

Appendix 9 – Quantitative analysis of proposed amendments to residential zones

This document provides a qualitative analysis to support proposed changes to planning controls applying to residential land. The analysis focuses on the following proposals, which have the potential to reduce the development potential of land:

- Dual occupancy prohibition areas
- Minimum lot size controls for dual occupancy development
- Rezoning of certain land from R3 Medium Density Residential to R2 Low Density Residential
- Prohibition of residential flat buildings in the R3 zone
- Changes to floor space ratio and height controls, including a reduction in FSR applying to R3 zoned land in Silverwater
- Changes to the minimum subdivision lot size applying to residential zoned land

Further explanation and justification of each proposal can be found in Section 3.2.4 of the Planning Proposal report.

Dual occupancy prohibition areas

It is proposed to prohibit dual occupancy development on certain land identified on a Dual Occupancy Prohibition Map, which are areas where dual occupancy development is not considered appropriate and, outside these areas, lots less than 600sqm.

Land proposed to be included on the Dual Occupancy Prohibition Map is shown on maps (Item 46) in Appendix 8 of the Planning Proposal. The proposed dual occupancy prohibition areas have been informed by an analysis of constraints that has identified areas where dual occupancy development could have an ongoing and cumulative negative impact on local amenity and character (refer to the Dual Occupancy Constraints Analysis at Appendix 6 of the Planning Proposal).

While there will be a reduction in the lots available for dual occupancy development under the proposed changes to the Dual Occupancy Prohibition Map, analysis undertaken to support preparation of this planning proposal and Council's Local Housing Strategy identified that there would remain sufficient sites in the R2 zone (approximately 8,245 sites) to provide approximately 53 years supply of dual occupancy housing. It is also noted smaller secondary dwellings will continue to be permitted on most sites under NSW Government policy, allowing an opportunity for some additional housing to be provided in areas where dual occupancies will be prohibited.

Land to be where dual occupancies are proposed to be prohibited	Lots affected ¹	Reduction in potential dwellings ²	Approvals under existing controls ³	Comments
Existing prohibition areas under Parramatta LEP 2011	3,922	Nil	Nil	No changes are proposed to the current controls that already prohibit dual occupancy development in these areas.
R2 zoned land in the former Hornsby Council area	4,820	Nil	Nil	Dual occupancies are currently prohibited in this area under <i>Hornsby LEP 2013</i> , as such the proposals will not reduce development potential. There will be a small net increase of 89 potential dual occupancy dwellings in this area, as it is proposed to permit dual occupancies on land fronting Carlingford Road.
R2 zoned land in the former The Hills Council area (including land proposed to be rezoned from R3 to R2)	7,273	6,934*	15	Excludes R2 zoned land fronting Pennant Hills Road and Windsor Road, where it is proposed to continue to permit dual occupancies. <u>*Note:</u> Subdivision of dual occupancies is currently prohibited in this area under <i>Parramatta (former The Hills) LEP 2012</i> . This policy has acted to significantly limit development in this area. This can be seen in the small number of dual occupancy approvals in this area (only 15). On this basis, the proposed controls will have an impact similar to the current controls.
Certain R2 zoned land in Carlingford, Dundas, Dundas Valley, Eastwood, Epping and Oatlands	4,072	2,435	201	This land is located within the former Parramatta Council area. Dual occupancies are currently permitted here under <i>Parramatta LEP 2011</i> , on sites over 600sqm. The Dual Occupancy Constraints Analysis has identified multiple constraints to dual occupancy development in these locations.

Land to be where dual occupancies are proposed to be prohibited	Lots affected ¹	Reduction in potential dwellings ²	Approvals under existing controls ³	Comments
R2 zoned land within heritage conservation areas	396	150	Nil	Includes land within heritage conservation areas, outside of the areas identified above. Excludes land within the South Parramatta Conservation Area, where dual occupancies are proposed to continue to be permitted.
R2 zoned lots outside the above locations with a site area less than 600sqm.	8,119	207 (on lots 595sqm - 600sqm) 468 (on lots 585sqm - 595sqm) 501 (on lots 575sqm - 585sqm) 37 (on lots 575sqm - 500sqm in former Holroyd area)*	5	It is proposed to prohibit dual occupancy development outright on R2 zoned sites less than 600sqm. Sites identified on the Dual Occupancy Prohibition Map would not be able to make use of the provisions of clause 4.6 of the LEP (" <i>Exceptions to development standards</i> "), which enables variations to controls, such as minimum site area requirements, to be approved if certain criteria are met. It is difficult to estimate the impact of this proposal on reducing development potential given proposals under clause 4.6 are assessed on merit, on a case by case basis. However, under current policies only three such approvals have been issued since May 2016, with the smallest site approved being 574sqm. On this basis, the analysis of reduction in potential dwellings has considered sites down to 575sqm in size. *The current minimum lot size in the former Holroyd council area is 500sqm for R2 zoned land – since May 2016 there were only two approvals on sites under 600sqm in this area. The analysis of reduction in potential dwellings in this area, has also considered sites down to 500sqm.
TOTAL – ALL AREAS	28,602	Up to 10,695	221	

NOTES

¹Lots affected: Total R2 zoned lots within the proposed Dual Occupancy Prohibition Areas over 200sqm, excluding school sites and strata-titled lots.

²Reduced potential dwellings: Assumes one dwelling per lot over 600sqm. R2 zoned lots only, excluding strata titled or school sites. Sites over 1,100sqm (or 1,400sqm in the former The Hills council area) have also been excluded, as additional dwellings could be built on these sites under proposed LEP subdivision controls. Note. This analysis does not account for other site conditions which would further limit development potential under current controls.

While the proposals may reduce the potential for dual occupancies, small 'secondary dwellings' (granny flats) of up to 60sqm would continue to be permitted on most sites under NSW Government policy, providing an opportunity for some uplift on these sites.

³DA approvals data: Approvals for dual occupancies since Council amalgamations (12 May 2016 to 24 April 2020). Excludes approvals for modifications to approved schemes, subdivision of existing dual occupancies or duplicate applications on the same site.

Dual occupancy minimum lot size controls

It is proposed to apply a minimum lot size requirement of 600sqm to the development of dual occupancies in the R2 Low Density Residential, R3 Medium Density Residential and R4 High Density Residential zones. It is also proposed to require lots to have a minimum primary road frontage of 15 metres, measured along the site boundary line.

While this proposal increases the minimum lot size requirement in some areas compared to current controls, it is noted that only a small number of properties will be negatively impacted. Small variations to the lot area and width controls may be considered under the provisions of Clause 4.6 of the LEP (however, refer to proposals above relating to the prohibition of dual occupancies on R2 zoned sites lots less than 600sqm).

It is also noted secondary dwellings will continue to be permitted on sites over 450sqm, under NSW Government policy, allowing an opportunity for additional housing to be provided on smaller lots. Other forms of housing will also continue to be permitted in R3 and R4 zones, noting that dual occupancies are currently prohibited on R4 zoned land under Auburn, Holroyd and Hornsby LEPs.

Areas impacted by MLS provisions	Lots affected by change in control ¹	Reduction in potential dwellings ²	Approvals under existing controls ³	Comments
Land currently under <i>Parramatta LEP 2011</i>	Nil	Nil	4	The proposals are consistent with current LEP MLS controls and minimum site frontage widths in the Parramatta DCP. Since May 2016, four approvals were issued for dual occupancies on sites less than 600sqm, through the provisions of Cl 4.6 of the LEP. Refer to comments above regarding impact of prohibition of dual occupancies on R2 zoned sites less than 600sqm.
Land currently under <i>Holroyd LEP 2013</i> .	329	48	2	<i>Holroyd DCP 2013</i> currently applies a MLS of 500sqm currently applies to dual occupancy development on R2 zoned land in the City of Parramatta LGA. Of the recent dual occupancy approvals, two were on lots less than 600sqm and one on a site over 600sqm.
Land currently under <i>Auburn LEP 2010</i>	1,353	Nil	1	This part of the LGA does not contain any R2 zoned land. Very few dual occupancies are therefore anticipated as higher density forms of development are permitted. <i>Auburn DCP 2010</i> requires a MLS of 450sqm for attached and 600sqm for detached dual occupancies. Of the recent dual occupancy approvals, two were on lots over 600sqm and one on a 572sqm lot.
Land currently under <i>Parramatta (former The Hills) LEP 2012</i>	Nil	Nil	Nil	Current LEP requires a MLS of 600sqm for attached dual occupancies and 700sqm for detached dual occupancies on R2 and R3 zoned land. A MLS of 1,800sqm is currently required for R4 zoned land. Since May 2016, there have been no approvals of dual occupancies on sites less than 600sqm.

Areas impacted by MLS provisions	Lots affected by change in control ¹	Reduction in potential dwellings ²	Approvals under existing controls ³	Comments
Land currently under <i>Hornsby LEP 2013</i>	273	Nil	Nil	Dual occupancies are currently prohibited on all land subject to <i>Hornsby LEP 2013</i> . It is proposed to permit dual occupancies on R3 and R4 zoned land and a small number of R2 zoned sites in this area.
TOTAL – ALL AREAS	1,955	48	7	

NOTES

¹ Lots affected:	Total lots over 200sqm, where the MLS control will change from current LEP/DCP policy - excluding school sites and strata-titled sites.
² Reduced potential dwellings:	<p>R2 zoned lots only, excluding strata titled or school sites. Assumes one dwelling per lot below 600sqm and above the current MLS control applying to the land.</p> <p>This analysis has not been able to fully account for sites with widths less than 15 metres, as complete data is not available for all properties in the LGA. However, the proposed control is consistent with the requirements already applying to land in the LGA under Parramatta, Auburn and Holroyd DCPs. So in this regard, it is a continuation of existing policy in a majority of areas where dual occupancies are proposed to be permitted.</p> <p>Based on data that is available (for approx. 80% of sites within the former Parramatta council area), it is estimated that approx. 82% of R2 zoned lots over 600sqm outside of prohibition areas have a site frontage of at least 15 metres. On this basis, there would remain in excess of 40 years of dual occupancy supply at current take-up rates. Additional development on smaller lots could occur under Clause 4.6 of the LEP, where a variation to minimum lot width be able to be justified.</p>
³ DA approvals data:	Approvals for dual occupancies since Council amalgamations (12 May 2016 to 24 April 2020) on sites smaller than 600sqm. Excludes approvals for modifications to approved schemes, subdivision of existing dual occupancies or duplicate applications on the same site.

Rezoning of certain land from R3 Medium Density Residential to R2 Low Density Residential

It is proposed to rezone certain properties in North Rocks, Northmead and Carlingford from R3 Medium Density Residential to R2 Low Density Residential to address environmental constraints in these locations, which are not conducive to well-designed medium density housing. A height limit of 9m and FSR of 0.5:1 will be adopted consistent with the controls proposed for adjoining R2 zoned land.

Rezoning these properties to R2 is considered of minor significance and will have a negligible impact on housing supply in the LGA, given the lack of medium density housing development that has occurred in these areas since the current planning controls were introduced. Current controls include the requirement for a minimum lot size of 1,800sqm for medium density housing development, which would require significant consolidation of lots to achieve. The proposed rezoning of these sites is therefore consistent with the effect of the existing MLS policy applying to these sites.

Land proposed to be rezoned is shown at Items 11A, 11B, 12A and 12B in Part 4 of the Planning Proposal.

None of the subject sites are located in an identified growth area or meet the criteria within Council's draft Local Housing Strategy for Housing Diversity Precincts; which are more appropriate locations for the delivery of housing diversity in the LGA.

While there will be a reduction in the lots available for medium density housing under the proposed zoning changes, analysis undertaken to support preparation of this planning proposal and Council's draft Local Housing Strategy identified that there would remain sufficient sites in the R3 zone (approximately 1,580 sites) to provide approximately 5,200 homes (a net addition of 3,600 homes) across the LGA – equivalent to approximately 75 years of supply at current take-up rates. Within the former The Hills Council area, there would remain approximately 185 undeveloped R3 zoned sites, capable of providing approximately 771 homes. This would be in addition to any new medium density housing areas delivered as part of new growth areas and Housing Diversity Precincts.

Location	Lots affected by rezoning ¹	Reduction in potential dwellings - current controls ²	Lots that could be eligible for LRHD Code ³	MDH approvals under existing controls ⁴	Comments
Item 11A - Speers Road & Jean Street, North Rocks	6	Between 0 and 10 dwellings	6 (up to 24 dwellings)	Nil	Lots are located on a narrow cul-de-sac, with some sites being irregularly shaped. Without site consolidation, it would be difficult to deliver many medium density homes without compromising residential amenity or creating on-street parking congestion.
Item 11B – Fletcher, Campbell & Murray Streets, Northmead	35	Between 0 and 29 – dwellings	18 (up to 72 dwellings)	Nil	One townhouse development exists in this location; it was approved and built before the commencement of the current LEP and is on a large site that is not typical of this location. Most other lots are long and narrow, and there is no rear lane access. Without site consolidation, it would be difficult to deliver a large number of homes without compromising residential amenity.

Location	Lots affected by rezoning ¹	Reduction in potential dwellings - current controls ²	Lots that could be eligible for LRHD Code ³	MDH approvals under existing controls ⁴	Comments
Item 12A - North Rocks Road, Lawndale & Riviera Avenues, North Rocks	62	Between 0 and 80 dwellings	61 (up to 242 dwellings)	Nil	Lots are located on narrow streets, with many being irregularly shaped as a result of the street pattern, which includes culs-de-sac. Without site consolidation, it would be difficult to deliver many medium density homes without compromising residential amenity or creating on-street parking congestion.
Item 12B - Felton Road, Carlingford	12	Between 0 and 12 dwellings	11 (up to 44 dwellings)	Nil	One townhouse development exists in this location, following consolidation of two sites – scheme was approved prior to the commencement of the current LEP. Felton Road is relatively narrow street, is partly a cul-de-sac and adjoins a large school site, which increases the potential impact for traffic and parking congestion associated with medium density housing in this location.
TOTAL – ALL AREAS	115	Between 0 and 131 dwellings	96 (up to 382 dwellings)	Nil	

NOTES

¹Lots affected: Total lots to be rezoned.

²Reduced potential dwellings under current controls: Net difference in dwellings possible under an R3 zoning compared to an R2 zoning, based on current LEP and DCP controls. Excludes sites already built out for multi-dwelling housing and figures are net of exiting dwellings on each site. Potential dwelling yield in these locations is highly dependent on the extent and pattern of lot consolidation that occurs. As such, a high and low estimate is provided:

- The low estimate reflects potential dwelling yield without any site consolidation. As no individual site is over 1,800sqm, only dual occupancies are possible without site consolidation under current controls.
- The high estimate is maximum theoretical capacity assuming ALL lots are consolidated with adjoining sites to meet the current 1,800sqm minimum lot size requirements, and DCP lot width requirements. Dwelling yield was estimated at the rate of one dwelling per 217sqm of site area for each site; which is the average lot area per dwelling for townhouse developments approved under the current LEP and DCP controls (refer to Attachment A). Sites with a depth of less than 40 metres (and greater than 20 metres) were assumed to only have potential for terraces where it is not possible to increase depths through consolidation. Yield was estimated at a rate of approximately one dwelling per 200sqm/6 metres site frontage.

Dwelling potential under an R2 zone assumes one secondary dwelling is possible on all sites. Sites over 1,400sqm have been counted as having potential for three dwellings, through subdivision into two lots, with a primary and secondary dwelling on each.

³Lots that could be eligible for LRHD Code

Theoretical number of lots that meet the key lot size and width criteria to be eligible for manor houses or terrace development under the provisions of the Low Rise Housing Diversity Code in *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008*.

For manor houses, criteria are a minimum site area 600sqm and site frontage of 15 metres wide. Sites less than 30 metres deep have been excluded, as urban design testing indicates this is the minimum needed to accommodate a Code compliant scheme. 94 sites meet these requirements. To achieve the maximum yield of 4 dwellings, many sites would require provision of basement parking, which may not be feasible. Alternatively, a smaller 3 dwelling manor house may be feasible.

In addition to sites that could accommodate a manor house, two sites meet the key requirements for terrace housing under the Code (being over 600sqm with a frontage of 18 metres and sufficient depth to accommodate setbacks and landscaping requirements). On such sites, yield is estimated on the basis of one dwelling per 200sqm with a 6 metre frontage, as per Code requirements.

Note. While many sites meet the minimum lot size and width requirements for manor houses, urban design analysis has identified potential issues with their development on many lots in these areas. Specifically, there are concerns with the ability of sites to accommodate the required on-site car parking and still provide sufficient landscaping and deep-soil planting, particularly given the prevailing front setbacks and narrow lot widths in many locations. The provision of lower levels of car parking on-site would lead to on-street parking congestion over time. In this regard, we note that the car parking requirements for manor houses under the SEPP are lower than would be required under Council's local planning controls, and would likely increase the need for on-street parking.

Given the narrow width of many sites, and the sloping nature of land in some locations, there is also increased potential for overlooking/privacy impacts associated with second storey apartments. This is a particular concern for manor houses as they are introducing a style of housing different to traditional medium density housing which typically have primary living areas at the ground level with direct access to private open space. Apartment-style accommodation was not envisaged when these sites were originally zoned to R3.

⁴DA approvals data:

Approvals for multi-dwelling housing (townhouses, villas or terraces) since the commencement of *Parramatta (former The Hills) Local Environmental Plan 2012* on 5 October 2012. Excludes approvals for modifications to approved schemes, subdivision of existing housing or duplicate applications on the same site.

Prohibiting residential flat buildings in the R3 Medium Density Residential Zone

Currently, only *Hornsby LEP 2013* permits residential flat buildings (RFBs) in the R3 zone. Allowing this form of development across the R3 zone is not considered desirable as it would result in a loss of distinction between the R3 and R4 zones and could limit the provision of housing diversity. Consistent with the approach in other medium density areas of the LGA, it is also proposed to reduce the height limit applying to the R3 zoned land in Epping to 11 metres (from 12 metres) and apply an FSR of 0.6:1.

The land that will be impacted by these proposals is shown at Item 19 in Part 4 of the Planning Proposal.

With the exception of properties fronting Maida Road (where an additional permitted use designation is proposed), there has only been one approval for RFBs on the R3 zoned land. Instead, the focus of apartment development has been within the nearby Epping town centre core (R4 and B2 zoned land).

While prohibiting RFBs in this area could reduce development potential by up to 69 dwellings (assuming optimal site consolidation occurs), it is considered that the supply of apartment-style housing in this area is adequately provided for within the adjoining R4 and B2 zoned land. Given the intensity of apartment development that has occurred in the town centre, prohibiting RFBs in the R3 zone would enable more medium density style housing to be provided in this area, facilitating the provision of housing diversity within this area.

Location	Lots affected by changes to controls ¹	Reduction in potential dwellings ²	Approvals under existing controls ³	Comments
Derby, Surrey, Cambridge, Oxford, and Somerset Streets, Epping	35	Between 2 and 69	RFBS: 1 (18 dwellings) MDH: Nil	The one site that has been approved for an RFB (21 Derby Street) is a regular shaped lot with an area in excess of 1,500sqm. Most of the remaining sites are of a size, width or configuration (including battle-axe lots) that would require consolidation with adjoining sites before they could be redeveloped for higher density housing. Without consolidation, only one site would be suitable for RFBs. However, manor houses, with up to four apartments, would be possible on up to 12 sites without the need for consolidation, and would be an option under an R3 zoning.
Rockleigh Way and Pembroke Street*, Epping	15	Nil	RFBS: Nil MDH: Nil	Properties along Rockleigh Way are not suitable for RFBs due to the size and depth of sites. <i>*Note.</i> Council is progressing a separate planning proposal to rezone land at 23 and 23A Pembroke Street to R4 High Density Residential. These sites have been excluded from this analysis.
Maida Road, Epping	Nil	Nil	RFBS: 4 (132 dwellings) MDH: Nil	All but two properties in this cluster have already been developed for RFBs (and one of the remaining sites has an active approval for an RFB). An additional permitted use provision is proposed for the remaining undeveloped sites at 14 and 16 Maida Road to enable these sites to be developed for RFBs, in line with adjoining properties.

Location	Lots affected by changes to controls ¹	Reduction in potential dwellings ²	Approvals under existing controls ³	Comments
TOTAL – ALL AREAS	50	Between 2 and 69	RBFs: 5 MDH: Nil	

NOTES

¹Lots affected: Includes all R3 zoned lots, excluding those which have already been developed for multi-dwelling housing (MDH) or RFBs.

²Reduced potential dwellings: Net difference in dwellings possible with RFB development compared to no RFB development. Analysis has considered all lots which have not already been developed for RFBs or MDH and is net of exiting dwellings on each site. Development yield is highly dependent on the extent and pattern of lot consolidation that occurs. As such, a high and low estimate is provided.

The low estimate reflects potential dwelling yield without any site consolidations. Battle-axe lots were excluded, in line with current and proposed development controls.

The high estimate is maximum theoretical capacity assuming ALL lots are consolidated with adjoining sites, where possible, to meet the relevant site size, frontage and depth requirements (isolated sites, unable to be consolidated, where treated on their own merits).

The following benchmarks have been used to estimate yield:

RFBs

Minimum street frontage of 30 metres (current Hornsby DCP requirement) and site depth of at least 24 metres (to accommodate required DCP setbacks).

For eligible sites*, dwelling yield estimated by applying an FSR of 0.8:1 to site area, divided by 85sqm gross average apartment sizes (consistent with Local Housing Strategy)

Manor houses

Minimum site of 600sqm, minimum street frontage of 15 metres and site depth of at least 30 metres.

For eligible sites*, dwelling yield is up to four (4) apartments.

Townhouses

Minimum street frontage of 30 metres and site depth of at least 40 metres. For eligible sites*, dwelling yield was estimate at a rate of one dwelling per 190sqm. This is based on recent approvals in the former Parramatta Council area where an FSR of 0.6:1 and height of 11 metres currently applies (refer to Attachment A).

Terraces

Where sites do not meet parameters for townhouses or manor houses, they have been considered for terraces if they have a street frontage of at least 18 metres and a depth of at least 20 metres. For such sites*, yield has been estimated at a rate of 1 dwelling per 200sqm/6 metres of site frontage.

*Note: Sites with heritage items have been excluded from potential RFB, manor house or multi-dwelling housing.

Maximum RFBs with optimum site consolidation is approximately 179 across all sites. By comparison, up to 84 apartments could be provided through manor house development with site consolidation.

³DA approvals data: Approvals for/construction of residential flat buildings (RFBs) and multi-dwelling housing (MDH) since commencement of Hornsby LEP 2013 (to 12 May 2020). Excludes approvals for modifications to approved schemes, subdivision applications or duplicate applications on the same site.

Changes to floor space ratio and height controls applying to R3 zoned land at Silverwater

It is proposed to reduce the floor space ratio applying to certain R3 zoned land in Silverwater from 0.75:1 to 0.6:1; and to increase the height limit applying to this land from 9 metres to 11 metres. The proposed controls are consistent with those proposed for the majority of R3 zoned land across the LGA.

The land that will be impacted by these proposals is shown at Item 22 in Part 4 of the Planning Proposal.

This proposed change will impact approximately 212 properties, excluding those that have already been developed for medium density housing. This could have a relatively small impact on development potential of up to 101 dwellings across all sites (or an average of 0.5 dwellings per site). However, the proposed changes would enable better designed housing compared to that which has been delivered under the current controls, with bigger gardens and landscaped open space, more tree planting and better building separation able to be provided.

Land impacted	Lots affected by changes to controls ¹	Reduction in potential dwellings ²	Approvals under existing controls ³	Comments
R3 zoned land in Silverwater	212	101	3	Average FSR achieved across approved schemes in this area under current controls is 0.7:1, with an average site area per dwelling of 165sqm. This compares to an average FSR of 0.6:1 and average site area per dwelling of 190sqm under current controls in the Parramatta LEP area – which are closest to the controls being proposed through the Harmonisation planning proposal.

NOTES

¹Lots affected: R3 zoned lots, excluding those which have already been developed for multi-dwelling housing or have a current approval.

²Reduced potential dwellings: Estimate of difference in dwellings possible under an FSR of 0.75:1 and height limit of 9 metres, compared to the proposed FSR of 0.6:1 and a height limit of 11 metres. Development yield has been estimated using the following benchmarks:
 Current controls: one dwelling per 165sqm of site area; based on the average of recent approvals in the area (refer to Attachment A).
 Proposed controls: one dwelling per 190sqm of site area; based on the average of approvals under *Parramatta LEP 2011*, where an FSR of 0.6:1 and height limit of 11 metres applies (refer to Attachment A).

Note. Development yield is dependent on the extent and pattern of lot consolidation that occurs as many sites are not large enough to be developed on their own under current *Auburn DCP 2010* requirements (which requires a minimum frontage of 18 metres). The analysis is based on maximum theoretical capacity, assuming all lots will be able to be consolidated to meet minimum lot size requirements, and therefore represents maximum theoretical capacity.

³DA approvals data: Approvals for multi-dwelling housing (MDH) since the commencement of *Auburn LEP 2010* to May 2020). Excludes approvals for modifications to approved schemes, subdivision applications or duplicate applications on the same site.

Changes to the minimum subdivision lot size applying to residential zoned land

It is proposed to apply a consistent minimum subdivision lot size control of 550sqm to residential zoned land in the LGA, consistent with the controls currently applying under *Parramatta LEP 2011* - this means a site of at least 1,100sqm is needed to create two smaller lots.

The exception will be R2 Low Density Residential zoned land in the former The Hills Council area, which will retain the current 700sqm subdivision lot size control that applies to this land. This is to reflect the existing low density character of development in this area and avoid a reduction in lot size controls applying to low density land in the LGA.

The land that will be impacted by changes to subdivision controls is identified at Item 39A and Item 39B in Part 4 of the Planning Proposal, and on the associated maps in Appendix 8 of the Planning Proposal.

The proposals will increase the minimum size of lots that can be subdivided in the R2 zone in the former Hornsby and Holroyd areas. This could result in up to 266 fewer sites being able to be subdivided into two lots – though it is noted that small variations to the lot size and width controls may be considered under the provisions of Clause 4.6 of the LEP. Increasing the MLS requirement will assist with tree retention on sites and achieving better design outcomes in low density residential areas.

Location	Lots affected by change in control ¹	Reduction in potential dwellings ²	Approvals under existing controls ³	Comments
Land currently under <i>Parramatta LEP 2011</i>	Nil	Nil	21	No change is proposed to existing subdivision lot size controls in this area.
Land currently under <i>Holroyd LEP 2013</i> .	329	3	Nil	Under current LEP controls in this area, an R2 zoned site cannot be subdivided into lots smaller than 450sqm (ie. requiring a site of at least 900sqm).
Land currently under <i>Auburn LEP 2010</i>	1,262	Nil	Nil	There is no R2 zoned land in this part of the LGA. Proposed lot size requirements for R3 and R4 zones are lower than current controls, so will not reduce dwelling potential.

Location	Lots affected by change in control ¹	Reduction in potential dwellings ²	Approvals under existing controls ³	Comments
Land currently under <i>Parramatta (former The Hills) LEP 2012</i>	483 (R3 and R4 zoned sites)	Nil	2	No change is proposed to the subdivision lot size control applying to R2 zoned land in this area. The control for R3 and R4 zones will be reduced (ie. subdivision can result in smaller lots can currently allowed). This will not reduce development potential of land.
Land currently under <i>Hornsby LEP 2013</i>	5,108	263	31	Under current LEP controls in this area, an R2 zoned site cannot be subdivided into lots smaller than 500sqm (ie. requiring a site of at least 1,000sqm). Of the recent subdivision approvals, four were on lots between 1,000sqm and 1,100sqm. Average lot sizes in this area are 828sqm.
TOTAL – ALL AREAS	7,182	266	54	

NOTES

¹ Lots affected	Total lots over 200sqm, where the subdivision MLS control will change - excluding strata-titled sites.
² Reduced potential dwellings:	Total R2 zoned lots between 900sqm and 1,100sqm (Holroyd) or between 1,000sqm and 1,100sqm (Hornsby). It is noted that additional subdivision could occur under Clause 4.6 of the LEP, where a variation to minimum subdivision lot size is able to be justified. R3 and R4 zones have been excluded from the calculations as higher density housing is permitted in these zones and other LEP provisions are proposed that allows subdivision into smaller lots when undertaken in conjunction with medium and high density housing.
³ DA approvals data:	Approvals for subdivision of R2 zoned land since Council amalgamations (12 May 2016 to 12 May 2020). Excludes approvals for subdivision of dual occupancies or strata subdivision of existing development.

Application of floor space ratio controls to residential zoned land where none currently are applied

It is proposed to:

- Apply an FSR of 0.5:1 to R2 zoned land in the former Hornsby and The Hills council areas. Refer to Item 18 in Part 4 of the Planning Proposal, and the associated maps in Appendix 8.
- Apply an FSR of 0.6:1 to R3 zoned land in the former The Hills council area, consistent with the approach to R3 zoned land across the majority of the LGA. This land is described at Item 21 in Part 4 of the Planning Proposal and is shown on the associated map in Appendix 8. (Note. Proposals to introduce an FSR of 0.6:1 to R3 zoned land in the former Hornsby and Auburn council areas has already been discussed above).
- Apply an FSR, matched to existing height controls, to various R4 zoned land that currently does not have an FSR applied. Refer to Items 23 – 33 in

Part 4 of the Planning Proposal.

The intent of these proposals is to bring more certainty and consistency to the development and density outcomes expected in different parts of the LGA. They are not expected to have a significant impact on potential dwelling yield.

Proposal	Lots affected ¹	Reduction in potential dwellings	Comments
Apply an FSR of 0.5:1 to R2 zoned land in the former The Hills and Hornsby council areas	12,267	Nil	An FSR of 0.5:1 is typical across most low density zones in Sydney and is consistent with the controls applying to R2 zoned land in other parts of the LGA. Most sites in these areas already contain single dwellings and it is proposed to prohibit dual occupancies. The main impact of the proposals would therefore be to control the size of extensions or replacement dwellings.
Apply and FSR of 0.6:1 to R3 zoned land in the former The Hills council area	186	Nil	An analysis of recent approvals for multi-dwelling housing on R3 zoned land in the former The Hills council area, indicates that most developments under current LEP and DCP controls do not exceed an FSR of 0.6:1 (refer to Attachment A). Of the two developments that did, both were developed under the provisions of the <i>State Environmental Planning Policy (Affordable Rental Housing) 2009</i> , which offers an FSR bonus to development that includes an element of affordable housing. The proposals are therefore not expected to reduce development potential in this area.
Apply an FSR to R4 zoned land in the former The Hills and Hornsby council areas	147	Nil	The proposed FSR has been derived based on the current height control applying to the site, and taking into consideration the requirements of the Apartment Design Guide and relevant DCP controls. The recommended FSRs are generally consistent with those within Parramatta LEP, where sites have the same height.
TOTAL – ALL AREAS	12,600	Nil	

NOTES

¹Lots affected: Total lots over 200sqm, which do not currently have a FSR applied, excluding strata titled sites.

Attachment A – Approvals data for multi-dwelling housing

Silverwater (former Auburn Council area) – Approvals since commencement of Auburn LEP 2010

Site	Approved	Site Area (sqm)	Dwellings	GFA (sqm)	FSR
38-40 Barker Avenue, Silverwater (DA 360/2009)	21/01/2010	1,131.6	7	786.5	0.695:1
64-66 Carnarvon Street, Silverwater (DA 201/2010/A)	13/12/2011	1,700	10	1,193.5	0.68:1
63-67 Wetherill Street North, Silverwater (DA 201/2010)	13/12/2011	1,699.5	10	1,173.78	0.69:1
66 Asquith Street and 33 Stubbs Street, Silverwater (DA 27/2015)	14/08/2015	1,034	7	765.8	0.74:1
57-59 Beaconsfield Street, Silverwater (DA 223/2015)	25/11/2015	1,378.4	7	1,032	0.75:1
69-71 Deakin Street, Silverwater (DA 136/2015)	1/12/2015	1,241.6	7	850.7	0.68:1
2 Carnarvon Street, 82-84 Wetherill Street North, 59-61 Barker Avenue, Silverwater (DA/356/2016)	28/04/2016	3,547	24	2,445	0.69:1
56 Asquith Street, Silverwater (DA/989/2016)	4/05/2017	900.3	6	597.3	0.66:1
56-58 Beaconsfield Street, Silverwater (DA/692/2018)	7/05/2019	1,332.6	8	998.7	0.75:1
AVERAGE		1,552	9.5	1,094	0.7:1
				Average GFA of 117sqm per dwelling Average lot area per dwelling of 165sqm	

Former The Hills Council area – approvals since commencement of Parramatta (former The Hills) LEP 2012

Site	Approved	Site Area (sqm)	Dwellings	GFA (sqm)	FSR
9-17 Windermere Avenue, Northmead (DA 266/2012/HB)	21/02/2010	7,125	26	3,726.6	0.52:1
50-52 Felton Road, Carlingford (DA 679/2013/HB)	9/07/2013	1,542	6	845	0.55:1
141 Windsor Road, Northmead (DA 72/2014/HB)	20/12/2013	990.5	6	582	0.59:1
3-5 Margaret Street, Northmead (DA BGGMZ)	24/11/2015	2,049.2	11	772.1	0.38:1
14-16 Blenheim Road, Carlingford (DA 327/2016/HB)	26/04/2016	1,917	7	970	0.51:1
7 Anderson Road, Northmead (DA459/2016)	7/01/2019	753.4	4	424.7	0.56:1
6 Felton Road, Carlingford (DA/401/2016)	17/04/2017	1,815	10	1,392.1	0.77:1*

Site	Approved	Site Area (sqm)	Dwellings	GFA (sqm)	FSR
17-19 Margaret Street, Northmead (DA BGQ3P)	10/01/2017	1,789.4	8	673.7	0.38:1
1 Margret Street, 5 Anderson Road Northmead (DA/580/2016)	12/01/2017	1,685	11	1,210	0.72*
1 Dunmore Avenue, Carlingford (DA/669/2017)	21/01/2020	1,082	4	568.6	0.53
		2,075	9.3	1,116	0.55:1
AVERAGE				Average GFA of 117sqm per dwelling	Average lot area per dwelling of 217sqm

*Approved under the provisions of State Environmental Planning Policy (Affordable Rental Housing) 2009

Former Parramatta council area – approvals since May 2015

Site	Approved	Site area (sqm)	Dwellings	GFA (sqm)	FSR
43 Albert Street, North Parramatta (DA/790/2014)	15/06/2015	894.85	3	469	0.52:1
6 - 8 Water Street, Wentworthville (DA/874/2014)	02/07/2015	1,858	10	1,125	0.6:1
29 Sophie Street and 30-32 Marshall Road, Telopea (DA/827/2014)	25/08/2015	2,076.8	13	1,213.3	0.58:1
57-59 Moffatts Drive, Dundas Valley (DA/810/2014)	14/09/2015	1,689	9	975.5	0.58:1
2-4 Water Street, Wentworthville (DA/262/2015)	25/09/2015	1,859	10	1,110	0.6:1
34 - 36 The Parade, Telopea (DA/159/2015)	02/10/2015	1,495	8	817	0.55:1
19 - 21 Charles Street, Carlingford (DA/174/2014)	07/12/2015	1,730	10	1,044	0.6:1
54 Adderton Road, Telopea (DA/748/2015)	05/02/2016	773.5	3	363	0.47:1
43 - 45 Railway Street, Wentworthville (DA/54/2015)	22/03/2016	1,872.8	10	1,065.9	0.57:1
375 - 377 Victoria Road, Rydalmere (DA/566/2014)	14/07/2016	1,682	10	995	0.59:1
2 and 6 Brickfield Street, North Parramatta (DA/953/2015)	15/07/2016	1,037	6	610.98	0.59:1
25 - 27 Reynolds Street, Old Toongabbie (DA/737/2015)	24/08/2016	2,436	12	1,031.9	0.42:1
135 - 135A Adderton Road, Carlingford (DA/293/2015)	26/08/2016	1,675	8	962.5	0.57:1
169 - 171 Adderton Road, Carlingford (DA/944/2015)	22/11/2016	1,454.3	8	874	0.6:1
16 Charles Street, Carlingford (DA/789/2016)	11/10/2017	716.3	3	417.5	0.58:1

Site	Approved	Site area (sqm)	Dwellings	GFA (sqm)	FSR
40 - 42 Adderton Road, Telopea (DA/621/2016)	13/10/2017	1,840.5	11	1,058.3	0.58:1
18 Charles Street, Carlingford (DA/947/2017)	01/03/2018	706.6	4	423.05	0.6:1
59 - 61 Moffatts Drive, Dundas Valley (DA/250/2016)	02/11/2018	1,492.9	8	829.4	0.56:1
9 - 11 Hill Street, Wentworthville (DA/168/2018)	05/11/2018	2,022.8	10	1,075.7	0.53:1
161 - 167 Adderton Road, Carlingford (DA/136/2018)	12/11/2018	3,148.8	18	1858	0.59:1
57 - 61 Victoria Road, Parramatta (DA/470/2018)	18/12/2018	1,766.4	11	1,059.8	0.6:1
439 Wentworth Avenue, Toongabbie (DA/838/2018)	21/05/2019	929.5	6	558.42	0.6:1
373 - 375 Wentworth Avenue, Toongabbie (DA/466/2019)	15/01/2020	1,992.1	12	1,179.7	0.59:1
AVERAGE		1,615	8.8	918	0.57:1
				Average GFA of 108sqm per dwelling Average lot area per dwelling of 190sqm	

Note: Only includes sites subject to a FSR of 0.6:1 and HOB of 11 metres under Parramatta LEP 2011.