Attachment 1: Council Officer Assessment of Revised Proposal (November 2022) against HDP Criteria and Urban Design Capability Test

A. Housing Diversity Precinct Criteria (HDP Criteria)

HOUSING DIVERSITY PRECINCT CRITERIA

To be considered as a Housing Diversity Precinct, a site or area must satisfy the following criteria:

(1) Have urban design merit via an urban design capability test that demonstrates the proposed built form is compatible with surrounding development and neighbourhoods.

(2) Be at least 1 hectare and located either:

a. entirely within a 10 minute walk of, a Strategic or Local Centre, or

b. within the GPOP area, having 30 minute door-to-door access to employment in Parramatta CBD, Westmead or Sydney Olympic Park.

(3) Include or be located within walking distance (800m) of retail convenience.

(4) For sites 1-2 ha in size - contain or be entirely within a 5 minute walk of a park, sportsground or play space as detailed in the Community Infrastructure Strategy

(5) For sites greater than 2 ha in size – require the on-site provision of quality parks, sportsgrounds or play spaces as detailed in the Community Infrastructure Strategy

(6) Be predominantly low-rise, two to three storeys.

(7) Propose one or more of the following housing types:

- attached or detached dwelling houses
- terrace housing
- semi-detached housing
- villas
- townhouses
- manor homes
- co-housing (maximum 3 storeys)
- seniors housing (maximum 3 storeys)
- new age boarding houses (maximum 3 storeys)

(8) Residential flat buildings may be permitted in Housing Diversity Precincts, but only where:

a. The built form is compatible with the surrounding neighbourhood and meets the urban test as per clause (1); and

b. Other housing types are also provided in the precinct, as specified in clause (7); and

c. They contain at least 5-10% permanent affordable rental housing (subject to viability); however, where viable, Council's aspiration is for a higher provision.

(9) Have strategic merit in relation to: access (including to a regular public transport service); constraints; topography; environment; and amenity.

B. Assessment of Proposal against Housing Diversity Precinct Criteria

Housing Diversity Precinct Criteria	Compliance
(1) **Urban design -** Have urban design merit via an urban design capability test that demonstrates the proposed built form is compatible with surrounding development and neighbourhoods.	No. The revised proposal is not considered to exhibit urban design merit as it has not satisfied the urban design capability test (refer Table 2).
(2) **Size and proximity to Strategic or Local Centre -** Be at least 1ha and located either: a. Entirely within a 10-minute walk of a Strategic or Local Centre or Within the GPOP area, having 30 minute door-to-door access to employment in Parramatta CBD, Westmead or Sydney Olympic Park	Yes
(3) **Proximity to retail convenience -** Include or be located within walking distance (800m) of retail convenience.	Yes
(4) **Size and proximity to open space** - For site 1-2ha in size – contain or be entirely within a 5 minute walk of a park, sportsground	Not applicable.
(5) **Open space provision** - For sites greater than 2ha in size – require the on-site provision of quality parks, sportsgrounds or play spaces as detailed in the Community Infrastructure Strategy (CIS).	No. The revised proposal seeks to dedicate 20.5% of the site to be dedicated as public open space. While the revised proposal meets qualitative requirements (CIS requires 20% of the site to be dedicated as per identified benchmarks), the irregular shape and dimensions of the linear parks raises concerns in relation to the amenity and usability of the proposed open space.
(6) **Predominance of low rise building forms -** Be predominantly low-rise, two to three storeys.	No. The proposed building heights are predominantly greater than 2-3 storeys. Based on percentage of gross floor area that is accommodate in the different housing types (p.21 of Rezoning Review Report), the proposal is considered predominantly mid-rise, 4-7 storeys.

(7) **Housing diversity and building heights** - Propose one or more of the following housing types: • attached or detached dwelling houses; • terrace housing; • semi-detached housing; • villas; • townhouses; • manor homes; • co-housing (maximum 3 storeys); • seniors housing (maximum 3 storeys); and • new age boarding houses (maximum 3 storeys).	No. While the proposed housing typologies are broadly supported, the proposal does not satisfy this criteria as it exceeds the maximum 3 storey height identified for seniors housing.
(8) **Criteria for residential flat buildings -** Residential flat buildings may be permitted in Housing Diversity Precincts, but only where: a. The built form is compatible with the surrounding neighbourhood and meets the urban test as per clause 1; and b. Other housing types are also provided in the precinct as per clause 1; and c. They contain at least 5-10% permanent affordable rental housing (subject to viability) ; however, where viable, Council's aspiration is for a higher provision.	No. In terms of criteria 8a, the predominance of bulky residential flat buildings is incompatible with the low scale, suburban setting of the locality. The predominant residential typology and character of the surrounding context comprises of single and double storey detached dwellings. In terms of criteria 8b, the revised proposal does provide other housing typologies as per clause 1. In terms of criteria 8c, the revised proposal does not seek to provide 5 -10% permanent affordable rental housing. It is proposed for 5 dwellings to be dedicated to Council in perpetuity (0.5% approx.) which is an unacceptably low proportion. Additionally, it is proposed to provide rent-controlled units (40 units approx.) for a limited amount of time. The nature of these units is inconsistent with the definition of Affordable Housing in Council's Affordable Rental Housing Policy.

	It was previously indicated to Council officers that Applicants seeks to retain a portion of the affordable housing units for use of staff and visitors; which is inconsistent with the definition of Affordable Housing in Council's Affordable Rental Housing Policy.
(9) **Site constraints and opportunities -** Have strategic merit in relation to: access (including to a regular public transport service); constraints; topography; environment; and amenity.	No. The revised proposal seeks an excessive density and built form outcome that is not responsive to access constraints including the lack of major public transport services; steep topography; existing significant vegetation and hazard constraints; and public and private amenity in terms of solar access and privacy. Additional technical information (i.e. traffic modelling, arborist report, overland flow investigation and additional visual impact assessment) is required to demonstrate an adequate response to the site constraints and opportunities. This will require further consultation with NSW Rural Fire Service regarding their concurrence with bushfire risk methodology applied and TfNSW regarding proposed bus servicing improvements and road/intersection works.

Table 1: Assessment of Proposal against HDP Criteria

C. Detailed Council Officer Assessment - Urban Design Capability Test

Urban design metric/criteria	Existing Context and/or Desired Future Character	Assessment of Proposal
1. Connectivity to the existing neighbourhood, permeability of block structure, enhancement of view corridors.	The surrounding street network is generally well-connected, with a logical block structure and size, pedestrian links and some cul-de-sacs, typical of residential subdivision. In consideration of the proposed medium density residential and apartment typologies, the internal street network should form a grid structure with visual connections to open space and sky. A street network should provide travellers with a sense of orientation through physical elements that serve as reference points. The road structure should be further extended outside of the site with multiple access points, tying into the surrounding street network. Blocks should be permeable to enable pedestrian circulation.	The proposed internal street system is inwardly focused due to minimal vehicular entries, creating a perception of a gated community. The proposed connectivity to the internal street structure limits vehicular accessibility to the site.
2. Street widths, hierarchy and elements within the road reserve	The surrounding local roads have a suburban character with 16m-wide road reserves with mature tree planting and wide grass verges. A compatible street structure would simulate and enhance this layout, improve vehicular movement, and increase tree planting through a legible street hierarchy with 20m and 16m road reserves.	The proposed street layout proposes some 12m wide streets, which is incompatible with the low scale residential context. All streets should have vehicular lanes and sufficient public footpaths to enable all users to traverse the site safely. The 12m streets lead to poor legibility and integration with the surrounding road network.
3. Accessibility and street address to all buildings and public domain	The surrounding single dwellings each have a clear street address. All open spaces and public areas must be bounded by streets and appear public. Users should not have to enter public spaces through private lands, neither should these spaces appear part of private land.	The proposed public open space is not clearly bounded by streets, directly abutting private residential development that limits accessibility and creates a sense of privatised space.

4. Responsiveness of built form and streets to topography through extent of cut and fill	The surrounding single dwellings are sensitively situated within individual lots, reducing cut and fill by orientating buildings to existing contours. Streets are also aligned to existing contours.	The proposal includes some built form envelopes and streets that do not sensitively respond to the topography, with building envelopes positioned on steep embankments or in gullies, resulting in significant fill. The proposed envelopes are therefore incompatible with the topography of the site. This is contrary to identified Aboriginal Planning Principles identified in the Connecting with Country report.
5. Responsiveness to significant vegetation	The surrounding neighbourhood incorporates significant vegetation within road reserves and setbacks.	While some clusters of significant trees have been retained, ecologically sensitive vegetation to the rear of the site is encroached by building envelope footprints and the proposed street network (refer p.44 of Rezoning Review Report). The proposal should further manipulate and articulate built form and street structure to preserve large native trees. A Preliminary Tree Assessment (prepared by a qualified Arbocultural Consultant) has not been supplied despite having been requested by Council officers. This is vital to understanding which existing trees are high and medium retention value trees, informing the masterplan with regard to optimal retention, and providing tree species, health and condition and Tree Protection Zone (TPZ) setbacks.
6. Responsiveness to natural features	The surrounding localities are clearly separated from dense vegetation with a buffer. Landform, native vegetation, ecological communities, and water courses should be considered in any design. Natural elements should define and shape the structure of new elements in places.	The proposed building envelopes and street network (Lot A2 identified in p.87 of Urban Design Report) encroach into ecologically significant vegetation identified at the rear of the site. Furthermore, a Preliminary Tree Assessment (prepared by a qualified Arbocultural Consultant) has not been submitted to support the proposal despite having been requested by Council officers.

7. Predominant residential typology and residential mix	The predominant residential typology and character of the surrounding context is low rise residential comprising single detached houses.	Based on percentage of gross floor area accommodated in proposed residential typologies, the proposed predominant typology predominantly comprises bulky 4-7 storey residential flat buildings which is far removed from the neighbourhood suburban setting and deemed incompatible. It is noted that a portion of 'townhouses' have been provided as 'under building' two-level products as part of proposed residential flat buildings. This would not be considered townhouse or multi-dwelling housing as per the definition of the PLEP 2011.
8. Building height	The existing maximum building height in the locality is 2 storeys.	The proposed number of storeys ranges from 2-7 storeys, with the predominant building form being 4-7 storey residential flat buildings. Building heights up to 7 storeys are not compatible with the surrounding low rise residential area. A 5-storey interface to North Rocks Road is not an appropriate height as it is incompatible with the North Rocks Shopping Centre building height that is perceived as one storey from the street (currently sitting lower within the landform). The argument of locating density within the suppression of the landform is not supported as it will require significant fill and the height would be perceptible from within the site, from new streets and public spaces. The proposed height is deemed to be incompatible with the locality.
9. Building footprint and site coverage	The building footprints of the surrounding context cover approximately 30% of each lot with an average length and depth of 17m.	The proposed built form is not considered compatible with the context given its excessive site coverage which is further

	Compatible building footprints would be appropriately broken up with articulation and mid-block breaks and low scale footprints.	exacerbated by other factors such as reduced setbacks throughout the site.
10. Overshadowing and privacy impacts to development outside and within the site	Existing dwellings within the neighbourhood are modest in scale, allowing adequate sunlight access and privacy to adjoining dwellings. Building height and bulk should align with adjacent development to limit overshadowing impacts.	The proposed 'underbuilding' townhouses and residential flat building in the north-east portion of the site (Lot A5 identified in p.87 of Urban Design Report), located in close proximity to the site boundaries are incompatible with the local context, as these buildings will potentially impact on visual privacy of adjacent properties which is exacerbated by the steep topography.
11. Solar access to the public domain and private open space	Existing dwellings within the neighbourhood are modest in scale, allowing adequate sunlight access to adjoining private open spaces and the public domain. The street structure and built form bulk should be articulated to ensure sufficient solar access is provided to streets, the public and private open space.	The proposed building heights and street wall, in particular the 4-6 storey residential flat building and seniors housing in the central east portion of the site (identified as Lot A9 in p.87 of Urban Design Report) could have impact on solar access to public and private open spaces.
12. Front setbacks and landscape character	The locality has a distinct landscape character with an abundance of mature native trees, with large front and rear setbacks of 10m to ensure the preservation of these trees.	With the exception of the collector street, the proposed generic application of a 3m setback (identified in p.88-91 of the Urban Design Report) does not respond to the existing or proposed context. Building setbacks should relate to the street hierarchy, allow for retention of mature trees, provide physical separation of built form from the street, allow for landscaping to mitigate the perceived building bulk, and be utilised to help meet deep soil requirements.

Table 2: Urban design capability test