Site Specific Assessment for properties located at 5A, 51-61 and 64-82 Naomi Street South, 1-5 and 2-8 Lois Street and 1 and 3 Simpson Street, Winston Hills

This attachment contains a detailed site-specific assessment of the subject land for the purposes of understanding the level of constraints the properties exhibit in relation to accommodating potential dual occupancy development. The site specific assessment adopts the same methodology used in the LGA wide mapping of constrained land under the Dual Occupancy Constraints Analysis (the constraints analysis) prepared by Council to inform the Harmonisation Planning Proposal. This assessment refers to specific sections and figures of the constraints analysis. A copy of the analysis report has been enclosed in **Appendix 4** of this Planning Proposal and should be read in conjunction with this document.

Identification of constraints factors

To provide a consistent basis for identifying land appropriate for identification on the Dual Occupancy Prohibition Map, The constraints used a methodology that mapped and considered a number of constraints factors in the LGA. These were:

- areas with special character;
- narrow streets;
- areas lacking permeability;
- access to public transport;
- tree coverage;
- bushfire hazard; and
- site availability.

Table 1 below provides a description of the constraints factors and an assessment of the subject site against each factor. A full explanation of the constraints factors and methodology used in the development of the Harmonisation Planning Proposal can be viewed in **Appendix 4**.

Table 1: Site specific assessment

Constraints Factors	Description	Site Specific Assessment	Is the site constrained by this factor?
Areas with special character	These are mapped areas that have a strong and consistent local character and not considered compatible with dual occupancy development.	The site is not located within an area of special character. This constraints factor does not apply.	No
Narrow streets (less than 7.5m wide)	Roads less than 7.5m wide can generate parking and local traffic issues. These roads are generally not wide enough to have two vehicles pass each other unimpeded when cars are parked on either side of the road. Heavy vehicle access may be particularly difficult - for example waste vehicles or emergency service vehicles such as fire engines. A concentration of long, narrow streets with dead-ends can be particularly problematic, especially when they occur in street patterns that provide poor access for through traffic and a lack of opportunity for cars to park elsewhere, such as side-on streets.	The site is constrained by this factor. The Dual Occupancy Constraints Analysis identifies Lois Street and Naomi Street South as narrow streets, having road widths less than 7.5m wide. In addition to this, there are two dead ends in the site located at Naomi Street South (a no through road) and Simpson Street, which also has a dead end to the north of the subject site. The concentration of narrow streets and dead ends in the subject site indicates a street pattern that poorly facilitates vehicle access and movement. Lois Street is of particular concern, as in addition to being a narrow street, it remains the only through access in and out of the subject site. Over time, access into the site via Lois Street may become increasingly difficult, particularly as demand for on-street parking increases and local traffic becomes more frequent with additional dwellings in the area. The concentration of dead ends to the north and south of the site, isolates it from opportunities to park elsewhere. Furthermore, the dead ends to the north of the site at Simpson Street and Naomi Street South are not designed as “Y” or “U” shaped turning heads but are rectangular stub roads. The design of these stubs will	Yes

Constraints Factors	Description	Site Specific Assessment	Is the site constrained by this factor?
		likely exacerbate difficulties in vehicle manoeuvrability, particularly for heavy vehicles such as waste vehicles, fire engines and the like. It is noted community concerns regarding traffic and parking issues have already been raised in the context of existing dual occupancies located at 2/2A Lois Street and 5/5A Naomi Street South. Similar objections were received with a recent approval in August 2021 for dual occupancy development at 4 Lois Street. It is likely the negative impacts of this constraint will worsen over time, should further dual occupancy development continue to be permitted within the subject site. The location of dead ends and narrow road widths in the subject site are shown in **Figure 1** below.	
Areas lacking permeability	Street patterns characterised by large blocks and concentrations of curvilinear streets with dead ends and fewer pedestrian links act as barriers to walkability for pedestrians to access local services. The Low Rise Housing Diversity Guide stipulates that medium density housing generally requires a much finer grain street network (such as a grid pattern) rather than lower density single dwelling housing.	The site is characteristic of curvilinear street patterns. The street layout has not been designed to facilitate direct routes that would encourage active transportation. Importantly, this is further exacerbated by the concentration of dead-end streets that isolate the site. The site does not demonstrate a finer grain street network that is ideal to facilitating medium density housing. The street network suggests that car usage is likely to be prioritised over walking to access local services in the area.	Yes
Access to public transport	Areas with good access to public transport are more suited to intensification.	The site is not impacted by a lack of access to public transportation. Particularly, it is noted the site is in	No

Constraints Factors	Description	Site Specific Assessment	Is the site constrained by this factor?
	These areas will help reduce traffic on local roads and reduce levels of car ownership and on street parking demand. Areas with walking catchments of 800m and 400m to light rail and bus stops are considered appropriate.	proximity to a major bus corridor that runs through Windsor Road to the east and local bus services on nearby Asquith Avenue to the west. Both services are located within an 800m walking catchment.	
Tree coverage	Intensification of development in low density areas can place pressure on the retention of established trees. Floor area allowances for dual occupancy development are higher than for single dwellings under the Low Rise Housing Diversity Code. This makes trees vulnerable to removal. Blocks and streets with a high concentration of established trees were identified in the constraints analysis as constrained.	The site is identified as having less than 20% tree coverage in the private domain and less than 25% tree coverage on road reserves. The site is therefore not considered an area with a high concentration of trees and does qualify as constrained under this particular factor. Notwithstanding the above, it is noted the prohibition of dual occupancy development will make established trees in the subject site less vulnerable to removal, than if dual occupancy development were permitted on the site. Retention of trees in the subject site would assist Council's objectives of retaining mature trees in low residential density areas.	No
Bushfire hazard	A key priority of Council's Local Strategic Planning Statement is to increase resilience of people and infrastructure against natural and urban hazards. Land that is prone to hazards such as bushfires is not considered the most ideal location for increasing housing densities. This land tends to be located adjoining bushland reserves.	The site is not located on bushfire prone land. This constraints factor does not apply.	No

Constraints Factors	Description	Site Specific Assessment	Is the site constrained by this factor?
Site availability	The minimum, lot size for dual occupancy development is 600sqm. The potential for negative impacts arising from dual occupancy development will be higher in areas with a concentration of 600sqm or more. If a site is large enough, it could accommodate dual occupancy development and construction of secondary dwellings under the Affordable Rental Housing SEPP.	With the exception of lots already containing dual occupancy development, all lots within the subject site can comply with the minimum lot size for dual occupancy development. There is only one lot larger than 900sqm on Naomi Street South that could enable both dual occupancy development and secondary dwellings under the Affordable Rental Housing SEPP. This is considered a constraint.	Yes

Figure 1: Site Specific Assessment – constraints mapping

Layering of constraints

The constraints overlayed the factors outlined above and each were given a score between 1 and 3 to ascertain the degree of constraint affecting the land. For example, constraints factors ranked a value of 1 would be insufficient as a barrier to dual occupancy development on their own. Where multiple constraints applied to the land however, the degree of constraint would be much higher (scores of 2 and above), and it would be difficult to avoid negative impacts. The weighting values used are excerpted in **Table 2** below.

Table 2: constraints weighting scale

Constraints factors	**Weighting**
Heritage conservation areas/special character	3
40% or more tree cover	2
30% - 40% tree cover	
Battle axe lot	
Higher potential for traffic problems and parking congestion	
20% – 30% tree cover	1
High concentration of street trees	
Lack of pedestrian permeability	
Infrequent public transport	
Bushfire prone	

The initial constraints analysis that supported the Harmonisation Planning Proposal did not specifically identify the subject site as having any constraints beyond that of potential traffic issues resulting from narrow road reserves on Lois Street and Naomi Street South as well as the southern cul de sac on the latter of these streets (see Figure 6 of the Dual Occupancies Constraints Analysis, pp.13). These factors on their own were scored minimally on the constraints weighting scale (0-1) (see Section 2.8 of Dual Occupancies Constraints Analysis, pp. 11). As such, the subject site retained a minimal scoring of 0-1 points on the constraints weighting scale (See Dual Occupancies Constraints Analysis, pp. 20). However it is noted the constraints analysis did not identify the northern road stubs as contributing to potential traffic issues or lack of permeability within the site.

A more detailed reassessment of the constraints affecting the subject site has established that the land has merit to be granted a higher score of 3 on the weighting scale as highly constrained land. The site exhibits a combination of factors that reasonably support this higher scoring, such as the prevalence of narrow streets, limited through access due to the concentration of dead ends (noting both the northern road stubs and southern cul de sac) and minimal on-street parking opportunities due to the isolated nature of the site. In particular, the rectangular design of the

northern road stubs are likely to pose a greater challenge to vehicle manoeuvrability within the site than the typical “Y” or “U” shaped dead ends that make vehicle turning movements safer and more practical.

The constraints factors applying to the subject site and a breakdown of the applicable scoring according to the constraints weighting scale is provided in **Table 3** below. Table 3 demonstrates that the subject site has a combined score of 3, thereby identifying the land as highly constrained. This scoring supports including the site on the Dual Occupancy Prohibition Map. Additionally, in relation to site availability, the subject site contains one lot greater than 900sqm. Although this factor was not attributed a constraints scoring in the Dual Occupancy Constraints Analysis, it is a further constraint affecting the subject site as explained in **Table 2** above thus further emphasising support for this planning proposal.

Table 3: Constraints scoring assessment

Constraints factors applicable	**Scoring**
Higher potential for traffic problems and parking congestion	2
Lack of pedestrian permeability	1
Site availability	-
Total scoring	**3**

Recommendation

This site specific assessment has concluded the subject site should be acknowledged as being ‘highly constrained’ in its ability to accommodate dual occupancy development. As a result, inclusion of the subject site on the Dual Occupancy Prohibition Map would be consistent with the objectives of the Dual Occupancy Constraints Analysis and Harmonisation Planning Proposal, which seek to ensure dual occupancy development is supplied in the right locations.

It is recommended the site be included on the Dual Occupancy Prohibition Map.