Planning Proposal 33

Multi Dwelling Housing

8 May 2018

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PART 1 – OBJECTIVES OR INTENDED OUTCOMES

The purpose of this Planning Proposal is to amend Lane Cove Local Environmental Plan 2009 to remove 'multi dwelling housing' as a permissible land use from the R2 Low Density Residential zone and all other supporting controls.

The intended outcome is in response to rectify an administrative oversight and the unintended planning outcomes that will arise by the new Medium Density Housing Code and Design Guide within the Lane Cove LGA in particular.

Although Council's Local Environmental Plan currently permits multi dwelling housing in the R2 Low Density Residential zone, Council's long standing planning approach has been to promote only single storey villa homes in this zone and restrict townhouses/terraces to the R3 Medium Density Residential zone.

Planning controls were implemented in the Lane Cove Local Environmental Plan 2009 which limit the height of multi dwelling housing in the Low Density zone to 5 metres and a floor space ratio of 0.4:1. However, under the new Medium Density Housing Code and Design Guide these provisions would be overridden in favour of two storey terraces.

It is important to note that many of the eligible properties (approximately 2000) are adjacent to the Lane Cove River. Council's existing LEP objective for R2 Low Density Residential zone is to 'encourage new dwelling houses that are not highly visible when viewed from the Lane Cove River'. As the adjacent foreshore area is not excluded from the Exempt and Complying Code, the Design Guide would apply to these sensitive areas adjacent to the Lane Cove River.

Foreshore areas have a greater visual impact and are environmentally more sensitive than flat suburban land. It would be highly inappropriate to permit intense complying development, which would not be subject to professional review from architects, planners and engineers, in foreshore areas.

The proposed amendments are supported by the Council Resolution and accompanying Council Report from the Extraordinary Council Meeting of 1 May 2018 attached at **AT-A.**

PART 2 – EXPLANATION OF THE PROVISIONS

The proposed outcomes will be achieved by the following amendments to the Lane Cove Local Environmental Plan 2009 (LEP 2009):

Provisions:

- Land Use Table for Zone R2 Low Density Residential Zone -
    - Amend the Land Use Table for the R2 zone to delete 'Multi dwelling housing' as development 'Permitted with consent'.
- Sub-clause 4.3(2A)
    - Delete sub-clause 4.3(2A) referring to the maximum building height for multi dwelling housing in the R2 Low Density Residential Zone.
- Sub-clause 4.4(2A)(a)
    - Delete sub-clause 4.4(2A)(a) referring to the maximum floor space ratio for multi dwelling housing on land in Area 1.

Mapping:

- FSR maps - FSR_ 001:
    - Amend the LEP 2009 Floor Space Ratio Map to remove 'Area 1'.
- FSR maps - FSR_ 002:
    - Amend the LEP 2009 Floor Space Ratio Map to remove 'Area 1'.
- FSR maps - FSR_ 003:
    - Amend the LEP 2009 Floor Space Ratio Map to remove 'Area 1'.
- FSR maps - FSR_ 004:
    - Amend the LEP 2009 Floor Space Ratio Map to remove 'Area 1'.

PART 3 – JUSTIFICATION

SECTION A – NEED FOR THE PLANNING PROPOSAL

1. Is the planning proposal a result of any strategic study or report?

The planning proposal is in response to analysis and information considered by an extraordinary meeting of Council (**AT-A** and **AT-B**) in response to the provisions of new Medium Density Housing Code and Design Guide.

The new provisions will allow dual occupancies, manor houses and multi-dwelling housing (terraces) to be undertaken through the Exempt and Complying development pathway if that medium density development is permissible in a current zoning and meets standards described in the Code and Guide.

Existing housing stock (single family dwellings) in Lane Cove are zoned as R2 Low Density Residential and permit (with consent) forms of low scale dual occupancy (detached and attached) and multi-dwelling housing. Currently both forms of development are permissible with consent in the R2 Low Density Residential zone.

All lands zoned as R2 Low Density Residential and R3 Medium Density Residential that could comply with the code and guide provisions were identified. This was then combined with all exclusions that would apply under the Exempt and Complying Development policy, i.e:

- Heritage items;
- Heritage conservation areas,
- Environmental Protection Areas;
- Lands reserved for public purposes;
- Foreshore building areas;
- Flood control lots;
- Bush fire prone land; and
- Existing battle axe lots.

While this eliminates a large number of properties from being able to utilise the new Medium Density Code and Design Guide, it identifies that many of the eligible properties (approximately 2000) are adjacent to the Lane Cove River.

Of particular concern is that these properties would be able to build multi dwelling housing (terraces/townhouses) in areas immediately adjoining the Lane Cove River – these areas are predominantly zoned as R2 Low Density Residential.

It is considered that the provisions of the new Code are appropriate for dual occupancies as both Council's minimum lot sizes and prohibition of dual occupancy subdivisions will remain in effect. Multi dwelling housing of the type proposed in the Code are also appropriate in the R3 Medium Density Residential zone, as the existing controls allow for two storey townhouses / terraces.

However, allowing townhouses / terraces to be developed in the R2 Low Density Residential zone is contrary to Council's long standing planning intent to only permit lower scale, single storey villas in this zone – this is explained below.

2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The planning proposal is the best way to rectify this administrative oversight and ensure that Council's long standing planning approach to villas and townhouses is upheld. This intent is explained in Council's report to extraordinary Council meeting dated 1 May 2018.

In the mid 1990's, the NSW State Government sought more housing diversity and density in inner city areas. A review conducted by Council staff at the time revealed that Lane Cove's housing stock was predominantly made up of either detached houses or flats.

A housing strategy was developed and adopted to increase zones which encouraged townhouses and villas. Council's Local Environmental Plan 1987 contained specific controls that were developed to differentiate between the two land uses based on the local context. They were defined as:

- *"townhouse means a dwelling in a two-storey building containing three or more dwellings, and within the curtilage of which pedestrian access and open space exclusive to each dwelling is provided.*
- *villa home means a building of one but not more than one residential storey containing two or more dwellings within the curtilage of which pedestrian access and open space exclusive to each dwelling is provided".*

Different bulk and scale requirements of both types of development were also incorporated. Villa homes were only permitted a floor space ratio of 0.4:1 and the total number of dwellings could not exceed one dwelling for each 350 m^2. However, the scale of townhouses varied depending on the zoning, for example:

- townhouses in zones 2 (b) and (c) permitted a floor space ratio of 0.6:1 and the total number of dwellings could not exceed one dwelling for each 250 m^2.
- townhouses in zone 2 (b1) permitted a floor space ratio of 0.5:1 and the total number of dwellings could not exceed one dwelling for each 300 m^2.

This approach ensured that different development types would respond to local housing needs at the time and increase diversity and stock.

However, this differentiation was not initially recognised when Council came to undertake its comprehensive Local Environmental Plan in 2006. Under the NSW Standard Instrument Order 2006, Councils were required to standardise their LEP's including zones and definitions – including villa homes or townhouses. For example "villa homes" which were previously permitted in the detached zone Residential 2(a1) were replaced with the closest definition, being 'multi dwelling housing':-

- *3 or more dwellings (whether attached or detached) on one lot of land, each with access at ground level, but does not include a residential flat building.*

Council wrote to the Department in 2006 advising that both land uses should be separately defined as they served different purposes and sought and received confirmation that if Council permitted multi dwelling housing in its R2 Low Density Residential zone that the height should be limited to allow only single storey dwellings (villas) and not townhouses.

The Department responded in 2006 by supporting the inclusion of 'multi dwelling housing' in the R2 Low Density Residential zone with a height control of 5 metres

(limiting it to single storey). Townhouses (terraces) are located in the R3 Medium Density Residential zone in order to be consistent with Council's long standing planning approach.

The Draft Local Environmental Plan was subject to extensive community consultation between December 2007 and July 2008. The community did not raise concern about villa homes being made permissible in the R2 Low Density Residential zone under the 'multi dwelling housing' term, on the basis that it would be single storey and appropriately controlled. Council made its final decision on this basis and the Standard Instrument LEP was gazetted on 19 February 2010.

Since its implementation, only one Development Application has been received for single storey villas in Lane Cove, whilst over 3500 units have been approved.

It is apparent that the local context of multi dwelling housing creates an unintended and inappropriate permissibility. As the new Code overrides Council's original intent to permit villas of only one storey in its Low Density zones, the removal of 'multi dwelling housing' as a permissible use is the most logical and acceptable means of achieving this objective.

SECTION B – RELATIONSHIP TO STRATEGIC PLANNING FRAMEWORK

3. Is the planning proposal consistent with the objectives and actions contained within the applicable regional or sub-regional strategy?

Yes. The planning proposal is consistent with all relevant objectives, directions and actions of both: *A Metropolis of Three Cities* (March 2018) and *North District Plan* (March 2018).

A Metropolis of Three Cities

Adopted in March 2018 by the Greater Sydney Commission, this Regional Plan sets ten (10) directions for planning Sydney with forty (40) subsequent objectives. The Planning Proposal is relevant to the four following objectives:

Objective 10 – Greater housing supply

This objective is targeted at delivering more housing supply in the right locations, and one portion of this is local infill development (referred to as "the missing middle" or medium density housing). It states that Councils should investigate and consider additional medium density opportunities based on the following matters:

1. *"transitional areas between urban renewal precincts and existing neighbourhoods;*
2. *residential land around local centres where links for walking and cycling help promote a healthy lifestyle;*
3. *areas with good proximity to regional transport where more intensive urban renewal is not suitable due to challenging topography or other characteristics;*
4. *lower density parts of suburban Greater Sydney undergoing replacement of older housing stock;*
5. *areas with existing social housing that could benefit from urban renewal and which provide good access to transport and jobs" (page 61).*

Council considered these and other matters, during its Comprehensive Local Environmental Plan phase.

Allowing 'multi dwelling housing' to remain as a permissible land use in the R2 zone (with the Code superseding Council's existing controls) would result in unacceptable and unintended planning outcomes, which are inconsistent with the five matters listed above:

1. Much of the zoned R2 Low Density land identified for medium density is located far from any R3 or R4 higher density, and so will not act as "transitional" medium density.
2. Likewise much of the zoned R2 Low Density land is located far from local centres.
3. State Government policies re-affirm that the highest housing densities should be located close to major public transport stops and corridors, where appropriate. However, much of the zoned R2 Low Density land is located on peninsulas with poor regional transport.
4. The majority of zoned R2 Low Density land in Lane Cove LGA is not currently being considered for replacement. Council's housing target is being exceeded due to strategic planning of higher densities in the Mowbray Road and St Leonards precincts. There is no intention or need to increase housing densities elsewhere in Lane Cove.
5. There is very little social housing in the Lane Cove LGA, particularly in the R2 zone. Most of this land is also far away from major transport stops and corridors.

On all five matters for consideration, it is clear that allowing multi dwelling housing to remain as a permissible land use in the R2 Low Density Residential zone would promote medium

density development in the wrong location. This is contrary to Council's long standing strategic planning intent for this land use as well as State Government Policies to promote densities in the appropriate locations. All five matters support the planning proposal to remove multi-dwelling housing from Council's R2 zone.

Objective 25 – The coast and waterways are protected and healthier

This objective identifies that protecting and improving the health of waterways is essential to the sustainability and liveability of Greater Sydney. Strategy 25.1 aims to "*protect environmentally sensitive areas of waterways and the coastal environment area*".

Many of the R2 zoned properties in Lane Cove LGA are located adjacent to the Sydney Harbour foreshore. Management of coastal catchments, particularly by Councils, is in accordance with the Coastal Management Act 2016 and the State Environmental Planning Policy (Coastal Management) 2016.

If the new medium density provisions were utilised, multi dwelling housing (terraces) could be developed on land affected by the Coastal Management SEPP. This could have the potential effect of adversely impacting the runoff water quality and the visual quality of the foreshore – an area sensitive to greater development.

By removing the Code's potential greater densities from the R2 zone, this proposal aims to protect the unique character, cultural and built heritage along the foreshore. In addition, it aims to protect the coastal wetlands and littoral rainforests within the R2 zones from the impacts of greater adjacent residential densities.

Objective 27 – Biodiversity is protected, urban bushland and remnant vegetation is enhanced

This objective aims to protect and enhance biodiversity in the Sydney Basin. In particular, Strategy 27.1 aims "*to manage urban development and urban bushland to reduce edge-effect impacts*".

Removing multi dwelling housing development from the R2 zone, by reducing the potential for development intensity, especially where it is adjacent to bushland, supports this objective to protect urban bushland.

Objective 28 – Scenic and cultural landscapes are protected

This objective recognises the aesthetic, social and economic values of the Sydney environment. In particular, Strategy 28.2 aims "*to enhance and protect views of scenic and cultural landscapes from the public realm*".

By preventing two storey multi dwelling housing in those R2 areas visible from the Sydney Harbour waters, these views of scenic landscapes will be protected. This is also a key objective of Council's existing R2 Low Density Residential zone, where it states:

> *"To encourage new dwelling houses or extensions of existing dwelling houses that are not highly visible when viewed from the Lane Cove River or Parramatta River".*

<u>*North District Plan*</u>

Adopted in March 2018 by the Greater Sydney Commission, this North District Plan sets 24 Priorities for planning Sydney's North District with subsequent objectives. It is a guide for

implementing *A Metropolis of Three Cities* - the Greater Sydney Region Plan at a District level. This Planning Proposal is particularly relevant to the Liveability Priority N5:

> ***Planning Priority N5 – Providing housing supply, choice and affordability, with access to jobs, services and public transport***

A Metropolis of Three Cities sets out objectives to deliver housing supply and affordability, with some emphasis on housing diversity. To guide this delivery, Councils are to prepare a Housing Strategy and give it effect through amendments to the local environmental plan. It is under the following principles that a *Housing Strategy* should consider any change to residential land use and zoning.

The planning proposal to remove multi dwelling housing from the Lane Cove R2 Low Density Residential zone is assessed under these principles:

- *Housing need*: Due to strategic planning of higher densities in the Mowbray Road and St Leonards precincts, Council's housing target is soon to be exceeded. There is no intention or need to increase housing densities elsewhere in Lane Cove in the foreseeable future.

- *Diversity*: In all other residential zones in the Lane Cove LGA, development provides a mix of dwelling types and sizes – attached dwellings, dual occupancies, residential flat buildings, shop top housing, seniors and aged care housing, student accommodation, and boarding houses. Council sets a requirement on all new high density development of 20% universal design.

- *Market preferences*: In much of the low density residential areas of Lane Cove LGA there is a strong preference for single houses in the real estate market. Most demand for higher density dwelling is in closer proximity to centres and/or main transport routes.

- *Alignment of infrastructure*: Many areas of R2 land are relatively less accessible to jobs, health, education and recreation facilities. To increase residential densities in these areas is inconsistent with State and local government infrastructure priorities and does not create new housing in the right locations.

- *Displacement*: The location and volume of affordable rental housing stock is not relevant to this proposal.

- *Amenity*: Locating higher density housing stock further from urban centres will not necessarily improve access to amenity such as recreation, the public realm, and increased walkable and cycle-friendly connections to centres. In some instances it will reduce access to such amenity.

- *Engagement*: The Lane Cove community was consulted extensively during the Comprehensive Local Environmental Plan and Development Control Plan phase between December 2007 and July 2008. The community did not raise concern about villa homes being made permissible in the R2 Low Density Residential zone under the 'multi dwelling housing' term, on the basis that it would be single storey and appropriately controlled. Council made its final decision on this basis and the Standard Instrument LEP was gazetted on 19 February 2010.

- *Efficiency*: The Code provision does theoretically provide "opportunities for innovations in waste management, water and energy provision". However, this is not based on any strategic planning in the nature of growth, location and demand for

utilities. Allowing multi dwelling housing would result in having dispersed and uncoordinated land uses and growth throughout an entire Local Government Area – thus not achieving this principle.

As assessed against the North District Plan's principles for undertaking a Housing Strategy, allowing multi dwelling housing to remain as a permissible land use in the R2 zone (with the Code superseding Council's existing controls) would again result in unacceptable and unintended planning outcomes.

4. Is the planning proposal consistent with the local council's Community Strategic Plan or other local strategic plan?

The planning proposal to remove "multi-dwelling housing" from Council's R2 zone is consistent with Lane Cove Council's Community Strategic Plan (CSP). It is addressed under the following six Built Environment objectives for *A Well Designed, Liveable and Connected Area*:

Sustainable Development – To balance sustainability, heritage and growth of Lane Cove

It has always been Council's long standing planning intent to only allow single storey villa developments in order to be consistent with the local character and locate townhouses and terraces in more appropriate zones.

Retaining 'multi dwelling housing' as a permissible land use within the R2 Low Density Residential zone can be expected to create unacceptable and unintended planning outcomes within this zone, in particular the construction of double storey dwellings in unsuitable locations which would be highly visible when viewed from the Lane Cove River.

Foreshore areas have a greater visual impact and are environmentally more sensitive than flat suburban land. It would be inconsistent with community priorities and local values to permit bulkier, intense development, which would not be subject to professional scrutiny from architects, planners and engineers, in these locations.

Removing this land use from the R2 Low Density Zone would permit the environmental heritage Lane Cove to be recognised and respected while allowing growth to be accommodated in more appropriate locations.

Sustainable Development – To encourage environmentally sustainable development

The location of 'multi dwelling housing' exclusively in the R3 Medium Density residential zone, which is generally closer to public transport, reduces travel-to-work time and would lead to a more sustainable form of development.

Locating this more intensive type of development in inappropriate locations away from centres and transport is contrary to achieving the aims of sustainable 'local living'.

Sustainable Development – To encourage high quality planning and urban design outcomes

High quality planning and urban design outcomes are best achieved when the proposed development is sympathetic with the existing character and built form of the immediate neighbourhood. This neighbourhood context includes local character, building height and density, building appearance, existing garden and bushland setting and streetscape.

Council's planning policies for all residential development were based on extensive urban design research and a significant amount of public input during the exhibition of Council's Standard LEP and Development Control Plan.

Development for the purposes of 'multi dwelling housing' within the R2 Low Density Residential zone can be expected to result in unacceptable and unintended planning outcomes, in particular the construction of double storey dwellings in unsuitable locations such as those which would be highly visible when viewed from the Lane Cove River.

Multi dwelling housing is better located in the R3 Medium Density residential zone, which is generally closer to public transport. These areas support the use of more sustainable modes of transport, including public transport, walking and cycling, and reduces the distances people must travel to access goods, services and employment opportunities and will help address traffic congestion and auto-usage.

Housing – To promote a range of sustainable housing options in response to changing demographics

Villas served as an important housing role for elderly and disabled residents dispersed within the low density areas; it is not conceivable that they would ever contribute in large numbers to achieve the State Government's housing targets for the LGA. Council's housing strategy focuses on higher density R4 zones close to transport nodes and amenities.

It is not best planning practice to provide for every housing form in every area or portion of an LGA. The nature of zoning is to allocate built form to appropriate locations. Nor should this be at the detriment of the prime environmental assets which Lane Cove Council and its residents have sought to preserve. The housing needs of Lane Cove LGA can and have been accommodated readily away from key environmental assets such as key bushland areas and waterways.

Assets, Infrastructure and Public Domain – To ensure assets and infrastructure cater for increased population growth, are well maintained and support sustainable living

Key community assets, such as community facilities, open space, walkways are planned to cater for the largest population areas. Dispersed higher densities are a less efficient way to link population to assets. Furthermore, by allowing 'multi dwelling housing' in the R2 Low Density Residential zone to continue, this will further discourage community ownership and management of assets and local streets. Loss and gradual erosion of neighbourhood character by inappropriate built form will not encourage or induce ongoing or sustainable community engagement and involvement.

Transport and Mobility – To promote integrated transport options that link people to work, services and facilities.

Council's zoning maps demonstrate that much of the R2 Low Density Residential zone is located at the bushland and waterway extremities of the LGA and remote from public transport opportunities. It would be far preferable to locate 'multi dwelling housing' close to major public transport stops, corridors and support services.

The principle of promotion of integrated transport options that link people to work, services and facilities is undermined by permitting more intense 'multi dwelling housing' in the R2 Low Density Residential zone.

Transport and Mobility – To encourage the use of sustainable transport options.

Similarly, permitting more intense forms of 'multi dwelling housing' in the R2 Low Density Residential zone was not envisaged or supported by Council's planning policies and is inconsistent with encouraging the use of sustainable transport options.

Traffic – To ensure traffic volumes and speeds accord with local conditions and road type and To alleviate road congestion and improve safety.

Permitting more intense forms of 'multi dwelling housing' in the R2 Low Density Residential zone is contrary to the sustainable management of traffic volumes and flow as it will lead to an increase in traffic congestion in the more 'remote' extremities of the LGA where local streets are narrower and require traffic safety controls.

5. Is the planning proposal consistent with applicable state environmental planning policies?

Yes. The proposal is consistent with relevant state environmental planning policies. Please see **AT-C.**

6. Is the planning proposal consistent with applicable Ministerial Directions (s. 9.1 directions)?

Yes. The proposal is consistent with relevant Section 9.1 Directions. Please see **AT-D**.

SECTION C – ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The proposal will not adversely affect any critical habitat or threatened species, populations or ecological communities, or their habitats.

A number of properties that would be able to utilise the provisions of the new Medium Density Housing Code and Design Guide adjoin sensitive environments.

If these provisions were utilised, multi dwelling housing (terraces) could be developed on land affected by the Sydney Harbour foreshore, State Environmental Planning Policy No 19 – Bushland in Urban Areas and Coastal Management.

Foreshore areas in particular are environmentally more sensitive than flat suburban land. It would be highly inappropriate to permit intense development, which would not be subject to professional scrutiny from architects, planners and engineers, in foreshore areas.

8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

There are no other known environmental effects that could arise from the planning proposal.

In fact, by removing multi dwelling housing as a permissible land use in the R2 zone it would retain Lane Cove's bushland character and protect its sensitive environmental and foreshore areas.

9. How has the planning proposal adequately addressed any social and economic effects?

The proposal does not result in adverse social or economic effects.

SECTION D – STATE AND COMMONWEALTH INTERESTS

10. Is there adequate public infrastructure for the planning proposal?

During its comprehensive Local Environmental Plan phase, Council identified appropriate areas for density increases which were supported by appropriate infrastructure.

Permitting low scale (single storey) villa homes were considered to be compatible with the local context while concentrating new larger (two storey) townhouses to R3 Medium Density Residential areas close to the Lane Cove village.

Allowing townhouse and terraces in areas close to the foreshore and sensitive bushlands are considered to be contrary to this planning approach.

11. What are the views of State and Commonwealth public authorities consulted in accordance with the gateway determination?

No State or Commonwealth public authorities have been consulted at this stage. It is envisaged that any Gateway Determination would nominate relevant Government agencies that should be consulted.

PART 4 – MAPPING

As a result, all existing Floor Space Ratio maps will need to be amended to remove the control for multi dwelling housing. This is referred to as “Area 1” on Council’s Local Environmental Plan maps.

A full set of maps compliant with the *NSW Standard Technical Requirements for Spatial Datasets and Maps* is also available, in preparation for an exhibition, and can be provided now if the Department requests it.

PART 5 – COMMUNITY CONSULTATION

Dependent on the Department's advice, however given that the proposal will have no issues with regard to infrastructure servicing; is not a principal LEP; and does not reclassify public land – Council considers this as a 'low impact planning proposal' and requests that the Department consider a 14 day exhibition period.

As stated in Council's report and resolution, Council has chosen to waive its standard six – week exhibition period.

PART 6 – PROJECT TIMELINE: Indicative

Stage	*Completion Date*
Commencement date of Gateway	**17 May 2018**
Completion of required technical information	**Not expected**
Government agency consultation	**18 May 2018 to 1 June 2018**
Commencement and completion dates for public exhibition	**18 May 2018 to 1 June 2018**
Dates for public hearing	**Not expected**
Consideration of submissions	**June 2018**
Consideration of proposal post exhibition	**June 2018**
Date of submission to the Department to finalise the LEP	**Mid June 2018**
Anticipated date RPA will make the plan (if delegated)	**Not applicable**
Anticipated date RPA will forward to the Department for notification	**Late June 2018**

Attachments

AT-A: Council Report dated 1 May 2018

AT-B: Council Minutes dated 1 May 2018

AT-C: Consistency with applicable State Environmental Planning Policies

AT-D: Consistency with applicable Section 9.1 Directions

Departmental Attachment 1: Information Checklist

Departmental Attachment 2: Evaluation Criteria for the Delegation of Plan Making Functions

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