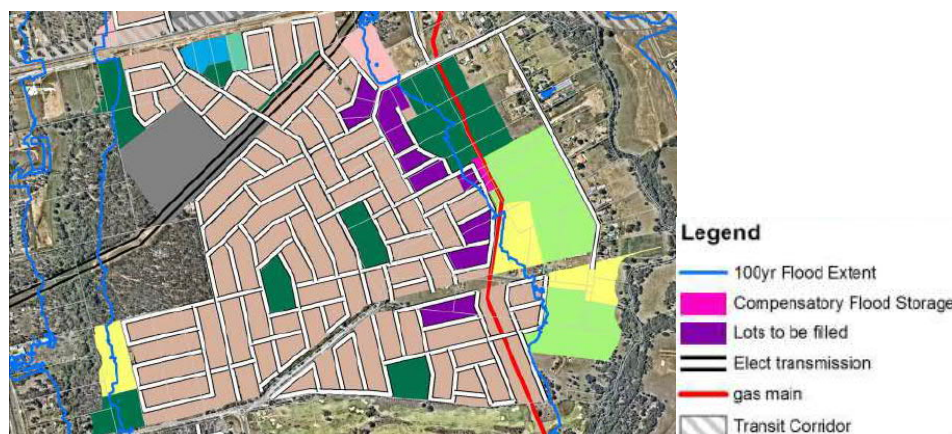


Figure 2.2 – Extract from ‘Lots requiring filling’ figure from exhibited Calibre Water Cycle Management and Flooding technical study

2.3 Reports and Mapping

Contributions

DPE have recently placed the North West Special Infrastructure Contribution (NW SIC) on exhibition, which has increased to \$15,426 per dwelling. Whilst Mirvac supports the minor increase in the NW SIC and the inclusion of all major infrastructure, the viability of the development in the West Schofields precinct is directly related to the **overall** development contributions including both the NW SIC and the Section 7.11 contribution

The Department needs to work with Blacktown City Council to finalise and exhibit the Section 7.11 contributions for the precinct, especially noting the cap being increased progressively / removed by the State government. This should be exhibited concurrently with the indicative layout plan, as developers and landowners are being asked to commit to a land use outcome without certainty about the contributions levels likely to apply and the underlying viability of development types and densities proposed.

It is also noted that an increased amount of open space per capita is proposed to be provided in the precinct to make up for shortfalls across the North West Priority Growth Area. It is understood the abundance of flood prone land in the West Schofields Precinct has been reserved for the delivery of these additional playing fields. The cost of acquiring this open space land should not be fully apportioned to the West Schofields Precinct but shared with other precincts as well to reduce contribution rates. Clarification should be provided as to the role and function of the proposed open space, and which lands are apportioned to regional open space contributions collected across the broader North West Growth Centre area so that the spaces (and their associated costs) catering to local demand are better understood.

Developers need to be aware of the costs of development contributions as soon as possible to mitigate the risk associated with delivering the precinct. The viability of developing the Precinct is compromised by multi-layered additional costs and uncertain nature on the timing these costs will be known.

Open Space Relocation

The Demographics and Social Infrastructure Assessment by Hill PDA provided as part of the exhibited documentation package, lists under Table 18, Standards of Provision Local Open space Playgrounds being as follows:

- 1 playground per 1,750 people and
- within walking distance of 500 metres of all residents

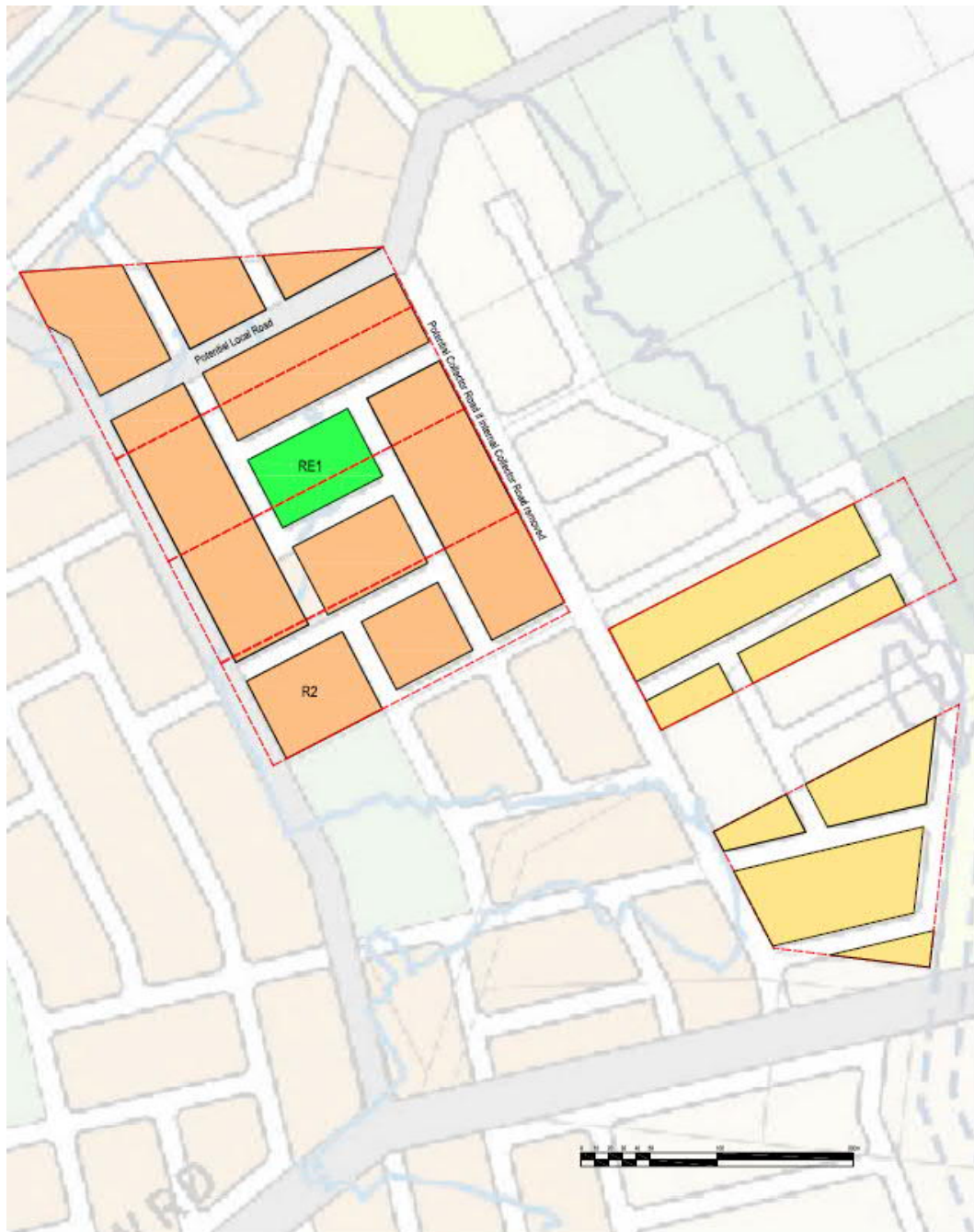
When planning for community infrastructure in urban renewal areas, it is necessary to develop/confirm a preferred facility response with key stakeholders rather than simply applying an arbitrary benchmark. Clause 8.5.2 - Recreation Facilities Provision of the HillPDA report states the draft indicative layout plan includes the provision of about 38.2ha of local open space and 70.8ha of playing fields which is considered sufficient to meet the needs of the future community in the West Schofields Precinct. The report also states the following:

“HillPDA recommends that all residents are located within 400 metres of a local open space of a minimum size of 0.3ha.”

As discussed earlier, Mirvac has secured interest in several parcels as shown in Figures 1.2 and 1.3. Part of lot 32/12076 is proposed to be zoned RE1 and contribute to a larger RE1 parcel to the south. Mirvac are seeking to relocate the component of RE1 within Lot 32 in DP 12076 to the area shown in Lot 34 in DP 12076. The reasons for this are as follows.

- The relocated open space parcel is a like for like in size (approximately 0.5ha)
- The proposed open space area exceeds the minimum lot size of 0.3ha recommended by HillPDA in their report
- Based on Mirvac's extensive experience in designing, developing and ongoing community engagement within playground space, our data suggests that the 0.5 ha is an optimum size for meeting local playground needs.
- The location is capable of better accommodating the requirement to enable community access within 400m.
- the new location enables Mirvac to more effectively design built form outcomes adjacent to the park which will benefit from:
 - framing built form around the park
 - provision of compact housing options around amenity where they are appropriate
 - designing homes under safer by design principles offering passive surveillance opportunities between common space and homes

- better relationship between public and private open space.
- It offers a more efficient urban planning outcome by enabling multiple local and diverse open space options for the public



West Schofields
Draft Layout
26,09,18

**Mirvac
Design**
architects
planners
interior designers

Figure 2.3: Mirvac Draft Layout

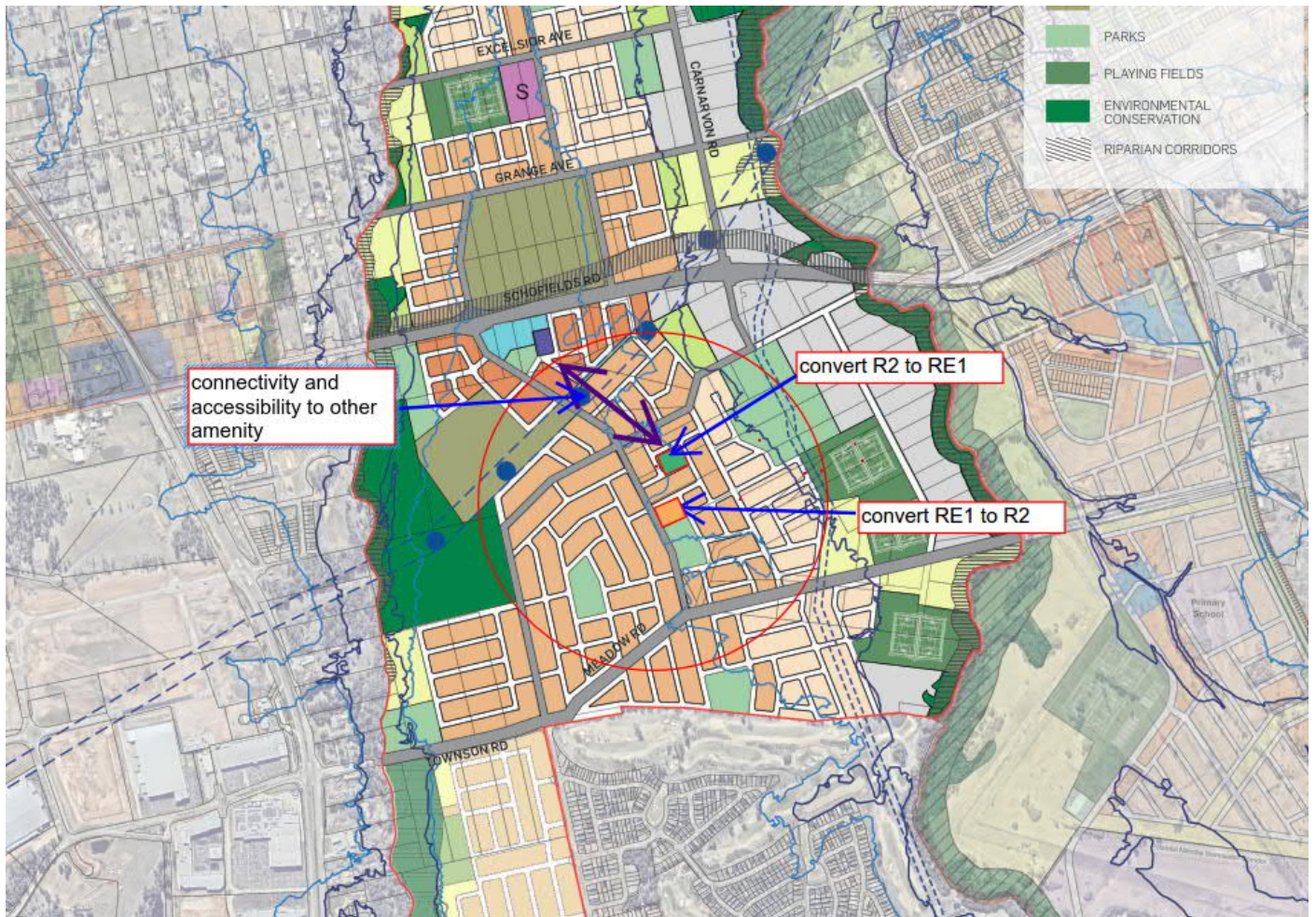


Figure 2.4: Wider Context for Mirvac Layout

3 RECOMMENDATIONS

The Department of Planning and Environment is urged to consider these issues and the implications on viability of development in the West Schofields release precinct. In summary, it is recommended that the Department:

- Table 3.1 Typical Characteristics of the DCP to be updated as noted in 2.1.1 of this submission,
- Table 3.2 Minimum Lot Size of the DCP to be updated as noted in 2.1.1 of this submission,
- Amend existing parts of the DCP as noted in 2.1.3 of this submission,
- Amend wording of Section 4.1 Residential Structure of the DCP as per 2.2.1 of this submission,
- Request confirmation from BCC that public laneways are acceptable as per the existing and proposed DCP,
- Amend Figure 15 in Schedule 9 on the DCP to adopt a Collector Road width of 20m as noted in 2.2.2 of this submission,
- Relocate the Collector road to better utilise existing road reserve corridors
- Remove Section 6.2 of Schedule 9 of the DCP relating to 'wet flood proofing' as per 2.2.3 of this submission,
- Request confirmation and completion of the S.7.11 contribution as per 3.0 of this submission.
- Relocation of Open Space to ensure more efficient urban planning outcome

This submission details proposed changes that will produce an exemplary development precinct allowing for a diverse and affordable range of housing choice for all. The DPE need to be very wary of the additional costs the exhibited and future documents will create over and above a standard development including:

- Costs to be incurred by the stringent building controls ('wet flood proofing') proposed for homes located between 100YR ARI and PMF will add to the overall cost to deliver a home and subsequently further impact housing affordability,
- Increase to SIC, likely increase to the Section 7.1.1 contributions above the historic costs, and
- The associated additional costs effected by this increased cost base i.e. margin on cost, GST and stamp duty.

When all of these costs are included it is inappropriate and places an unreasonable burden on Sydney's public and their ability to purchase and own a home. This will in turn reduce any potential housing supply which is the very purpose of this rezoning

Should you wish to discuss any of these issues further, please don't hesitate to contact me on (02) 8808 5000.

Yours sincerely

Calibre Consulting (NSW) Pty Ltd

Tom Foster

Senior Town Planner

Attachment 1

Secondary Dwelling Multi Gen House

Overview

Mirvac's Multi-Gen range of new homes embodies the best kind of innovation – it provides the solution to a problem in a way that is simple, affordable and in many respects obvious.

The “little house that grows” allows first home buyers and those moving from apartment to a house the chance to buy at a pared back cost, meeting their immediate needs and budget. It is designed to grow in stages offering a whole of life solution to meet the changing composition of the family unit.

The base model Multi-EST features two bedrooms and is targeted at those establishing their first home, most likely couples and young families, as well as down-sizing empty-nesters.

The second stage Multi-EVO sees the house evolve to meet the needs of a growing family, offering more bedrooms and a bathroom. The addition can be supplied by Mirvac but owners will not be locked into forward contracts meaning that they can choose another builder to carry out the addition or take on the project as an owner builder, investing their own “sweat equity”.

Completing the three stages the Multi-DUO with dual entries caters for the multi-generational family, whether that is accommodating older children or in-laws.

The product emulates Mirvac's key brand pillars of:

- Innovation
- Design
- Social responsibility
- Social sustainability

Key Outcomes

- Addresses housing affordability with a house design that starts small and evolves with the changing needs and budget of the family
- Adopts an innovative approach to meeting the need for more affordable and flexible housing
- Multi-Gen is one of several Mirvac initiatives to address housing affordability and social change
- Multi-Gen will allow buyers to own their homes with less debt and upgrade when they are ready
- Multi-Gen encourages owners to invest more of their own “sweat equity” in their home
- Multi-Gen is a response to changing household composition – adult children living at home; grandparents living within the family unit; down-sizing couples
- The Multi-DUO offers flexibility for family accommodation or to generate income
- Multi-Gen buyers are able to upgrade and expand their home without a change of address
- Streetscape is not compromised throughout the life journey as all growing occurs behind the façade.

Images showing the variety streetscape facades and the growing floor plans of the Multi Generational Home series follow.

MULTIGENERATION SERIES

Hampton



80 Homes by Mirvac

13M LOT WIDTH

The new MultiGeneration home is your forever home

A unique innovation, Mirvac has designed a stylish MultiGeneration home that will grow with you. From the first home owner to an expanding family, or multi-couple family, the MultiGeneration Collection transforms to reflect your life's changes. Featuring three unique, clever designs that evolve behind the façade, you'll never have to change address again.

Multi-EST

- Open plan living and dining area
- Galley-style designer kitchen for easy entertaining
- Walk-in robe to the main
- Internal home access from the double garage
- Option to include stackable glass sliding doors to maximise indoor-outdoor living
- Ideal for the first home buyer or downsizer

Multi-EVO

As life's demands change and your family grows, you require more spaces for all family members. The Multi-EVO has been designed to provide additional bedrooms, bathrooms and enhanced entertaining features with the option to incorporate two, private outdoor living areas. The Multi-EVO features effortless single-level living for the modern family.

Multi-DUO*

The Multi-DUO has been designed to follow your familial stages and caters to the needs of multi-family and multi-living needs. The Multi-DUO features more private areas for independent living such as a kitchen and dining spaces, making your ideal first home the ideal home for retirement or the ideal home for grown children returning home.

Images displayed are artist's impressions only. Facade images may feature some upgrade items above standard specification. Images contain items not supplied by Mirvac Homes (2020) Pty Ltd including, but not limited to, landscaping, fencing, paving, lighting and pools. Facade designs are subject to Council and relevant agency approvals. Speak to your Sales Consultant for details.

Homes by Mirvac 107



MULTI-EST 13



Lot width	13m
Width x depth	11.1 x 21.1m
Total area	150m ²
Plan shows Como facade	



GROUND FLOOR PLAN

MULTI-EVO 13



Lot width	13m
Width x depth	11.1 x 21.1m
Total area	19.3m ²
Plan shows Como facade	

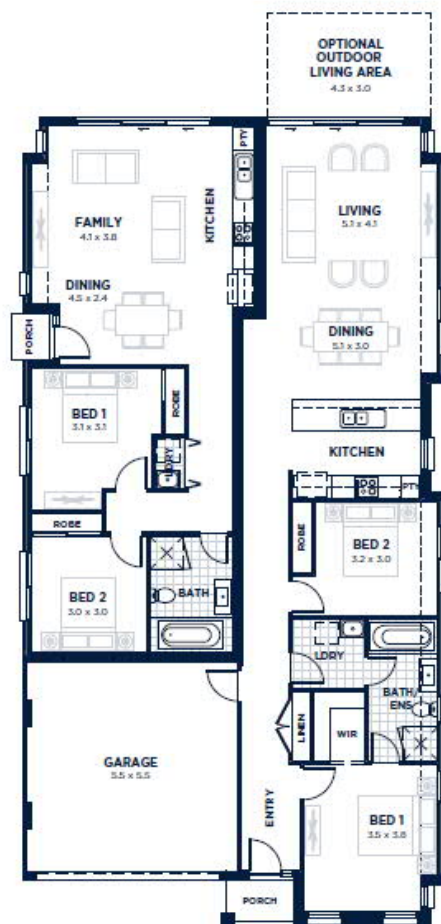


GROUND FLOOR PLAN

MULTI-DUO 13



Lot width	13m
Width x depth	11.6 x 21.1m
Total area	228m ²
Plan shows Como facade	



GROUND FLOOR PLAN

Subject to council approval (STCA)

Refer to page 162 for Disclaimer notes. Optional extensions not included in living and total area above. See Sales Consultant for details. Images displayed are artist's impressions only. Image contains styling items not supplied by Mirvac Homes (NSW) Pty Ltd.

Homes by Mirvac 111

Great innovative solution to address housing affordability, diversity and supply but the constraint is the current policies do not promote this solution. However with minor amendments this could be implemented.

Current legislative controls

The dwelling above would likely fall in the residential class of a Secondary dwelling.

- Secondary Dwelling Controls are provided in the following policies:
- State Environmental Planning Policy (Sydney Region Growth Centres) 2006
- Council Local LEP's
- State Environmental Planning Policy (Affordable Rental Housing) 2009

Interestingly the building footprint of the Multi-Duo product offering (largest final product in series) meets all the dwelling controls stated in the current State Environmental Planning Policy (Exempt and Complying Development Codes) 2008. This confirms that the house is not an overdesign. It also complies with the Draft Housing Code controls. Given the current environment of needing affordable housing supply it seems appropriate that this form of housing now sits within the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 rather than just State Environmental Planning Policy (Affordable Rental Housing) 2009. I understand that DPE are pursuing this.

Summary Recommendation put to DPE previously that remains consistent with this request is shown below. The text highlighted should be considered in the drafting of controls for West Schofields and Marsden Park North Release areas.

Mirvac recommends the following minimum minor amendments be actioned to promote this type of housing.

- Secondary Dwellings are included in the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (or updated draft housing codes) rather than just State Environmental Planning Policy (Affordable Rental Housing) 2009.
- Amend clauses in State Environmental Planning Policy (Sydney Region Growth Centres) 2006 to set minimum lot size for a secondary dwelling in a R2 zone to be 400sqm.
- Enable secondary dwellings to be permissible in all R2 zones in all LEP's in Sydney. This should be partly addressed if the dwellings are included in the Exempt and complying codes SEPP as proposed in top point. Ensure the minimum lot size for a secondary dwelling on land in Zone R2 Low Density Residential is 400m2
- Recommend the total floor area of the secondary dwelling (excluding any area used for parking) must not exceed whichever of the following is the greater:
 - (a) 75 (minimum) or 110 (preferable) square metres,
 - (b) 35% of the total floor area of both the self-contained dwelling and the principal dwelling.

Mirvac have included in the following pages request forwarded to DPE regarding the current relevant controls within policies and what is required to be amended to accommodate this type of dwelling. Although not typically related to this exhibited document the text also demonstrates how the Multi-Duo building footprint currently complies with the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008

State Environmental Planning Policy (Sydney Region Growth Centres) 2006

All Growth Centres SEPP's permit secondary dwellings in R2 zones. Some controls prescribed typically include the following:

Appendix 9 Camden Growth Centres Precinct Plan

CI 4.1AC Minimum lot sizes for secondary dwellings in Zone R2 Low Density Residential and Zone R3 Medium Density Residential

- (1) This clause applies to land in the following zones:
 - (a) Zone R2 Low Density Residential,
 - (b) Zone R3 Medium Density Residential.
- (2) The minimum lot size for a secondary dwelling on land in Zone R2 Low Density Residential is 450m2

CI 5.4 Controls relating to miscellaneous permissible uses

- (9) Secondary dwellings If development for the purposes of a secondary dwelling is permitted under this Precinct Plan, the total gross floor area of the dwelling (excluding any area used for parking) must not exceed whichever of the following is the greater:
 - (a) 75 square metres,
 - (b) 30% of the total gross floor area of both the self-contained dwelling and the principal dwelling.

Appendix 4 Alex Avenue and Riverstone Precinct Plan 2010

CI 5.4 Controls relating to miscellaneous permissible uses

- (9) Secondary dwellings If development for the purposes of a secondary dwelling is permitted under this Precinct Plan, the total floor area of the dwelling (excluding any area used for parking) must not exceed whichever of the following is the greater:
 - (a) 110 square metres,
 - (b) 30% of the total floor area of both the self-contained dwelling and the principal dwelling.

- ✓ Mirvac's multigenerational home is approximately 75sqm and complies with (a). However given the primary dwelling is purposely designed to be small a slight non-conformance arises. I.e. 75sqm secondary dwelling/224sqm total primary and secondary = 33.4%.

The house can be built on 400 sqm. The reason for the reduced land size was to address the affordability constraints of the market where land typically makes up over 60% of the house and land price. Recommendation is to amend minimum lot size for a secondary dwelling in a R2 zone to be 400sqm. Recommend the total floor area of the secondary dwelling (excluding any area used for parking) must not exceed whichever of the following is the greater:

- (a) 75 (minimum) or 110 (preferable) square metres,
- (b) 35% of the total floor area of both the self-contained dwelling and the principal dwelling.

Local LEPS

Some Local LEPS do not permit Secondary Dwellings in R2 zones.

Recommendation: Amend all LEPs to enable secondary dwellings to be permissible in R2 zones. Ensure the minimum lot size for a secondary dwelling on land in Zone R2 Low Density Residential is 400m2

State Environmental Planning Policy (Exempt and Complying Development Codes) 2008

The following demonstrates that the footprint of the Multi Duo complies with this SEPP. This compliance would enable the house footprint to be constructed via complying development and potentially be privately converted into a secondary dwelling in any event.

CI 3.9 Maximum site coverage of all development

- (1) The site coverage of the dwelling house and all ancillary development on a lot must not be more than the following:
 - (a) 65 per cent of the area of the lot, if the lot has an area of at least 200m² but less than 250m²,
 - (b) 60 per cent of the area of the lot, if the lot has an area of at least 250m² but less than 300m²,
 - (c) 55 per cent of the area of the lot, if the lot has an area of at least 300m² but less than 450m²,

- ✓ Multi Duo 12. Site area is 400 sqm (12.5m wide x 32m deep). House size is 223.8sqm. Site coverage is 55.95%. Within tolerance. Compliant
- ✓ Multi Duo 13. Site area is 416 sqm. (13m wide x 32m deep). House size is 228sqm. Site coverage is 54.8%. Compliant

CI 3.10 Maximum floor area

The total floor area of a dwelling house, detached studio, basement and any secondary dwelling on a lot must not be more than the following:

- (a) if the lot has an area of at least 200m² but not more than 250m²—90% of the area of the lot,
- (b) if the lot has an area of more than 250m² but not more than 300m²—85% of the area of the lot,
- (c) if the lot has an area of more than 300m² but not more than 450m²—270m²,

- ✓ Multi duo 12 House size is 223.8sqm. Compliant. Multi Duo13 house size is 228sqm. Compliant. CI 3.12-3.17 compliant

CI 3.24 Landscaped area

(1) A lot on which development specified for this code is carried out must have a landscaped area of at least the following:

- (a) if the lot has an area of at least 200m² but not more than 300m²—10% of the area of the lot,
- (b) if the lot has an area of more than 300m² but not more than 450m²—15% of the area of the lot

- ✓ Landscape area = 12.5 x 4.5 + 12.5 x 6.4 = 136.25 = 34% compliant

(3) If the lot has a width, measured at the building line, of not more than 18m, at least 25% of the area forward of the building line to the primary road must be landscaped.

- ✓ Only driveway not landscaped. Greater than 25% landscaped.

(4) At least 50% of the landscaped area must be located behind the building line to the primary road

(5) The landscaped area must be at least 1.5m wide

- ✓ 59% of landscaped area is behind building line. Compliant

3.25 Principal private open space

(1) A lot, with a width measured at the building line of at least 6m but not more than 10m, on which a new dwelling house is erected must have at least 16m² of principal private open space.

(2) A lot, with a width measured at the building line of more than 10m, on which a new dwelling house is erected must have more than 24m² of principal private open space.

(3) In this clause, principal private open space means an area that:

- (a) is directly accessible from, and adjacent to, a habitable room, other than a bedroom, and
- (b) is at least 3m wide, and
- (c) is not steeper than 1:50 gradient.

- ✓ Compliant

Car parking requirements

(1) At least one off-street car parking space must be provided on the lot on which a new dwelling house is erected.

(1A) Subclause (1) does not apply to a lot that has a width, measured at the building line, of less than 8m.

(2) At least one off-street car parking space must be retained on a lot on which alterations or additions to an existing car parking space are carried out.

(3) A car parking space under this clause may be an open hard stand space or a carport or garage, whether attached to or detached from the dwelling house.

- ✓ 2 off street parking spots available. Compliant.

Thus apart from the potential to be considered as two separate dwellings the multi duo is compliant under the Environmental Planning Policy (Exempt and Complying Development Codes) 2008.

State Environmental Planning Policy (Affordable Rental Housing) 2009

Although the recommendation is to transfer the Secondary Dwelling Controls from this SEPP to the Codes SEPP Mirvac have assessed the controls that would need to be amended within the Affordable Housing SEPP. Amendments are marked up in RED.

CI 22

(3) A consent authority must not consent to development to which this Division applies unless:

- (a) the total floor area of the principal dwelling and the secondary dwelling is no more than the maximum floor area allowed for a dwelling house on the land under another environmental planning instrument, and
 - (b) the total floor area of the secondary dwelling is no more than ~~60~~ 110 square metres or, if a greater floor area is permitted in respect of a secondary dwelling on the land under another environmental planning instrument, that greater floor area.
- (4) A consent authority must not refuse consent to development to which this Division applies on either of the following grounds:
- (a) site area if:

- (i) the secondary dwelling is located within, or is attached to, the principal dwelling, or
- (ii) the site area is at least ~~450~~ 400 square metres, (note some secondary dwellings can be accommodated on a 375 square metres lot also utilising this or similar designs)

Schedule 1 Development standards for secondary dwellings

CI 2 Lot requirements

- (1) Development for the purposes of a secondary dwelling may only be carried out on a lot that:
 - (a) at the completion of the development will have only one principal dwelling and one secondary dwelling, and
 - (b) if it is not a battle-axe lot, has a boundary with a primary road, measured at the building line, of at least the following:

- (i) 12 metres, if the lot has an area of at least ~~450~~ 400 square metres but not more than 900 square metres,

CI 3 Maximum site coverage of all development

- (1) The site coverage of the principal dwelling, secondary dwelling and all ancillary development on a lot must not be more than the following:
 - (a) ~~50~~ 55 per cent of the area of the lot, if the lot has an area of at least ~~450~~ 400 square metres but not more than 900 square metres,

This is line with site coverage requirements of under the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008

CI 4 Maximum floor area for principal and secondary dwelling

- (1) The floor area of a secondary dwelling must not be more than ~~60~~ 75 square metres or, if a greater floor area is permitted in respect of a secondary dwelling on the land under another environmental planning instrument, that greater floor area.

- (2) The floor area of a principal dwelling, secondary dwelling and any carport, garage, balcony, deck, patio, pergola, terrace or verandah attached to either dwelling and enclosed by a wall (other than the external wall of a dwelling) higher than 1.4 metres above the floor level on a lot must not be more than the following:

- (a) 270 square metres, if the lot has an area of at least 450 square metres but not more than 600 square metres

(This is line with site coverage requirements of under the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008)

- (a) 330 square metres, if the lot has an area of at least 300 square metres but not more than 450 square metres,

CI 7 Setbacks from roads, other than classified roads

- (1) Development for the purpose of a secondary dwelling on a lot must result in a new building or a new part of an existing building having a setback from a primary road that is not a classified road of at least:
 - (b) if 2 dwelling houses are not located within 40 metres of the lot:
 - (i) in the case of a lot that has an area of at least ~~450~~ 400 square metres but not more than 900 square metres—4.5 metres,
 - (3) Development for the purpose of a secondary dwelling on a corner lot must result in a new building or a new part of an existing building on the lot having a setback from the boundary with a secondary road that is not a classified road of at least:
 - (a) if the lot has an area of at least ~~450~~ 400 square metres but not more than 600 square metres—2 metres,

CI 9 Setbacks from side boundaries

- (1) Development for the purposes of a secondary dwelling must not result in a new building or a new part of an existing building or any new carport, garage, balcony, deck, patio, pergola, terrace or verandah that is attached to such a building having a setback from a side boundary of less than the following:
 - (a) 0.9 metres, if the lot has an area of at least ~~450~~ 400 square metres but not more than 900 square metres,
 - (2) Development for the purposes of a secondary dwelling that involves the construction of a new building or additions to an existing building where the new or existing building will, at the end of the development, have a building height at any part of more than 3.8 metres must not result in the new building or any new part of the existing building or any new carport, garage, balcony, deck, patio, pergola, terrace or verandah that is attached to such a building, having a setback from a side boundary of less than the sum of:

- (a) the amount of the setback specified for the relevant sized lot in subclause (1), and

~~(b) an amount that is equal to one-quarter of the additional building height above 3.8 metres.~~

Part 4 Landscaping

CI 16 Landscaped area

- (1) A lot on which development for the purposes of a secondary dwelling is carried out must have a landscaped area of at least the following:

- (a) 15 per cent, if the lot has an area of more than 300 square metres but not more than 450 square metres,

- (a) 20 per cent, if the lot has an area of at least 450 square metres but not more than 600 square metres,