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*Street view (Source: Google Maps 2020).*

## Site Study Report

**For 55-57 Edgeworth David Avenue, Waitara**

Prepared for:  
Mrs Mary Camilleri

Revision A – 26 June 2025

## A | Introduction

### A.1 Introduction

This report seeks to review the opportunities and constraints in relation to development of the subject site.

### A.2 Street and Site Context Plan

**Address:** 55 Edgeworth David Avenue, Waitara

**Lot/DP:** A/DP309668

**Land area:** 847.3m<sup>2</sup> based on site survey.

**Frontage:** 15.240m based on site survey.

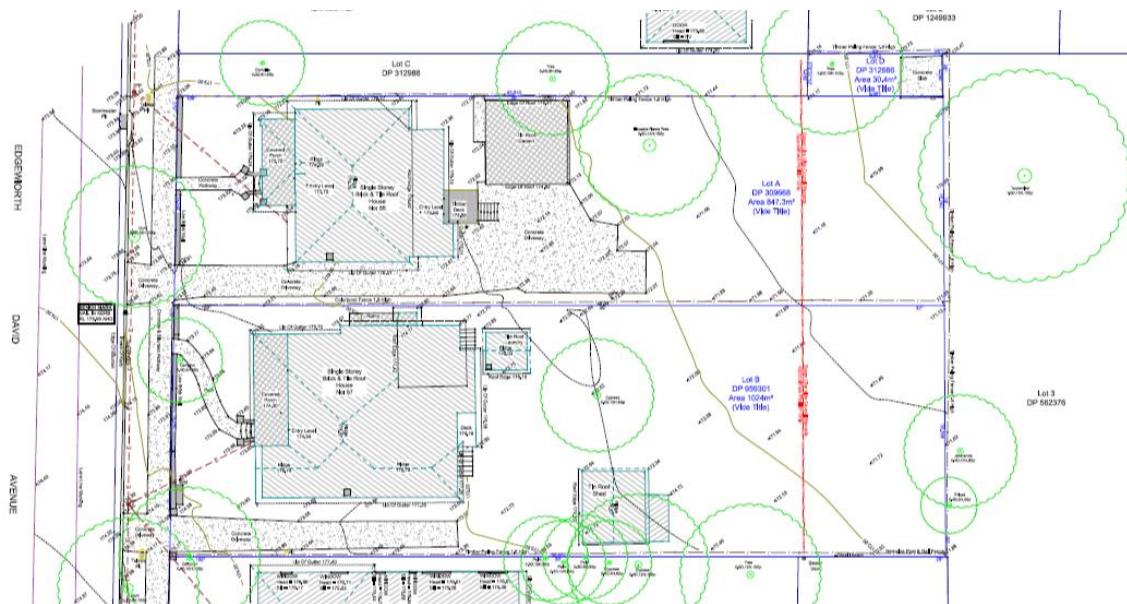
**Address:** 57 Edgeworth David Avenue, Waitara

**Lot/DP:** B/DP959301.

**Land area:** 1,024m<sup>2</sup> based on site survey.

**Frontage:** 18.290m based on site survey.

The following site plan identifies topography, site orientation and layout.



*Survey (Source: Hammond Smeallie & Co 2025).*

The subject sites are rectangular in shape and orientated in a north to south direction.

More specifically, 55 Edgeworth David Avenue (number 55) is approximately 15.24m by 56.04m and 57 Edgeworth David Avenue (number 57) is approximately 18.29m by 56.452m in size, the sites when amalgamated will have a combined 33.53m frontage. The properties are 847.3m<sup>2</sup> and 1,024m<sup>2</sup> by survey respectively or 1,871.3m<sup>2</sup> in total.

The sites contain existing residential dwellings to the southern end of the lot with large open backyards. The sites have a notable cross fall of approximately 3.42m from a nominal RL174.17 at the SE corner to RL170.75 at the NW corner.

## B | Report Methodology

### B.1 Process

This report looks to review at a high level, the architectural and planning opportunities based on the constraints of the subject site to then identify a possible development layout of the site. This will then be used to inform a future architectural design development which is not included in this report.

The type of development is client specific, and this report does not include all development types. In this case, this report focuses solely on development under the *Low and Mid-Rise Housing Policy* (Housing SEPP) detailed in **Chapter 6** of the ***State Environmental Planning Policy (Housing) 2021***.

Part E of this report reviews the sites' development potential and clarifies the preferred architectural option.

### B.2 Limitations

This report has been prepared as a desktop service and does not include a physical inspection of the site and its surrounds. The report looks to review the planning and physical attributes of the site that may or not make it suitable for the proposed architectural works.

Further advice should also be sought from a solicitor in relation to all restrictions that may exist on title which are not part of this report. Additionally, further advice should also be sought from a quantity surveyor as no cost analysis of the proposed works is proposed by or should be inferred from this report.

The report is to be taken as guidance only. No financial decision shall be based on this report.

## C | Planning Controls

### C.1 Development Type

The Housing SEPP considers the following development types:

**Dual Occupancies** - means 2 dwellings on one lot of land (whether they are attached or detached to each other), but does not include a secondary dwelling.

**Semi-detached dwellings** - means a dwelling that is on its own lot of land and is attached to only one other dwelling.

**Attached dwellings** - means a building containing 3 or more dwellings, where—  
(a) each dwelling is attached to another dwelling by a common wall, and  
(b) each of the dwellings is on its own lot of land, and  
(c) none of the dwellings is located above any part of another dwelling.

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

**Multi dwelling housing (terraces)** - means multi dwelling housing where all dwellings are attached and face, and are generally aligned along, 1 or more public roads.

**Residential flat buildings** - means a building containing 3 or more dwellings, but does not include an attached dwelling, co-living housing or multi dwelling housing.

**Shop top housing** - means one or more dwellings located above the ground floor of a building, where at least the ground floor is used for commercial premises or health services facilities.

## C.2 Housing SEPP Area Type

### C.2.1 Low and Mid-Rise Housing Area

The site is mapped as an Indicative LMF Housing Area.



(Source: Spatial Portal 2025).

### C.2.3 Land Zoning

The site is mapped as R2 zoned land.



Permissible Uses (Source: HLEP 2025).

Zone R2 (Low Density Residential) permits:

3 Permitted with consent

Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Dwelling houses; Educational establishments; Emergency services facilities; Exhibition homes; Flood mitigation works; Group homes; Home-based child care; Home businesses; Information and education facilities; Oyster aquaculture; Places of public worship; Pond-based aquaculture; Public administration buildings; Recreation areas; Recreation facilities (outdoor); Respite day care centres; Roads; Tank-based aquaculture; Tourist and visitor accommodation; Veterinary hospitals; Water reticulation systems

## C.3 Does the Housing SEPP apply to this land? (cl. 164)

The following site constraints are noted from the NSW Planning Portal Spatial viewer, this includes the *Hornsby Local Environmental Plan 2013* (HLEP).

Chapter 6 of the Housing SEPP applies to the whole of the State, other than the following:

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**C.3.1(a) Bushfire Prone Land Map**

The site is not mapped as affected.

**C.3.1(b) Coastal Vulnerability Area or a Coastal Wetlands & Littoral Rainforests Map**

The site is not mapped as affected.



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**C.3.1(c) TOD (Chapter 5) Map**

The site is not mapped as affected.

**C.3.1(d) Heritage Map**

The site is not mapped as affected.



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**C.3.1(e) LGA Areas**

Not applicable.

The LGA of the subject site is not listed at *Clause 164(1)(e)* of the Housing SEPP.

**C.3.1(g) Flooding Planning Areas**

Not applicable.

The LGA of the subject site is not listed at *Clause 164(1)(g)* of the Housing SEPP.

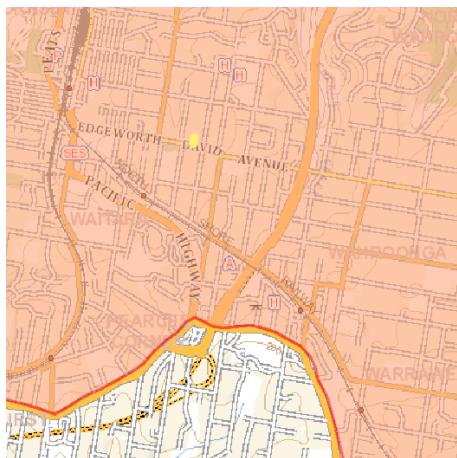
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### C.3.1(e)(i) Flood Prone Land in the Hawkesbury-Nepean Catchment (HNC)

The site is mapped as being in the HNC.

### C.3.1(e)(ii) Flood Prone Land

The site is not mapped as being a 1% AEP Flood Control Lot however, the s10.7 notes at clause 9.2 that the land may be affected by the probable maximum flood (PMF).



Further advice should be sought from a civil engineer before proceeding with design development.

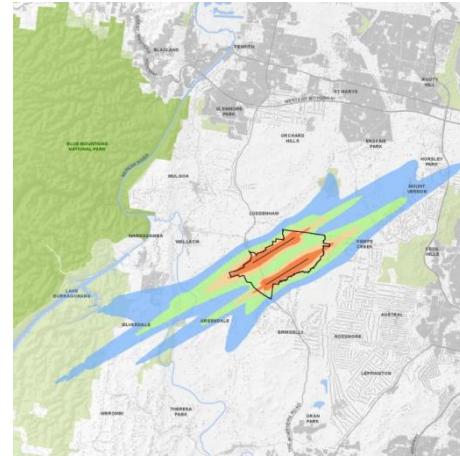
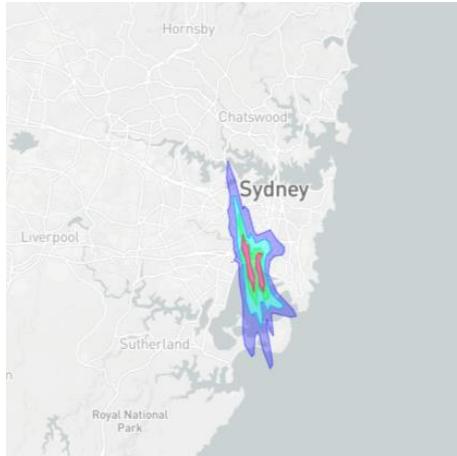
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### C.3.1(f)(i) ANEC Contours (Sydney Airport)

The site is not mapped as affected

### C.3.1(f)(ii) ANEF Contours (Western Sydney Airport)

The site is not mapped as affected



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### C.3.1(g) Deferred Transport Oriented Development stations

Not applicable.

The site is not within 800m of the railway, metro or light rail stations listed in *Schedule 12* of the Housing SEPP.

### C.3.1(h) Pipeline

We are not aware of any pipelines proximate to the subject site however, further advice from a civil engineer and town planner should be sought before proceeding with design development.

### C.3.1(i) Deferred TOD Map

The site is not mapped as affected.



### C.3.1(j) Accelerated TOD Map

The site is not mapped as affected.



### C.4 Road Type

Edgeworth David Avenue is identified as a Designated Road in *Appendix C* of the HDCP. It is also recorded as a Classified Road under the *Roads Act 1993*. These designations affect some development standards.

### C.5 Summary of Key Housing SEPP Design Standards

*The following table surmises the applicable non-discretionary development standards in the Housing SEPP.*

For R2 zoned low & mid-rise housing outer areas only	Development Type			
	Dual occupancies and semi-detached dwellings	Attached dwellings & multi dwelling housing	Multi dwelling housing (terraces)	Residential flat buildings and shop top housing
<b>Non-discretionary development standards</b>				
Tree Canopy Guide		Yes		No
Min. lot size	450m <sup>2</sup>	600m <sup>2</sup>		500m <sup>2</sup>
Min. lot width		12m	18m	12m
Min. car parking		1 per dwelling		0.5 per dwelling
Max. FSR	0.65:1		0.7:1	
Max. building height			9.5m	
<b>Non-discretionary development standards—subdivision (excl. strata)</b>				
Dwellings per lot	1	N/A	1	N/A
Lot width	6m		6m	
Lawful access	Yes		Yes	
Min. lot size	225m <sup>2</sup>		165m <sup>2</sup>	
Battle-axe	No		N/A	

### C.10 Summary of Key HDCP Design Standards

The following table surmises the development standards in Part 3.2 of the HDCP. It should be noted that this document is not referenced in the Housing SEPP and currently only applies to R3/R4 zoned land. Whilst this document is not referenced in the SEPP, where the SEPP, HLEP or DCP do not contain a standard, the HDCP may provide guidance.

*The provisions in Section 3.2 apply to residential development which typically includes dwellings that are known as villas, town houses, row houses, terrace houses and residential flat buildings (RFB) up to 2 storeys.*

Development Type		
<b>3.2 Medium Density Housing (non-corner sites)</b>	Villas, town houses, row houses and terrace houses	Residential flat buildings
Min. site width	Refer to Housing SEPP	
Max. building height	Refer to Housing SEPP	
Max. roof pitch	25 degrees, 2m wide dormers are permissible	
<b>3.2.4 Setbacks</b>		
Setbacks – front	9m to designated roads	
Setbacks – side	3m when orientated front to rear, 6m if orientated otherwise	6m reducing to 3m for max. 1/3
Setbacks – rear	6m	
Setbacks – basement parking	6m (front), 3m (side) and 4m (rear)	
<b>3.2.6 Landscaping</b>		
Deep soil – front	Min. 50%	
Deep soil – width	6m (front), 3m (side) and 4m (rear)	
Existing trees	Retain where possible, otherwise replace	
<b>3.2.7 Open Spaces</b>		
Private Open Space (POS) - must connect to living space	24m <sup>2</sup> with min. 3m dimension (townhouses)	1B (10m <sup>2</sup> ), 2B (12m <sup>2</sup> ), 3+B (16m <sup>2</sup> ) with min. 2.5m dimension
Communal Open Space (min 10 dwellings)	N/A	Min. 50m <sup>2</sup> with min. 4m dimension
<b>3.2.9 Sunlight and Ventilation</b>		
Sunlight - dwellings	3 hours on 22/6 to 70% of dwellings (at least half of the dwelling's principal living room windows and principal POS area) between 9am and 3pm.	
Sunlight (communal open space)	N/A	2 hours on 22/6
Natural cross ventilation - dwellings	Min. 2 external walls	60% dual aspect
<b>3.2.12 Vehicle Access and Parking</b>		
Driveways	Setback 2m to side boundary & not gun barrel	
Parking (above ground)	Max. 50% any elevation & max. contiguous garage width of 6m	
Parking numbers	No maximum rates so refer to Housing SEPP	

## C.11 Summary of Key Low-Rise Housing Diversity Design Guide Standards

Planning NSW developed the [Low-Rise Housing Diversity Design Guide](#) (HDG) for the *Low-Rise Housing Diversity Code* to help Council's assess development applications (DAs) for manor houses and terraces for Councils until they develop their own DCPs. The *Low-Rise Housing Diversity Code* is *Part 3B of the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008*, which is not to be confused with the *State Environmental Planning Policy (Housing) 2021* which is the SEPP referenced in this report.

The following table surmises the development standards in the HDG. Whilst this document is not referenced in the Housing SEPP, where the SEPP, HLEP or DCP do not contain a standard, the HDG may provide guidance.

Development Type				
<b>HDG for Development Applications on R2 (non-corner sites)</b>				
<b>2.1A, 2.2A, 2.3A &amp; 2.4A - Building Envelopes</b>				
2.1 Dual Occupancy (Side by Side)	2.2 Manor house & dual occupancy (one above the other, max. 4 dwellings)	2.3 Terraces	2.4 Multi Dwelling Housing	
Max. building height	Refer to Housing SEPP			
Max. storeys	2			
Setbacks – front	9m to a classified road			

Setbacks – side	Lot width 0-24m (0.9m) & 24-36m (1.5m) up to 4.5m height then use equation	1.5m up to 10m from front building line then >10m past front building line, 45° plane above 3m.	1.5m	1.5m to 10m from front building line then, above 4.5m height, setback = height - 3m		
Setbacks – rear	Lot area 900-1,500m <sup>2</sup> (5m up to 4.5m height then 12m) or >1,500m <sup>2</sup> (10m up to 4.5m height then 15m)	Lot area 0-1,500m <sup>2</sup> (6m up to 4.5m height then 10m) or >1,500m <sup>2</sup> (10m up to 4.5m height then 15m)	Lot area 900-1,500m <sup>2</sup> (5m up to 4.5m height then 12m) or >1,500m <sup>2</sup> (10m up to 4.5m height then 15m)	6m		
<b>2.1B, 2.2B, 2.3B &amp; 2.4B - Gross Floor Area</b>						
Gross Floor Area	Refer to Housing SEPP					
<b>2.1C, 2.2C, 2.3C &amp; 2.4C - Landscaped Area</b>						
Min. landscape area	50% of parent lot minus 100m <sup>2</sup>		30%			
Min. landscape dim.	1.5m					
Min. landscape (front)	25% of the area forward of building line		50%			
Min. landscape (rear)	50% of total must be behind building line		N/A			
Existing mature trees	Mature trees are to be retained, particularly those along the boundary					
<b>2.1G, 2.2G, 2.3G &amp; 2.4G - Orientation, Siting and Subdivision</b>						
Min. lot size & width	Refer to Housing SEPP					
GF max. RL & NGL (over basement)	+1.3m (above) -1m (below)		+1.3m (above) & -1m (below) However, over basement is exempt			
<b>2.1H, 2.2H, 2.3H &amp; 2.4H - Solar and Daylight Access</b>						
Solar Access	3 hours on 21/6 to dwellings (a living room & principal POS area) between 9am and 3pm.	3 hours on 21/6 to 75% of (a living room & principal POS area) between 9am and 3pm.	2 hours on 21/6 to dwellings (a living room & principal POS area) between 9am and 3pm.			
<b>2.1K, 2.2K, 2.3K &amp; 2.4K - Dwelling Size and Layout</b>						
Min. floor area	1B (65m <sup>2</sup> ), 2B (90m <sup>2</sup> ), 3+B (115m <sup>2</sup> ) + 5m <sup>2</sup> per bathroom >1	Studio (35m <sup>2</sup> ), 1B (50m <sup>2</sup> ), 2B (70m <sup>2</sup> ), 3+B (90m <sup>2</sup> ) + 5m <sup>2</sup> per bathroom >1	1B (65m <sup>2</sup> ), 2B (90m <sup>2</sup> ), 3+B (115m <sup>2</sup> ) + 5m <sup>2</sup> per bathroom >1			
Min. bedroom dim.	3m excl. wardrobe					
Min. living/dining area	1-2B (24m <sup>2</sup> ), 3+B (28m <sup>2</sup> )					
Min. living/dining width	4m excl. fixtures					
<b>2.1L, 2.2L, 2.3L &amp; 2.4M - Principal Private Open Spaces (POS)</b>						
Min. area (behind front building line)	16m <sup>2</sup> with min. dimension of 3m	<1B (8m <sup>2</sup> ), 2+B (12m <sup>2</sup> ) GF (16m <sup>2</sup> )	45m <sup>2</sup> with min. dimension 4m	45m <sup>2</sup> with min. dimension 5m		
<b>2.1N, 2.2N, 2.3N &amp; 2.4N - Car and Bicycle Parking</b>						
Car parking	Refer to Housing SEPP					
Visitor parking (in basements)	N/A		1 per 5 dwellings (>10 dwellings)	1 per 5 dwellings (>5 dwellings)		
Bicycle parking	1 per dwelling					

Where controls in the HDCP or HDG directly conflict with the Housing SEPP eg: GFA, the SEPP takes precedence.

## C.12 Apartment Design Guide Standards

Planning NSW developed the *Apartment Design Guide (ADG)* which provides design criteria and general guidance about how development proposals can achieve the 9 design quality principles identified in *Schedule 9 of State Environmental Planning Policy (Housing) 2021*.

Given the ADG only applies to 3 storey RFB's (cl. 144.3.b), it has not been considered further in this report.

## D | Architectural Design considerations

The following architectural design considerations.

### D.1 Previous Applications

There are no previous applications for the subject sites recorded in the Council's property search tool.

#### D1.1 55 Edgeworth David Avenue

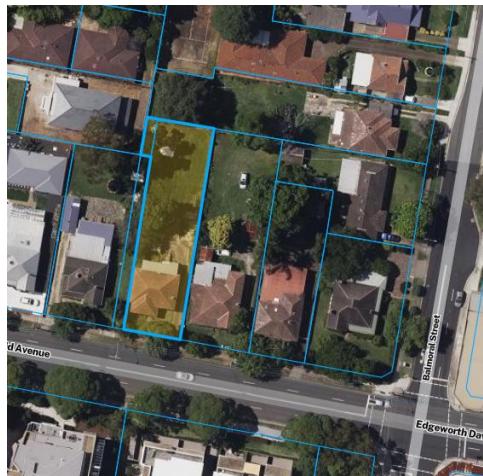
No applications were noted on Council's online tracker.

#### D1.1 57 Edgeworth David Avenue

No applications were noted on Council's online tracker.

### D.2 Existing Buildings

The amalgamated sites currently contain two existing single storey brick and tiled roof dwellings and associated outbuildings. These will need to be demolished to facilitate the proposed development.



Aerial view (Source: NSW Planning 2025).

The property to the west is a narrow lot of land identified as Lot C DP312986 in the survey which based on the fencing pattern appears to be associated with 53 Edgeworth David Avenue. Number 53 contains a single brick & tile storey detached bungalow with a weatherboard and metal roof secondary dwelling at its rear. The primary dwelling is set back approximately 6.75m from the common side boundary whilst the secondary dwelling is set back approximately 3.91m from the common side boundary.

The rear boundary adjoins a further three properties, the north-western boundary adjoins a small pocket of land identified as Lot D DP312986, it is unclear to which parent lot this land is connected however based on the fencing pattern, it is assumed this land is also associated with 53 Edgeworth David Avenue. The rear and northern boundary adjoins the rear yard of 57 Balmoral Street. The north-easterly boundary adjoins the rear of contemporary dwelling being 57A Balmoral Street.

The property to the east is a single storey brick and tile/tin roofed dwelling. The dwelling is set back approximately 1.11m from the common side setback.

### **D.3 Topography**

The sites have a considerable cross fall of approximately 3.42m from a nominal RL174.17 on the SE corner to RL170.75 on the NW corner. This will affect pedestrian and vehicular access and building floor levels and will need to be carefully considered further in design development.

### **D.4 Biodiversity & trees**

The site is not mapped as affected by biodiversity.

There are three trees located on the lot with a further fourteen proximate to the lots' boundaries. Any proposed development would need to consider trees on the subject lots as well as proximate trees on adjoining lots.

An Arboricultural Impact Assessment will be undertaken for a Development Application to assess the value of existing trees on the site that are proposed to be removed to facilitate the development, and management measures for those trees proposed to be retained.

### **D.5 Heritage Impact**

The site is not mapped as affected.

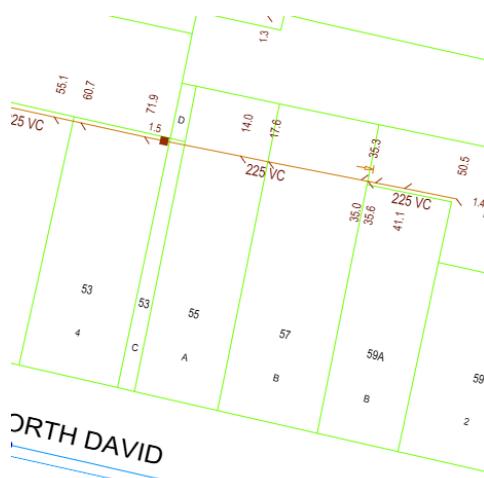
### **D.6 Access & transport**

Vehicular access will need to be provided to a public road, in this case Edgeworth David Avenue. There is currently one (1) street tree, one (1) stormwater kerb inlet and two (2) proximate telegraph poles. Whilst poles and pits may be able to be moved (at the developer's expense), the driveway crossover location will be constrained as it will need to be located to consider these site constraints.

A Traffic Impact Assessment (TIA) to assess key traffic considerations in relation to the site and its development will need to be obtained and evaluated by a traffic engineer as part of a Development Application and to guide the architectural design.

### **D.7 Sewer Drainage**

Sydney Water assets are mapped within the site boundaries.



The sewer main bisects the properties in an east-west direction approximately 10.32m from the rear boundary. Whilst the property would have ready access to this existing sewer main, proposed construction works cannot unduly impact this infrastructure. This physical constraint that will need to be considered during the design development to guide the architectural design.

A qualified plumbing contractor (for the sewer peg out) and a section 73 coordinator (also known as a water servicing engineer/coordinator) will need to be engaged during the design development to establish the methodology for draining the site and mitigating any proposed impact on the noted assets.

#### **D.8 Stormwater Drainage**

As part of any subdivision, the developer must dispose of on-site stormwater in an orderly and lawful manner.

Drainage should ideally connect directly by gravitation to the street however, as this site falls to the rear an inter allotment drainage easement may be required which would increase the cost of construction and complexity of the stormwater drainage design.

Analysis of the sites' water and stormwater conditions will need to be prepared by a civil engineer as part of a Development Application.

#### **D.9 Sunlight (Solar) Access**

The sites have a north to south orientation with north to the rear of the lot which is also the lowest point of the site. This is ideal as any built form will overshadow towards the street and proposed private open space can be located be towards the rear. Due to the depth of the site, any dwelling/s constructed to the rear will naturally overshadow the front dwellings including the open space however the fall to the rear will mitigate this.

Any design will need to orientate the living rooms of the dwellings to the north whilst concurrently mitigating impacts of intra-property overshadowing of proposed dwellings on site.

#### **D.10 Visual and Acoustic Privacy**

Visual privacy balances site and context specific design solutions with views, outlook, ventilation and solar access. The adjacent context, site configuration, topography, the scale of the development and the dwelling layout all need to be considered.

Acoustic privacy is about protecting sound transmission between external and internal spaces, between apartments and communal areas and between dwellings and their neighbours.

The architectural design should consider the visual and acoustic privacy of the development both on site but also from and towards adjacent properties.

Further site investigation would need to be undertaken during design development to ascertain the constraints posed by the site.

## **E | Possible Site Layout**

For the purposes of this report, whilst each lot may be developed on its own (subject to lot area and width standards) it is assumed that the two individual lots are amalgamated to create a larger single site for development as this removes the need for side setbacks to the common central boundary.

The following site layouts at **Appendices A & B** are not a concept design but rather block massing of the site to establish the potential conceptual design on the site by exploring the known site opportunities and constraints noted above.

Given this report only provides for a review at a high level of the architectural and planning opportunities based on the available design standards and constraints of the subject sites, it is important to note from the outset that this report does not consider all design standards which are considered beyond the scope of this report and will need to be considered further as part of any design development.

## **E.1 Design Standards**

We note:

1. Whilst it may provide guidance, currently, the **Part 3.2 of the HDCP does not apply to R2 zoned land**.
2. Whilst it may provide guidance, currently, the **HDG does not apply to the Housing SEPP or RFBs**.
3. Whilst it may provide guidance, currently, the **ADG does not apply to 2 storey RFBs**.
4. As a result of the above, there are currently **no definitive design standards** that apply to development of the subject sites under *Chapter 6* of the Housing SEPP.

For the purposes of this report, we have made assumptions about the preferable design standards which varies based on the development type and has been noted below for each option.

## **E.2 Development Type**

Based on the Housing SEPP, the available development types include:

- **Dual occupancies and semi-detached dwellings**
- **Attached dwellings & multi dwelling housing**
- **Multi dwelling housing (terraces)**
- **Residential flat buildings and shop top housing**

### **E.2.1 Development Type - Dual occupancies (side by side) and semi-detached dwellings**

Based on the definition in the Housing SEPP and the minimum lot size and lot width, it may be possible to develop each lot individually with a **dual occupancy**.

The Housing SEPP and both the HDCP (not R2 however) and HDG have detailed standards for this type of development.

Based on the amalgamated frontage of 33.53m, this development type would only yield 4 dwellings, 2 on each lot. The site has a depth of approximately 56m which does not configure efficiently with this development type. In addition to this, dual occupancies cannot be sub-divided under the Housing SEPP to create a battle-axe lot (does not apply to strata).

Given the above, this development type is not considered a preferable architectural outcome.

### **E.2.2 Development Type - Attached dwellings & multi dwelling housing**

Based on the definition in the Housing SEPP and the minimum lot size and lot width, it may be possible to develop each lot individually (or by amalgamation) as **multi dwelling housing**.

The Housing SEPP and both the HDCP (not R2 however) and HDG have detailed standards for multi-dwelling housing.

The number of dwellings will depend on the development standards and the opportunities and constraints for the site. This type of development cannot be subdivided under the Housing SEPP (does not apply to strata).

Noting the above, this development type may provide a preferable architectural outcome and has been explored further at **Appendix A**.

### **E.2.3 Development Type - Multi dwelling housing (terraces)**

Based on the definition in the Housing SEPP and the minimum lot size and lot width, it may be possible to develop the consolidated lots as **multi dwelling housing (terraces)**.

The Housing SEPP and both the HDCP (not R2 however) and HDG have detailed standards for this type of development however the definition of this type notes that terraces, '*....are generally aligned along, 1 or more public roads.*' Whilst it may be possible to develop the front (south) half of the site with a row of terraces, development of the rear may have to be developed as another type, eg: multi dwelling housing. Given the

implications of the differing development standards, advice would need to be sought from a town planner to establish if this is a viable pathway to approval.

The number of dwellings will depend on the development standards and the opportunities and constraints for the site. This type of development can be subdivided under the Housing SEPP subject to compliance with the relevant standards.

Noting the above, this development type may provide a preferable architectural outcome and has been explored further at **Appendix A**.

#### **E.2.4 Development Type - Residential flat buildings and shop top housing**

Based on the definition in the Housing SEPP and the minimum lot size and lot width, it may be possible to develop each lot individually (or by amalgamation) as **residential flat buildings and shop top housing**.

The Housing SEPP and both the HDCP (not R2 however) has detailed standards for this type of development. The HDG does not consider this type of development. The ADG does not apply unless the development is 3 or more storeys. Significantly, the side setback controls under the HDCP increase from a min. of 3m for villas, town houses, row houses and terrace houses to 6m (can be 3m for max 1/3) for RFBs which is a notable reduction in the available developable land.

The number of dwellings will depend on the development standards and the opportunities and constraints for the site. This type of development cannot be subdivided under the Housing SEPP (does not apply to strata).

Given the above, this development type may be a preferable architectural outcome and has been explored further at **Appendix B**.

#### **E.3 Floor Area**

Floor area refers to the area of floor within the boundary walls/railings, this should not be confused with GFA which is a town planning measurement and is defined as follows.

**Gross floor area (GFA)** means the sum of the floor area of each floor of a building measured from the internal face of external walls, ...measured at a height of 1.4 metres above the floor, and **includes**—

- (a) the area of a mezzanine, and
- (b) habitable rooms in a basement or an attic, and
- (c) any shop, auditorium, cinema, and the like, in a basement or attic, but **excludes**—
- (d) any area for common vertical circulation, such as lifts and stairs, and...
- (e) any basement—
  - (i) storage, and
  - (ii) vehicular access, loading areas, garbage and services, and
- (f) plant rooms, lift towers and other areas used exclusively for mechanical services or ducting, and
- (g) car parking to meet any requirements of the consent authority (including access to that car parking), and
- (h) any space used for the loading or unloading of goods (including access to it), and
- (i) terraces and balconies with outer walls less than 1.4 metres high, and
- (j) **voids** above a floor at the level of a storey or storey above.

#### **E.4.A Design Observations – Option A for Multi Dwelling Housing & (Terraces)**

We note the following broad comments in relation to development as multi dwelling housing & (terraces):

1. **The amalgamated site area and dimensions** are sufficient to accommodate the development types under the Housing SEPP however the required setbacks proportionally consume a substantial part of the site.
2. **Building setbacks** have been accommodated where possible as noted in the HDG. As Edgeworth David Avenue is a Classified Road, the required front setback is 9m. The side setbacks are min. 1.5m however this increases deeper into the lot where multi dwelling housing is proposed. The rear setback is 6m where multi dwelling housing is proposed.

3. The Housing SEPP provides a max. building height however does not address the permissible number of storeys. Both the HDCP and HDG limit the storeys to 2 (except for RFBs). On this basis, the design of all dwellings has been **limited to 2 storeys** at any vertical point. Dwellings 1-4 currently include floor area in an attic style space. For the purposes of this report this attic is not considered a storey.
4. All dwellings have north facing living rooms and POS which may achieve the onsite requirement for **solar access** of the HDCP and HDG. Notwithstanding, the site topography will affect over shadowing and as a solar access study is not within the scope of this report, any future design development will need to consider this further.
5. The proposal currently includes a proposed **dwelling mix** of 2\* 2 bedroom and 6\* 3 bedroom dwellings, 8 in total.
6. Proposed **carparking** includes 5\* enclosed and 4\* unenclosed spaces, 9 in total. The Housing SEPP design standards for car parking require between 6-8 depending on the final development type. Enclosed car parking exceeding the design standards is considered GFA.
7. The proposal provides **private open space (POS)** for each dwelling exceeding 45m<sup>2</sup> which exceeds both the HDCP and HDG however, the configuration of the POS for dwellings 5-8 is split into three separate areas, one of which is forward of the front building line. Given this may not strictly adhere to the design standards, further advice would need to be sought from a town planner to establish if this is a viable option.
8. The proposal provides **landscape areas** (min. 1.5m) along each side boundary as well as 6m in the front setback and the rear 4m for the sites which is capable of compliance with the HDG. The front and rear areas may also be considered **deep soil**. Confirmation of compliance (including with the *Tree Canopy Guide*) should be confirmed with the landscape architect during design development.

The following table articulates the potential internal floor area and GFA based on the proposed building massing in **Appendix A**.

OPTION A - MULTI DWELLING HOUSING & (TERRACES) CONCEPT				
Floor	Room	Floor Area (m <sup>2</sup> )	GFA <sup>1</sup> (yes or no)	GFA <sup>1</sup> (m <sup>2</sup> )
Level 1	Dwelling 1	64m <sup>2</sup>	Yes	64m <sup>2</sup>
	Dwelling 2	82m <sup>2</sup>	Yes (excl. car space)	66m <sup>2</sup>
	Dwelling 3	82m <sup>2</sup>	Yes (excl. car space)	66m <sup>2</sup>
	Dwelling 4	64m <sup>2</sup>	Yes	64m <sup>2</sup>
	Terrace 5	28m <sup>2</sup>	Yes	28m <sup>2</sup>
	Terrace 6	78m <sup>2</sup>	Partially (excl. basement)	53m <sup>2</sup> (approx.)
	Terrace 7	28m <sup>2</sup>	Yes (excl. car space)	12m <sup>2</sup>
	Terrace 8	28m <sup>2</sup>	No (basement)	0m <sup>2</sup>
Level 2	Dwelling 1	67m <sup>2</sup>	Yes (excl. void)	62m <sup>2</sup>
	Dwelling 2	75m <sup>2</sup>	Yes (excl. void)	70m <sup>2</sup>
	Dwelling 3	75m <sup>2</sup>	Yes (excl. void)	70m <sup>2</sup>
	Dwelling 4	67m <sup>2</sup>	Yes (excl. void)	62m <sup>2</sup>
	Terrace 5	62m <sup>2</sup>	Yes	62m <sup>2</sup>
	Terrace 6	62m <sup>2</sup>	Yes	62m <sup>2</sup>
	Terrace 7	62m <sup>2</sup>	Yes	62m <sup>2</sup>
	Terrace 8	62m <sup>2</sup>	Yes	62m <sup>2</sup>
Level 3	Dwelling 1	15m <sup>2</sup>	Yes (excl. void)	10m <sup>2</sup>
	Dwelling 2	37m <sup>2</sup>	Yes (excl. void)	32m <sup>2</sup>
	Dwelling 3	37m <sup>2</sup>	Yes (excl. void)	32m <sup>2</sup>
	Dwelling 4	15m <sup>2</sup>	Yes (excl. void)	10m <sup>2</sup>
	Terrace 5	58m <sup>2</sup>	Yes (excl. void)	53m <sup>2</sup>
	Terrace 6	65m <sup>2</sup>	Yes (excl. void)	60m <sup>2</sup>
	Terrace 7	65m <sup>2</sup>	Yes (excl. void)	60m <sup>2</sup>
	Terrace 8	58m <sup>2</sup>	Yes (excl. void)	53m <sup>2</sup>
<b>TOTALS</b>		<b>1,336m<sup>2</sup><sup>1</sup></b>	<b>-</b>	<b>1,175m<sup>2</sup> or an FSR of 0.63:1<sup>1</sup></b>

<sup>1</sup>The accurate calculation of the proposed GFA is not possible at this stage, the above figures are a guide only.

#### E.4.B Design Observations – Option B for Residential Flat Building

We note the following broad comments in relation to development as a residential flat building:

1. **The amalgamated site area and dimensions** are sufficient to accommodate the development type under the Housing SEPP however the required setbacks proportionally consume a substantial part of the site. This is most notable when a 6m side (reduced for 1/3 to 3m) setback is applied and the remaining area is only approximately 958m<sup>2</sup> or 51% of the amalgamated lot area.
2. **Building setbacks** have been accommodated where possible as noted in the HDCP. As Edgeworth David Avenue is a classified road, the required front setback is 9m. The side setbacks are min. 6m (reduced to 3m for 1/3). The rear setback is 6m.
3. The Housing SEPP provides a max. building height however does not address the permissible number of storeys. On this basis, the design of all dwellings has been **limited to 2 storeys** at any vertical point. The basement cannot be more than 1m above the ground level (existing) at any point on site which has resulted in the partial undercroft car parking design on Level 1.
4. Dwellings 1-2, 5-8 & 11-13 (9 in total) have a north-west aspects to living rooms and POS. Dwellings 3-4 & 9-10 have south-easterly aspect which may not achieve the requirement for **solar access** of the HDCP. Notwithstanding, as a solar access study is not within the scope of this report, any future development will need to consider this further.
5. The proposal currently includes a proposed **dwelling mix** of 3\* 1 bedroom, 5\* 2 bedroom and 5\* 3 bedroom dwellings, 13 in total.
6. Proposed **carparking** includes 4\* enclosed and 9\* unenclosed spaces, 13 in total. The Housing SEPP design standards for car parking only require 7 (13\*0.5) depending on the final number of dwellings. Enclosed car parking exceeding the design standards is considered GFA however unenclosed spaces in an undercroft may be excluded from this. This would need to be considered further with town planning advice during design development.
7. The proposal provides **private open space (POS)** for each dwelling greater than 12m<sup>2</sup> (1B) & 16m<sup>2</sup> (2B+) which exceeds the HDCP.
8. The proposal provides **landscape areas** (min. 1.5m) along each side boundary as well as 6m in the front setback and the rear 6m for the sites which is capable of compliance with the HDCP. The front and rear areas as well as the side areas where they are 3m or greater in size may also be considered **deep soil**. Confirmation of compliance should be confirmed with the landscape architect during design development.

The following table articulates the potential internal floor area and GFA based on the proposed building massing in **Appendix B**.

OPTION B – RESIDENTIAL FLAT BUILDING CONCEPT				
Floor	Room	Floor Area (m <sup>2</sup> )	GFA <sup>1</sup> (yes or no)	GFA <sup>1</sup> (m <sup>2</sup> )
Level 1	Basement	605m <sup>2</sup>	TBC <sup>1</sup>	0m <sup>2</sup> approx. <sup>1</sup>
Level 2	Apartment 1	115m <sup>2</sup>	Yes	683m <sup>2</sup>
	Apartment 2	115m <sup>2</sup>	Yes	
	Apartment 3	65m <sup>2</sup>	Yes	
	Apartment 4	90m <sup>2</sup>	Yes	
	Apartment 5	115m <sup>2</sup>	Yes	
	Apartment 6	90m <sup>2</sup>	Yes	
Level 3	Apartment 7	90m <sup>2</sup>	Yes	721m <sup>2</sup>
	Apartment 8	115m <sup>2</sup>	Yes	
	Apartment 9	115m <sup>2</sup>	Yes	
	Apartment 10	90m <sup>2</sup>	Yes	
	Apartment 11	90m <sup>2</sup>	Yes	
	Apartment 12	65m <sup>2</sup>	Yes	
	Apartment 13	65m <sup>2</sup>	Yes	
<b>TOTALS</b>		<b>1,825m<sup>2</sup></b>		<b>1,404m<sup>2</sup> or an FSR of 0.75:1<sup>1</sup></b>

<sup>1</sup>The accurate calculation of the proposed GFA is not possible at this stage, the above figures are a guide only.

## F | Risks

### F.1 Walking Distance

The walking distance noted at C2.2 is approximately only and based on the provided walking distance as measured in Google. As 800m is the outer limit, before proceeding with the development of the sites, confirmation should be sought from a registered surveyor that the sites are consistent with the definitions noted in *clause 163* of the Housing SEPP.

If they are not, development under the Housing SEPP may not be permissible on the subject site/s.

### F.2 Flood Prone Land

The Hornsby Shire Council flood mapping locates the sites outside the 1% AEP mapped area however, the provided section 10.7 certificates identify the sites are subject to the probable maximum flood (PMF) which may result in the land being classified as *flood prone land* as defined under the Housing SEPP. A civil engineer will need to be consulted to establish if the land is classified as flood prone land.

If the site is classified as flood prone land within the Hawkesbury-Nepean Catchment, development under the Housing SEPP may not be permissible on the subject site/s.

### F.3 Design Guidelines and Planning Controls

Whilst the Housing SEPP addresses the primary planning controls of lot size, lot width, parking, FSR and building height it is silent on many other planning controls that normally apply eg: setbacks, building separation, landscaped area, solar access, privacy and the like.

Planning NSW has previously produced design guides such as the *Low-Rise Housing Diversity Design Guide* and the *Apartment Design Guide* whose goal is to improve design by focusing on factors such as layout, landscaping, private open space, light, natural ventilation and privacy. At the time of preparing this report, no guidance has been provided in relation to the application of these documents or their applicability to the Housing SEPP.

At this stage, it remains unclear whether Council may look to apply its own DCP guidelines or NSW Planning Guidelines to any proposed development application. A town planner will need to be consulted to establish what guidelines may apply.

### F.4 Topography

Given the fall in the site, the architectural design development will need to carefully consider proposed building levels, and particularly the maximum building height, the resulting excavation and fill plus any inclusion of a basement/s in the design which cannot be more than 1m above ground level (existing).

Given the topography of the site, compliance will vary constantly across the site and will need to be considered in detail during design development. This risk is particularly notable with Option B.

### F.5 Gross floor area & storeys

The actual GFA will largely depend on the detailed design of the project and notably whether part/all of Level 1 is a 'basement' by definition under the Housing SEPP. If it is not a basement, even partially, the enclosed floor area that is not defined as being a basement, will be included as GFA. It will also count as a building storey which may prohibit development on Level 3 vertically above or require a substantial reduction in car parking.

A town planner will need to be consulted to advise how this may affect the detailed design.

### F.6 Sewer Infrastructure

Our infrastructure search indicates that the sewer line intersects mid-way through the rear of the lot and will impact the available building area. Developing over a sewer line carries significant risks, including potential

damage to infrastructure, restricted maintenance access, legal and regulatory complications. In some instances, the line may need to be relocated and/or in others, encased, both at the cost of the developer.

A water servicing coordinator will need to be engaged to establish what guidelines may apply and how this may affect the detailed design.

#### **F.7 Stormwater Infrastructure**

Our research indicates there may not be any available stormwater infrastructure (at least lawfully) on site. Introduction of this infrastructure will be at the cost of the developer and may require negotiation and financial compensation to one or more downstream neighbours.

A civil engineer (stormwater) will need to be engaged to establish what guidelines may apply.

## **G | Summary**

The above report makes observations in relation to the opportunities and constraints affecting the subject site.

With all development comes risk, in some cases this risk is minor and in other cases significant. In this instance, the walking distance and flood prone land are notable significant risks and should be clarified before any further design development occurs.

If permissible and once consolidated, the sites may be capable of accommodating the numerical requirements of the Housing SEPP, the HDCP and/or HDG however, the constraints posed by the setbacks (notably the front and sides for RFBs) and topography may mean that it is not possible to achieve the max. permissible development density listed within the Housing SEPP.

Additionally, the lack of obvious design standards means that any Development Application will need detailed planning advice and likely a strategic assumption of what if any applicable standards may apply, this may also change over time.

We wish you all the best in your endeavours and look forward to any opportunities to work with you again in the future.

The information contained in this statement is true and accurate to the best of my knowledge.



Murray Ashby  
Architect Registration No. 8055

Thursday 26 June 2025

## Appendix A

SHEET      DRAWING

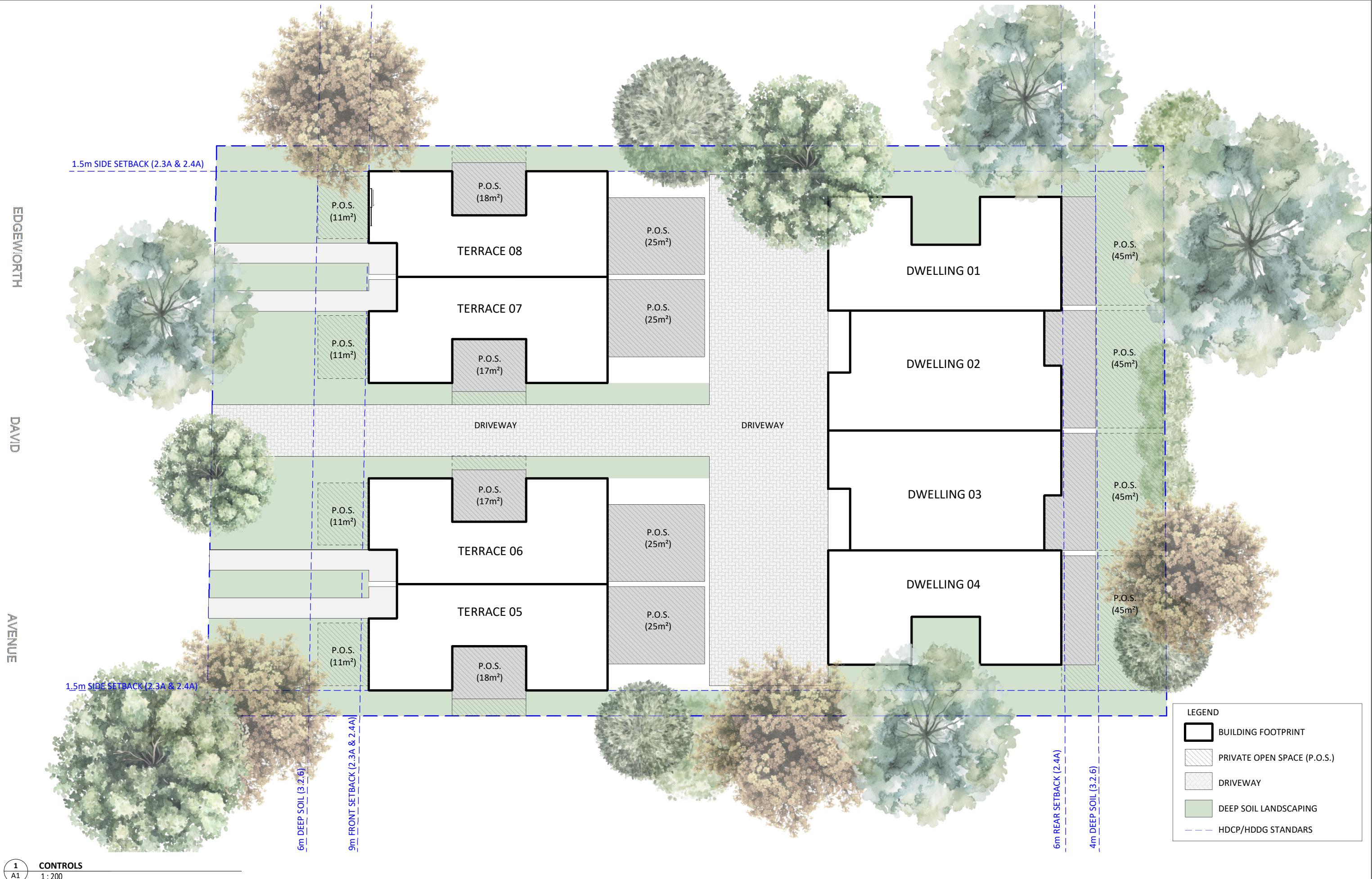
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A2	LEVEL 01
A3	LEVEL 02
A4	LEVEL 03
A5	TYPICAL FLOOR PLANS

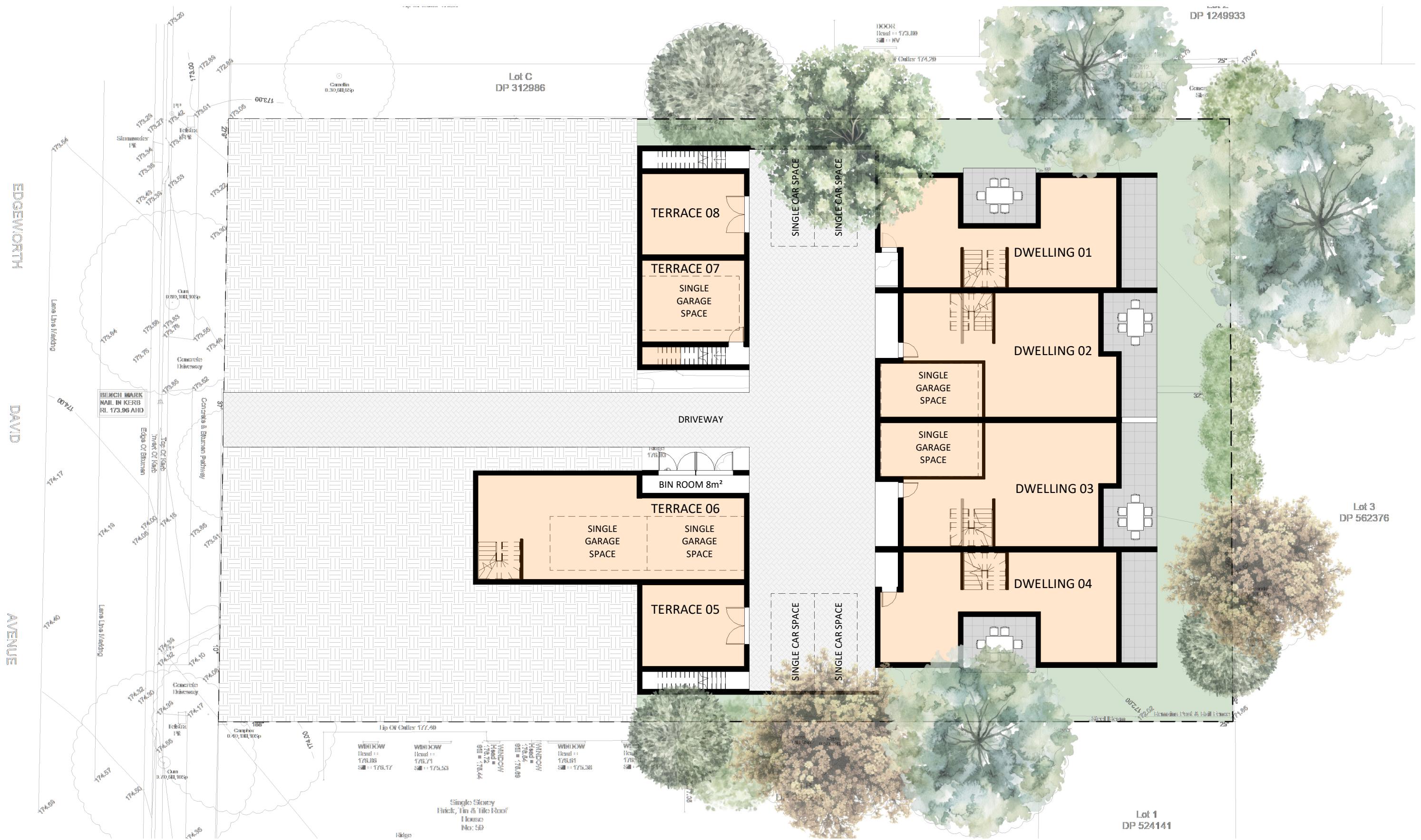


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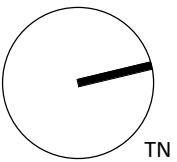
MULTI DWELLING HOUSING & (TERRACES)  
55-57 EDGEWORTH DAVID AV.  
WAITARA NSW 2077





1  
A2  
1: 200

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# MULTI DWELLING HOUSING & (TERRACES)

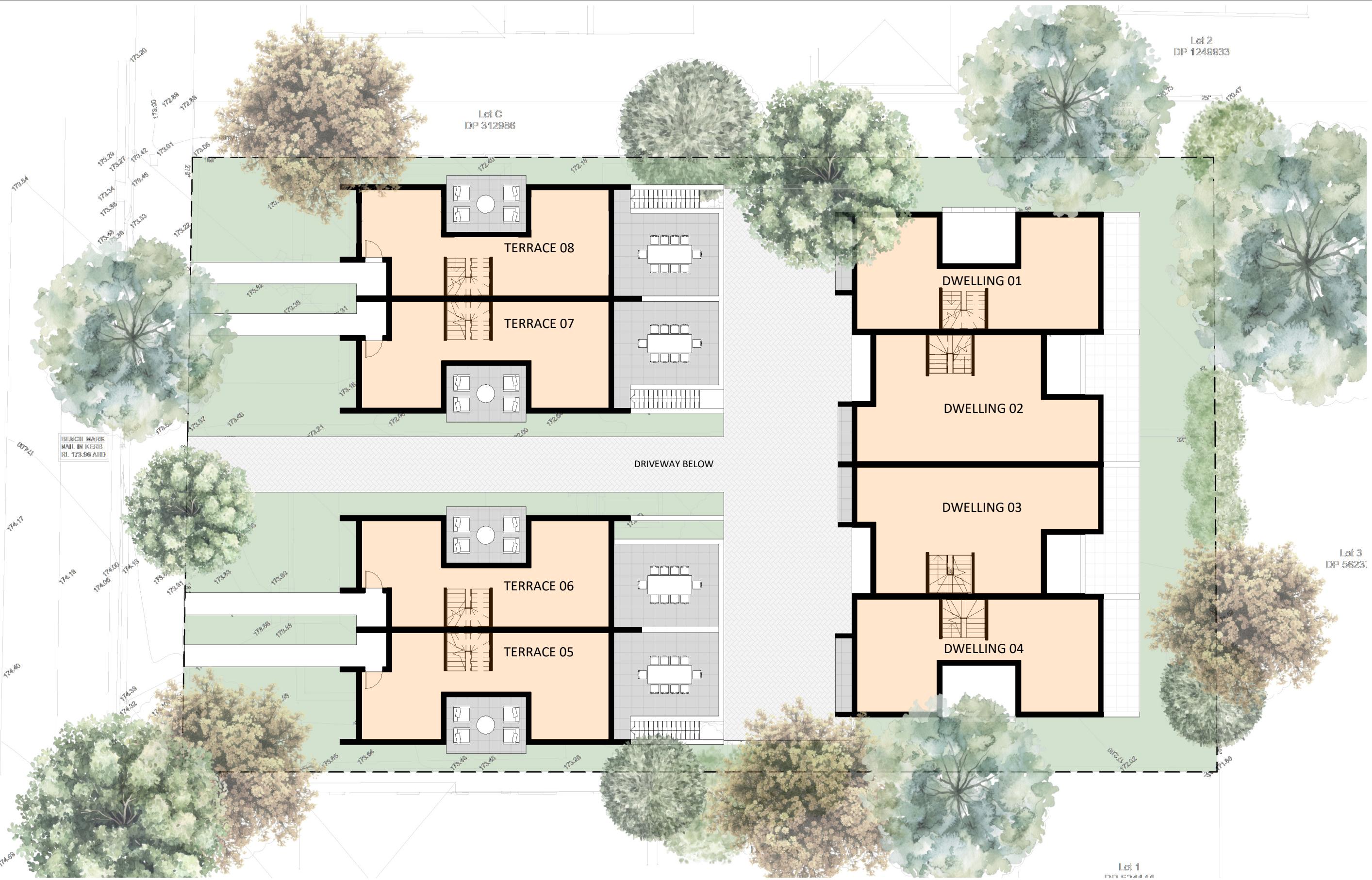
## LEVEL 01

25/06/2025

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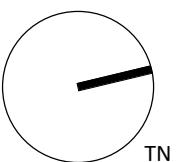
55-57 EDGEWORTH DAVID AV.  
WAITARA NSW 2077

# A2



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LEVEL 2 GF - SK  
1 : 200

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# MULTI DWELLING HOUSING & (TERRACES)

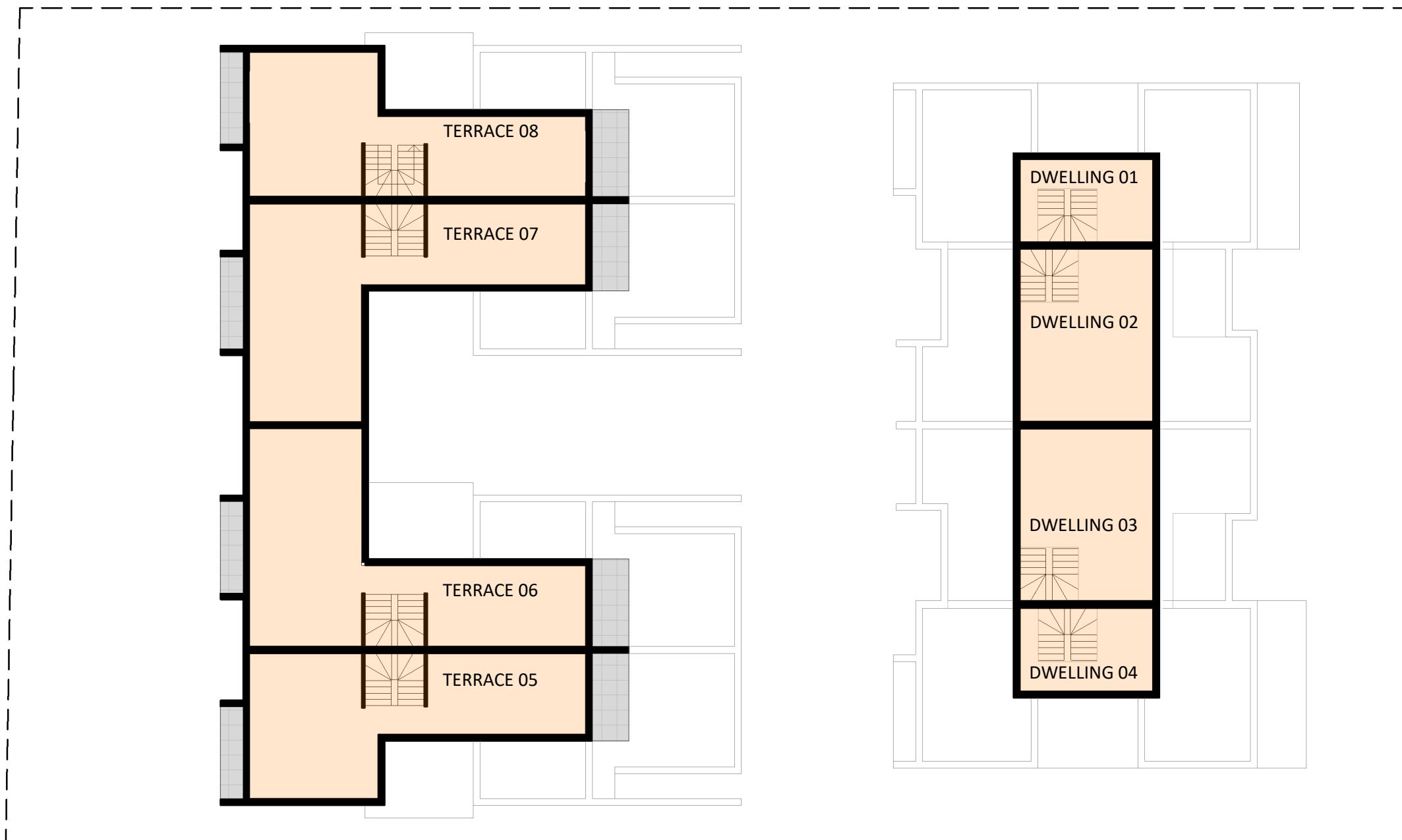
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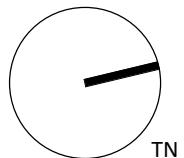
55-57 EDGEWORTH DAVID AV.  
WAITARA NSW 2077

# A3



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A4  
LEVEL 3 FF - SK  
1:200

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MULTI DWELLING HOUSING & (TERRACES)  
LEVEL 03  
25/06/2025

SKETCH DESIGN  
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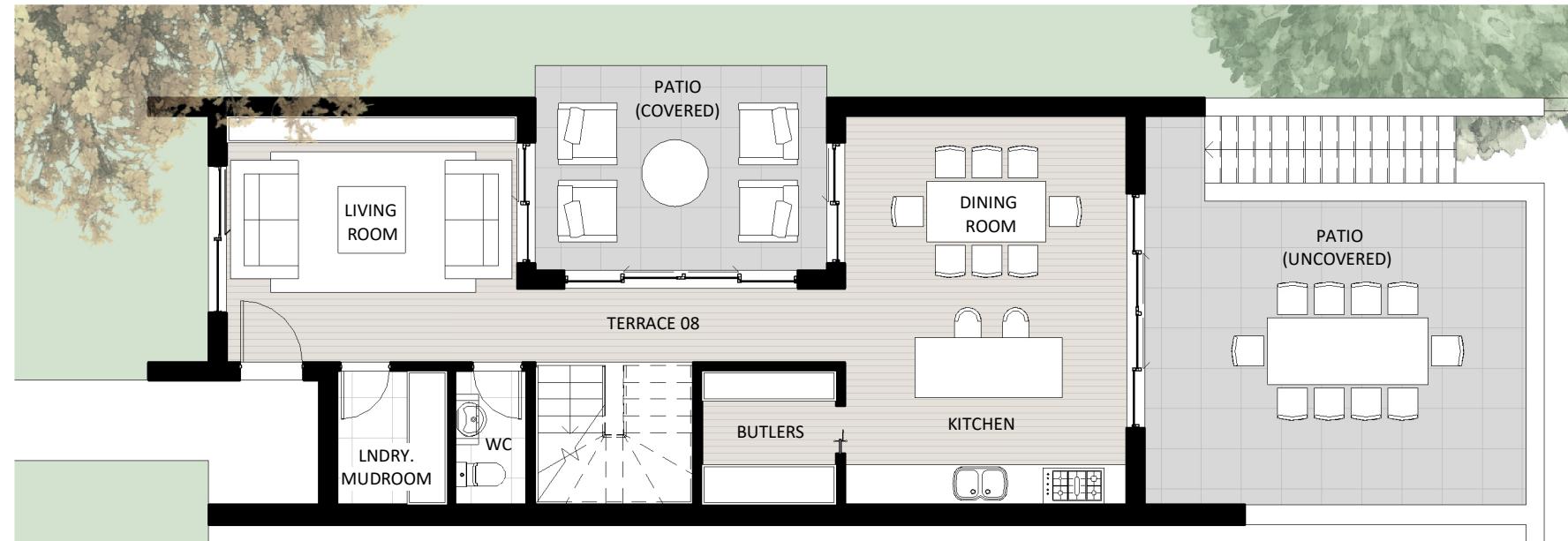
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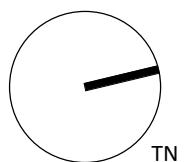
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1:100



3  
A5 LEVEL 3 FF - FLOOR PLAN  
1:100



2  
A5 LEVEL 2 GF - FLOOR PLAN  
1:100



## Appendix B

SHEET      DRAWING

SHEET	TITLE
B1	CONTROLS
B2	LEVEL 01
B3	LEVEL 02
B4	LEVEL 03



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**RESIDENTIAL FLAT BUILDING**  
**55-57 EDGEWORTH DAVID AV.**  
**WAITARA NSW 2077**

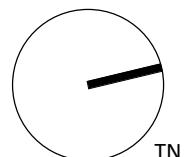
EDGEWORTH

DAVID

AVENUE

1  
B1  
CONTROLS  
1:200

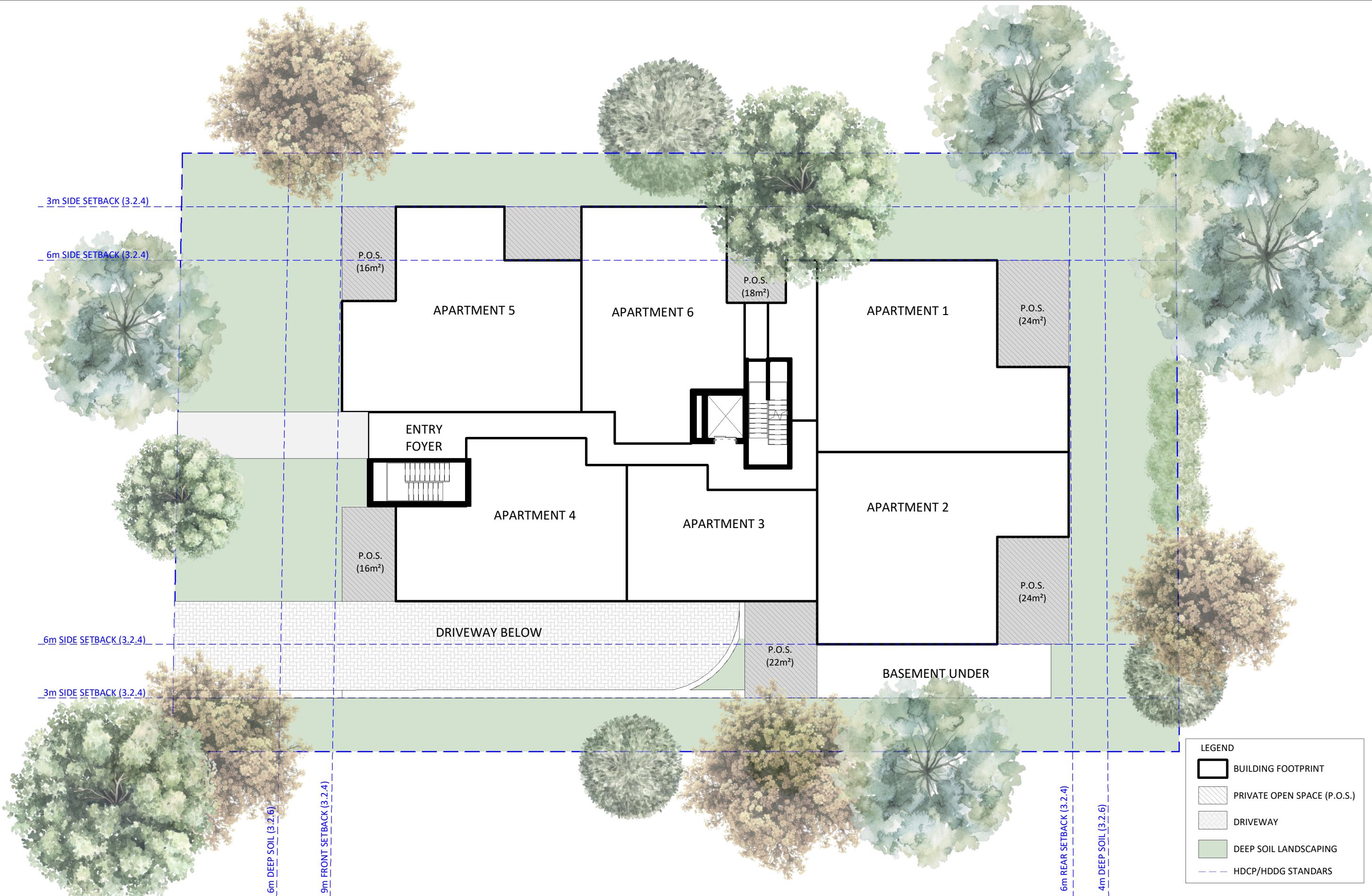
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TN



RESIDENTIAL FLAT BUILDING  
CONTROLS  
25/06/2025

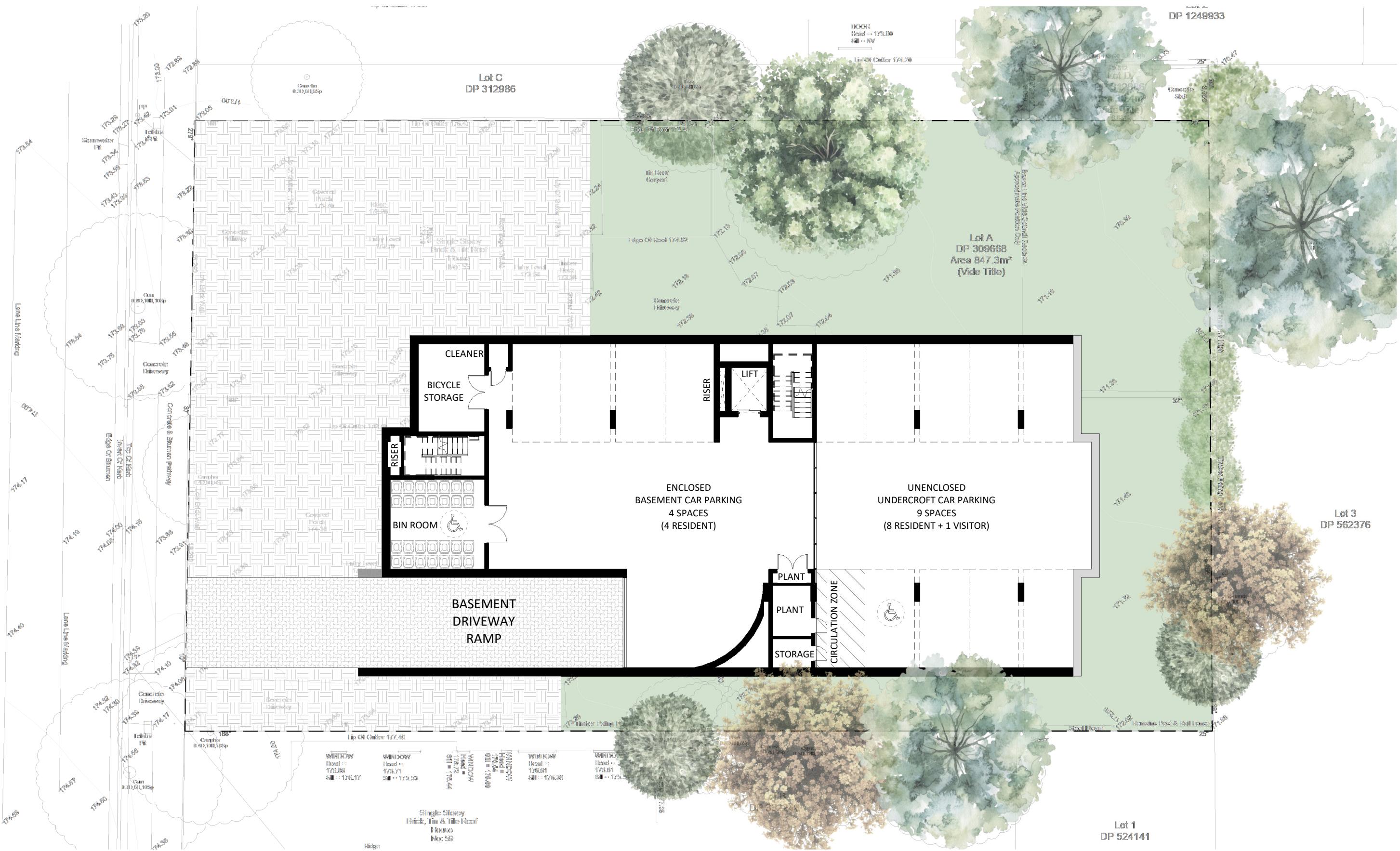
SKETCH DESIGN  
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B1



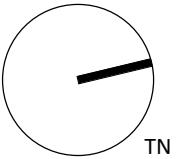
LEGEND

- BUILDING FOOTPRINT
- PRIVATE OPEN SPACE (P.O.S.)
- DRIVEWAY
- DEEP SOIL LANDSCAPING
- HDCP/HDDG STANDARDS



1  
B2  
LEVEL 1 - SK  
1 : 200

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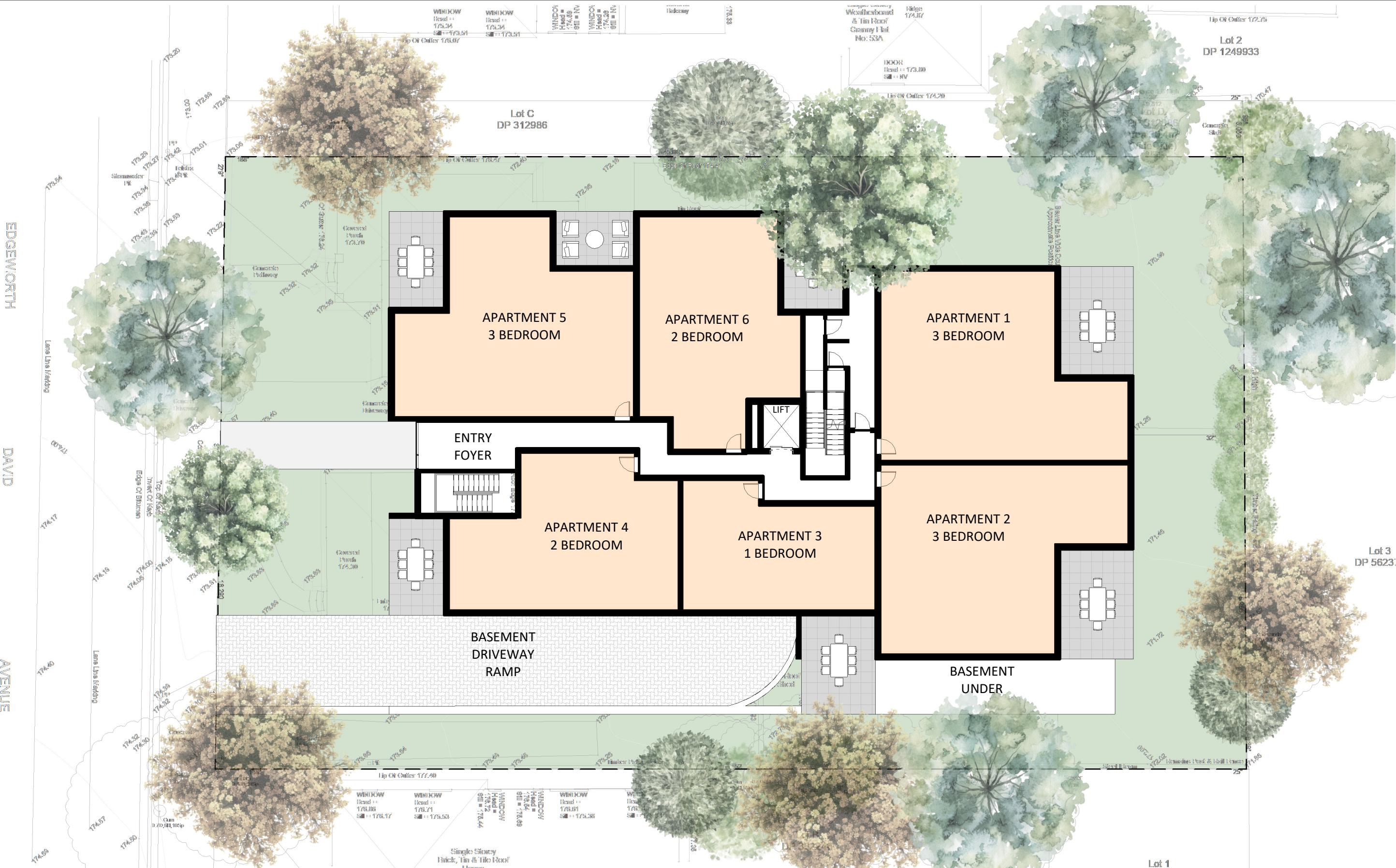


RESIDENTIAL FLAT BUILDING  
LEVEL 01  
25/06/2025

# SKETCH DESIGN

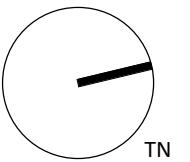
55-57 EDGEWORTH DAVID AV.  
WAITARA NSW 2077

# B2



1  
B3  
LEVEL 2 GF - SK  
1:200

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RESIDENTIAL FLAT BUILDING  
LEVEL 02  
25/06/2025

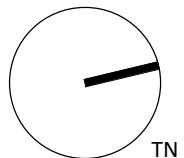
SKETCH DESIGN  
55-57 EDGEWORTH DAVID AV.  
WAITARA NSW 2077

B3



1  
B4  
LEVEL 3 FF - SK  
1:200

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RESIDENTIAL FLAT BUILDING  
LEVEL 03  
25/06/2025

SKETCH DESIGN  
55-57 EDGEWORTH DAVID AV.  
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B4