GEORGES RIVER COUNCIL

Ref No: D19/240533

APPENDIX 3 – Development Standards Justification

Amended Planning Proposal

Georges River Local Environmental Plan

(PP2019/0004)

June 2020 – For Finalisation

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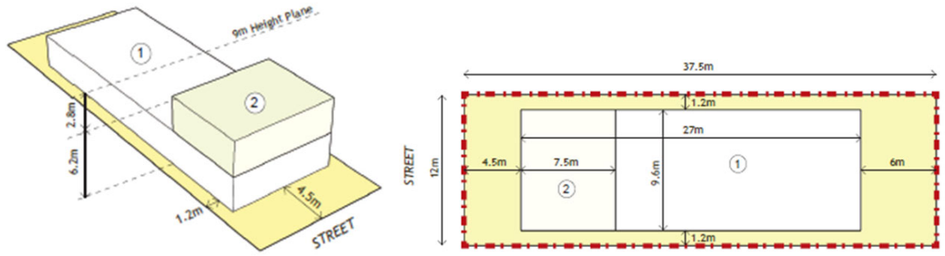
**Note – Sample modelling included within the development standard justification has applied the greater setbacks from the existing DCPs for the LGA to enable the viability of proposed controls to be understood.*

Development standard	HLEP 2012	KLEP 2012	Proposed GRLEP 2020	Justification
Residential Development Standards – Dwelling Houses				
Minimum subdivision lot size in the R2 zone	450sqm	550sqm	450sqm	This approach is consistent with the Bankstown and Rockdale LEPs. By adopting a 450sqm minimum lot size (as per *HLEP 2012*), approximately 598 lots in the former Kogarah LGA will gain development potential to subdivide. If a minimum lot size of 550sqm is adopted, approximately 504 lots in the former Hurstville LGA will lose existing development potential to subdivide, therefore the smaller lot size is proposed. Urban design testing was undertaken by Council to compare the different built forms resulting from the different minimum lot sizes. **Figure 1** is an example of a potential built form which demonstrates that the proposed FSR (0.55:1) and height control (9m) can be achieved on the proposed lot size of 450sqm.  *Figure 1 – Sample R2 Dwelling Development*
Minimum subdivision lot size in the R2 zone (for properties located in the Foreshore Scenic Protection Area)	550sqm (FSPA)	700sqm (foreshore localities as identified in Kogarah DCP)	700sqm for lots located in the proposed FSPA The development of the new FSPA is discussed further in connection with the local provision in Appendix [4].	The foreshore scenic protection area (FSPA) is an additional local provision which seeks to protect the scenic and landscape amenity of the foreshore area by ensuring landscaping and vegetation have visual dominance over buildings. Both existing LEPs present a correlation between foreshore localities and increased lot size. Properties in these areas generally require larger lot sizes because of factors such as the requirement for more landscaping to be provided, more generous traditional subdivision patterns due to topography constraints, and buildings needing increased setbacks to encourage sharing of views to the water. The increase in lot size for foreshore localities enables developments in these areas to meet requirements. In accordance with the principle of applying a consistent set of controls across the two former LGAs, the existing FSPA was reviewed as informed by the character analysis work undertaken by the *Foreshore Study*. It is proposed to retain the extent of the existing FSPA within the former Hurstville LGA and to extend the FSPA to the former Kogarah LGA to enable this development standard to be applied across the Georges River LGA. Adoption of the 700sqm minimum lot size (as per *KLEP 2012*) for R2 zoned properties located within the FSPA ensures that the existing character of these areas can be retained. This means that the minimum subdivision lot size of properties within the existing FSPA in the Hurstville, Mortdale and Peakhurst Wards is increased from 550sqm under the *HLEP 2012* to 700sqm under the proposed *GRLEP 2020*. A total of 31 lots will lose their development potential to subdivide into two Torrens-titled dwelling houses as result of the increase in minimum subdivision lot size. However, the overall development potential of these

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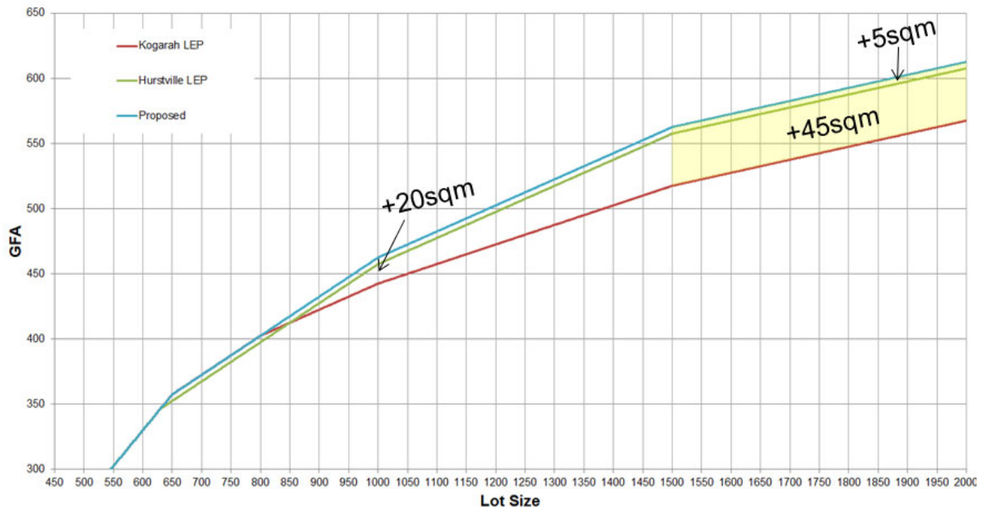
<tr><th>Development standard</th><th>HLEP 2012</th><th>KLEP 2012</th><th>Proposed GRLEP 2020</th><th>Justification</th></tr>
<tr><td></td><td></td><td></td><td></td><td>properties remains unchanged. This is due to the proposed retention of the existing 1,000sqm minimum dual occupancy lot size requirement in these areas, where dual occupancies remain permissible despite the potential loss of development capacity for two dwelling houses. Further explanation is provided below under the “dual occupancies” subheading of this table.</td></tr>
<tr><td>Height – R2</td><td>9m</td><td>9m</td><td>9m (no change)</td><td>Retain and harmonise the existing 9m height as this is common across both existing LEPs.</td></tr>
<tr><td>FSR – R2 dwelling houses (lots ≤650sqm)</td><td>0.55:1</td><td>0.55:1</td><td>0.55:1 (no change)</td><td>Retain and harmonise the existing 0.55:1 FSR as this is common across both existing LEPs.</td></tr>
<tr><td>FSR – R2 dwelling houses (lots >650sqm)</td><td>Sliding scale GFA</td><td>Sliding scale FSR</td><td>Adopt the GFA sliding scale in the HLEP 2012 with a varied threshold lot size of 650sqm to reflect the proposed minimum dual occupancy lot size.

The proposed formula is provided below.<table><tr><th>Site Area</th><th>Proposed GFA Formula</th></tr><tr><td>≤650sqm</td><td>Site area × 0.55</td></tr><tr><td>>650 to 1000sqm</td><td>(Site area − 650) × 0.3 + 357.50</td></tr><tr><td>>1000 to 1500sqm</td><td>(Site area − 1000) × 0.2 + 462.50</td></tr><tr><td>>1500sqm</td><td>(Site area − 1500) × 0.1 + 562.50</td></tr></table></td><td>The existing LEPs are consistent in their approach of regulating the bulk and scale of dwelling houses on larger lots through a sliding scale formula; though KLEP 2012 utilises a sliding scale FSR whilst HLEP 2012 utilises a sliding scale GFA. In both existing LEPs, the minimum lot size of dual occupancies is used as the trigger for this development standard – at 630sqm and 650sqm respectively for the HLEP 2012 and KLEP 2012. It should be noted that the recent gazettal of an amendment to the HLEP 2012 on 6 December 2019 through the Georges River Local Environmental Plan Amendment (Miscellaneous) 2019 has increased the minimum lot size requirement for dual occupancies from 630sqm to 650sqm under the HLEP 2012. The amendment did not include a revision of the trigger for the sliding scale FSR formula to match the new minimum dual occupancy lot size requirement.

Based on a comparison of the GFA yield from the existing LEP formulas, adoption of the existing HLEP 2012 formula will ensure that no lot, irrespective of lot size will lose GFA due to harmonisation of the LEPs.

Figure 2 below shows the proposed approach which will mean that those lots currently located within the former Kogarah LGA will benefit from approximately a 20sqm to 45sqm increase in GFA (depending on lot size) and larger lots within the former Hurstville LGA will benefit from an increase of approximately 5sqm. A principle in preparing the GRLEP 2020 has been to ensure that there is equity in controls across the LGA which is achieved by adopting the revised sliding scale for dwelling houses in the R2 zone.
 
Figure 2 – Comparison of existing and proposed GFA sliding scale formulas</td></tr>
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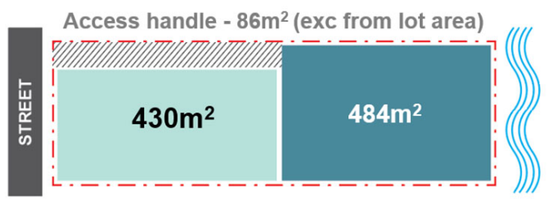
Development standard	HLEP 2012	KLEP 2012	Proposed GRLEP 2020	Justification
Residential Development Standards – Dual Occupancies				
Minimum lot size for dual occupancies	630sqm	650sqm	650sqm	The minimum dual occupancy lot size of 650sqm is proposed for the whole LGA in accordance with the *Georges River Local Environmental Plan Amendment (Miscellaneous) 2019* (Low Rise Medium Density Housing Planning Proposal) which was finalised by the Department of Planning, Industry and Environment and gazetted on 6 December 2019.
Minimum lot size for dual occupancies (FSPA)	1,000sqm (FSPA)	1,000sqm (foreshore localities as identified in Kogarah DCP)	1,000sqm	The existing minimum lot size for dual occupancies in the FSPA will be retained to ensure the continued protection and preservation of the foreshore area and its character. The exhibited version of the *GRLEP 2020* proposed a reduction in the extent of the existing FSPA under the *HLEP 2012* which would have resulted in the removal of a number of properties from the existing FSPA and enabled 742 lots to gain the potential to develop dual occupancies as a result of the reduction in the minimum dual occupancy lot size requirement (1,000sqm for lots within the FSPA to 650sqm for lots outside of the FSPA). However at its meeting dated 25 and 26 June 2020, the Georges River Local Planning Panel resolved to retain the existing extent of the *HLEP 2012* FSPA and the associated 1,000sqm dual occupancy lot size requirement for these properties. The amended Planning Proposal therefore removes the development potential granted to these 742 properties.
Minimum subdivision lot size for dual occupancies	N/A	300sqm	300sqm	The existing minimum 300sqm subdivision lot size for dual occupancy developments will be retained from *KLEP 2012* and proposed to be applied to the whole LGA. This control will ensure dual occupancies are located on reasonably sized lots that allow adequate amenity, including open space, setbacks, privacy and solar access. The control will ensure a consistent and efficient subdivision outcome without being overly restrictive whilst maintaining a consistent built form and streetscape.
Minimum subdivision lot size for dual occupancies (FSPA)	N/A	300sqm	430sqm	The *KLEP 2012* currently applies a minimum subdivision lot size of 300sqm for all dual occupancy developments, irrespective of lot size. Whilst the merit of the 300sqm subdivision lot size is seen through dual occupancies in non-foreshore localities, a larger minimum subdivision lot size is required in the FSPA to ensure dual occupancies respond to the character of the foreshore localities. This will enable developments to respect the topography, landscaping and amenity of the foreshore area by providing increased setbacks and landscaping without compromising the size of dwellings. Dual occupancies arranged front and back (i.e. resulting in battle axe subdivisions) is the most common dual occupancy configuration in waterfront localities. **Figure 3** below is an example of a battle axe subdivision pattern on a minimum lot size of 1,000sqm for dual occupancies within the FSPA, illustrating that once the area of the access handle is excluded from the calculation of the lot area, similar sized allotments of 430sqm can be provided. The larger minimum lot size will ensure that dual occupancy lots within the FSPA can be appropriately sized to accommodate the built form of development that respects the topography and provides appropriate landscaping which is not detrimental to the streetscape and character of the FSPA.  *Figure 3 – Example of Subdivision pattern within FSPA.*

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Deleted: This means that the minimum 650sqm dual occupancy lot size will apply to these properties. In summary, the reduction in the FSPA enables approx. 740 lots to gain the potential to develop dual occupancies.¶

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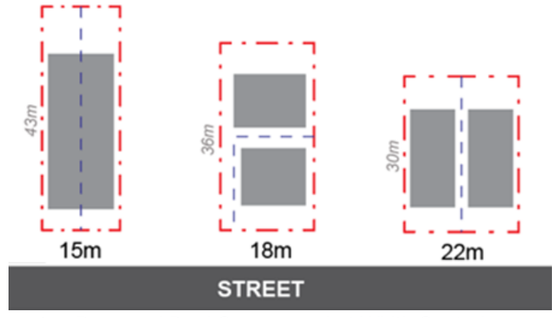
Development standard	HLEP 2012	KLEP 2012	Proposed GRLEP 2020	Justification
Minimum lot width for dual occupancies (attached)	Interim DCP: 15m		15m	Since Council's amalgamation, it has been acknowledged that the assessment of development throughout the Georges River LGA was setting an inconsistent precedent due to the different controls (primarily residential controls). An interim DCP was developed by undertaking a comparison of residential controls across the two former Councils and relevant SEPPs to determine the most appropriate controls for maintaining and enhancing the LGA's local character, as well as a review of Council's variations register which documents all DCP variations sought by DAs lodged since Council's amalgamation in May 2016. The *Interim DCP* was adopted by Council on 11 June 2019 and came into effect on 22 July 2019. It is proposed to adopt the lot width controls existing within the Interim DCP (as shown in **Figure 4** below) in the LEP to ensure that local character is maintained and achieved in future dual occupancy developments, and that variations are comprehensively considered through the merit-based assessment process. It should be noted that the current DCP lot width requirement is measured at the frontage of the site whilst the draft *GRLEP 2020* control applies to the minimum lot width at the front building line. These controls have been introduced in the draft *GRLEP 2020* in response to the community feedback Council received as part of the *LSPS 2040* consultation. The community requested greater certainty over development outcomes, a clear hierarchy of residential zones and a strong desire for low density areas to retain their character. The minimum lot width requirements for dual occupancy developments are particularly important as dual occupancies will be primarily located in the R2 Low Density Residential zones. The lot width controls play a vital role in defining the desired future character of our suburbs by regulating subdivision patterns and building widths to reflect the hierarchy and density of the respective residential zone and ensuring development occurs on appropriately sized lots in response to Object (c) of the *EP&A Act* "to promote the orderly and economic use and development of land". The legal weight afforded to the lot width requirements as a result of their elevation to the LEP will ensure that any variations to these standards will be justified through Clause 4.6 variations. The inclusion of lot width controls in the SILEP is currently adopted by the *Ryde LEP 2014* and the *Bankstown LEP 2015* for the purposes of ensuring development is appropriate to its locality and minimising amenity impacts on the surrounding residential area as a result of any residential intensification. The relevant clauses are referenced below: • Clause 4.1A Dual occupancy (attached) subdivisions – *Ryde LEP 2014* • Clause 4.1A Minimum lot sizes and special provisions for dual occupancies – *Bankstown LEP 2015*  *Figure 4 – Proposed Dual Occupancy Lot Width Controls*
Minimum lot width for dual occupancies (detached front and back)	Interim DCP: 18m		18m	
Minimum lot width for dual occupancies (detached side by side)	Interim DCP: 22m		22m	

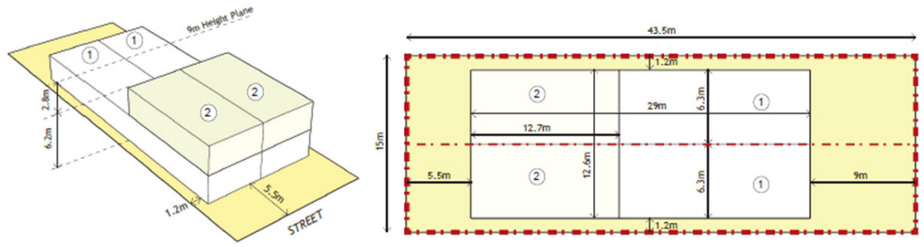
<table>
<tr><th>Development standard</th><th>HLEP 2012</th><th>KLEP 2012</th><th>Proposed GRLEP 2020</th><th>Justification</th></tr>
<tr><td></td><td></td><td></td><td></td><td> 

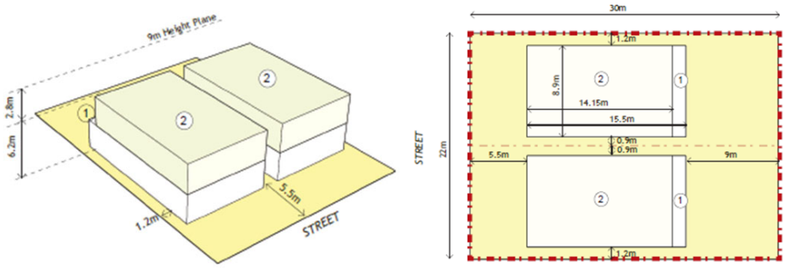
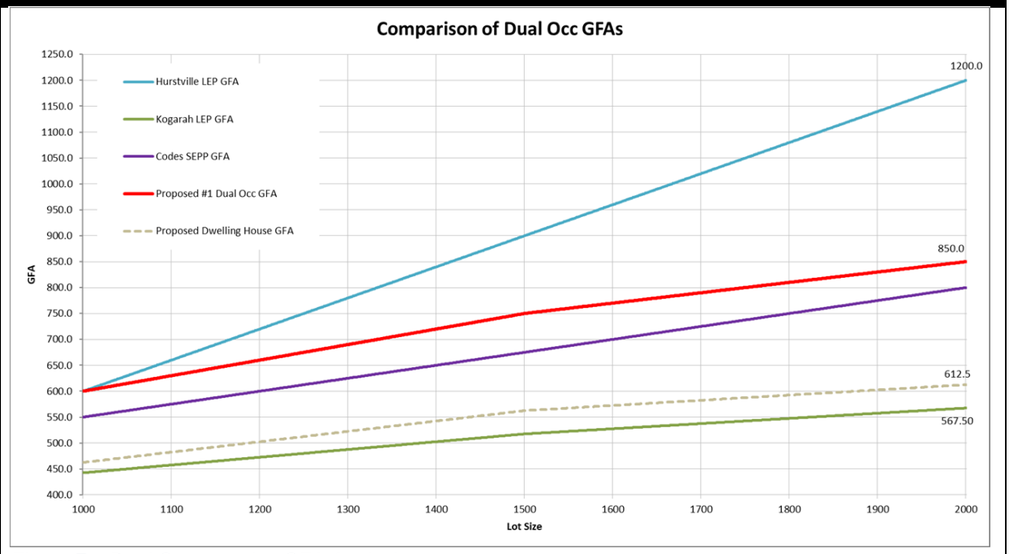
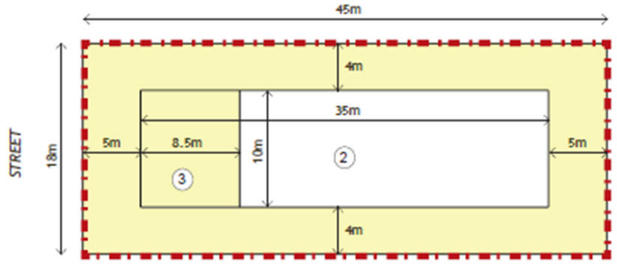
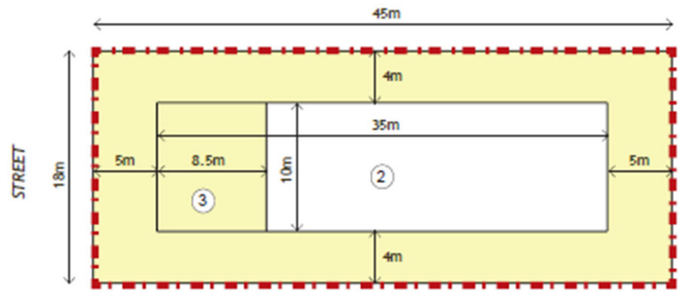
Figure 5 – Sample Dual Occupancy Side by Side Semi Detached Development
 

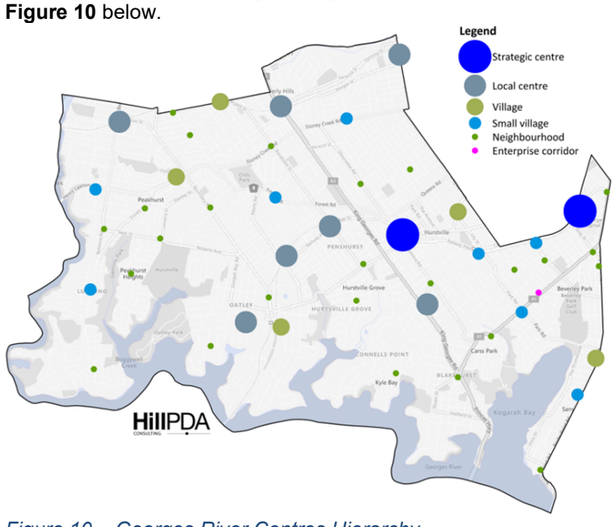
Figure 6 – Sample Dual Occupancy Detached Side by Side Development</td></tr>
<tr><td>FSR – dual occupancies (lots 650sqm to ≤1000sqm)</td><td>0.6:1</td><td>Same sliding scale FSR as dwelling houses (max. FSR of 0.55:1)</td><td>0.6:1</td><td>The existing HLEP 2012 FSR of 0.6:1 is adopted for all dual occupancies to achieve consistent yields across the LGA.</td></tr>
<tr><td>FSR – dual occupancies (lots > 1000sqm)</td><td>0.6:1</td><td>Same sliding scale FSR as dwelling houses (max. FSR of 0.44:1)</td><td>Revised GFA sliding scale formula. The proposed formula is provided below.
<table><tr><th>Site Area</th><th>Formula</th></tr><tr><td>>1,000sqm to 1,500sqm</td><td>[(site-1,000) x 0.3] + 600</td></tr><tr><td>>1,500sqm to 2,000sqm</td><td>[(site-1,500) x 0.2] + 750</td></tr><tr><td>>2,000sqm</td><td>[(site-2,000) x 0.1] + 850</td></tr></table></td><td>During the harmonisation process, it was identified that whilst the KLEP 2012 retains the sliding scale FSR for dual occupancies on larger lots, the HLEP 2012 applies a FSR of 0.6:1 for all dual occupancy developments irrespective of lot size. As a result, larger lots, which are located predominately along the foreshore, are able to accommodate very large dual occupancies of a bulk and scale inconsistent with a low density residential area. The comparison presented in Figure 7 demonstrates a significant disparity between the GFA offered by the HLEP 2012 (shown in blue) and the KLEP 2012 (shown in green).

A sliding scale approach is therefore required to regulate the density, bulk and scale of dual occupancies in foreshore localities where the minimum lot size is 1,000sqm.

The revised GFA formula (which is represented by the red line in Figure 7 will ensure that an appropriate level of development is permitted on large lots within the FSPA to ensure the amenity and environmental impacts of development in these areas are protected without being too restrictive. The GFA permitted by the Low Rise Medium Density Housing Code (shown in purple) and the proposed GRLEP dwelling house formula (shown in dashed) are illustrated for reference.</td></tr>
</table>

Development standard	HLEP 2012	KLEP 2012	Proposed GRLEP 2020	Justification
				 *Figure 7 – Dual Occupancies GFA Analysis*
Residential Development Standards – R3 Medium Density Residential zone				
Minimum lot size for multi dwelling housing	945sqm (DCP)	800sqm	800sqm	The *GRLEP 2020* proposes to adopt the existing Kogarah LEP minimum lot size for multi dwelling housing as there has been no recorded Clause 4.6 variation to this development standard since Council's amalgamation which demonstrates the viability and feasibility of this requirement. The smaller minimum lot size, together with the reduced minimum lot width proposed will facilitate multi-dwelling housing on more lots across the LGA, assisting in achieving housing targets. Built form testing prepared for Council, comparing the potential outcome of adopting the 800sqm minimum lot size together with the minimum lot width of 18m as shown in **Figure 8** below, shows that multi dwelling housing can be adequately accommodated on such lots.  *Figure 8 – Multi Dwelling Housing with 800sqm Lot Size*

Development standard	HLEP 2012	KLEP 2012	Proposed GRLEP 2020	Justification
Minimum lot width for multi dwelling housing	15m (DCP)	20m (DCP)	18m	A minimum lot width requirement for multi dwelling housing is currently provided by the existing Hurstville and Kogarah DCPs. Inclusion of this development standard within the LEP reinforces the desired future character of the LGA's medium density zones whilst also giving the lot width requirement greater legal weight and ensuring variations are comprehensively considered through the merit-based assessment process. The inclusion of lot width controls in the SILEP is currently adopted by Clause 4.1B Minimum lot sizes and special provisions for certain dwellings of the *Bankstown LEP 2015* for the purposes of ensuring development is appropriate to its locality and minimising amenity impacts on the surrounding residential area as a result of any residential intensification. Based on the assessment of development applications, it is known 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 9** below.  *Figure 9 – Sample Multi-Dwelling Housing Site Plan with 18m lot width*
Height – R3	9m	9m	9m (no change)	Retain existing 9m height as this is consistent across both existing LEPs. An additional control is proposed to complement the objectives of this clause in ensuring appropriate transition is provided between medium and low density residential zones. The proposed additional control specifies that in a multi dwelling housing development, the dwelling that is located immediately adjacent to the rear boundary is to have a maximum height of 5m.
FSR – R3	0.6:1	0.7:1	0.7:1	Adopt the 0.7:1 FSR as per *KLEP 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.
Residential Development Standards – R4 High Density Residential zone				
Minimum lot size for R4 zone	Nil	1,000sqm	1,000sqm	This development standard prevents the fragmentation of land within the R4 zone to ensure large parcels of land are available for development outcomes that are compatible with the high density zone. It should be noted that no minimum lot size is prescribed for residential flat building developments due to the various development standards (i.e. height and FSR) applied to the proposed R4 High Density Residential zones.

Development standard	HLEP 2012	KLEP 2012	Proposed GRLEP 2020	Justification
Height & FSR – R4 zone	**Type A** • Height 12m • FSR 1:1 **Type B** • Height 15m • FSR 1.5:1 **Type C** • Height 21m • FSR 2:1 **Type D** • Height 33m • FSR 4:1		No change	There are no changes to the current FSR and height controls within the R4 zones across the LGA. It is proposed to rezone all existing R3 zoned land in both the *HLEP 2012* and *KLEP 2012* to an R4 zone where residential flat buildings are currently permitted, as the prevailing typology, due to the maximum building height of 12m or greater currently applicable to these areas. Hillcrest Avenue (currently zoned R2) will be rezoned to R4 to create a hierarchy of residential zones in accordance with the LSPS Action 47, which requires a Local Housing Strategy to be competing to provide a hierarchy of residential zones and reflecting the initial findings of the Local Housing Strategy. The first stage of the Local Housing Strategy has been completed. This evidence base comprises a review of the current and future population and housing trends for the LGA for the purpose of reviewing the 2036 housing target.
Non-residential Development Standards – Business Zones				
Minimum subdivision lot size (Business Zones)	Nil	500sqm	Nil	For the purpose of harmonisation, the minimum subdivision lot size control is removed from all business zones to apply a consistent approach across the LGA. This is based on the absence of subdivision applications for business zoned land in recent years. The removal of this control is aligned with the principle of the preparation of the *GRLEP 2020* to ensure controls are equitable across the LGA as imposing a 500sqm subdivision lot size is unjustified and onerous at this stage. The development standards of commercial centres will be reviewed in Part 2 of the Commercial Centres Strategy to inform the preparation of Stage 3 of the comprehensive *GRLEP*.
Non-residential FSR	0.3:1 in B1 and B2 zones	0.7:1 in B6 zones	Strategic centres 1:1 (Hurstville City Centre and Kogarah Town Centre) Local Centres 0.5:1 (Beverly Hills, Kingsgrove, Mortdale, Oatley West, Penshurst, Riverwood and South Hurstville) B6 zone 0.7:1 Other centres 0.3:1	A centres hierarchy has been developed in the first stage of the Centres Strategy. The Centres hierarchy has been based on the existing retail floor space provided and consists of 6 tiers; strategic centres, local centres, villages, small villages, neighbourhood centres and the B6 Enterprise Corridor as identified in **Figure 10** below.  *Figure 10 – Georges River Centres Hierarchy*

Development standard	HLEP 2012	KLEP 2012	Proposed GRLEP 2020	Justification
				The Centres Strategy has identified that additional employment floor space of 187,000sqm is required to meet the forecast 2036 demand. It is identified that the existing minimum non-residential FSR requirement is insufficient to support the growing population or to meet District Plan job targets by 2036. The current controls imply that as redevelopment occurs, there will be a net loss in non-residential floor space across all centres. **Figure 11** below shows the non-residential FSR required within the LGA's centres to meet the forecast 2036 demand.

Hierarchy	Centre	Existing LEP overall FSR (inc resi and non-resi)	Non-resi FSR required by 2036
Strategic centre	Hurstville City Centre	Up to 6:1 in B4 (0.5:1 non-resi)	1.48 :1
Strategic centre	Kogarah Town Centre	Up to 4.5:1 (0.5:1 non-resi)	1.60:1
Local centre	Beverly Hills	1.5:1 and 2:1 (0.3:1 non-resi)	0.82 :1
Local centre	Kingsgrove	1.5:1 and 2:1 (0.3:1 non-resi)	1.28 :1
Local centre	Mortdale	1.5:1 and 2.5:1 (0.3:1 non-resi)	0.98 :1
Local centre	Oatley West	1.5:1 (0.3:1 non-resi)	1.17 :1
Local centre	Penshurst	2:1 and 2.5:1 (0.3:1 non-resi)	0.69 :1
Local centre	Riverwood	2:1 and 3:1 (0.3:1 non-resi)	1.02 :1
Local centre	South Hurstville	1:1 and 2.5:1 (0.3:1 non-resi)	0.90 :1
All other 39 centres (villages, small villages, neighbourhood centres and enterprise corridor)		1:1 to 4:1 - mostly 1.5 and 2.5:1 (0.3:1 non-resi)	0.67 :1

Figure 11 – Current FSR Control and FSR required by 2036

This Planning Proposal proposes an interim solution of minimum non-residential FSR requirements to reduce the loss of employment floor space through infill development, which is severely impacting the ongoing viability of the LGA's centres.

The modelling conducted by Council in **Figure 12** below illustrates that the proposed increase in non-residential floor space from 0.3:1 to 0.5:1 can be accommodated entirely on the ground floor of a development. For example, 500sqm of non-residential floor space is required on a 1,000sqm lot. Approx. 770sqm of floor space (excluding vehicle entrance) can be provided on the ground floor, which may include lobbies for the apartments above.

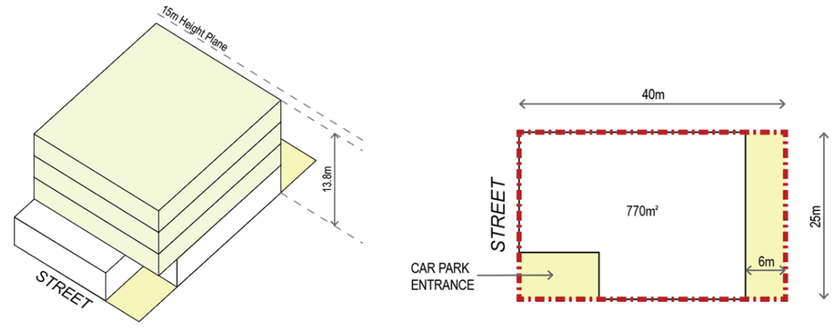
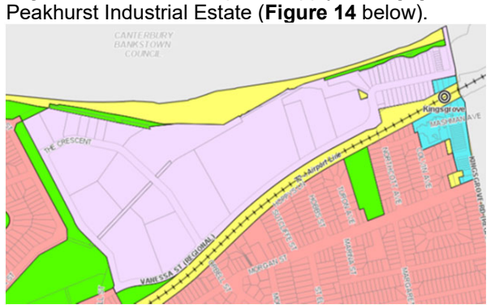
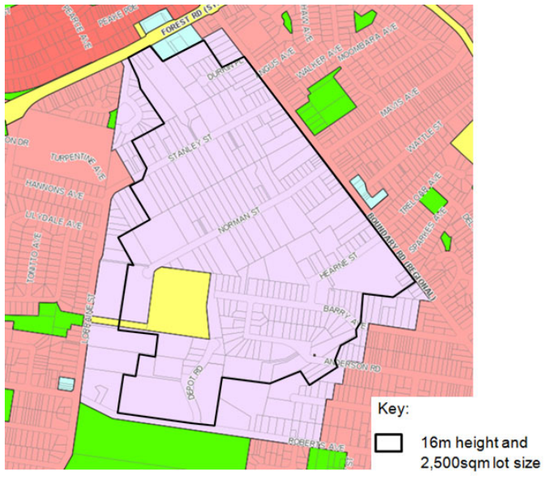
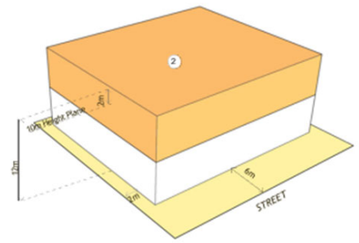
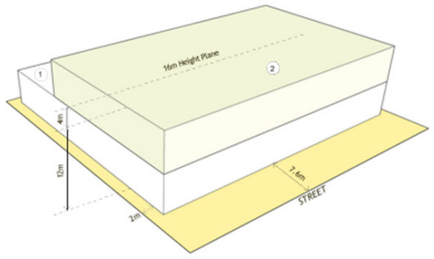


Figure 12 – Sample shop top housing with ground floor non-residential

Development standard	HLEP 2012	KLEP 2012	Proposed GRLEP 2020		Justification
					The proposed FSR controls have been applied according to the hierarchy rather than the zoning of centres within the LGA. For example, Oatley West is currently zoned B1 but is identified as a local centre in the first stage of the Centres Strategy. Further increases to the non-residential FSR requirement will be investigated in Stage 3 of the LEP process as part of the comprehensive review of the development standards of business zones across the LGA. Placed-based analysis will also be conducted to investigate the suitability of the hierarchy.
Non-residential Development Standards – IN2 Light Industrial zone					
Minimum lot size (Industrial zones)	Nil		750sqm	1,000sqm and 2,500sqm	Increased minimum lot sizes are proposed for the IN2 zone to prevent the fragmentation of larger lots. The larger lot size of 2,500sqm will apply to Kingsgrove Industrial Estate (**Figure 13** below) and parts of Peakhurst Industrial Estate (**Figure 14** below).  *Figure 13 – Kingsgrove Industrial Estate*  *Figure 14 – Peakhurst Industrial Estate* These two areas generally have larger lot sizes with 27% of lots in the Peakhurst Industrial Estate being more than 2000sqm and over 16% of lots in the Kingsgrove Industrial Estate being more than 5000sqm. This area needs to be retained to provide employment opportunities and allow the operation of a diverse

Development standard	HLEP 2012	KLEP 2012	Proposed GRLEP 2020		Justification
					range of industrial uses, such as warehousing which requires large floor plates. The Industrial Land Review highlights the need for industrial land to be retained across the LGA, including for both strategic and local industries. The Review recognises the importance of larger lot sizes for strategic industries due to building type and function. This is in contrast to local industries which do not necessarily require large lot sizes to operate.
Height Controls (IN2)	10m		10m	16m for the Kingsgrove Industrial Precinct and portions of the Peakhurst Industrial Precinct 12m for all other industrial zoned land .	The existing 10m height control within the IN2 zone does not allow new developments to achieve an FSR of 1:1. The increase to 12m across the IN2 zone enables an FSR of 1:1 to be achieved as illustrated in **Figure 15** below. The increased height will improve development viability within the IN2 zone, which in turn will reduce the pressure for rezoning to residential which is often sought to the detriment of the LGA's employment lands. In addition, the increase in height controls will promote increased industrial floor space to assist with the general undersupply within the South District and encourage more investment within the LGA.  *Figure 15 – IN2 Smaller Precinct Modelling* The increase in height to 16m is appropriate for the Kingsgrove Industrial Precinct and part of the Peakhurst Industrial Precinct. The increased 16m height control will only apply within the area edged black in **Figure 14** above for Peakhurst to ensure the residential interface is protected and amenity impacts on the surrounding residential zone is mitigated. The 12m height control is to be applied to the lots outside of the area edged black. The increased height control of 16m will allow two floors of industrial and one floor of office which allows a flexibility of uses, attracting investment and redevelopment of industrial lands. It also allows for greater setbacks and landscaping on larger lots as show in **Figure 16** below which will improve both the visual and environmental impacts within these larger industrial areas.  *Figure 16 – IN2 Larger Precinct Modelling*