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Housing Investigation Areas Paper

April 2020

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1. INTRODUCTION

Housing stock in the Georges River Local Government Area (LGA) needs to adapt over the next 20 years to respond to future housing demands. Additionally, it is critical to advocate for improved transport connectivity to support the existing and future needs of the community.

As discussed in this Paper, the need for additional housing derives from multiple planning policies that set long term future directions, notably the *Local Strategic Planning Statement (LSPS) 2040* which seeks to plan for additional dwellings towards the LGA's 6-10 year housing target while providing the community with greater housing choice.

The LSPS 2040 identifies a number of areas to be investigated for potential new housing. This Paper provides the detailed justification for the selection of these areas, known as Housing Investigation Areas (HIAs).

A total of five (5) HIAs are identified to be upzoned as part of the *Georges River Local Environmental Plan (GRLEP) 2020*, creating opportunity to deliver an additional 650 dwellings in the form of medium density and high density dwellings in accessible locations across the LGA:

- 1) Hillcrest Avenue – Hurstville
- 2) North and West of Peakhurst Park – Peakhurst
- 3) Apsley Estate – Penshurst
- 4) Culwulla Street – South Hurstville
- 5) Rowe Street – South Hurstville

The underlying principles for the HIAs, as discussed in this Paper, aim to deliver a supply of housing that respects the established character and environmental constraints of the LGA. The HIA locations are supported by an evidence-based approach that includes traffic assessments and built form analysis.

1.1. Purpose of this Paper

This Paper provides the detailed justification for the selection of the five HIAs, including:

- Consistency with the *Greater Sydney Region Plan* and *South District Plan*
- Consistency with the *Georges River Community Strategic Plan 2018-2028*
- Consistency with Council's *Local Strategic Planning Statement (LSPS) 2040*
- Results of the LSPS 2040 community consultation
- Results of the targeted community consultation
- Traffic analysis of the proposed upzoning
- Analysis of the proposed built form outcomes, including medium density residential typologies

This Paper also itemises the actions required to implement the proposed HIAs through GRLEP 2020.

1.2. Strategic Policy Context

In undertaking strategic planning processes, Council must give effect to the region plan, district plan and the local strategic planning statement in accordance with the requirements of the *Environmental Planning and Assessment Act 1979*. The local strategic planning

statement is required to be consistent with Council's community strategic plan prepared under the *Local Government Act 1993*.

An overview of the Paper's consistency with the strategic planning policy context is summarised below.

1.2.1. Greater Sydney Region Plan - A Metropolis of Three Cities

The *Greater Sydney Region Plan - A Metropolis of Three Cities* (Region Plan) is guided by a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. The LGA is located in the Eastern Harbour City. The Region Plan is comprised of a number of Directions centred on the following themes:

- Infrastructure and collaboration
- Liveability
- Productivity
- Sustainability

To deliver improved liveability across the Greater Sydney Region, this Plan specifies the following metropolitan wide Actions:

- Prepare housing strategies
- Develop 6-10 year housing targets
- Implement affordable rental housing targets

This Paper implements the Actions of the Region Plan by providing the detailed justification for the selection of the five HIAs.

1.2.2. South District Plan

The LGA sits within the South District in the Greater Sydney Region. The *South District Plan* is a guide for implementing the Region Plan at the district level by nominating a number of Planning Priorities to support the delivery of the Region Plan's Directions.

The *South District Plan* sets a housing target of 23,250 additional dwellings in the district by 2021 of which 4,800 are to be provided in the Georges River LGA. Council is required to prepare a local housing strategy to guide how these additional dwellings will be delivered. In particular, an emphasis is placed on "providing housing supply, choice and affordability, with access to jobs, services and public transport" through Planning Priority S5.

The considerations of Planning Priority S5 have been integrated into the guiding principles used to select the HIAs.

1.2.3. Community Strategic Plan 2018-2028

The *Community Strategic Plan 2018-2028* (CSP) was developed around six pillars which were identified in the consultation process as important to the community:

- Pillar 1:** A protected environment and green open spaces
- Pillar 2:** Quality, well planned development
- Pillar 3:** Active and accessible places and spaces

Pillar 4: A diverse and productive economy

Pillar 5: A harmonious and proud community with strong social services and infrastructure

Pillar 6: Leadership and transparency

The proposed upzoning of the five HIAs under the draft GRLEP 2020 directly responds to the goal of developing policies that encourage a greater supply of housing diversity and choice under Pillar 2 of the CSP.

1.2.4. Local Strategic Planning Statement 2040

The *Local Strategic Planning Statement (LSPS) 2040* creates a land use vision that recognises the character of the LGA's suburbs and builds on the community's social, environmental and economic values. The LSPS 2040 has five themes:

Theme 1: Access and Movement

Theme 2: Infrastructure and Community

Theme 3: Housing and Neighbourhoods

Theme 4: Economy and Centres

Theme 5: Environment and Open Space

The LSPS 2040 has been developed with the input of over 500 residents and business operators with housing preference being a core focus of the engagement program. The community was invited to have their say on the future vision for housing through written submissions, workshop participation and the completion of a housing survey that revealed current housing circumstances and future housing aspirations.

Throughout the engagement program, Council consistently heard the following messages from the community regarding their housing preferences:

- The character of the low density suburbs is highly valued
- Maintaining the existing character of neighbourhoods was important, particularly with respect to streetscape, trees, open space and walkability
- People want to see a mix of housing, especially housing that is affordable and suitable for older members of the community, such as single-level housing
- People support a clear hierarchy of residential zones
- There should be better transitions between different zone types and open space
- It is most important for their next home to be close to public transport, local shops and open space
- People would consider living in a duplex, dual occupancy or a terrace.

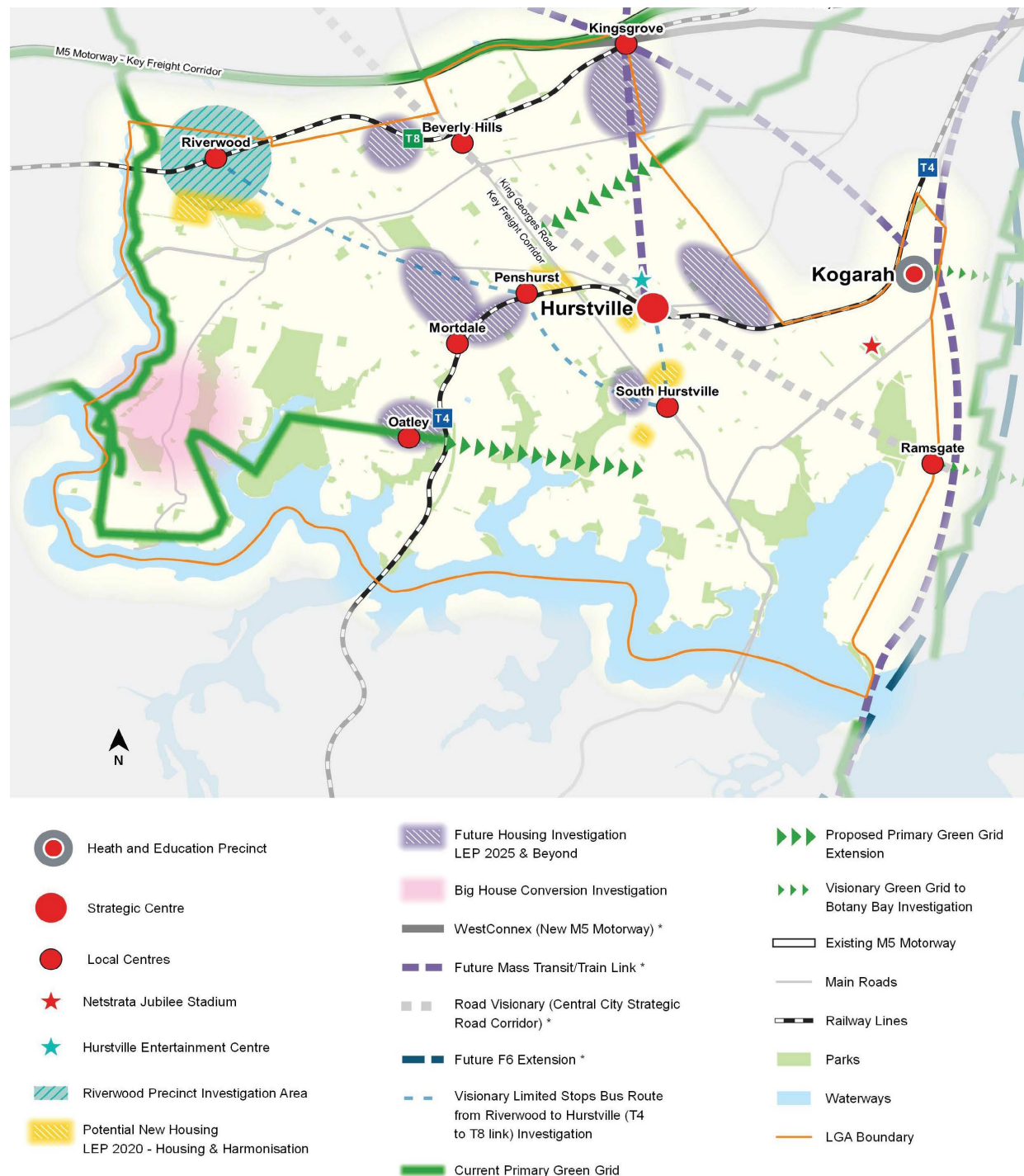
In summary, the community highlighted the need to access a choice of high quality housing across the LGA with a mix of dwelling types and sizes located appropriately to meet the needs of people at different life stages. The community also indicated the need to improve the character of higher density suburbs and protect the existing character of low scale residential areas.

To provide for the LGA's growing population over the next 20 years, the LSPS 2040 identifies the following additional housing targets, which can mostly be accommodated within the capacity of the existing zoning and controls:

- 6-10 year: additional 3,450 dwellings
- 10-20 year: additional 5,750 dwellings

The LSPS 2040 also nominates a number of locations where opportunities for new housing should be investigated through a staged approach in accordance with the program for the Georges River LEP, with the first stage occurring in LEP 2020 and future investigations to be conducted for LEP 2025 and beyond (refer **Figure 1** below), with the aim of providing additional housing to meet the housing targets specified by the *South District Plan*. These areas will contribute to the provision of additional dwellings to meet the future dwelling targets as a direct response to the supply gap and the community's housing preferences.

Figure 1: LSPS 2040 Housing and Neighbourhoods Structure Plan



* Proposed: as outlined in Future Transport 2056

The LSPS 2040 was formally made on 10 March 2020 after receiving the Letter of Support from the GSC on 4 March 2020. It contains a suite of Actions that contribute to the delivery of the land use vision for the LGA over the next 20 years. Specifically, the following Actions are being implemented through the *Local Housing Strategy* and the HIAs to reinforce Council's commitment to facilitate additional housing and more diverse dwelling typologies to meet future housing demands:

A47. *Complete a Local Housing Strategy that includes planning for District Plan housing targets, a hierarchy of residential zones, providing targets for inclusive housing and addressing housing diversity*

A48. *Facilitate a broader range of housing types across the LGA through rezoning land, including controls for medium density development in Council's LEP and DCP 2020*

This Paper provides the detailed justification for the selection of the five HIAs, which are to be upzoned as part of the GRLEP 2020 to create the opportunity to accommodate an additional 650 dwellings in the form of medium density and high density dwellings in accessible locations across the LGA.

1.2.5. Draft Local Housing Strategy

The draft *Local Housing Strategy* sets out the strategic direction for housing in the LGA over the next 20 years. It identifies the housing demand, gaps and issues, and establishes housing objectives to manage future growth. It is a mandated Strategy in response to the *Greater Sydney Region Plan* and *South District Plan* requirements, and aligns with the directions, objectives and actions for housing in the South District.

The Strategy also responds to local needs and context as well as community input from extensive consultation undertaken during the preparation of Council's CSP and LSPS 2040 which involved a housing survey and targeted consultation on five housing investigation areas.

The Strategy identifies that approximately 12,000 dwellings can be delivered by the existing planning framework, which results in a shortfall of approximately 2,000 dwellings to meet the demands of the future 2036 population.

To implement the LSPS 2040 vision and to provide capacity for additional housing into the medium term, the draft *Local Housing Strategy* reinforces the importance of investigating the five HIAs for their suitability in delivering additional housing capacity. The detailed justification for the selection of the five HIAs to deliver an additional 650 dwellings through GRLEP 2020 is provided in this Paper.

At its meeting dated 24 February 2020, Council resolved to publicly exhibit the draft *Local Housing Strategy* as a supporting document to the GRLEP 2020.

2. POPULATION AND HOUSING

An evidence base has been prepared to inform the preparation of the draft *Local Housing Strategy*. This *Evidence Base* identifies the current and future demographic profiles of the LGA until 2036 to determine future housing demands, and analyses the existing supply of housing and development trends in the LGA to forecast the future supply of housing types.

This Paper provides a brief summary of the key population and housing forecast findings. A comprehensive summary of Council's community profile is detailed in the draft *Local Housing Strategy*.

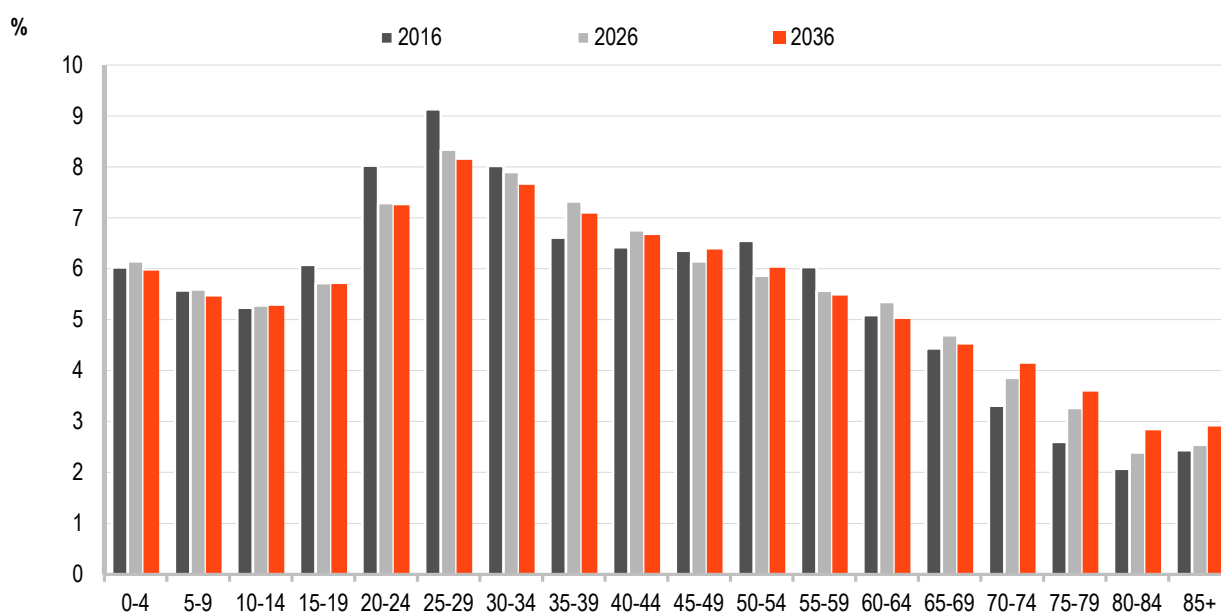
2.1. Population Forecasts

The LGA's population is projected to increase from 156,293 in 2017 to approximately 185,000 by 2036. Over the last 10 years, the LGA experienced significant growth in both the 20-34 years (young workers) and the 50-69 years (pre-retirement) age groups. The number of young workers and young families will continue to increase, primarily driven by migration to the area, from other areas of Australia and overseas.

The age structure of the LGA is fairly similar to that of Greater Sydney. However, there are a slightly higher proportion of young adults (20-29 years) and older adults aged over 75 years in the LGA.

Figure 2 shows how the age structure is expected to change in the future.

Figure 2: Forecast age structure, Georges River LGA – 2016-2036



Source: *forecast.id* (2018)

2.2. Household Forecasts

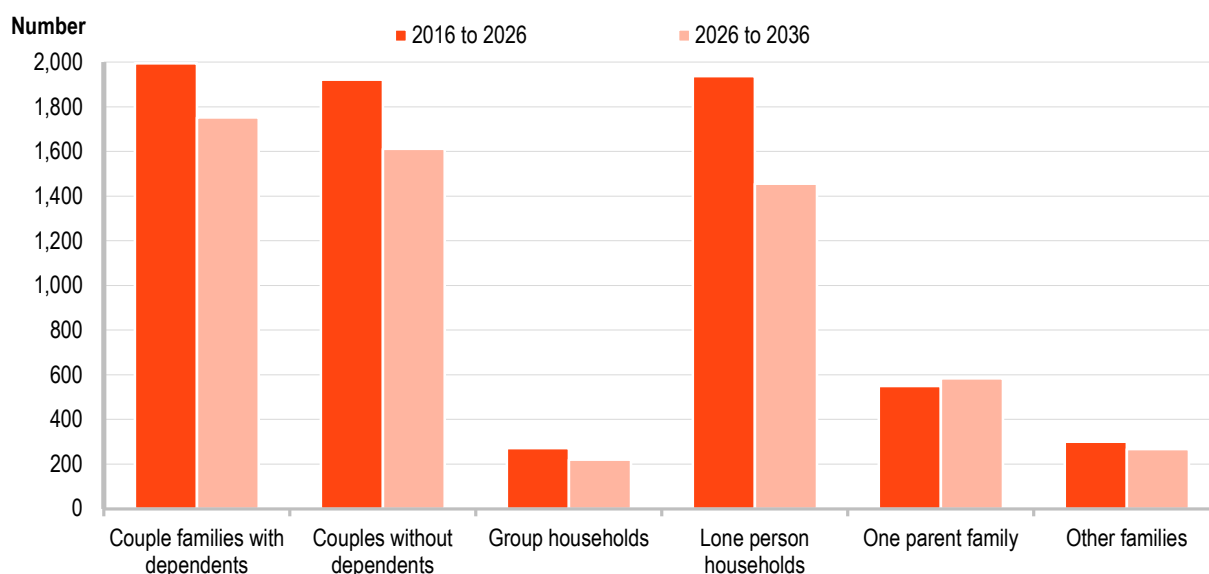
Over the next 20 years, the average household size is forecasted to decrease to 2.79 persons but the couples with children household type is expected to remain the dominant household type, totalling 19,195 households and comprising 37.4% of the total households

in the LGA by 2036. This is attributed to the significant increase in young workers who are often in the early stages of family formation.

Couples without children are identified as the next most common household type, comprising around 23.8% of all households. This household type has also been increasing in the area due to a combination of factors, such as an ageing population, resulting in growth of empty nester and elderly lone person households, couples choosing a child-free lifestyle, as well as the emergence of smaller households resulting from divorce and partner separations.

Figure 3 shows how the various household types are expected to change in the future.

Figure 3: Change in households by type, Georges River LGA – 2016-2036



Source: *forecast.id* (2018)

With growth in all household types, the planning framework needs to promote a diversity of dwelling sizes and typologies so housing choice is provided, ranging from adaptable housing that allows downsizing and ageing in place in low density suburbs to family-friendly dwellings in medium and high density locations.

2.3. Housing Supply

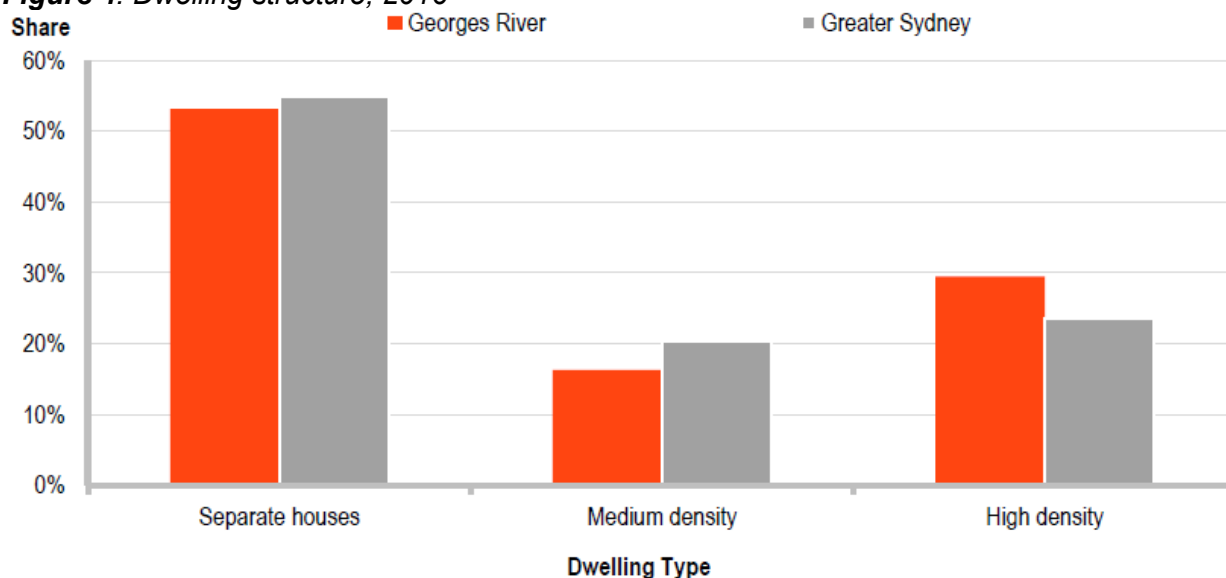
At the 2016 Census, there were 49,133 occupied dwellings in the LGA, consisting of:

- 53.2% low density dwellings (detached houses or dual occupancies)
- 16.3% medium density dwellings (terraces, townhouses and villas)
- 29.5% high density dwellings (apartment buildings of three or more storeys)

This mix is fairly similar to the Greater Sydney average (55%, 20.3%, and 23.5% respectively), though the Georges River LGA has a slightly higher proportion of high density dwellings.

Figure 4 shows a comparison of dwelling types with the Greater Sydney average.

Figure 4: Dwelling structure, 2016



Source: *forecast.id* (2018)

Much of the total dwelling change in the LGA has been driven by the increase in high density dwellings such as apartments, with 3,117 dwellings being built over the five year period between 2011 and 2016. These dwellings have been built in the major centres of Hurstville and Kogarah. Such areas are attractive for developers to build apartments, as these locations provide excellent public transport connections and high levels of amenity which are vital to successful high density living.

2.4. Housing Demand

Population and household size forecasts indicate that the LGA needs approximately an additional 14,000 dwellings to be provided by 2036.

The LGA is currently equipped to provide an additional 12,000 dwellings, comprising of:

- 5,532 dwellings from major development sites that are under assessment and subject to Council approval
- Capacity for 6,602 dwellings under existing planning controls

Accordingly, this results in a shortfall of approximately 2,000 dwellings to be provided by 2036. Planning for housing demand needs to consider the type of dwellings required to respond to the expected changes in household and age structures.

There is an increasing number of families with young children living in medium and high density homes in the LGA. This differs to other couples with young children across from Greater Sydney, where couples with young children are more likely to be living in separate houses with four bedrooms, and less likely to live in higher density homes.

Couples with older children are generally in a stable part of their housing career, with most remaining in the dwelling they chose during family formation. Some may be in the 'upgrader' housing market, looking for larger, newer dwellings in more aspirational areas.

Older couples are often already living in, and remaining in, large, separate houses with four or more bedrooms, however there has been some evidence of a small number of older residents downsizing to smaller homes.

Currently, 41.2% of households in the LGA are small (1-2 people), but only 34.0% of dwellings are classified as small (0-2 bedrooms). This highlights a mismatch in the demand and supply of dwellings.

Couples with young children (all under 15 years of age) are also a dominant household type in the LGA, comprising 20% of the total, yet there are a higher proportion of couples with young children living in two bedroom dwellings when compared to Greater Sydney (25.1%, 18.3% in Greater Sydney).

An increase in the proportion of older dependent residents due to an ageing population will also impact on housing requirements, such as an increase in demand for adaptable housing and greater options for downsizing beyond high density living.

2.5. Policy Implications

Utilising the findings of the *Evidence Base*, the draft *Local Housing Strategy* analyses the LGA's housing supply and demand and identifies the following housing gaps that will need to be addressed through policy responses:

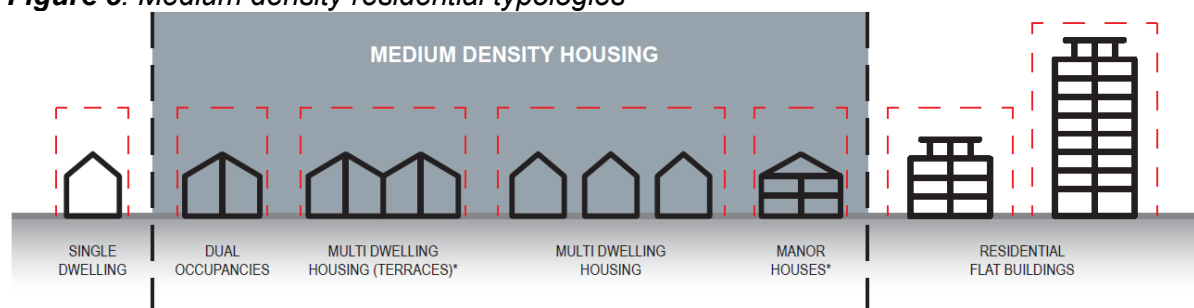
- An estimated population of 185,000 is forecast for 2036, with the largest increase in residents 60 years and older and the couples with children household type
- Support services aiding the elderly to stay in their own homes longer is particularly important as ageing in place is a main trend
- There is a mismatch between the demand and supply of suitable dwellings types in the LGA as smaller households are forecast to grow by 41%
- There is limited choice for small dwellings available suitable for the ageing population
- Different forms of medium density housing are needed in a wider range of suburbs in the LGA to cater for mature families to empty nesters and older lone person households
- The current housing supply of larger detached dwellings occupied by older, smaller households are not becoming available to attract and retain younger households to the area
- Diversifying housing types will free up the stock of three or more bedroom dwellings, increasing the range of dwelling choices for family households, the dominant household in the LGA
- Diversifying choice by facilitating alternative housing options is crucial to help maintain LGA population levels and create more sustainable, equitable and healthy communities
- Residential development in and around commercial centres and transport corridors provides residents with easy access to amenities, services and public transport.

In summary, the Georges River community requires access to a diverse choice of high quality housing across the LGA, comprising of a mix of housing types and sizes located appropriately to meet the needs of people at different life stages, with differing incomes and lifestyles. With the majority of the current housing stock provided as being either two bedroom apartments in high density locations or large dwelling houses with typically four or more bedrooms in low density suburbs, the GRLEP 2020 should prioritise the provision of medium density housing such as townhouses in appropriate locations as the first step to providing a range of housing choice.

3. RECENT UPDATES TO THE PLANNING FRAMEWORK

The provision of greater housing diversity through medium density housing (refer **Figure 5** below) has been recognised by the NSW Government as a way of enabling families to access greater housing choice. To support this, the *Low Rise Medium Density Housing Code* (LRMDHC) was commenced in 2018 to enable dual occupancies, manor houses and terraces to be carried out under a fast track complying development approval. However, Georges River Council is one of the 45 NSW councils that have been granted a temporary deferral of the LRMDHC until 1 July 2020.

Figure 5: Medium density residential typologies



Source: Adapted from the *Low Rise Medium Density Design Guide* (DPIE 2017)

3.1. Protect R2 Low Density Residential Zones – LRMDHC Planning Proposal

Under the LRMDHC, manor houses will become permissible where multi dwelling housing or residential flat buildings (or both) are permitted. Similarly, terraces will become permissible where multi dwelling housing developments are permitted. The complying development process allows development to be approved with minimal neighbour notification and no requirement for objections to be considered.

At the time of the LRMDHC's announcement, multi dwelling housing was a permitted land use under the Hurstville LEP 2012 in all R2 Low Density Residential zones while multi dwelling housing was prohibited in the R2 zones under the Kogarah LEP 2012. The permissibility of multi dwelling housing in the R2 zones of the former Hurstville LGA threatened the neighbourhood amenity and character of these low density suburbs due to the imminent introduction of the LRMDHC across the LGA.

The LRMDHC will allow private certifiers to approve 2 storey residential flat buildings comprising 3-4 dwellings, known as "manor houses", as well as duplexes and terrace housing. This would significantly increase the density of areas that do not have the requisite facilities and services to meet the day to day needs of the future residents.

At its meeting on 28 May 2018, Council acknowledged the serious concern that the LRMDHC will generate for the neighbourhood amenity and character of these R2 areas and resolved to remove the permissibility of multi dwelling housing from the R2 zones as part of a planning proposal known as the LRMDHC Planning Proposal.

The LRMDHC Planning Proposal sought to make the following amendments to the Hurstville and Kogarah LEPs:

Hurstville LEP 2012

- Prohibit villas, townhouses, multi dwelling housing (terraces) and manor houses in the R2 Low Density Residential zone so that they cannot be built in the zone through

a development application under HLEP 2012 or through complying development under the Code

- Increase the minimum lot size for dual occupancies under Area G (630sqm) of the Hurstville LEP 2012 so that it mirrors the minimum lot size for dual occupancies under Area O of Kogarah LEP 2012 (650sqm)
- Include a new savings provision to ensure that the proposed amendments do not affect any current development applications or appeal processes

Kogarah LEP 2012

- Delete Items 17, 18 and 19 of Schedule 1 Additional Permitted Uses to prevent manor houses, multi dwelling housing (terraces), villas and townhouses from being built through a development application under KLEP 2012 or through complying development under the Code, on land listed in the Items
- Include a new savings provision to ensure that the proposed amendments do not affect any current development applications or appeal processes

The intent of the LRMDHC Planning Proposal is for Council to develop provisions for manor houses and terraces that are designed specifically for the LGA in response to the local character of its neighbourhoods.

The LRMDHC Planning Proposal received a Gateway Determination from the Department of Planning, Industry and Environment (DPIE) on 31 July 2018 and was amended in accordance with the relevant Gateway Conditions. Subsequently, extensive community consultation was conducted in May 2019 where Council received:

- 100 individual submissions – with 54% of respondents supporting the LRMDHC Planning Proposal, and 31% objecting
- 200 survey responses – indicated mixed support for the introduction of medium density housing in the LGA. There was more support for dual occupancies rather than manor houses. Nonetheless, there was support for Council to develop local controls rather than adopting the NSW Government medium density housing controls

In response to the results of the community consultation, the LRMDHC Planning Proposal was submitted to the DPIE for final plan-making in August 2019 with a variation to retain, instead of deleting, Item 19 of Schedule 1 of the Kogarah LEP 2012. This variation was proposed to respect the development rights that all the properties under Item 19 have been granted since 1998 where large freehold sites over 1,500sqm were eligible for villas and townhouses under Clause 22A of the superseded Kogarah LEP 1998.

On 6 December 2019, the Minister for Planning and Public Spaces made the plan and the following amendments proposed by the LRMDHC Planning Proposal came into effect through the *Georges River Local Environmental Plan Amendment (Miscellaneous) 2019*:

Hurstville LEP 2012

- Prohibit multi dwelling housing in the R2 Low Density Residential zone
- Increase the minimum lot size for dual occupancies under Area G from 630sqm to 650sqm

Kogarah LEP 2012

- Repeal Items 17 and 18 of Schedule 1 Additional Permitted Uses

3.2. Review Medium Density Housing Areas

In the DPIE's endorsement of the LRMDHC Planning Proposal, it was specified that Council's *Local Housing Strategy* is required to outline the approach for the delivery of a sufficient number of dwellings to meet housing demand while ensuring a supply of a range of housing styles to promote choice and diversity.

To support the removal of medium density housing from the low density residential zones as result of the LRMDHC Planning Proposal, Council has committed to the following:

- Review of all residential zoned land in the LGA to determine the areas that have merit on strategic planning grounds to accommodate medium density housing
- Develop planning controls and development standards for medium density housing that are responsive to the local character of the LGA

In response, the LSPS 2040 has nominated a number of HIAs across the LGA to be investigated for rezoning to a R3 zone to facilitate the delivery of additional medium density housing (refer **Figure 1** above). The investigation of the suitability of these areas is completed in accordance with the criteria specified in **Section 4 Guiding Principles for the Selection of Housing Investigation Areas** of this Paper.

Furthermore as part of this investigation, a review of the development standards applied to the R3 zone and specific controls for each type of medium density housing typology is conducted to understand the desired future character of the LGA's 'true' medium density residential zones. The development standards for these new medium density dwelling typologies are detailed in **Section 6.2 Built Form Analysis** of this Paper.

4. GUIDING PRINCIPLES FOR THE SELECTION OF HOUSING INVESTIGATION AREAS

The LSPS 2040 commits to supporting homes with safe, accessible, green, clean, creative and diverse facilities, services and spaces by establishing the Criteria to Guide Growth:

- 1) The LGA's special characteristics are retained
- 2) Growth is supported by green open space, social and physical infrastructure
- 3) Growth areas are linked to transport corridors and frequent services
- 4) Kogarah and Hurstville are enhanced as strategic centres
- 5) All centres have a role in jobs and housing growth
- 6) A hierarchy of residential zones is developed
- 7) Evidence and community consultation provide the framework for strategic planning and decision-making.

This set of criteria responds to a number of key messages raised by the Georges River community during the LSPS engagement process.

Accordingly, the HIAs were selected based on the considerations above, including access to existing infrastructure and social services, such as schools, community facilities, open space and public transport to promote the efficient use of land and infrastructure. Seven (7) guiding principles have been developed to inform the selection of the HIAs based on these considerations.

4.1. Public Transport

Housing around transport nodes provides the community with convenience and accessibility, as well as improves connectivity to jobs, services and recreation. Maintaining and improving connectivity is important as the LGA grows.

The *Future Transport Strategy 2056* proposes NSW Government investment in transport infrastructure such as new mass transport links, improved services and road corridors, including proposals that will improve the LGA's connectivity to Bankstown, Loftus, Macquarie Park, Parramatta and Rhodes. As these proposals are progressed, Council will need to review and revise land use strategies to reflect the alignment of these major transport initiatives and ensure that opportunities for accommodating additional homes and jobs in the context of a 30 minute city are maximised.

In the meantime, areas along existing and committed transport links will be investigated for housing growth as a guiding principle for the selection of HIAs. Council will also advocate to the NSW Government to provide expanded and new public transport links to meet current and future demand.

4.2. Shops and Services

Commercial centres in the LGA play a vital role in providing a mix of amenities, essential and specialist services and retail outlets including supermarkets, local grocer, restaurants and cafes to cater to the demands for day to day goods and services close to where people live.

Centres also have an important role in providing access to local employment, especially when many local centres in the LGA are co-located with transport interchanges. With improved transport connections, there will be opportunities for centres to evolve into mixed-use, walkable neighbourhoods that provide ongoing employment growth.

Housing should be located in close proximity to existing centres to leverage off the amenities, services and social meeting spaces provided in these centres. Access to centres is one of the guiding principles for the selection of HIAs.

4.3. Educational Establishments

Educational establishments, such as schools and tertiary institutions, form an important part of the Georges River community. Housing in close proximity to educational establishments offer residents greater choice, accessibility and convenience, as well as the ability to access school sport and recreational facilities readily and participate in local social activities.

Proximity to existing educational establishments is one of the guiding principles for the selection of HIAs. Council will also advocate to the NSW Government to expand existing educational facilities and provide new facilities to meet the demands of a growing population.

4.4. Community Facilities

Community facilities in close proximity to housing can enhance social cohesion, build community links, increase connectivity between residents and improve community wellbeing. The LGA has a range of community facilities comprising of libraries, aquatic facilities, an entertainment centre, sports stadium, community centres and halls, and hireable community spaces.

Social infrastructure needs to be available in different sizes and for different uses as the population grows and diversifies. Proximity to existing community facilities is one of the guiding principles for the selection of HIAs.

4.5. Open Space

Open space is a form of green infrastructure that enhances the character of the LGA's neighbourhoods, supports healthy and active lifestyles, and brings communities together. Housing that is connected to a wide network of open space increases liveability and health outcomes for individuals and communities, as well as improves community building by encouraging social participation and interaction.

People in urban neighbourhoods should be able to walk to local open space. Nearly all residents in the LGA currently live within 400m of open space. However, there are a number of smaller local parks that lack facilities, visibility and general functionality.

The provision of open space is a key consideration when planning for growth. Locating HIAs within 400m of good quality public open spaces is a guiding principle.

4.6. Environmental Constraints

The LGA has a number of environmental constraints that could limit development potential in some locations. These constraints include flood prone land, bushfire prone land, acid sulfate soils, coastal hazard, riparian lands and watercourses and foreshore protection areas. Placing development in hazardous areas or increasing the density of development in areas with limited evacuation options increases risk to people and property.

Accordingly, as a guiding principle, HIAs should be located in areas with minimal environmental constraints and risks managed through preventative and protective measures.

4.7. Heritage

Heritage is an important part of the built environment and contributes to a sense of identity and history in the LGA. Council's aim is to conserve and protect the LGA's heritage so it can be enjoyed by current and future generations.

However, balancing housing growth with heritage conservation and protection objectives can be challenging. Development proposals will need to ensure any increase in density appropriately responds to the existing heritage significance of the item or heritage conservation area. Hence, in principle, the bulk and scale of developments in HIAs must be responsive and sympathetic to the existing heritage significance of housing areas.

4.8. Transition between Low and High Density

The draft *Local Housing Strategy* acknowledges that a harmonised hierarchy of residential zones is required to regulate the built form, typology and transition between the low and high density zones. Currently under both the Hurstville and Kogarah LEPs, the majority of R3 Medium Density Residential zones in the LGA are assigned maximum building heights of 12m to 21m, which can result in high density apartment buildings ranging from three to seven storeys. Recent development activities in the R3 zones have resulted in transition issues at the interface of R2 and R3 zones.

To ensure a diverse range of housing is created in appropriate locations, medium density developments under a 'true' medium density zone should be investigated in accessible locations to act as a buffer around high density zones. As a principle, the existing maximum height of building control of 9 metres will apply to medium density housing to encourage appropriate built forms and typologies within the proposed R3 Medium Density Residential zone and a maximum building height of 12 metres in the R4 High Density Residential zone.

4.9. Zoning Anomaly

A comparison between the existing Hurstville and Kogarah LEPs has identified a number of zoning anomalies. For example, in the Blakehurst and Kogarah Bay Wards, more than one zone was applied to a street block, despite the presence of only one type of residential development occurring within the street block. This means that on the ground, the two zones cannot be distinguished.

The rectification of these known zoning anomalies under the Kogarah LEP is one of the guiding principles for the selection of HIAs and will ensure a consistent hierarchy of planning controls across the LGA under the GRLEP2020.

5. HOUSING INVESTIGATION AREAS

Housing Investigations Areas (HIAs) seek to facilitate additional housing and more diverse dwelling typologies to meet future housing demands. Five (5) preliminary HIAs areas across the LGA were identified and analysed for potential upzoning suitability. The preliminary HIA list was:

- 1) Olds Park – Penshurst
- 2) Hillcrest Avenue – Hurstville
- 3) North and West of Peakhurst Park – Peakhurst
- 4) Apsley Estate – Penshurst
- 5) Culwulla Street – South Hurstville

At its meeting held 28 October 2019, Council resolved to include the following five (5) final HIAs in the draft *Local Housing Strategy* and also endorsed the rezoning of these HIAs in the proposed GRLEP 2020:

- 1) Hillcrest Avenue – Hurstville
- 2) North and West of Peakhurst Park – Peakhurst
- 3) Apsley Estate – Penshurst
- 4) Culwulla Street – South Hurstville
- 5) Rowe Street – South Hurstville

In summary, the proposed upzoning of the Olds Park – Penshurst precinct was not pursued due to strong community concerns and the outcomes of the traffic assessments, while the Rowe Street – South Hurstville precinct has been included as a formal HIA in light of the strategic merit demonstrated by the proposed upzoning in this accessible location. Further explanation is provided under the respective HIA heading.

Detailed analysis is provided for each HIA, which includes the:

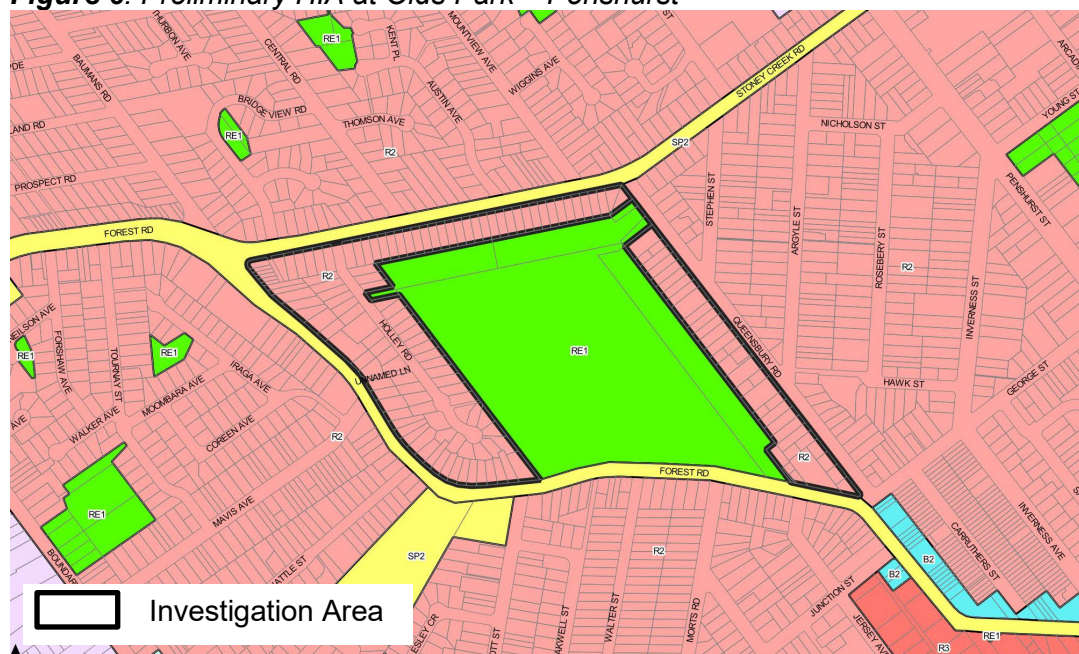
- number of additional dwellings created
- typologies of the surrounding context
- proposed building controls
- justification against the guiding principles identified in **Section 4** of this Paper.

Note: All information is sourced from site visits, aerial photos and desktop analysis based on Council's internal mapping system and document records. The number of proposed dwellings has been extracted from the information provided through the DPIE's Housing Mapping and Scenario Tool (HMST).

5.1. Preliminary Investigations and Community Engagement

Prior to the selection of the final HIAs, the Olds Park – Penshurst precinct (refer **Figure 6**) was considered. However, for the reasons discussed below, this precinct has not been included in the final list of HIAs for rezoning in the GRLEP 2020.

Figure 6: Preliminary HIA at Olds Park – Penshurst



Source: Land Zoning Map (Hurstville LEP 2012)

Targeted consultation with the residents and landowners of the preliminary precincts was conducted in September 2019. A total of 830 property owners were notified of the five preliminary HIAs across the LGA:

- 1) Olds Park – Penshurst
- 2) Hillcrest Avenue – Hurstville
- 3) North and West of Peakhurst Park – Peakhurst
- 4) Apsley Estate – Penshurst
- 5) Culwulla Street – South Hurstville

The property owners were invited to attend one of four information sessions. Overall, 72 property owners participated in the information sessions, 56 completed surveys and 44 completed feedback forms.

The community responded with strong opposition to the proposed upzoning of the Olds Park – Penshurst precinct due to concerns regarding the surrounding local road network's capacity to accommodate additional vehicular movements. Other issues including the impacts of additional on-street car parking, overdevelopment, loss of privacy and the loss of the area's existing low density character were also raised as key concerns.

Further investigation indicated that this area is not suitable for housing growth because of its existing traffic issues as highlighted by the traffic study and the lack of accessibility to train stations and commercial centres:

- The precinct is located 2km away from the nearest railway station at Penshurst, and the bus services in operation are infrequent.
- The precinct relies on the Penshurst Local Centre to cater to the day to day needs of its residents. However, this centre is located 2km away which severely restricts its accessibility.
- The road intersection operations in this precinct are operating near capacity due to the right turn movements from the local streets to the arterial corridors of Stoney Creek Road and Forest Road.

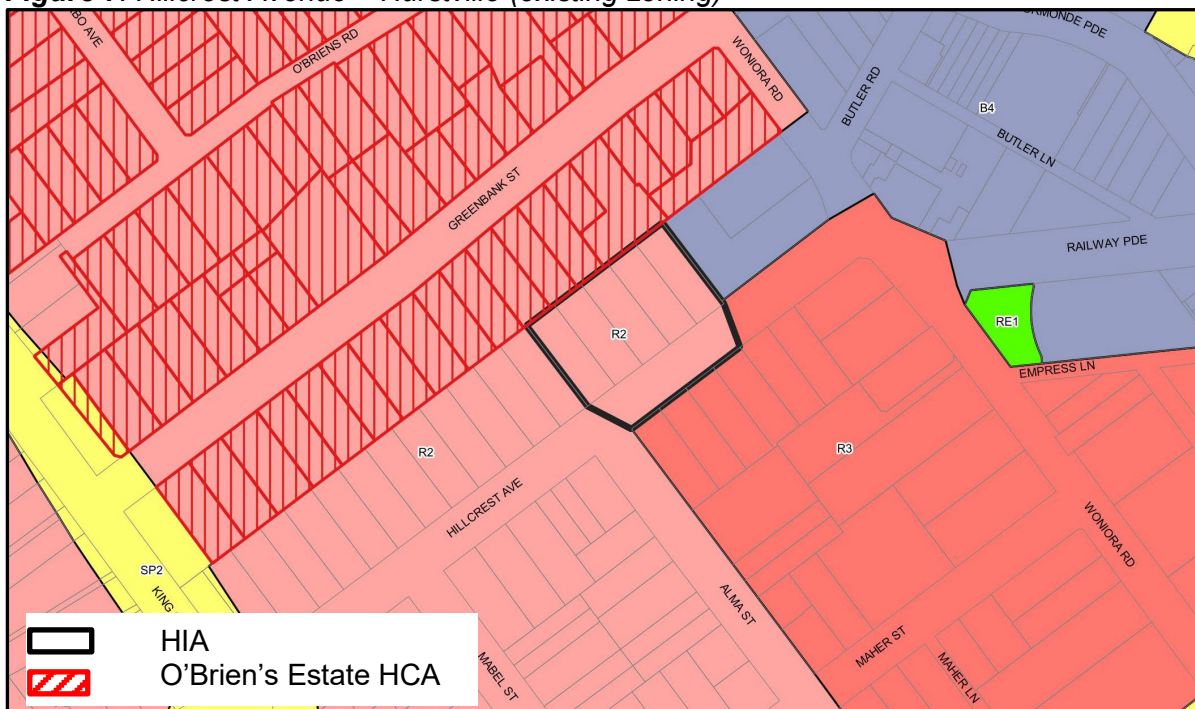
- Vehicle access to and from the allotments fronting Stoney Creek Road may be difficult in the future due to the restriction of a left in and left out vehicle access for arterial roads. It is also anticipated that RMS would either prohibit access or limit the number of access points along this frontage.
- The right turn vehicle movement from George Street to Forest Road currently has significant delays. The HIA analysis showed that this turning movement would have increased traffic under the proposed upzoning and hence result in greater delays and accident potential.

Accordingly, Council resolved to not proceed with the proposed upzoning of the Olds Park precinct in response to community concerns and traffic assessments.

5.2. HIA 01: Hillcrest Avenue – Hurstville

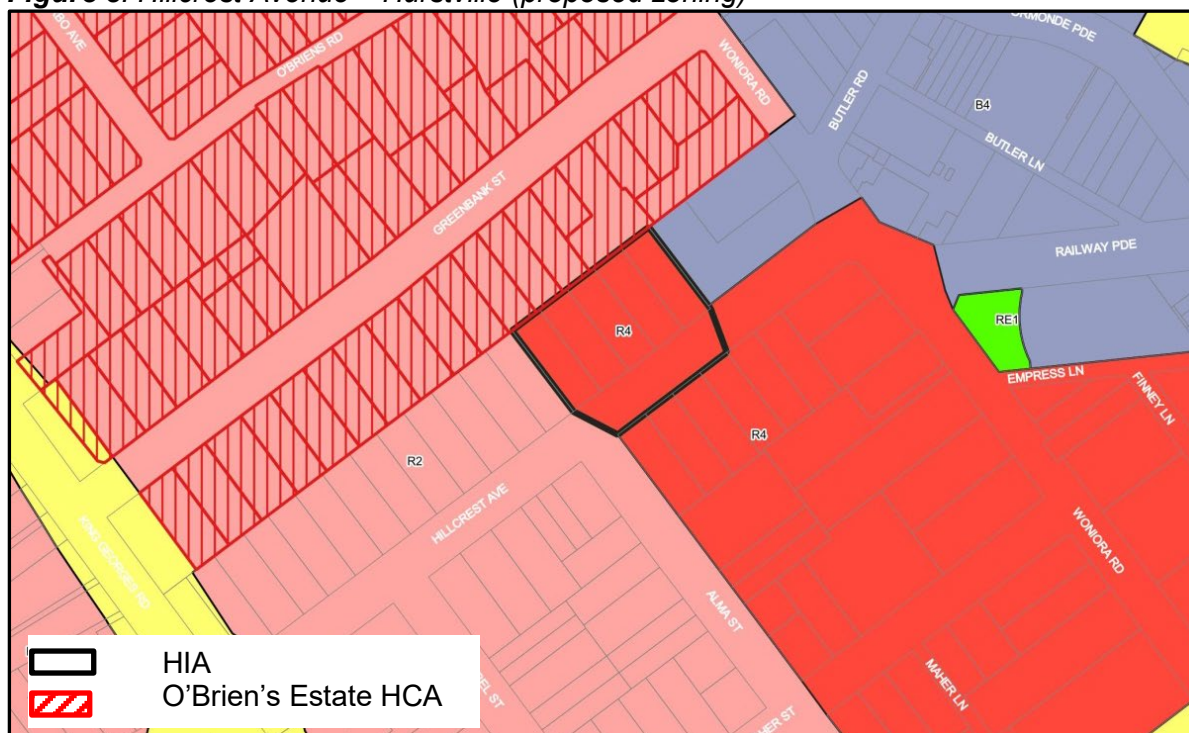
The Hillcrest Avenue – Hurstville precinct (refer **Figures 7 and 8**) is located at the interface between the Hurstville City Centre and the adjoining R2 and R3 zones. The O'Brien's Estate Heritage Conservation Area (HCA) is located at the rear of the precinct. This area is recognised as a critical area where intervention is required to address the transition between the low and high density zones.

Figure 7: Hillcrest Avenue – Hurstville (existing zoning)



Source: Land Zoning Map (Kogarah LEP 2012)

Figure 8: Hillcrest Avenue – Hurstville (proposed zoning)



Source: Land Zoning Map (draft GRLEP 2020)

Precinct Information: Hillcrest Avenue – Hurstville	
Approximate site area	3,490 sqm
Number of existing dwellings	5
Estimated potential yield	14 dwellings (5 existing and an additional 9 dwellings)
Existing zoning	R2 Low Density Residential
Proposed zoning	R4 High Density Residential
Adjoining zonings	R2 Low Density Residential R3 Medium Density Residential B4 Mixed Use
Current built form	Single brick dwellings of older stock and suitable for revitalisation
Proposed built form	Small apartment blocks of a maximum of four storeys
Surrounding land uses and built form	Small apartment blocks of two to three storeys and single dwellings
Ownership patterns	Individual ownership
Existing development standards	Height – 9m FSR – 0.6:1
Proposed development standards	Height – 12m FSR – 1:1

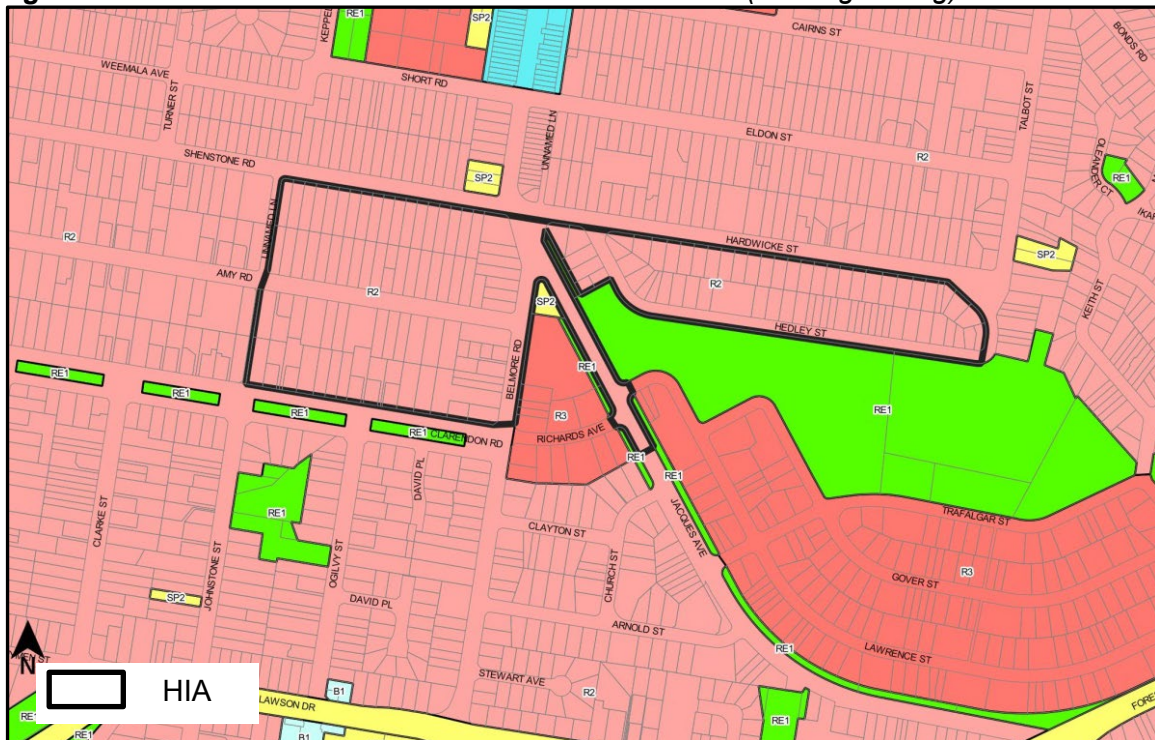
Selection Rationale: Hillcrest Avenue – Hurstville

Public Transport	Hurstville railway station is within 200m of the precinct with trains to the city (Central station) every 5-10 minutes (including express trains and trains stopping at stations between Hurstville and Arncliffe). Trains also depart to Cronulla and the South Coast. Hurstville City Centre also has two bus interchanges with buses departing to Macquarie Park, St George Hospital, Five Dock, Strathfield, Bankstown, Parramatta and other local suburbs.
Shops and Services	Hurstville City Centre is within 200m walking distance of the precinct. Recognised as a strategic centre by the <i>South District Plan</i> , the Hurstville City Centre is an important retail destination with an active main street (Forest Road) and large shopping centres (Westfield and Hurstville Central).
Educational Establishments	Seven schools are located within a kilometre: Woniora Road School, Hurstville South Public School, Hurstville Grove Infants School, Marist Catholic College South Hurstville Campus, St George Christian School, Hurstville Adventist School and Danebank Anglican School for Girls.
Community Facilities	Council's Civic Centre and Library are located within the Hurstville City Centre, which is within 400m walking distance, providing book loaning, activities and programs, and meeting room hiring services.
Open Space	Woniora Gardens and Denman Street Reserve are within 400m walking distance. They are passive recreation areas providing picnic tables and playground equipment.
Environmental Constraints	This precinct is not affected by any known environmental constraints.
Heritage	The area north of the precinct is O'Brien's Estate Heritage Conservation Area. The character of this area is to be preserved and development in the precinct should maintain and enhance the HCA's existing heritage values.
Transition	By rezoning the area to a R4 zone with a maximum height of 12m, this will create a buffer to the adjoining high density residential areas to minimise the impacts of development on the HCA.
Zoning Anomaly	The existing built form within this precinct is comparable to the development present in the existing R3 zone immediately opposite on Hillcrest Avenue. The existing R2 zoning is considered to be a zoning anomaly.

5.3. HIA 02: North and West of Peakhurst Park – Peakhurst

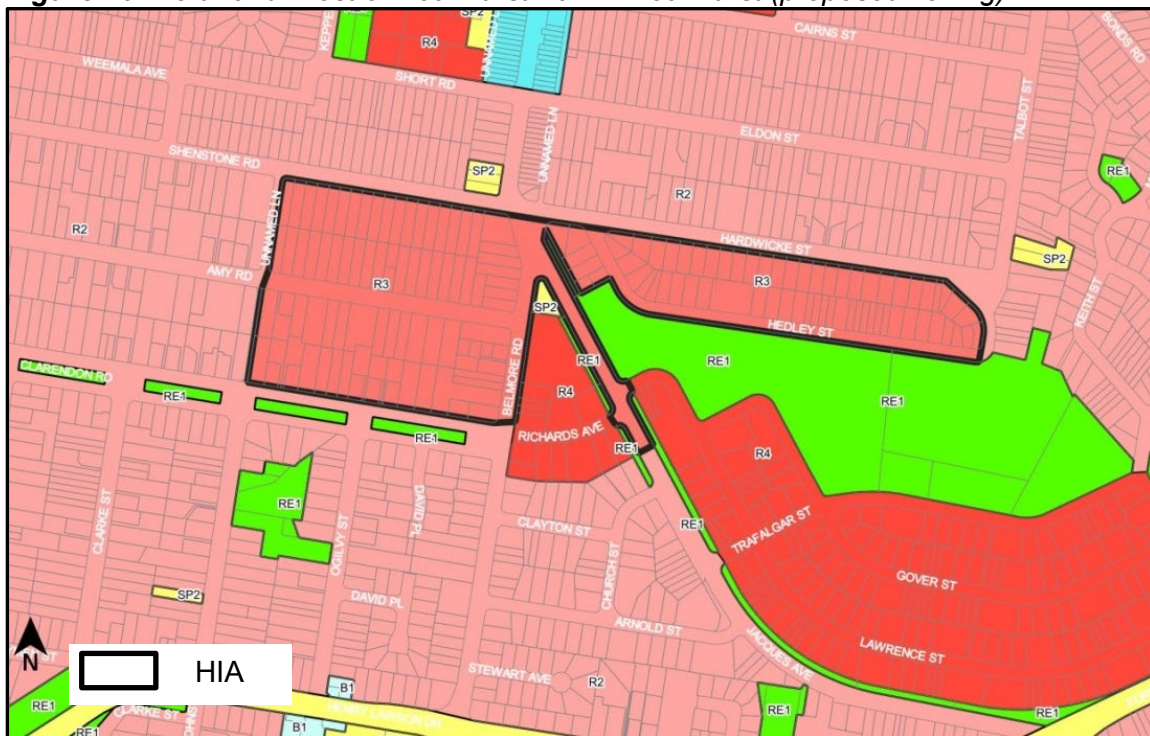
The North and West of Peakhurst Park – Peakhurst precinct (refer **Figures 9 and 10**) is located to the south of the Riverwood Local Centre. This precinct adjoins Peakhurst Park and the existing high density residential areas around Jacques Avenue. Additional housing in this area provides the opportunity to create diversity in dwelling types within walking distance to existing infrastructure.

Figure 9: North and West of Peakhurst Park – Peakhurst (existing zoning)



Source: Land Zoning Map (Hurstville LEP 2012)

Figure 10: North and West of Peakhurst Park – Peakhurst (proposed zoning)



Source: Land Zoning Map (GRLEP 2020)

Precinct Information: North and West of Peakhurst Park – Peakhurst

Approximate site area	111,950 sqm
Number of existing dwellings	179
Estimated Potential Yield	335 dwellings (179 existing dwellings and an additional 156 dwellings)
Existing zoning	R2 Low Density Residential
Proposed zoning	R3 Medium Density Residential
Adjoining zonings	R2 Low Density Residential R3 Medium Density Residential RE1 Public Recreation
Current built form	A mix of single and double storey brick and weatherboard dwelling houses, dual occupancies and multi-dwelling housing. Generally older dwelling stock, with a few new developments scattered in the area.
Proposed built form	One and two storey dual occupancies, manor houses, terraces, villas and townhouses.
Surrounding land uses and built form	The surrounding low density areas feature a mix of single and double storey dwelling houses while the high density residential area around Jacques Avenue is characterised by recent residential flat buildings (three to four storeys).
Ownership patterns	Generally individual ownership, several public housing properties and three strata titles.
Existing development standards	Height – 9m FSR – 0.6:1
Proposed development standards	Height – 9m FSR – 0.7:1

Selection Rationale: North and West of Peakhurst Park – Peakhurst

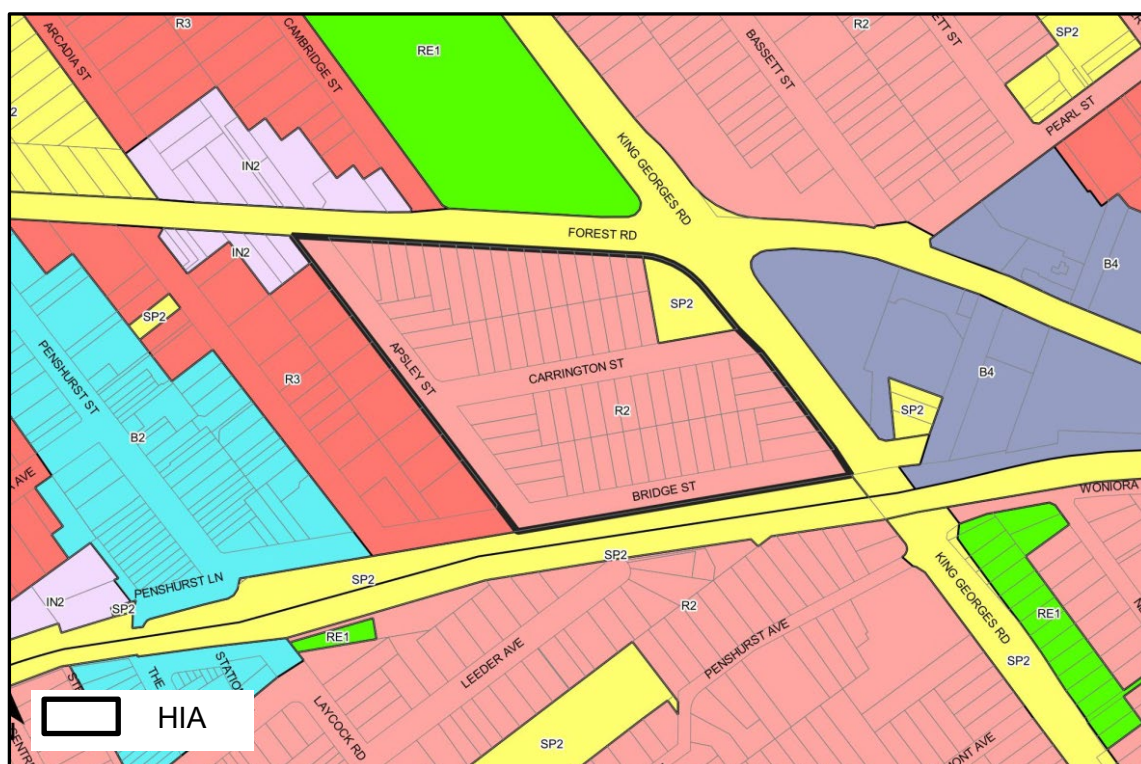
Public Transport	Riverwood train station is within 800m walking distance. Bus stops are available on Belmore Road which provides bus services towards Lugarno, Riverwood Station and Campsie every 15-30 minutes. Bus stops on Shenstone Road and Clarendon Road also have routes towards Lugarno and Campsie.
Shops and Services	Riverwood Local Centre is within 800m walking distance. The centre has great local retail offerings and provides a variety of services to meet the daily and weekly needs of its residential catchment. The major asset in the centre is the Riverwood Plaza Shopping Centre, anchored by Coles, Woolworths and Aldi supermarkets.
Educational Establishments	Three schools are located within a kilometre: St Joseph's Catholic Primary School Riverwood, Peakhurst Public School and Peakhurst West Public School.
Community Facilities	The Hurstville Chinese Baptist Church (Riverwood) is located within the precinct, offering hireable space for community events.
Open Space	Peakhurst Park is located across Hedley Street, adjoining the precinct. It provides facilities including BBQ, toilets, play equipment,

	bike tracks, walking tracks and fields for organised active recreation activities like soccer, cricket and rugby league. Harold Snodgrass Reserve is located across Clarendon Road, offering passive recreation space. Additional passive recreation open space is provided by Keppel Avenue Reserve and Johnston Reserve, which are within 100m and 500m walking distance respectively.
Environmental Constraints	The precinct is identified as being flood affected by the Hurstville Overland Flow Study. Measures such as freeboarding above the flood level will need to be implemented in future developments.
Heritage	There is no heritage item listed within or being adjacent to the precinct.
Transition	By rezoning the area to a R4 zone, it will create a buffer between the adjoining low and high density residential areas.
Zoning Anomaly	No zoning anomaly identified.

5.4. HIA 03: Apsley Estate – Penshurst

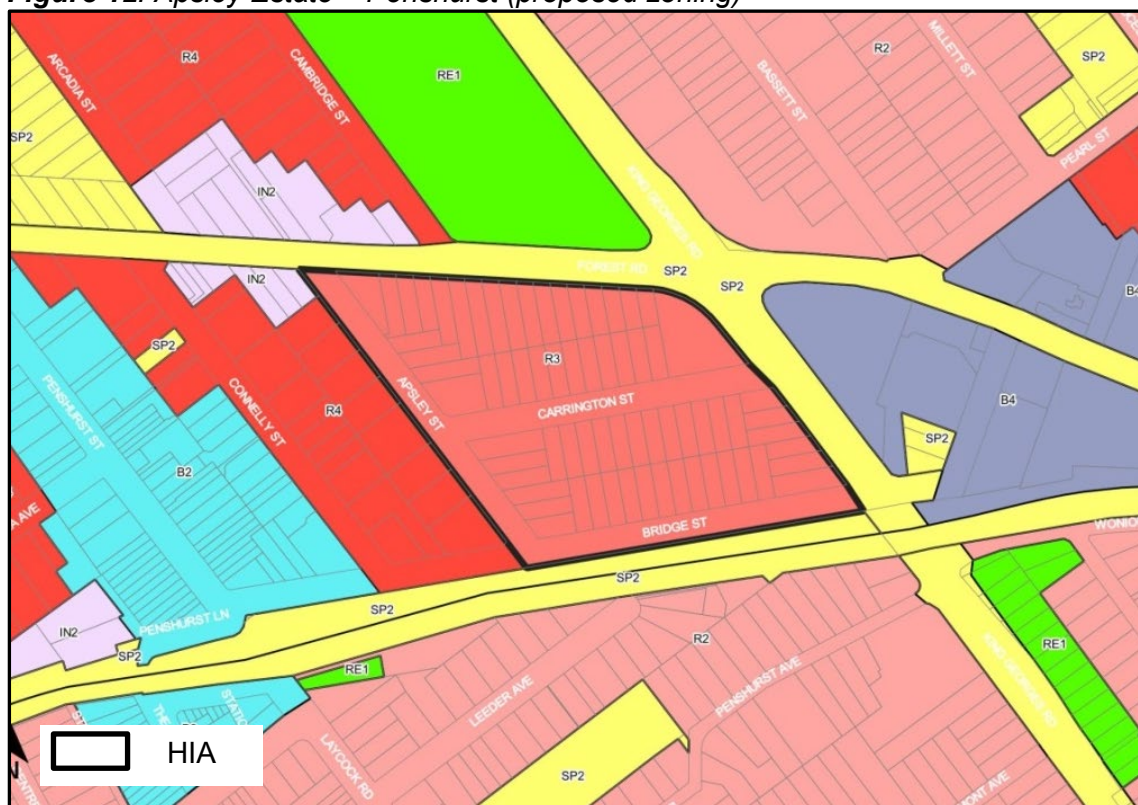
The Apsley Estate – Penshurst precinct (refer **Figures 11 and 12**) is comprised of two street blocks, bound by King Georges Road, Forest Road, Apsley Street and Bridge Street / the T4 Illawarra railway line. The precinct is located between the Hurstville City Centre to the east and the Penshurst Local Centre to the west. Additional housing in this area provides the opportunity to create diversity in dwelling types within walking distance to existing infrastructure.

Figure 11: Apsley Estate – Penshurst (existing zoning)



Source: Land Zoning Map (Hurstville LEP 2012)

Figure 12: Apsley Estate – Penshurst (proposed zoning)



Source: Land Zoning Map (GRLEP 2020)

Precinct Information: Apsley Estate – Penshurst	
Approximate site area	41,850 sqm
Number of existing dwellings	78
Estimate potential yield	183 dwellings (78 existing and an additional 105 dwellings)
Existing zoning	R2 Low Density Residential SP2 Infrastructure
Proposed zoning	R3 Medium Density Residential
Adjoining zonings	R2 Low Density Residential R3 Medium Density Residential RE1 Public Recreation IN2 Light Industrial B4 Mixed Use
Current built form	A mix of single and double storey brick and weatherboard dwelling houses and some dual occupancy developments. Generally older dwelling stock, with only a few new developments scattered in the area.
Proposed built form	One and two storey dual occupancies, manor houses, terraces, villas and townhouses.
Surrounding land uses and built form	Penshurst Park with the Hurstville Aquatic Centre and light industrial uses to the north; residential flat buildings (10 storeys) to the east, single storey dwellings to the south and

	residential flat buildings (three or four storeys) to the west.
Ownership patterns	Individual ownership.
Existing development standards	Height – 9m FSR – 0.6:1
Proposed development standards	Height – 9m FSR – 0.7:1

Selection Rationale: Apsley Estate – Penshurst

Public Transport	Penshurst train station is within 400m walking distance. Bus stops are available on Forest Road and Bridge Street which provide convenient bus services towards Hurstville City Centre every 2-15 minutes, as well as other destinations, including Parramatta every 10 minutes, Bankstown every 2-15 minutes, and Lugarno every 20 minutes.
Shops and Services	Penshurst Local Centre is within 400m walking distance. The centre is anchored by a small IGA supermarket with a good retail mix concentrated along Penshurst Street. It is also supported by a Council owned car park accessed from Connolly Street.
Educational Establishments	Six schools are located within a kilometre: Penshurst Public School, St Declan's Catholic Primary School, Georges River College-Penshurst Girls, Marist Catholic College, Hurstville Grove Infants, and Danebank Anglican School.
Community Facilities	Hurstville Aquatic Leisure Centre is located on the opposite side of Forest Road. It contains a number of facilities, including pools, a fitness centre, multi-purpose indoor stadium space, sauna, steam room and spa, childcare services, and a café.
Open Space	Penshurst Park is within 300m walking distance, providing a playground, netball courts, picnic tables, BBQ facilities and toilets. The Development Application for stages 2 and 3 of the implementation of the Master Plan for Penshurst Park was approved on 13 March 2018 to upgrade the sporting facilities and public amenities at the park. Other accessible open spaces include Arrowsmith Park within 150m which contains a walking track and unleashed dog area, and Sunnyhurst Reserve within 400m.
Environmental Constraints	Part of the precinct is identified as being flood affected by the Hurstville Overland Flow Study. Measures such as freeboarding above the flood level will need to be implemented in future developments.
Heritage	There is one heritage item located within the precinct at 645 King Georges Road. This is listed as the St John the Evangelist's Anglican Church. Future developments will need to respond sympathetically to the heritage significance of this item. The Penshurst Heritage Conservation Area and O'Brien's Estate Heritage Conservation Area are located on the southern side of the T4 Illawarra railway line. Due to the spatial isolation of the precinct provided by Bridge Street, the railway and street trees, the impact of the proposed rezoning on the two existing Heritage Conservation Areas is considered to be minimal.
Transition	No transition is required due to the spatial isolation of the precinct created by the arterial roads, Apsley Street, the railway and street

	trees. This precinct will present a consistent medium density character through the rezoning to R3.
Zoning Anomaly	No zoning anomaly identified.

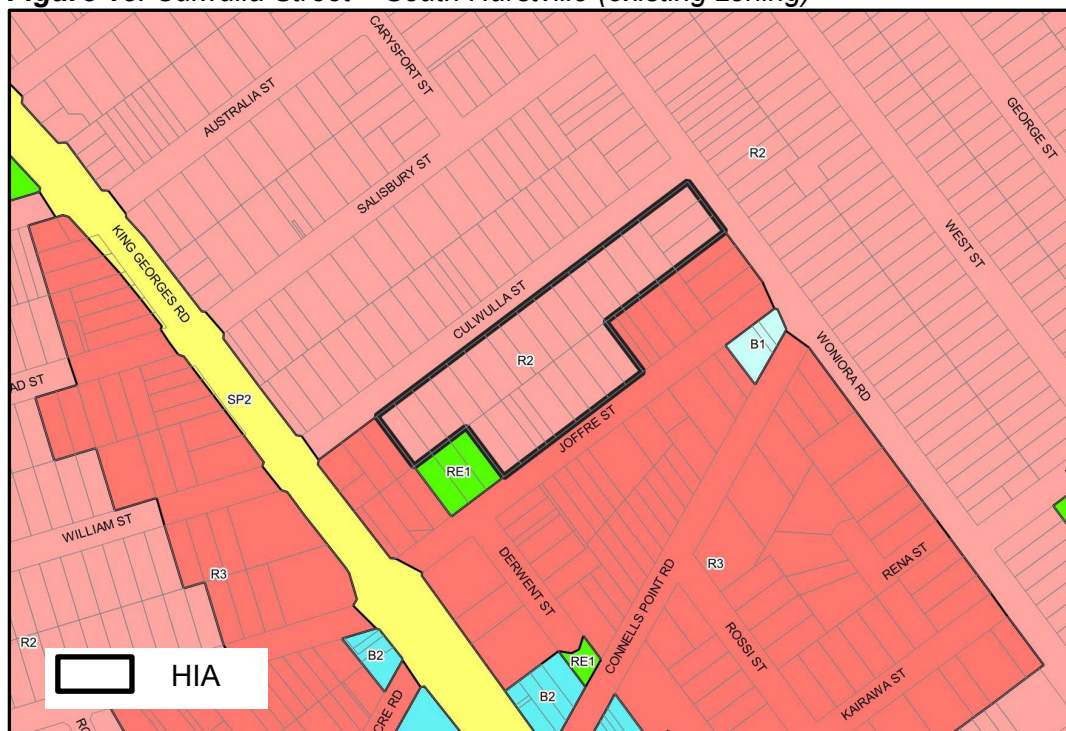
5.5. HIA 04: Culwulla Street – South Hurstville

The Culwulla Street – South Hurstville precinct (refer **Figures 13 and 14**) is located on the eastern side of King Georges Road and is comprised of the remaining R2 zoned portion of the street block bound by King Georges Road, Culwulla Street, Joffre Street and Woniora Road. Additional housing in this area will provide the opportunity to create diversity in dwelling types within walking distance of existing infrastructure.

To further enhance the liveability of this precinct, land reservation acquisition is proposed at 26-30 Culwulla Street to enable the creation of a larger park (adjacent to existing land already zoned RE1 Public Recreation) in an area identified for housing growth and to enable through site access between Culwulla Street and Joffre Street.

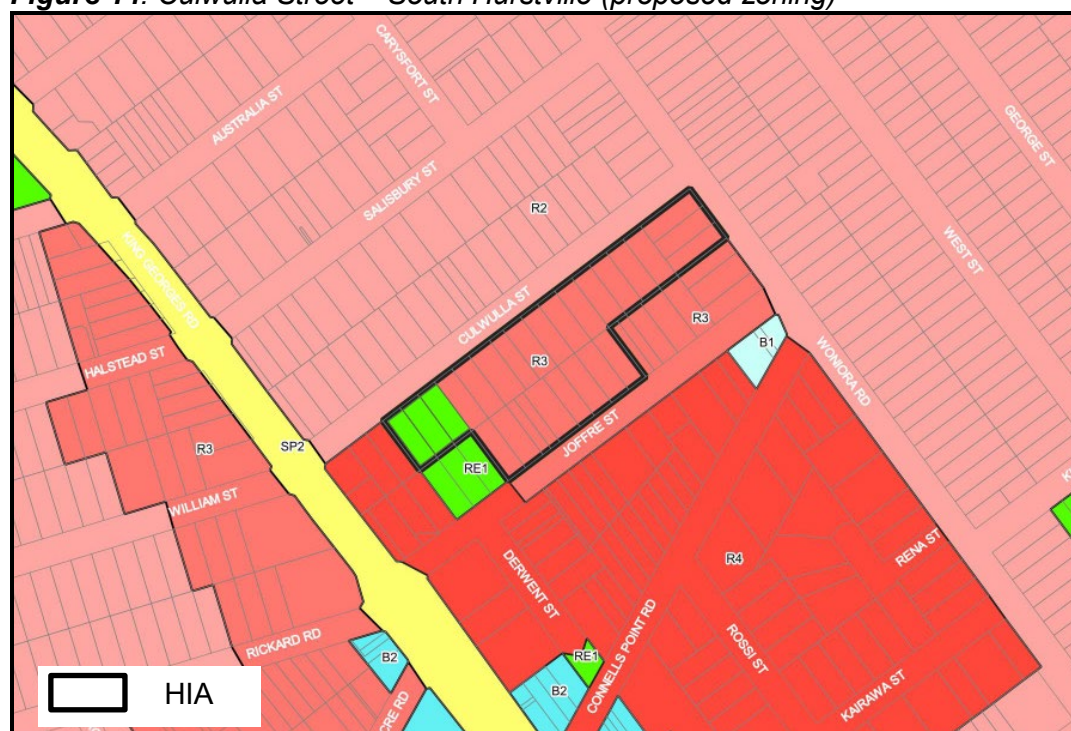
Note: The funding sources for the current acquisitions as specified by the existing LEPs and additional acquisitions proposed by the GRLEP 2020 will be considered as part of the preparation of the Georges River Development Contributions Plan. The new development contributions plan is currently being prepared in parallel with the GRLEP 2020.

Figure 13: Culwulla Street – South Hurstville (existing zoning)



Source: Land Zoning Map (Kogarah LEP 2012)

Figure 14: Culwulla Street – South Hurstville (proposed zoning)



Source: Land Zoning Map (GRLEP 2020)

Precinct Information: Culwulla Street – South Hurstville	
Approximate site area	17,125 sqm
Number of existing dwellings	27
Estimated Potential Yield	57 dwellings (27 existing dwellings and an additional 30 dwellings)
Existing zoning	R2 Low Density Residential
Proposed zoning	R3 Medium Density Residential RE1 Public Recreation
Adjoining zonings	R2 Low Density Residential R3 Medium Density Residential RE1 Public Recreation
Current built form	A mix of single and double storey brick and weatherboard dwelling houses. Generally older dwelling stock, with several new developments scattered in the area.
Proposed built form	One and two storey dual occupancies, manor houses, terraces, villas and townhouses.
Surrounding land uses and built form	A mix of single brick and weatherboard dwellings.
Ownership patterns	Predominately individual ownership
Existing development standards	Height – 9m FSR – 0.6:1
Proposed development standards	Height – 9m FSR – 0.7:1

Selection Rationale: Culwulla Street – South Hurstville

Public Transport	Parts of the precinct fall within the 800m radius of Hurstville Station. Bus stops are available on Woniora Road, which provide frequent bus services towards Hurstville Station every 2-10 minutes. Other bus stops on Connells Point Road, King Georges Road and Cole Street provide services towards Miranda, Cronulla and Hurstville Railway Station every 10 minutes.
Shops and Services	The South Hurstville Local Centre is within 400m walking distance. The centre offers a range of specialty shops as well as an IGA supermarket, McDonald's and a hotel. The Hurstville City Centre is within 1km of the precinct. Recognised as a strategic centre in the <i>South District Plan</i> , the Hurstville City Centre is an important retail destination with an active main street (Forest Road) and a large shopping centre (Westfield).
Educational Establishments	Six schools are located within a kilometre of this precinct: Woniora Road School, Hurstville South Public School, Marist Catholic College South Hurstville Campus, Blakehurst High School, St Raphael's Catholic Primary School, and St George Christian School.
Community Facilities	Council's South Hurstville Branch Library is located within 400m walking distance, providing book loaning, activities and programs, as well as meeting room hiring services.
Open Space	Bell Park, Derwent Street and Maanshan Friendship Park are all located within a 400m radius of this precinct, providing facilities, including play equipment and soccer field, seats, and picnic facilities. The proposed future acquisition of 26-30 Culwulla Street would enable the creation of a larger park for passive recreation uses.
Environmental Constraints	Part of the precinct is identified as being flood affected by the Poulton Park Overland Flow Study. Measures such as freeboarding above the flood level will need to be implemented in future developments.
Heritage	No heritage items are within this precinct. There are a number of local heritage items adjoining the precinct, including the Former South Hurstville Methodist Church—South Hurstville Uniting Church located across Culwulla Street and the 'Pine Villa' house and garden located across Joffre Street.
Transition	The proposed rezoning will apply a consistent R3 zoning to the whole street block, which will create a transition between the adjoining low and high density residential areas.
Zoning Anomaly	The existing built form within this precinct is comparable to the development present in the existing R3 zone in the same street block. The existing R2 zoning is considered to be a zoning anomaly.

5.6. HIA 05: Rowe Street – South Hurstville

The Rowe Street – South Hurstville precinct (refer **Figures 15 and 16**) is located to the south of the South Hurstville Local Centre and is comprised of the remaining R2 zoned portion of the street block bound by Connells Point Road, Greenacre Road, Mimosa Street and Rowe Street. Additional housing in this area provides the opportunity to create diversity in dwelling types within walking distance to existing infrastructure.

The draft LSPS 2040 was placed on community consultation from 26 June 2019 to 7 August 2019. During this process, Council received a number of submissions requesting increases to development potential through upzonings in the GRLEP 2020. A comprehensive analysis of each of the requests for rezoning is detailed in the Council report ENV035-19 dated 14 October 2019.

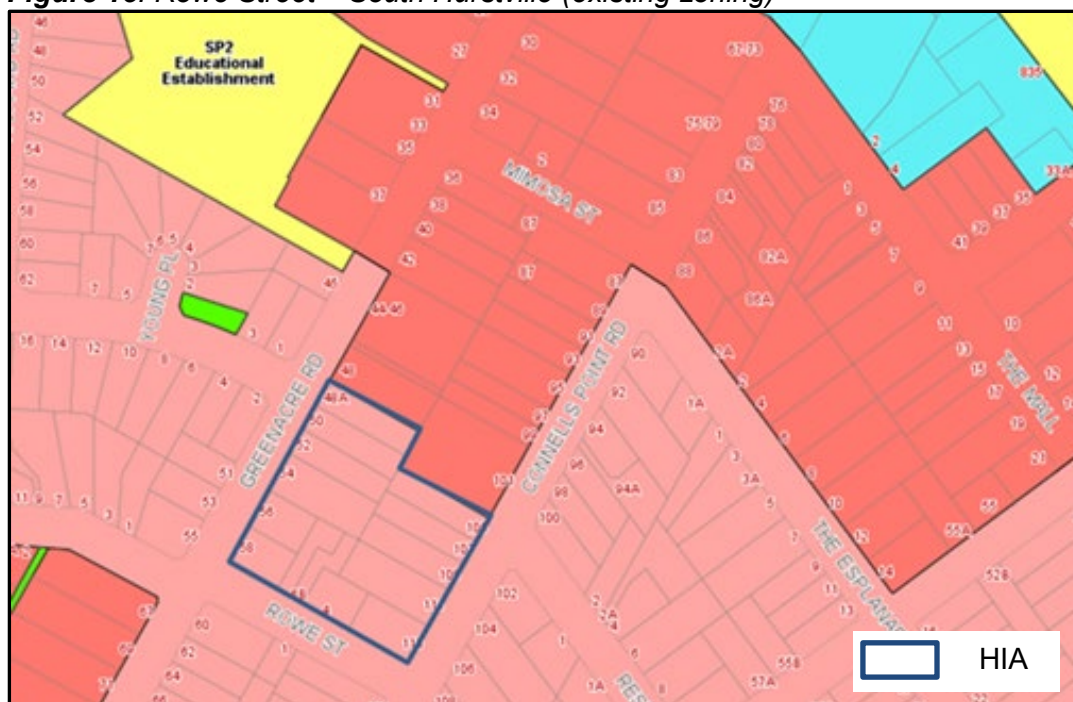
This precinct was not included in the preliminary HIAs for investigation. Accordingly, targeted consultation was not conducted with residents and landowners of this precinct.

Through a detailed assessment process in line with the guiding principles for the selection of HIAs, the Rowe Street – South Hurstville precinct was considered to be suitable for rezoning from R2 to R3 as a HIA to be implemented through the GRLEP 2020 for the following reasons:

- Rectifies an existing zoning anomaly by extending the R3 zone across the whole street block
- Adjoins existing townhouse developments
- Provides additional housing choice and diversity with minimal impacts to the amenity and character of the surrounding low density residential areas
- Located on a bus route with frequent services to the Hurstville City Centre, which is a major transport interchange supported by train and bus services
- Located within 300m walking distance to shops, services, community facilities and open space, including the South Hurstville Local Centre, South Hurstville Library and Poulton Park
- Located in close proximity to existing educational establishments, including Connells Point Public School.

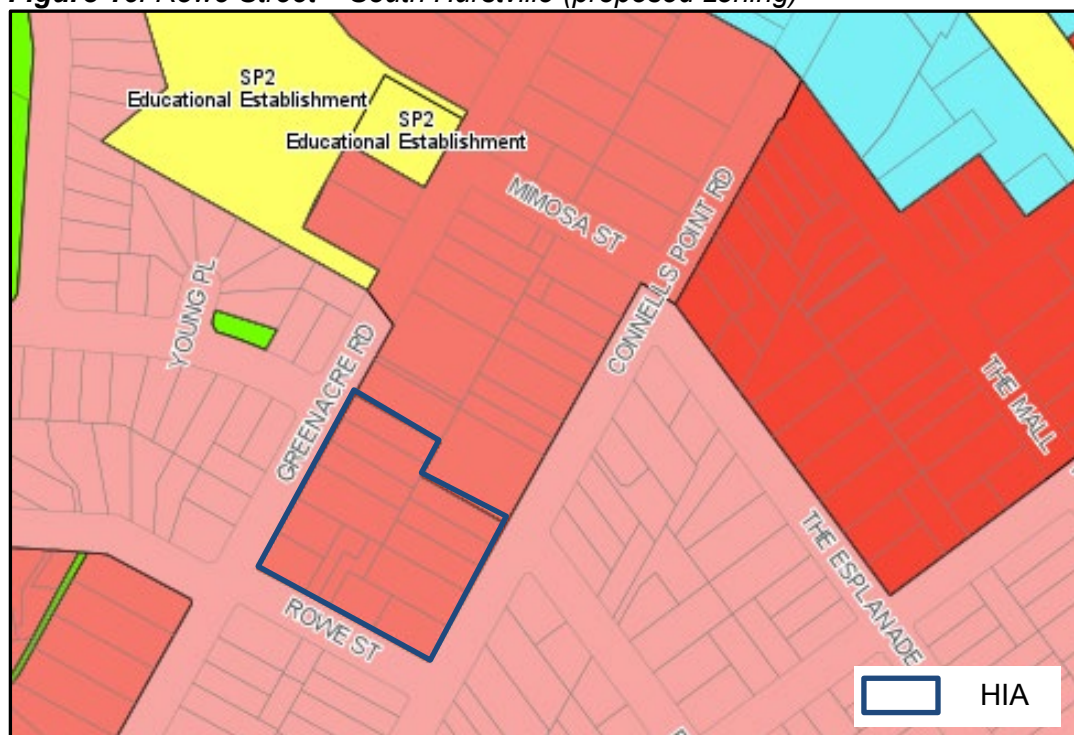
Accordingly, Council resolved to upzone this precinct at its meeting on 28 October 2019 with its inclusion in the LSPS 2040, draft *Local Housing Strategy* and GRLEP 2020.

Figure 15: Rowe Street – South Hurstville (existing zoning)



Source: Land Zoning Map (Kogarah LEP 2012)

Figure 16: Rowe Street – South Hurstville (proposed zoning)



Source: Land Zoning Map (GRLEP 2020)

Precinct Information: Rowe Street – South Hurstville	
Approximate site area	9,160 sqm
Number of existing dwellings	14
Estimated Potential Yield	48 dwellings (14 existing dwelling and an additional 34 dwellings)
Existing zoning	R2 Low Density Residential
Proposed zoning	R3 Medium Density Residential
Adjoining zonings	R2 Low Density Residential R3 Medium Density Residential
Current built form	A mix of single and double storey dwelling houses. Generally older dwelling stock, with several new dual occupancy developments scattered in the area.
Proposed built form	One and two storey dual occupancies, manor houses, terraces, villas and townhouses.
Surrounding land uses and built form	A mix of dwelling houses and villas in the current R3 zoning.
Ownership patterns	Individual ownership.
Existing development standards	Height – 9m FSR – 0.6:1
Proposed development standards	Height – 9m FSR – 0.7:1

Selection Rationale: Rowe Street – South Hurstville

Public Transport	Bus stops are available on Woniora Road, which provide frequent bus services towards Hurstville Station every 2-10 minutes. Other bus stops on Connells Point Road, King Georges Road and Cole Street provide services towards Miranda, Cronulla and Hurstville Railways Stations every 10 minutes.
Shops and Services	The South Hurstville Local Centre is within 400m walking distance. The centre offers a range of specialty shops as well as an IGA supermarket, McDonald's and a hotel. Hurstville City Centre is within 1km of the precinct. Recognised as a strategic centre by the <i>South District Plan</i>, the Hurstville City Centre is an important retail destination with an active main street (Forest Road) and a large shopping centre (Westfield).
Educational Establishments	Four schools are located within a kilometre: Connells Point Public School, Hurstville South Public School, Marist Catholic College South Hurstville and Blakehurst High School.
Community Facilities	Council's South Hurstville Branch Library is located within 500m walking distance, providing book loaning, activities and programs, as well as meeting room hiring services.
Open Space	Poulton Park is located within 400m walking distance, providing an active recreation space with synthetic playing field and tennis courts. Duggan Park, Condor Crescent Reserve, Terry Street Reserve and Pogson Park are also within 400 metre walking distance. They are passive recreation areas providing picnic tables and playground equipment.
Environmental Constraints	Part of the precinct is identified as being flood affected by the Poulton Park Overland Flow Study. Measures such as freeboarding above the flood level will need to be implemented in future developments.
Heritage	No heritage items are within this precinct. There is one local heritage item adjoining the precinct – 'Whitevale' house and garden located across Greenacre Road.
Transition	The proposed rezoning will apply a consistent R3 zoning to the whole street block, which will create a buffer between the adjoining low and high density residential areas.
Zoning Anomaly	The existing built form within this precinct is comparable to the development present in the existing R3 zone in the same street block. The existing R2 zoning is considered to be a zoning anomaly.

6. SUPPORTING ANALYSIS

Supporting analysis of the potential traffic impacts and built form outcomes have been prepared to demonstrate that the proposed development standards applied to the HIAs will result in feasible development yields and outcomes that address streetscape character and traffic management.

The proposed HIAs are also assessed against the relevant *State Environmental Planning Policies* (SEPPs) and Ministerial Directions to determine the consistency of the proposed upzoning with the NSW legislative framework and to demonstrate the suitability of including these areas in the draft *GRLEP 2020*.

6.1. Traffic Impact Analysis

The proposed upzoning in the HIAs are supported by a Traffic Impact Assessment (TIA) for the purposes of:

- Establishing the existing traffic capacity in the local road network of each HIA
- Identifying existing traffic issues and capacity constraints within the local road network
- Identifying the additional traffic generation resulting from the proposed rezoning
- Assessing any potential traffic impacts resulting from the additional traffic
- Recommending mitigation measures to alleviate the potential traffic impacts.

Overall, the TIA identifies that the proposed upzonings for all 5 precincts can be accommodated with no undue difficulty subject to the execution of a number of minor interventions to the existing local road network. These recommendations are summarised as follows:

6.1.1. Hillcrest Avenue – Hurstville

The proposed number of additional dwellings will not trigger any need to upgrade the existing road network as the post-upzoned traffic conditions will continue to operate satisfactorily.

6.1.2. North and West of Peakhurst Park – Peakhurst

The local streets of Hardwicke Street and Clarendon Road will exceed the RMS environmental capacity following the proposed upzoning. This is only marginally exceeded at Hardwicke Street; however the impacts are more significant at Clarendon Road. It is recommended that Clarendon Road be widened to accommodate kerbside parking on both sides and two-way traffic flows.

Furthermore, a part time (eg peak hours) or full time restriction of the right turn from Hardwicke Street to Belmore Road is recommended to reduce traffic along Hardwicke Street and maintain its amenity.

6.1.3. Apsley Estate – Penshurst

The existing intersections which serve this precinct are largely satisfactory except the turning movements from Apsley Street to Forest Road. It is recommended that the right turn movement is restricted (eg at peak hours) at this intersection. The proposed upzoning will have no adverse impact on the remaining access intersections.

6.1.4. Culwulla Street – South Hurstville

The existing intersections which serve this precinct are largely satisfactory except the right turn movements from Culwulla Street to King Georges Road. A part time (eg at peak hours) or full time ban may alleviate the existing delays. The proposed upzoning will have no adverse impact on the remaining access intersections.

6.1.5. Rowe Street – South Hurstville

The post-upzoned traffic conditions will continue to operate satisfactorily. However, it is recommended that Rowe Street be widened to accommodate kerbside parking on both sides of the roadway and two-way traffic flow in the event that traffic flows are diverted away from the King Georges Road intersection due to unforeseen delays.

6.2. Built Form Analysis – High Density Residential

The Hillcrest Avenue – Hurstville precinct (refer **Figures 7 and 8** above) is proposed to be rezoned to the R4 High Density Residential zone. Residential flat buildings are the prevailing development typology in the R4 zone.

Accordingly, a maximum building height of 12m and FSR of 1:1 is proposed to be applied to the precinct to enable residential flat building developments of three to four storeys. These development standards have been developed with consideration of the single storey built forms of the O'Briens Estate Heritage Conservation Area located to the rear of the site, and the existing four storey apartment building located in the B4 Mixed Use zone to the northeast of the precinct.

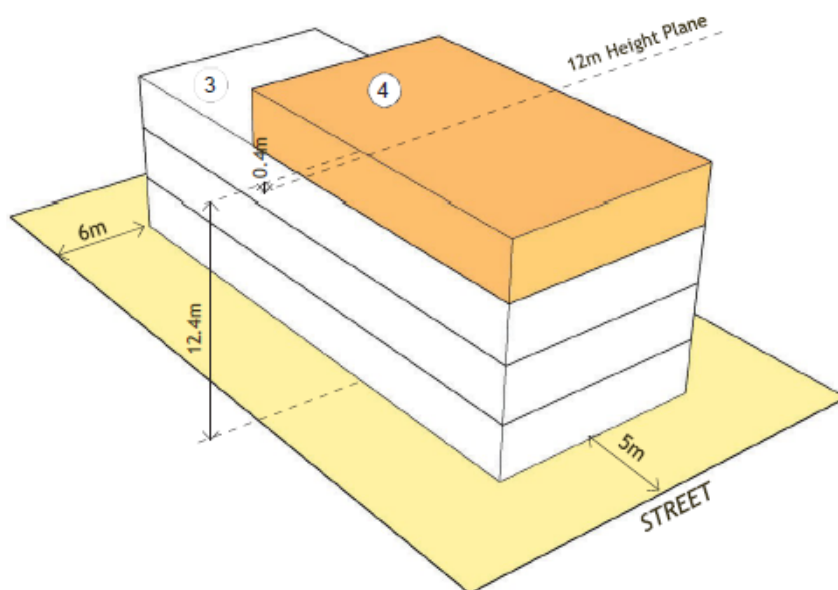
Furthermore, to ensure consistency with all proposed R4 zones across the LGA, a 1,000sqm minimum lot size will apply to this precinct for the purpose of preventing the fragmentation of land to ensure large parcels of land are available for development outcomes that are compatible with the high density zone.

Built form analysis (refer **Figure 17**) prepared for Council demonstrates the feasibility of the proposed development standards for this precinct. *Apartment Design Guide* controls such as building height, building setback development controls have been applied to assist in the visualisation of the potential development outcome. The proposed development standards are tabulated in **Table 1** below:

Table 1: Proposed development standards for Hillcrest Avenue – Hurstville

Development Standard	Proposed Control
Zone	R4 High Density Residential
Height	12m
FSR	1:1
Minimum lot size	1,000 sqm

Figure 17: 3D visualisation of potential built form in the proposed R4 zone



6.3. Built Form Analysis – Medium Density Residential

The remaining 4 HIAs are proposed to be rezoned to the R3 Medium Density Residential zone to facilitate the provision of greater housing choice and diversity across the LGA through the creation of ‘true’ medium density zoned areas. Developments such as multi dwelling housing, terraces and manor houses are the prevailing development typologies in the R3 zone.

A set of development controls have been developed for all medium density zones and the various medium density residential typologies permissible in the R3 Medium Density Residential zone.

Built form analysis prepared for Council demonstrates the feasibility of the proposed development standards for these medium density precincts. Existing DCP controls such as building setback distances have been applied as parameters and are summarised in **Table 2** below:

Table 2: Proposed development standards for medium density HIAs

Development Standard	Proposed Control	Implementation
Zone	R3 Medium Density Residential	GRLEP 2020
Height	9m	GRLEP 2020
FSR	0.7:1	GRLEP 2020
Minimum lot size	800 sqm	GRLEP 2020
Minimum lot width	18m (multi dwelling housing)	GRLEP 2020
	18m (manor houses)	Commencement of the LRMDHC
	21m (terraces)	Commencement of the LRMDHC

The following sections provide the detailed justification for the proposed development standards.

6.3.1. Maximum Height and FSR

An assessment of the existing planning controls and an urban design analysis were undertaken to determine the development standards for the R3 Medium Density Residential zone. A 9m height is proposed to be retained as this is consistent across both existing LEPs. A 0.7:1 FSR is also proposed as per the Kogarah LEP 2012 for all R3 zones to ensure consistent development potential across the LGA which is aligned with Council's guiding principles of ensuring that the harmonisation of the current controls achieves equity across the LGA.

6.3.2. Minimum Lot Size

An 800sqm minimum lot size for multi dwelling housing is also proposed, consistent with the Kogarah LEP 2012 as there has been no recorded Clause 4.6 variations to this development standard since Council's amalgamation which demonstrates the viability and feasibility of this requirement. The smaller minimum lot size will facilitate multi dwelling housing on more lots across the LGA, assisting in achieving housing targets. It is proposed that the new land uses, terraces and manor houses, should also require an 800sqm minimum lot size to ensure consistency across all medium density typologies.

6.3.3. Minimum Lot Width

To ensure a good level of amenity is provided by these medium density typologies, minimum lot width controls are required to regulate the minimum width of the built form. The enforcement of minimum lot width controls in the GRLEP 2020 will also reinforce the desired future character of the LGA's medium density zones whilst also giving the frontage requirement greater legal weight and ensuring variations are comprehensively considered through the merit-based assessment process.

Multi Dwelling Housing

The minimum lot width requirement for multi dwelling housing is currently provided by the following Hurstville and Kogarah Development Control Plans (DCPs):

- *Kogarah Development Control Plan 2013*
- *Hurstville Development Control Plan No.1* (Applies to land within the Peakhurst, Mortdale and Hurstville Wards)

Based on the assessment of development applications, it is evident that a 15m wide lot is too narrow to accommodate a driveway along one side boundary and private open space for the multi dwelling units along the opposite side boundary.

Therefore, an 18m width lot requirement is proposed to provide an improved development outcome which is illustrated in **Figure 18 and 19** below.

Figure 18: Sample multi dwelling housing site plan with 18m lot width

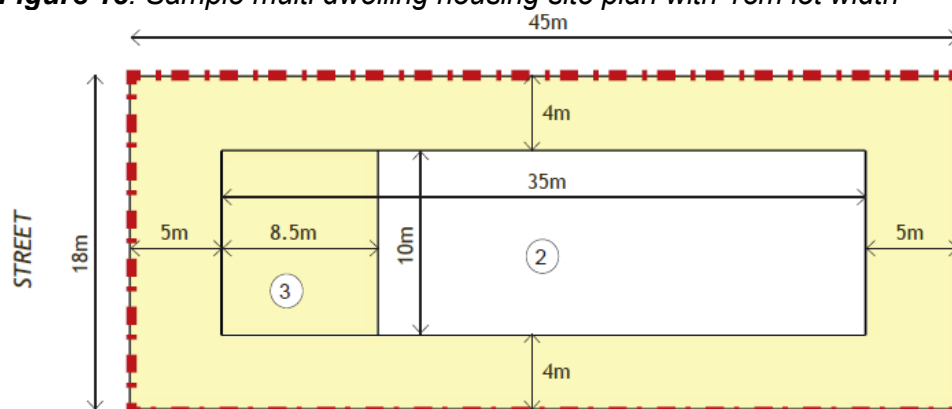
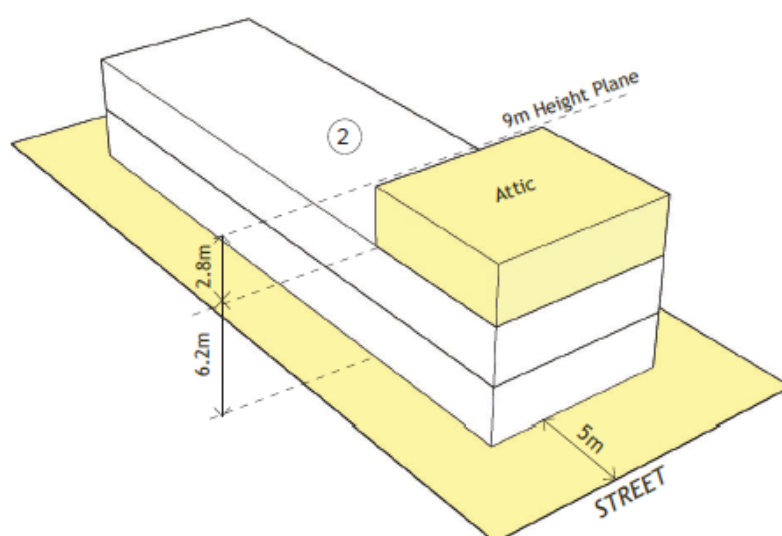


Figure 19: 3D visualisation of potential multi dwelling housing built form in the R3 zone



Manor Houses

As outlined in **Section 3** of this Paper, manor houses are being introduced as a new type of medium density housing under the LRMDHC, which is currently deferred and will not be implemented in the LGA until 1 July 2020. The deferred commencement of the LRMDHC is intended to allow Council to develop provisions for manor houses and terraces that are designed specifically for the LGA in response to the local character of its neighbourhoods.

From 1 July 2020, manor houses will be permitted under the LRMDHC as complying development with the following controls:

- Minimum lot size 600sqm
- Minimum lot width 15m
- Maximum height 8.5m
- Maximum FSR 0.5:1

Local controls have been developed for manor houses to ensure that any future development is compatible with the desired future character of the LGA's medium density zones. Accordingly, an 18m minimum lot width is proposed to apply to manor

houses to ensure consistency with multi dwelling housing so that flexibility is provided for the development industry to deliver various medium density residential typologies based on market demand. The proposed minimum lot size will also ensure local manor house developments are compatible with the desired streetscape character and subdivision pattern.

Whilst the proposed controls appear more onerous with greater lot size and lot width requirements than the LRMDHC, they are more generous in both height and FSR, which will result in greater development yield. The more generous height and FSR controls will encourage the lodgement of development applications for manor houses rather than complying development through the LRMDHC, providing a merit-based consideration of development outcomes to ensure developments positively contribute to the local character.

It is proposed that these controls for manor houses be integrated into the Georges River LEP once the LRMDHC commences on 1 July 2020. The proposed controls are illustrated by **Figure 20 and 21** below.

Figure 20: Sample manor house site plan with 18m lot width

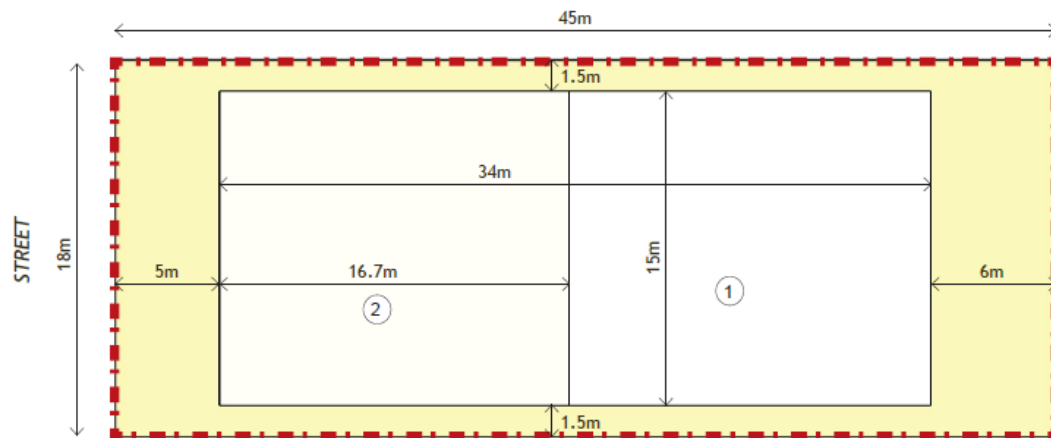
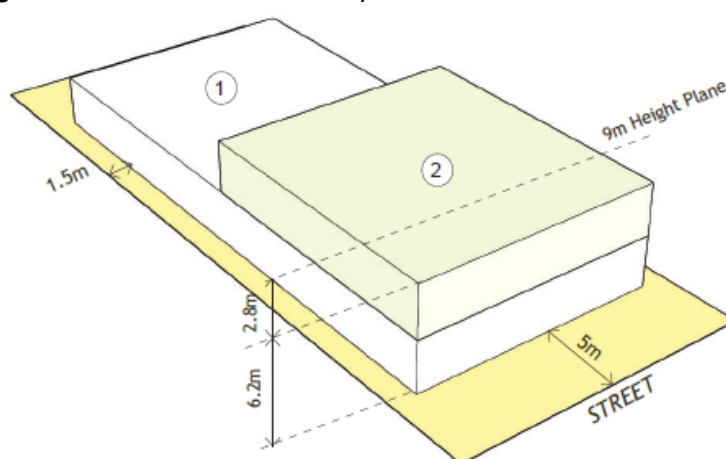


Figure 21: 3D visualisation of potential manor house built form in the R3 zone



Multi Dwelling Housing (Terraces)

Like manor houses, terraces are being introduced as a new type of medium density housing under the LRMDHC. From 1 July 2020, terraces will be permitted under the LRMDHC with a minimum 21m lot width requirement. This lot width requirement will sufficiently accommodate three dwellings that are each 6m in width and 1.5m side setbacks on from both side boundaries.

A minimum lot width of 21m, as per the requirements of the LRMDHC, is proposed to apply to terrace developments under the Georges River LEP once the LRMDHC commences on 1 July 2020 as this control is consistent with achieving the desired future character of the LGA.

The proposed controls are illustrated by **Figure 22 and 23** below.

Figure 22: Sample manor house site plan with 18m lot width

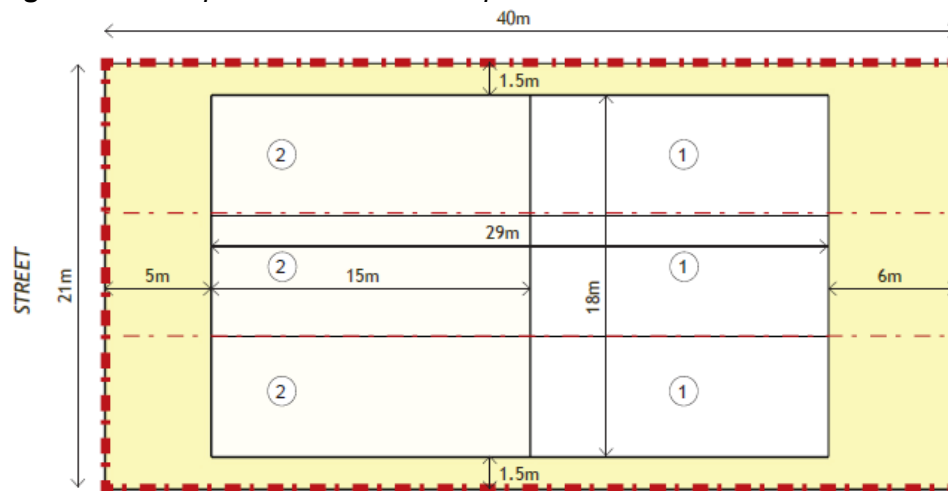
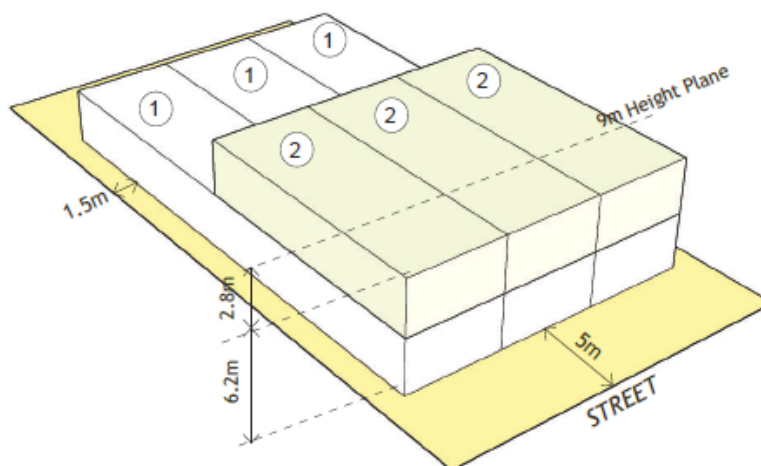


Figure 23: 3D visualisation of potential terrace built form in the R3 zone



6.4. Consistency with SEPPs

The proposed rezoning of the HIAs is considered to be consistent with the following SEPPs as assessed below in **Table 3**:

Table 3: Consistency of HIAs with SEPPs

List of SEPPs	Consistency	Comment
State Environmental Planning Policy No 19 – Bushland in Urban Areas	Yes	The proposed HIAs do not seek to rezone existing bushland. Accordingly, the proposed rezonings are consistent with this SEPP.
State Environmental Planning Policy No 21 – Caravan Parks	Yes	The existing residential zones under the Hurstville and Kogarah LEPs and the proposed residential zones under the GRLEP 2020 do not permit caravan parks. Accordingly, the proposed rezonings do not hinder or contradict the application of this SEPP.
State Environmental Planning Policy No 33 – Hazardous and Offensive Development	Yes	The existing residential zones under the Hurstville and Kogarah LEPs and the proposed residential zones under the GRLEP 2020 do not permit hazardous or offensive industries. Accordingly, the proposed rezonings do not hinder or contradict the application of this SEPP.
State Environmental Planning Policy No 36 – Manufactured Home Estates	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy No 47 – Moore Park Showground	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy No 50 – Canal Estate Development	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy No 55 – Remediation of Land	Yes	All proposed HIAs are currently zoned R2 Low Density Residential and is urban land. Therefore, the sites proposed for rezoning are unlikely to be contaminated. The proposed rezonings are retained for residential uses. Accordingly, the proposed rezonings do not hinder or contradict the application of this SEPP.
State Environmental Planning Policy No 64 – Advertising and Signage	Yes	Only business identification signs are proposed to be permitted in the residential zones across the LGA under the provisions of the GRLEP 2020. The proposed upzonings will not hinder or contradict the application of this SEPP.
State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development	Yes	Residential flat buildings are proposed to be permitted in the R4 High Density Residential zone under the GRLEP 2020. Any future development application within the Hillcrest Avenue – Hurstville precinct will need to comply with this SEPP and the associated <i>Apartment Design Guide</i> . Accordingly, the proposed rezoning is consistent with this SEPP.
State Environmental Planning Policy No 70 – Affordable Housing	Yes	Council is currently preparing an <i>Inclusive Housing Strategy</i> and a supporting <i>Delivery Plan</i> which will include an Affordable Housing

List of SEPPs	Consistency	Comment
(Revised Schemes)		Contribution Scheme to set out how, where, and at what rate development contributions can be collected by Council for affordable housing. The <i>Inclusive Housing Strategy</i> and the supporting Delivery Plan will inform the Stage 2 (Housing Choice) LEP in the staged LEP process. Affordable housing targets will not be implemented for the proposed HIAs in GRLEP 2020 as Council is yet to establish a policy position on the provision of affordable housing through infill developments. Accordingly, the proposed rezonings do not hinder or contradict the application of this SEPP.
State Environmental Planning Policy (Aboriginal Land) 2019	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Affordable Rental Housing) 2009	Yes	The provisions of this SEPP will continue to apply to the proposed HIAs will enable the provision of affordable rental housing. Accordingly, the proposed rezonings are consistent with this SEPP.
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	Yes	Any future development application within the proposed HIAs will need to comply with BASIX. Accordingly, the proposed rezonings are consistent with this SEPP.
State Environmental Planning Policy (Coastal Management) 2018	Yes	All proposed HIAs are located outside of the land application area of this SEPP. Accordingly, the proposed rezonings do not hinder or contradict the application of this SEPP.
State Environmental Planning Policy (Concurrences and Consents) 2018	Yes	Any future development application within the proposed HIAs will need to comply with this SEPP. Accordingly, the proposed rezonings are consistent with this SEPP.
State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017	Yes	Educational establishments and early education and care facilities are permitted in all residential zones across the LGA under GRLEP 2020. Any future development application within the proposed HIAs will need to comply with this SEPP. Accordingly, the proposed rezonings are consistent with this SEPP.
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	Yes	The provisions of this SEPP will continue to apply to the proposed HIAs to enable the provision of a streamlined assessment process for developments that comply with the development standards specified by this SEPP. Through the proposed rezoning from an R2 to an R3 zone for four of the HIAs, low rise medium density residential development like manor houses and terraces will become eligible for approval under the LRMDHC at the end of its deferred commencement on 1 July 2020. Accordingly, the proposed rezonings are consistent with this SEPP.

List of SEPPs	Consistency	Comment
State Environmental Planning Policy (Gosford City Centre)	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004	Yes	The provisions of this SEPP will continue to apply to the proposed HIAs to enable the provision of housing for seniors or people with disabilities. Accordingly, the proposed rezonings are consistent with this SEPP.
State Environmental Planning Policy (Infrastructure) 2007	Yes	The provisions of this SEPP will continue to apply to the proposed HIAs to enable the provision of infrastructure. Accordingly, the proposed rezonings are consistent with this SEPP.
State Environmental Planning Policy (Koala Habitat Protection) 2019	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Kosciuszko National Park – Alpine Resorts) 2007	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Kurnell Peninsula) 1989	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Mining, Petroleum Production & Extractive Industries) 2007	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Penrith Lakes Scheme) 1989	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Primary Production and Rural Development) 2019	Yes	There are no agricultural and production land within the Georges River LGA. Accordingly, the proposed rezonings do not hinder or contradict the application of this SEPP.
State Environmental Planning Policy (State and Regional Development) 2011	Yes	None of the proposed HIAs contain State significant development, State significant infrastructure or regionally significant development. Accordingly, the proposed rezonings do not hinder or contradict the application of this SEPP.
State Environmental Planning Policy (State Significant Precincts) 2005	Yes	There are no declared State significant precincts within the Georges River LGA. Accordingly, the proposed rezonings do not hinder or contradict the application of this SEPP.
State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Sydney Region Growth Centres) 2006	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Three Ports) 2013	Not applicable	This SEPP does not apply to land within the Georges River LGA.

List of SEPPs	Consistency	Comment
State Environmental Planning Policy (Urban Renewal) 2010	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017	Yes	The provisions of this SEPP will continue to apply to the proposed HIAs to protect the biodiversity values of trees and other vegetation across the LGA. Accordingly, the proposed rezonings are consistent with this SEPP.
State Environmental Planning Policy (Western Sydney Employment Area) 2009	Not applicable	This SEPP does not apply to land within the Georges River LGA.
State Environmental Planning Policy (Western Sydney Parklands) 2009	Not applicable	This SEPP does not apply to land within the Georges River LGA.
Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	Not applicable	This SEPP does not apply to land within the Georges River LGA.
Greater Metropolitan Regional Environmental Plan No 2—Georges River Catchment	Yes	All proposed HIAs are located within the land application area of this REP. Any future development application within the proposed HIAs will need to comply with this REP. Accordingly, the proposed rezonings are consistent with this REP.

6.5. Consistency with Ministerial Directions

The proposed rezoning of the HIAs is considered to be consistent with the following S9.1 Ministerial Directions as assessed below in **Table 4**:

Table 4: Consistency of HIAs with S9.1 Ministerial Directions

Direction	Consistency	Comment
1. Employment and Resources		
1.1 Business and Industrial Zones (a) <i>encourage employment growth in suitable locations,</i> (b) <i>protect employment land in business and industrial zones, and</i> (c) <i>support the viability of identified centres.</i>	N/A	Not applicable
1.2 Rural Zones	N/A	Not applicable
1.3 Mining, Petroleum Production and Extractive Industries <i>To ensure that the future extraction of State or regionally significant reserves of coal, other minerals, petroleum and extractive materials are not compromised by inappropriate development.</i>	Yes	There are no mining, petroleum production and extractive industries in the proposed HIAs. Accordingly, the proposed rezonings do not hinder or contradict the requirements of this Ministerial Direction.

Direction	Consistency	Comment
1.4 Oyster Aquaculture (a) <i>To ensure that Priority Oyster Aquaculture Areas and oyster aquaculture outside such an area are adequately considered when preparing a planning proposal.</i> (b) <i>To protect Priority Oyster Aquaculture Areas and oyster aquaculture outside such an area from land uses that may result in adverse impacts on water quality and consequently, on the health of oyster and oyster consumers.</i>	Yes	Although oyster aquaculture is permissible under GRLEP 2020 in the proposed R3 and R4 zones, there is no existing oyster aquaculture development in the proposed HIAs. Accordingly, the proposed rezonings do not hinder or contradict the requirements of this Ministerial Direction.
1.5 Rural Lands	N/A	Not applicable
2. Environment and Heritage		
2.1 Environment Protection Zones <i>To protect and conserve environmentally sensitive areas.</i>	Yes	The proposed HIAs do not seek to rezone existing environmental protection zones. Accordingly, the proposed rezonings do not hinder or contradict the requirements of this Ministerial Direction.
2.2 Coastal Protection <i>To protect and manage coastal areas of NSW.</i>	Yes	All proposed HIAs are not located within coastal areas. Accordingly, the proposed rezonings do not hinder or contradict the requirements of this Ministerial Direction.
2.3 Heritage Conservation <i>To conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance.</i>	Yes	The proposed rezonings do not seek to alter or remove the existing heritage listings within the HIAs. Any heritage items and HCAs within or located adjacent to the HIAs would be conserved in accordance with the provisions of the GRLEP 2020. Accordingly, the proposed rezonings are consistent with the requirements of this Ministerial Direction.
2.4 Recreation Vehicle Areas	N/A	Not applicable
2.5 Application of E2 and E3 Zones and Environmental Overlays in Far North Coast LEPs	N/A	Not applicable
3. Housing, Infrastructure and Urban Development		
3.1 Residential Zones (a) <i>To encourage a variety and choice of housing types to provide for existing and future housing needs</i> (b) <i>To make efficient use of existing infrastructure and services and ensure that new housing has appropriate access to infrastructure and services</i>	Yes	The proposed HIAs provide additional housing through the upzoning of existing low density residential areas to medium density and high density in highly accessible areas which are serviced by shops, schools, public open space and community facilities. These areas are located within walking distance to transport infrastructure, such as train stations and frequent bus

Direction	Consistency	Comment
(c) <i>To minimise the impact of residential development on environment and resource lands.</i>		services. Accordingly, the proposed rezonings are consistent with the requirements of this Ministerial Direction.
3.2 Caravan Parks and Manufactured Home Estates (a) <i>To provide for a variety of housing types</i> (b) <i>To provide opportunities for caravan parks and manufactured home estates.</i>	N/A	Not applicable
3.3 Home Occupations <i>To encourage the carrying out of low-impact small businesses in dwelling houses.</i>	Yes	Home occupations are permissible without consent across all residential zones under the GRLEP 2020. Accordingly, the proposed rezonings are consistent with the requirements of this Ministerial Direction.
3.4 Integrating Land Use and Transport <i>To ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives:</i> (a) <i>Improving access to housing, jobs and services by walking, cycling and public transport</i> (b) <i>Increasing the choice of available transport and reducing dependence on cars</i> (c) <i>Reducing travel demand including the number of trips generated by development and the distances travelled, especially by car</i> (d) <i>Supporting the efficient and viable operation of public transport services</i> (e) <i>Providing for the efficient movement of freight.</i>	Yes	The proposed HIAs provide additional housing through the upzoning of existing low density residential areas in highly accessible areas located within walking distance to commercial centres and transport infrastructure, such as train stations and frequent bus services. The locations of these areas have been chosen to provide existing and future residents the opportunity to access jobs and services by walking, cycling and public transport, reducing travel demand and dependence on cars. Accordingly, the proposed rezonings are consistent with the requirements of this Ministerial Direction.
3.5 Development Near Licensed Aerodromes (a) <i>to ensure the effective and safe operation of regulated airports and defence airfields;</i> (b) <i>to ensure that their operation is not compromised by development that constitutes an obstruction, hazard or potential hazard to aircraft flying in the vicinity; and</i> (c) <i>to ensure development, if situated on noise sensitive land, incorporates appropriate mitigation measures so that the</i>	Yes	The proposed building heights for the HIAs are 12m or under and do not constitute controlled activities as defined in section 182 of the <i>Airports Act 1996</i> . Nonetheless, Council has commenced preliminary discussions with Sydney Airport, the Commonwealth Department of Infrastructure, Transport, Cities and Regional Development (DITCRD), and the Civil Aviation Safety Authority (CASA) regarding the proposed height increases in accordance with this

Direction	Consistency	Comment
<i>development is not adversely affected by aircraft noise.</i>		Ministerial Direction.
3.6 Shooting Ranges	N/A	Not applicable
3.7 Reduction in non-hosted short term rental accommodation period	N/A	Not applicable
4. Hazard and Risk		
4.1 Acid Sulfate Soils <i>To avoid significant adverse environmental impacts from the use of land that has a probability of containing acid sulfate soils.</i>	Yes	Two of the proposed HIAs are affected by the presence of Class 5 acid sulfate soils: • North and West of Peakhurst Park – Peakhurst precinct • Rowe Street – South Hurstville precinct Any future development applications in these HIAs will need to comply with the requirements of the Acid Sulfate Soils local provisions proposed by the GRLEP 2020. Accordingly, the proposed rezonings are consistent with the requirements of this Ministerial Direction.
4.2 Mine Subsidence and Unstable Land <i>To prevent damage to life, property and the environment on land identified as unstable or potentially subject to mine subsidence.</i>	N/A	Not applicable
4.3 Flood Prone Land (a) <i>to ensure that development of flood prone land is consistent with the NSW Government's Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005, and</i> (b) <i>to ensure that the provisions of an LEP on flood prone land is commensurate with flood hazard and includes consideration of the potential flood impacts both on and off the subject land.</i>	Yes	Four of the proposed HIAs are identified as being partly flood affected as identified in Council's overland flow studies. • North and West of Peakhurst Park – Peakhurst precinct • Apsley Estate – Penshurst precinct • Culwulla Street – South Hurstville precinct • Rowe Street – South Hurstville precinct Measures such as freeboarding above the flood planning level would need to be implemented in future developments. Accordingly, the proposed rezonings are consistent with the requirements of this Ministerial Direction.
4.4 Planning for Bushfire Protection (a) <i>to protect life, property and the environment from bush fire hazards, by discouraging the establishment of incompatible land uses in bush fire prone areas, and</i> (b) <i>to encourage sound management of bush fire prone</i>	Yes	The proposed HIAs are located in existing urban areas and are not located in areas known to be bushfire affected. Accordingly, the proposed rezonings are consistent with the requirements of this Ministerial Direction.

Direction	Consistency	Comment
areas.		
5. Regional Planning		
5.1 Implementation of Regional Strategies	N/A	Not applicable
5.2 Sydney Drinking Water Catchments	N/A	Not applicable
5.3 Farmland of State and Regional Significance on the NSW Far North Coast	N/A	Not applicable
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	N/A	Not applicable
5.5 Revoked	N/A	Not applicable
5.6 Revoked	N/A	Not applicable
5.7 Revoked	N/A	Not applicable
5.8 Revoked	N/A	Not applicable
5.9 North West Rail Link Corridor Strategy	N/A	Not applicable
5.10 Implementation of Regional Plans	N/A	Not applicable
5.11 Development of Aboriginal Land Council land	N/A	Not applicable
6. Local Plan Making		
6.1 Approval and Referral Requirements <i>To ensure that LEP provisions encourage the efficient and appropriate assessment of development.</i>	Yes	The proposed HIAs do not include provisions that require the concurrence, consultation or referral of development applications to a Minister or public authority. Accordingly, the proposed rezonings are consistent with the requirements of this Ministerial Direction.
6.2 Reserving Land for Public Purposes (a) <i>To facilitate the provision of public services and facilities by reserving land for public purposes, and</i> (b) <i>To facilitate the removal of reservations of land for public purposes where the land is no longer required for acquisition.</i>	Yes	The proposed Culwulla Street – South Hurstville precinct includes a proposed land reservation acquisition at 26-30 Culwulla Street for the purpose of creating a larger park and facilitating through site access between Culwulla Street and Joffre Street. These sites are proposed to be rezoned from R2 to RE1 Public Recreation to enable the acquisition for public open space. Accordingly, the proposed rezonings are consistent with the requirements of this Ministerial Direction.
6.3 Site Specific Provisions <i>To discourage unnecessary restrictive site specific planning controls.</i>	Yes	No new site-specific provisions are proposed as part of the HIAs. Accordingly, the proposed rezonings are consistent with the requirements of this Ministerial Direction.
7. Metropolitan Planning		
7.1 Implementation of A Plan for	Yes	This Paper implements the Actions of

Direction	Consistency	Comment
Growing Sydney <i>To give legal effect to the planning principles, directions and priorities for subregions, strategic centres and transport gateways contained in A Plan for Growing Sydney.</i>		the <i>Great Sydney Region Plan</i> by providing the detailed justification for the selection of the five HIAs. The considerations of Planning Priority S5 of the <i>South District Plan</i> have been integrated into the guiding principles used to select the HIAs.
7.2 Implementation of Greater Macarthur Land Release Investigation	N/A	Not applicable
7.3 Parramatta Road Corridor Urban Transformation strategy	N/A	Not applicable
7.4 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	N/A	Not applicable
7.5 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	N/A	Not applicable
7.6 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	N/A	Not applicable
7.7 Implementation of Glenfield to Macarthur Urban Renewal Corridor	N/A	Not applicable
7.8 Implementation of Western Sydney Aerotropolis Interim Land Use and Infrastructure Implementation Plan	N/A	Not applicable
7.9 Implementation of Bayside West Precincts 2036 Plan	N/A	Not applicable
7.10 Implementation of Planning Principles for the Cooks Cove Precinct	N/A	Not applicable

7. ACTIONS FOR IMPLEMENTATION

The actions required to implement the proposed HIAs are tabulated in **Table 5** below:

Table 5: LEP actions and traffic recommendations for the proposed HIA precincts

HIA Precinct	Action – GRLEP 2020	Action – Future LEP Amendment	Traffic Recommendations
Hillcrest Avenue – Hurstville	Rezone precinct from R2 to R4	None required	None required
	Apply 12m height and 1:1 FSR		
	Apply 1,000sqm minimum subdivision lot size		
North and West of Peakhurst Park – Peakhurst	Rezone precinct from R2 to R3	Prepare a planning proposal to amend the Georges River LEP for the purpose of implementing the following development standards for manor houses and multi dwelling housing (terraces) upon the commencement of the LRMDHC in the Georges River LGA: - Minimum lot width of 18m for manor houses - Minimum lot width of 21m for terraces	- Review the extent of the existing reserve on Clarendon Road for the purpose of road widening - Investigate part/full-time restriction of the right turn from Hardwicke Street to Belmore Road
	Apply 9m height and 0.7:1 FSR		
	Apply 800sqm minimum lot size requirement for medium density housing		
Apsley Estate – Penshurst	Rezone precinct from R2 to R3		Investigate restriction of the right turn movement from Apsley Street to Forest Road
	Apply 9m height and 0.7:1 FSR		
	Apply 800sqm minimum lot size requirement for medium density housing		
Culwulla Street – South Hurstville	Rezone precinct from R2 to R3		Investigate part/full-time restriction of the right turn from Culwulla Street to King Georges Road
	Rezone 26-30 Culwulla Street from R2 to RE1 for the purpose of public open space and add as land reservation acquisition		
	Apply 9m height and 0.7:1 FSR		
	Apply 800sqm minimum lot size requirement for medium density housing		
Rowe Street – South Hurstville	Rezone precinct from R2 to R3		Review the extent of the existing footpaths on Rowe Street for the purpose of road widening
	Apply 9m height and 0.7:1 FSR		
	Apply 800sqm minimum lot size requirement for medium density housing		