

## ANALYSIS OF POTENTIAL IMPACT BY THE LOW AND MID-RISE HOUSING PROPOSAL

The *Low and Mid-Rise Housing* proposal (the Reforms) will increase the capacity for housing numbers and housing styles across the LGA by permitting dual occupancies, multi dwelling housing, manor houses and residential flat buildings (RFBs) where they are currently prohibited under the *Georges River Local Environmental Plan 2021* (GRLEP).

The most significant impact is along the T4 Eastern Suburbs and Illawarra Line (stations of Kogarah, Carlton, Allawah, Hurstville, Penshurst, Mortdale and Oatley) and in less accessible locations such as Carlton / Kogarah Bay (Princes Highway) and Oatley (Mulga Road) due to the existing presence of full line supermarkets.

The Reforms enable larger developments on smaller lots with greater height and floor space ratios (FSRs) and less landscaping requirements when compared to that provided by the provisions of the GRLEP.

Analysis has been conducted for the accompanying non-refusal standards proposed by the Reforms for low and mid-rise housing. The following comparison of the proposed controls against the GRLEP and GRDCP has been undertaken in **Tables 1 to 6** below for each development typology.

### Low Rise Housing - Dual Occupancies in the R2, R3 and R4 Zones

The Reforms propose to permit dual occupancy in the R2 Low Density Residential Zone across Greater Sydney as well as introduce a set of non-refusal standards that will apply to all dual occupancy development wherever they are permitted. In the GRLEP 2021, dual occupancy is permitted in the R2, R3 and R4 Zones.

**Table 1 – Comparison of Reforms to current Dual Occupancy provisions**

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
Seeks to make dual occupancy permitted in the R2 Low Density Residential Zone	Dual Occupancy is currently permitted in the R2 Low Density Residential, R3 Medium Density Residential and R4 High Density Residential Zones in the GRLEP 2021	No impact as the use is currently permissible in the R2 Zone of the GRLEP. The impact will be from the reduction in minimum site area which will result in an overall increase in the number of dual occupancies in the R2, R3 and R4 zones.
Torrens subdivision of dual occupancies	Torrens title subdivision is permitted under the LEP – the LEP requires a minimum 300sqm per allotment outside the Foreshore Scenic Protection Area (FSPA) following subdivision and a minimum 430sqm per allotment within the FSPA.	No impact as torrens title subdivision of dual occupancies is currently permissible in the GRLEP.
Maximum building height – 9.5m	Majority of the land zoned R2 has a maximum building height of 9m.	Increase of 0.5m in the maximum height permitted for dual occupancy development in the R2 and R3 zones.

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
	<p>Majority of the land zoned R3 has a maximum building height of 9m.</p> <p>Majority of the land zoned R4 has a maximum building height of 12m, 15m and 21m.</p>	<p>The maximum building height in the R4 zone exceeds the 9.5m under the Reforms.</p>
<p>Maximum FSR 0.65:1</p>	<p>The maximum FSR in the R2 zone is 0.55:1.</p> <p>Majority of land zoned R3 has a maximum FSR of 0.7:1.</p> <p>Majority of land zoned R4 has a maximum FSR of 1:1.</p>	<p>Increased footprint and bulk of the dwellings due to 0.10:1 increase in FSR for dual occupancies in the R2 zone. This is a 18% increase in floor space.</p> <p>The standards for the R3 and R4 zones in the GRLEP exceed the Reforms.</p>
<p>Minimum site area – 450sqm (225sqm per dwelling assumed as it is not explicitly stated)</p>	<p>Minimum lot sizes of 650sqm outside the FSPA and 1,000sqm inside the FSPA for a dual occupancy development.</p> <p>For subdivision, the GRLEP requires a minimum 300sqm per allotment created outside FSPA following subdivision and a minimum 430sqm per allotment created within the FSPA.</p> <p>If a lot is a battle-axe lot or other lot with an access handle, the area of the access handle and any right of carriageway is not to be included in calculating the lot size.</p>	<p>As indicated, a dual occupancy (2 dwellings) can be built on land with a 450sqm site area, which is a 200sqm reduction for areas outside of the FSPA and 550sqm reduction for areas within the FSPA (existing requirement 650sqm and 1,000sqm respectively).</p> <p>The FSPA will experience the most significant impact as 1 dwelling on 1,000sqm can be developed into 4 dwellings under the Reforms.</p> <p>Council requires a minimum 300sqm per allotment created outside the FSPA following subdivision and minimum 430sqm within the FSPA. If the Reforms propose only a 225sqm per allotment created then there will be an impact within all the residential zones under the GRLEP – loss of trees, biodiversity and character; increase in traffic and off-street parking.</p> <p>Furthermore, the work that has been undertaken to date by Council regarding the <i>Biodiversity Study</i> and <i>Foreshore Scenic Character Study</i> will be overridden by the Reforms if implemented.</p>

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
Minimum lot width – 12m	Minimum lot width – 15m	<p>The proposed control is less restrictive. This means almost all residential land within the LGA will meet the minimum lot width requirement under the Reform.</p> <p>Reducing the lot width requirement is likely to lead to an increase in driveways and the removal of street trees and on street parking to accommodate these additional driveways.</p>
Minimum carparking space – 1 space per dwelling	1 garage space and 1 driveway space per dwelling	<p>Council's DCP controls require 2 parking spaces in tandem – the Reform only requires 1 space. Carparking is already an area of concern for residents when a dual occupancy is proposed. Many believe that tandem parking is not adequate.</p>
<p>Landscaping:</p> <ul style="list-style-type: none"> <li>• &lt;300sqm site area - 15% tree canopy and deep soil and at least one small tree per dwelling</li> <li>• 300-600sqm site area – 20% tree canopy and deep soil and for every 200sqm of site area or part therefore at least one small tree</li> <li>• &gt;600sqm site area – 25% tree canopy and deep soil and for every 300sqm of site area or part therefore at least two medium trees or one large tree</li> </ul>	<p>For a dual occupancy located on land outside the FSPA — 25% of the site area.</p> <p>For a dual occupancy located on land within the FSPA — 30% of the site area.</p> <p>Landscaped area means a part of a site used for growing plants, grasses and trees, but does not include any building, structure or hard paved area.</p> <p>GRDCP requires a minimum of one tree in the front setback for dwelling houses and dual occupancies.</p>	<p>There is a disparity between the landscaping controls proposed by the Reforms and the existing provisions within the GRLEP. The Reforms regulate “tree canopy and deep soil targets” while the GRLEP regulates via “landscaped area”, which will allow the GRLEP provisions to be applied.</p> <p>However, there will be a reduction in landscaped area on sites due to the increase in maximum FSR leading to bigger building footprints and bulky developments.</p>

As indicated above, dual occupancy is currently permitted in the R2 Zone of the GRLEP. Concern is raised in relation to the loss of the existing low-density character by proliferating dual occupancy developments across the whole LGA. The issue stems from the reduction in minimum site area and frontage which will result in more allotments in the R2, R3 and R4 Zones being permitted for dual occupancy development – with the most significant impact being within the R2 zone.

**Table 2** below indicates that if the Reform standards are implemented in the R2 Zone then 22,070 lots will become eligible for dual occupancy development potential.

**Table 2 – Impact of Dual Occupancy Reform on the R2 Zone across the LGA**

Instrument	Standard	Allotments complying with standard	Potential additional dwellings
GRLEP – outside the FSPA and zoned R2	15m width & min. site area 650sqm	7,563 allotments	7,563 dwellings
GRLEP – inside the FSPA and zoned R2	15m width & min. site area 1,000sqm	1,603 allotments	1,603 dwellings
Housing Reform across all land zoned R2	12m width & min. site area 450sqm	22,070 allotments	22,070 dwellings

Low Rise Housing – Manor Houses in the R2 Zones

The Reforms introduce manor houses as a permissible use in the R2 Zones within “station and town centre precincts”. Manor houses are currently permitted in the R3 and R4 Zones in the GRLEP 2021. Manor houses are currently prohibited within the R2 Zones. A comparison of controls is provided in **Table 3** below.

**Table 3 – Comparison of Reforms to current Manor Housing provisions**

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
Seeks to make manor houses permitted with consent in the R2 Low Density Residential Zone within station and town centre precincts	<p>Currently not permitted in the R2 Low Density Residential Zone of the GRLEP 2021.</p> <p>Manor houses are permitted in the R3 and R4 zones of the GRLEP 2021.</p>	<p>Manor houses are not consistent with the objectives of the R2 Low Density Residential Zone which are:</p> <ul style="list-style-type: none"> <li>• To provide for the housing needs of the community within a low-density residential environment.</li> <li>• To enable other land uses that provide facilities or services to meet the day to day needs of residents.</li> <li>• To promote a high standard of urban design and built form that enhances the local character of the suburb and achieves a high level of residential amenity.</li> <li>• To provide for housing within a landscaped setting that enhances the existing environmental character of the Georges River local government area.</li> </ul> <p>Manor houses are 2 storey apartments, usually comprised of 4 units per development. However, there is no limit to the number of units that can be</p>

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
		provided within a manor house under the Reforms. If the Reforms are adopted, a single dwelling house has the potential to be redeveloped into 4 or more units at 3 storeys which will result in changes to the existing low-density character of the R2 areas.
Maximum building height – 9.5m	Majority of the land zoned R2 has a maximum building height of 9m.	Increase of 0.5m in the maximum height permitted for development in the R2 Zone.
Maximum FSR – 0.8:1	Maximum FSR is 0.55:1.	Increased footprint and bulk of buildings within the R2 Zone due to 0.25:1 increase in FSR. This equates to a 45% increase in floor space.
Minimum site area – 500sqm	As manor houses are not permitted in the R2 zone there is no standard for the R2 Zone. The R3 and R4 Zones require a minimum site area of 800sqm for a manor house.	Site area requirements will be less than that required in the R3 and R4 zones of the GRLEP. It is noted that manor houses under the Codes SEPP are restricted to a maximum of 4 dwellings. Under the Reform manor houses will be able to have more than 4 dwellings and at a height of 3 storeys under the proposed 9.5m height limit.
Minimum lot width – 12m	As manor houses are not permitted in the R2 zone there is no standard for the R2 Zone. The R3 and R4 Zones require a minimum lot width of 18 metres.	Minimum width requirements will be less than required in the R3 and R4 zones of the GRLEP.  Reducing the lot width requirements is likely to lead to an increase in driveways and the removal of street trees and on street parking to accommodate these additional driveways.
Minimum carparking – 0.5 space per dwelling	The GRDCP requires one space per dwelling.	May result in additional on street parking due to lack of onsite carparking.

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
<p>Landscaping:</p> <ul style="list-style-type: none"> <li>• &lt;300sqm site area - 20% tree canopy and deep soil and at least one small tree for every 200sqm of site area or part thereof</li> <li>• 300-600sqm site area – 25% tree canopy and deep soil and for every 250sqm of site area or part therefore at least one medium tree</li> <li>• &gt;600sqm site area – 30% tree canopy and deep soil and for every 350sqm of site area or part therefore at least two medium trees or one large tree</li> </ul>	<p>As the GRLEP does not permit manor houses in the R2 Zone, Council does not have landscaping requirements for the land use.</p> <p>Clause 6.12 of the GRLEP requires that at least the following percentage of the site area consists of landscaped areas:</p> <p>(a) for a dwelling house located on land outside the FSPA —20% of the site area, or</p> <p>(b) or a dwelling house located on land within the FSPA —25% of the site area,</p> <p>(e) for development in Zone R3 Medium Density Residential— 20% of the site area,</p> <p>Landscaped area as defined in the GRLEP means a part of a site used for growing plants, grasses and trees, but does not include any building, structure or hard paved area.</p>	<p>There is a disparity between the landscaping controls proposed by the Reforms and the existing provisions within the GRLEP. The Reforms regulate “tree canopy and deep soil targets” while the GRLEP regulates via “landscaped area”. Due to the absence of landscaped area requirements within the GRLEP for manor houses, any future manor house development in R2 Zones must comply with the Reforms.</p> <p>However, there will be a reduction in landscaped area on sites due to the increase in maximum FSR leading to bigger building footprints and bulky developments.</p>

#### Low Rise Housing – Multi Dwelling Housing (MDH) (Terraces) in the R2 Zones

The Reforms introduce multi dwelling housing (terraces) as a permissible use in R2 Zones within “station and town centre precincts”. Terraces are currently permitted in R3 and R4 Zones of the GRLEP 2021. Terraces are currently prohibited in the R2 Zones. A comparison of controls is provided in **Table 4** below.

**Table 4 – Comparison of Reforms to current MDH (Terraces) provisions**

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
<p>Seeks to make multi dwelling housing – terraces permitted with consent in the R2 Low Density Residential Zone within station and town centre precincts</p>	<p>Currently not permitted in the R2 Low Density Residential Zone of the GRLEP 2021.</p>	<p>Multi-unit housing is not consistent with the objectives of the R2 Low Density Residential Zone which are:</p> <ul style="list-style-type: none"> <li>• To provide for the housing needs of the community within a low-density residential environment.</li> <li>• To enable other land uses that provide facilities or services to meet the day to day needs of residents.</li> <li>• To promote a high standard of urban design and built form that enhances the local</li> </ul>

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
		<p>character of the suburb and achieves a high level of residential amenity.</p> <ul style="list-style-type: none"> <li>To provide for housing within a landscaped setting that enhances the existing environmental character of the Georges River local government area.</li> </ul> <p>Impact will be from the change in the existing low-density character of the R2 Zone by permitting more than a single dwelling house on a site.</p>
Maximum building height – 9.5m	Majority of the land zoned R2 has a maximum building height of 9m.	Increase of 0.5m in the maximum height permitted for development in the R2 Zone.
Maximum FSR – 0.7:1	Maximum FSR is 0.55:1	Increased footprint and bulk of buildings within the R2 Zone due to 0.15:1 increase in FSR. This equates to a 27% increase in floor space.
Minimum site area – 500sqm	As terraces are not permitted in the R2 Zone there is no standard for the R2 Zone. The R3 and R4 Zones require a minimum site area of 800sqm for a terrace.	Site area requirements will be less than that required in the R3 and R4 zones of the GRLEP.
Minimum lot width – 18m	As terraces are not permitted in the R2 Zone there is no standard for the R2 Zone. The R3 and R4 Zones require a minimum lot width of 21 metres.	<p>Minimum width requirements will be less than required in the R3 and R4 zones of the GRLEP.</p> <p>Reducing the lot width requirements is likely to lead to an increase in driveways and the removal of street trees and on street parking to accommodate these additional driveways.</p>
Minimum carparking – 0.5 space per dwelling	The GRDCP requires one space per dwelling and one visitor space per five units or part thereof and one designated car wash bay which may also be a visitor space.	May result in additional on street parking due to lack on onsite carparking.

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
<p>Landscaping:</p> <ul style="list-style-type: none"> <li>• &lt;1000sqm site area – 20% tree canopy and deep soil and at least one medium tree for every 300sqm of site area or part thereof</li> <li>• 1000-3000sqm site area – 25% tree canopy and deep soil and for every 200sqm of site area or part therefore at least one medium tree</li> <li>• &gt;3000sqm site area – 30% tree canopy and deep soil and for every 350sqm of site area or part therefore at least two medium trees or one large tree</li> </ul>	<p>As the GRLEP does not permit terraces in the R2 Zone, Council does not have landscaping requirements for the land use</p> <p>Clause 6.12 of the GRLEP requires that at least the following percentage of the site area consists of landscaped areas:</p> <p>(e) for development in Zone R3 Medium Density Residential— 20% of the site area, or</p> <p>(f) for development in Zone R4 High Density Residential—10% of the site area,</p> <p>Landscaped area as defined in the GRLEP means a part of a site used for growing plants, grasses and trees, but does not include any building, structure or hard paved area.</p>	<p>There is a disparity between the landscaping controls proposed by the Reforms and the existing provisions within the GRLEP. The Reforms regulate “tree canopy and deep soil targets” while the GRLEP regulates via “landscaped area”. Due to the absence of landscaped area requirements within the GRLEP for terraces, any future terrace development in the R2 Zone must comply with the Reforms.</p> <p>However, there will be a reduction in landscaped area on sites due to the increase in maximum FSR leading to bigger building footprints and bulky developments.</p>

#### Low Rise Housing – Multi Dwelling Housing (MDH) in the R2 Zones

The Reforms introduce multi dwelling housing as a permissible use in R2 Zones within “station and town centre precincts”. MDH are currently permitted in the R3 and R4 Zones of the GRLEP 2021. MDH are currently prohibited in the R2 Zones. A comparison of controls is provided in **Table 5** below.

**Table 5 – Comparison of Reforms to current MDH provisions**

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
<p>Seeks to make multi dwelling housing (MDH) permitted with consent in the R2 Low Density Residential Zone within station and town centre precincts</p>	<p>Currently not permitted in the R2 Low Density Residential Zone of the GRLEP 2021.</p>	<p>Multi-unit housing is not consistent with the objectives of the R2 Low Density Residential Zone which are:</p> <ul style="list-style-type: none"> <li>• To provide for the housing needs of the community within a low-density residential environment.</li> <li>• To enable other land uses that provide facilities or services to meet the day to day needs of residents.</li> <li>• To promote a high standard of urban design and built form that enhances the local character of the suburb</li> </ul>



Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
		<p>and achieves a high level of residential amenity.</p> <ul style="list-style-type: none"> <li>To provide for housing within a landscaped setting that enhances the existing environmental character of the Georges River local government area.</li> </ul> <p>Impact will be from the change in the existing low-density character of the R2 Zone by permitting more than a single dwelling house on a site.</p>
Maximum building height – 9.5m	Majority of the land zoned R2 has a maximum building height of 9m.	Increase of 0.5m in the maximum height permitted for development in the R2 Zone.
Maximum FSR – 0.7:1	Maximum FSR is 0.55:1.	Increased footprint and bulk of buildings within the R2 Zone due to 0.15:1 increase in FSR. This equates to an increase of 27% in floor space.
Minimum site area – 600sqm	As MDH are not permitted in the R2 Zone there is no standard for the R2 Zone. The R3 and R4 Zones require a minimum site area of 800sqm for a MDH development.	Site area requirements will be less than that required in the R3 and R4 zones of the GRLEP.
Minimum lot width – 12m	As MDH are not permitted in the R2 Zone there is no standard for the R2 Zone. The R3 and R4 Zones require a minimum lot width of 18 metres.	<p>Minimum lot width requirements will be less than required in the R3 and R4 zones of the GRLEP.</p> <p>Reducing the lot width requirements is likely to lead to an increase in driveways and the removal of street trees and on street parking to accommodate these additional driveways.</p>
Minimum carparking – one space per dwelling	The DCP requires 1.5 spaces per dwelling and one visitor space per five units or part thereof and one designated car wash bay which may also be a visitor space.	May result in additional on street parking due to lack on onsite carparking.

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
Landscaping – nothing specified	<p>As the GRLEP does not permit MDH in the R2 Zone, Council does not have landscaping requirements for the MDH as a land use.</p> <p>For developments in the R3 Medium Density Residential Zone where MDH is currently permitted, Clause 6.12 of the GRLEP requires at least 20% of the site area to be provided as landscaped area.</p> <p>Landscaped area as defined in the GRLEP means a part of a site used for growing plants, grasses and trees, but does not include any building, structure or hard paved area.</p>	Due to the absence of landscaped area requirements within the GRLEP for MDH, it is unclear how much landscaping must be provided by MDH developments carried out under the Reform. Further clarification will be sought from the Department of Planning, Housing and Infrastructure (DPHI).

#### Mid Rise Housing – Residential Flat Buildings (RFBs) in the R3 Zones

The Reforms introduce RFBs as a permissible use in R3 Zones within “station and town centre precincts”. RFBs are currently only permitted in the R4 Zones of the GRLEP 2021. A comparison of controls is provided in **Table 6** below.

**Table 6 – Comparison of Reforms to current RFBs**

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
Seeks to make RFBs permitted with consent in the R3 Medium Density Residential Zone within station and town centre precincts	RFBs are not permitted in the R3 Zone of the GRLEP 2021.	<p>RFBs are not consistent with the objectives of the R3 Zone which are:</p> <ul style="list-style-type: none"> <li>• To provide for the housing needs of the community within a medium density residential environment.</li> <li>• To provide a variety of housing types within a medium density residential environment.</li> <li>• To enable other land uses that provide facilities or services to meet the day to day needs of residents.</li> <li>• To enable other land uses that contribute to the vibrancy of the neighbourhood.</li> <li>• To promote a high standard of urban design and built form that enhances the local character of the</li> </ul>

Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
		<p>suburb and achieves a high level of residential amenity.</p> <ul style="list-style-type: none"> <li>To provide for housing within a landscaped setting that enhances the existing environmental character of the Georges River local government area.</li> </ul> <p>Shop top housing will remain prohibited in the R3 Zone as the Reforms do not propose to amend permissibility of this land use.</p> <p>There are R3 Zones within 800m of the following potential station and town centre precincts:</p> <ul style="list-style-type: none"> <li>Narwee (Broadarrow Road)</li> <li>Oatley (Oatley Avenue and Frederick Street)</li> <li>Penshurst (Penshurst Street)</li> <li>Riverwood (Belmore Road)</li> <li>South Hurstville (King Georges Road)</li> <li>Oatley (Mulga Road)</li> <li>Sans Souci (Rocky Point Road)</li> </ul>
<p>Within inner (0-400m) station and town centre precincts maximum building height – 21m (approx. 7 storeys)</p> <p>Within outer (400-800m) station and town centre precincts maximum building height – 16m (approx. 5 storeys)</p>	<p>The R3 Zones have a height of 9m and FSR of 0.7:1.</p>	<p>Heights will be significantly higher than that permitted in the R3 Zone:</p> <ul style="list-style-type: none"> <li>Increase of 12m within the inner areas (equating to an increase of 130%)</li> <li>Increase of 7m within the outer areas (equating to an increase of 78%)</li> </ul>
<p>Within inner (0-400m) station and town centre precincts maximum FSR – 3:1</p> <p>Within outer (400-800m) station and town centre precincts maximum FSR – 2:1</p>	<p>The R3 Zones have a height of 9m and FSR of 0.7:1.</p>	<p>FSRs will be significantly higher:</p> <ul style="list-style-type: none"> <li>Increase of 2.3:1 within the inner areas (equating to 330% increase in floor space)</li> <li>Increase of 1.3:1 within the outer areas (equating to 190% increase in floor space)</li> </ul>

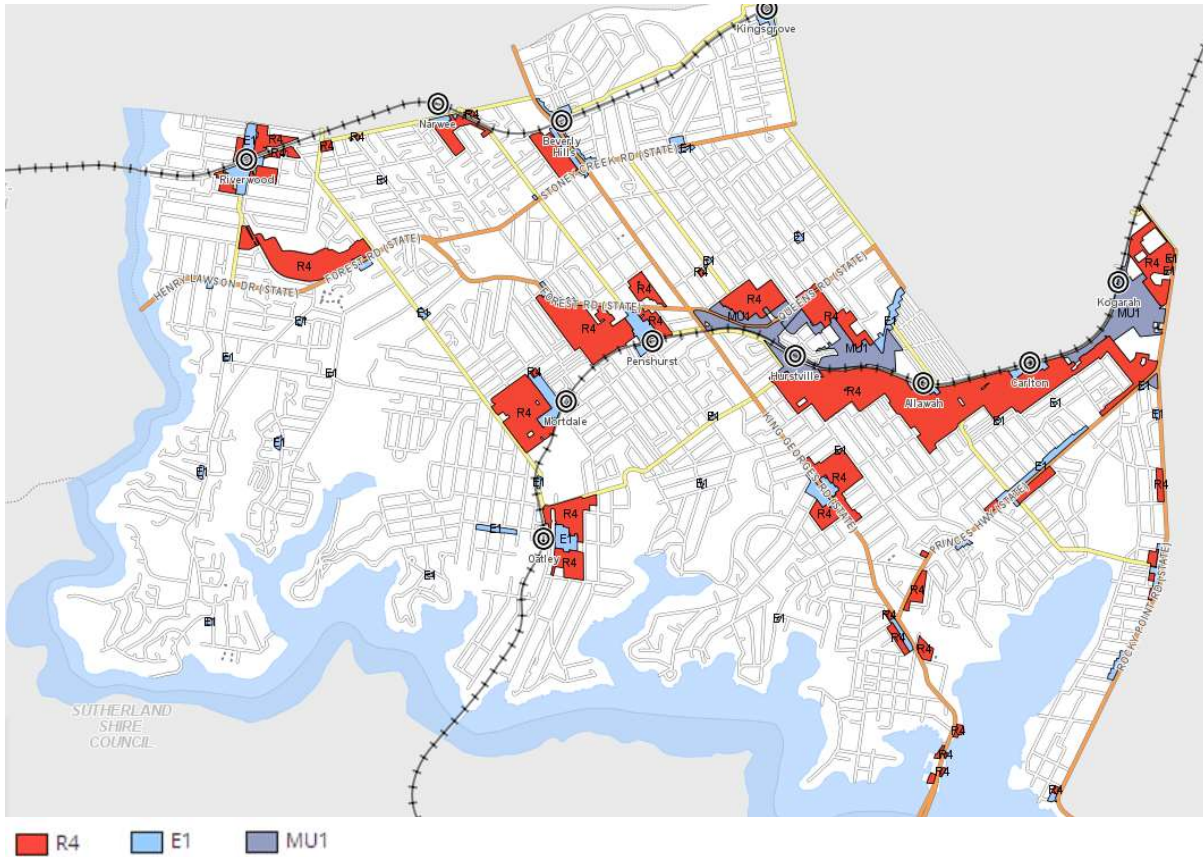
Non-Refusal Standards	Georges River LEP 2021 or Georges River DCP 2021	Comparison of Controls
<p>No minimum site area and width standards</p>	<p>The GRLEP does not contain minimum site area and width standards for RFBs and shop top housing. The GRDCP has a general requirement in Part 6 for a minimum lot width of 24m.</p>	<p>The role of this control is to ensure appropriate site width is provided to incorporate the setback and separation requirements of the ADG and the GRDCP. It also ensures that development sites are of sufficient dimensions to accommodate high quality development.</p> <p>The Reforms also propose a reduction in minimum building separation requirements for 5 and 6 storey RFBs of the ADG to match the current requirements for buildings of up to 4 storeys. The reductions are as follows:</p> <ul style="list-style-type: none"> <li>a) From 18m to 12m between habitable rooms/balconies</li> <li>b) From 12m to 9m between habitable and non-habitable rooms</li> <li>c) From 9m to 6m between non-habitable rooms</li> </ul>
<p>Landscaping provisions</p> <p>Less than 650sqm site area – 15% tree canopy and for every 350sqm of site area or part thereof at least one small tree planted in deep soil area.</p> <p>650sqm to 1500sqm site area – 15% tree canopy and for every 350sqm of site area or part thereof at least one medium tree planted in deep soil area.</p> <p>Greater than 1500sqm site area – 20% tree canopy and for every 575sqm of site area or part thereof at least two medium trees or one large tree planted in deep soil area.</p> <p>Deep soil to comply with the ADG.</p>	<p>Clause 6.12 of the GRLEP requires that at least the following percentage of the site area consists of landscaped areas:</p> <ul style="list-style-type: none"> <li>(e) for development in Zone R3 Medium Density Residential— 20% of the site area, or</li> <li>(f) for development in Zone R4 High Density Residential—10% of the site area,</li> </ul> <p>Landscaped area as defined in the GRLEP means a part of a site used for growing plants, grasses and trees, but does not include any building, structure or hard paved area.</p>	<p>The ADG requires 7% deep soil to be provided.</p> <p>Overall, the proposed changes are likely to result in a reduction in landscaping on development sites.</p>

### Shop Top Housing in the R4, E1 and MU1 Zones

Whilst the Reforms propose increasing housing capacity in the R2 and R3 Zones, they also seek to create additional capacity for housing (in the form of shop top housing) in the R4 High Density Residential, E1 Local Centre and MU1 Mixed Use Zones by introducing non-refusal standards for shop top housing. In summary:

1. The Reforms do not change the permissibility of shop top housing but propose to introduce non-refusal standards that apply wherever they are permitted.
2. Shop top housing is currently permitted in the R4 High Density Residential Zone, E1 Local Centre Zone and MU1 Mixed Use Zone under the GRLEP 2021 (refer **Figure 1** below for the location of these zones).
3. It is unclear if the non-refusal standards only apply to land zoned R4, E1 and MU1 within the “station and town centre precincts” or to all land within these zones across the LGA.
4. For the purposes of assessing the impact of the Reforms this report assumes that the non-refusal standards only apply to land zoned R4, E1 and MU1 within the “station and town centre precincts”.
5. The Reforms will permit:
  - (a) a FSR of 3:1 and a height of 21m within 400m and a height of 16m and FSR of 2:1 between 400m and 800m within a “station and town centre precinct”,
  - (b) No minimum site area and width standards,
  - (c) The following landscaping provisions:
    - (i) Less than 650sqm site area – 15% tree canopy and for every 350sqm of site area or part thereof at least one small tree planted in deep soil area,
    - (ii) 650sqm to 1500sqm site area – 15% tree canopy and for every 350sqm of site area or part thereof at least one medium tree planted in deep soil area,
    - (iii) Greater than 1500sqm site area – 20% tree canopy and for every 575sqm of site area or part thereof at least two medium trees or one large tree planted in deep soil area,
    - (iv) Deep soil to comply with the ADG.

**Figure 1 – Location of R4 High Density Residential Zone, E1 Local Centre Zone and MU1 Mixed Use Zone under the GRLEP 2021**



Currently there is no single set of development standards (i.e., height and FSR) for these zones. This means the potential impact of the non-refusal standards introduced by the Reforms varies from significant to negligible. The potential impacts are tabulated below:

Station and Town Centre Precincts	Impacts within the “station and town centre precincts”
Hurstville City Centre	<p>For the MU1 zone the majority of controls for the land exceeds the non-refusal standards of FSR 3:1 and height of 21m – therefore no impact in the MU1 zones.</p> <p>Impacts are likely to be seen in the R4 Zone as the GRLEP specifies from FSRs from 1:1 to 1.5:1 and heights from 12m to 15m. These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
Kogarah Town Centre	<p>The majority of land within the MU1 zone has a height of 39m and FSRs of 4:1 and 4.5:1, with a limited number of sites along Railway Parade and Regent Street having a height of 9m, 12m, and 15m and FSRs of 2.5:1 and 2.8:1.</p> <p>For the R4 Zone, the maximum FSR and height is 4:1 and 33m respectively.</p> <p>Therefore, for both zones the majority of land exceeds the non-refusal standards of FSR 3:1 and height 21m – no impacts under the Reforms.</p>

Station and Town Centre Precincts	Impacts within the “station and town centre precincts”
1 – Allawah (Railway Parade)	<p>The E1 Zone has a maximum FSR of 2.5:1 and height of 21m. The R4 Zone has an FSR of 1.5:1 and 2:1 and height of 15m and 21m.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – Beverly Hills (King Georges Road)	<p>For the E1 Zone there is current height limit of 15m along King Georges Road with a height limit of 9m at Tooronga Terrace. The maximum FSRs are 2:1 and 1.5:1 respectively.</p> <p>The R4 Zone has maximum height and FSR of 12m and 1:1 respectively.</p> <p>Council’s resolution of 24 April 2023 on the Way Forward for Beverly Hills Local Centre Master Plan proposed the following for the eastern side: The maximum building heights is 21m (base height) to 28m (gateway sites). The maximum floor space ratio is 2.5:1 (base FSR) to 3:1 (gateway sites).</p> <p>The recent decision by the Strategic Planning Panel of the Sydney South Planning Panel on the Rezoning Review for a proposal at 407-511 King Georges Road, Beverly Hills has set the following maximum height and FSR for the western site:</p> <ul style="list-style-type: none"> <li>• Non-gateway sites – Part 12m (for 26m from Dumbleton Lane) and part 24.1m for the remainder of these lots and FSR 3.5:1, and</li> <li>• Gateway sites - Part 12m (for 14m from western boundary) and part 31.4m for the remainder of these lots and 3.5:1 FSR.</li> </ul>
E1 – Carlton / Kogarah Bay (Princes Highway)	<p>The E1 Zone has a maximum FSR and height of 2.5:1 and 12m/21m respectively. The R4 Zone has FSRs of 1:1 and 2:1 and heights of 12m/21m.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – Carlton (Railway Parade)	<p>The E1 Zone has a FSR of 2.5:1 and height of 21m. The R4 Zone has FSRs of 2:1 and 1.5:1 and heights of 21m and 15m.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – Kingsgrove (Kingsgrove Road)	<p>For the E1 Zone, FSR and height for the Pottery Site is 2:1 and 15m respectively, with the rest having a FSR of 1.5:1 and no height.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – Mortdale (Morts Road)	<p>For the majority of the E1 Zone the FSR is 1.5:1 with no height. On the southern side of the station the height is 21m and the FSR is 2.5:1. The R4 Zone has a FSR of 1:1 and height of 12m.</p>

Station and Town Centre Precincts	Impacts within the “station and town centre precincts”
	<p>Council adopted Option 1A in October 2023 of the Mortdale Local Centre Master Plan. Option 1A proposed heights and FSRs less than the proposed non refusal standards:</p> <ul style="list-style-type: none"> <li>• E1 Local Centre (north of the railway) – heights of 15m-22m and FSR 1.5:1 – 2.5:1, and</li> <li>• E1 Local Centre (south of the railway) – no change to height and FSR, and</li> <li>• R4 High Density Residential – only an increase in height from 12m to 13m</li> </ul> <p>All of the above controls will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – Narwee (Broadarrow Road)	<p>The E1 Zone has a FSR of 1.5:1 and no height standard. The R4 Zone has a FSR of 1:1 and heights of 12m and 13m.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – Oatley (Oatley Avenue / Frederick Street)	<p>The E1 Zone has a FSR of 2.5:1 and height of 12m. The R4 has a FSR of 1:1 and height of 12m.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – Penshurst (Penshurst Street)	<p>The E1 Zone has FSRs of 2:1 and 2.5:1 and heights of 15m, 19m and 21m. The R4 Zone has a FSR of 1:1 and height of 12m.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – Riverwood (Belmore Road)	<p>The E1 Zone has FSRs of 2:1 and 3:1 and height of 18m. The R4 Zone has a FSR of 1:1 and height of 12m.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – South Hurstville (King Georges Road)	<p>The E1 Zone has a FSR of 2.5:1 and height of 21m. The R4 Zone has a FSR 1:1 and height of 12m.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>



Station and Town Centre Precincts	Impacts within the “station and town centre precincts”
E1 – Oatley (Mulga Road)	<p>The E1 Zone has a FSR of 1.5:1 and height of 9m.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – Peakhurst (Forest Road)	<p>The E1 Zone has a FSR of 1.5:1 and height of 9m.</p> <p>The R4 Zone has a height and FSR of 12m and 1:1 respectively.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>
E1 – Sans Souci (Rocky Point Road)	<p>The E1 Zone has a FSR of 2:1 and height of 15m.</p> <p>These will be increased to up to 3:1 FSR and 21m under the Reforms as the non-refusal standards will override the current FSR and heights within this Precinct.</p>