

Department of Planning, Housing and Infrastructure

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# Riverwood Estate – Revised Proposal

Riverwood Estate State Significant Precinct

May 2024





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Riverwood Estate – Revised Proposal

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# Executive Summary

This report presents the Department's assessment and finalisation of Homes NSW's revised proposal for the Riverwood Estate State Significant Precinct (SSP).

Homes NSW (formerly NSW Land and Housing Corporation) led a detailed master planning process for the Riverwood Estate SSP in consultation with the Department of Planning, Housing and Infrastructure (DPHI), City of Canterbury-Bankstown Council, Georges River Council, Government Architect NSW, the local community and other government agencies.

Homes NSW's original proposal covered an area of 30 hectares and proposed the delivery of close to 3,900 homes. The proposal was scaled back to 420 homes and limited to a portion of the Riverwood Estate near the north-east corner. The revised proposal facilitates earlier delivery of homes for the Riverwood Estate that can be supported with suitable infrastructure and community facilities. It also enables Homes NSW to deliver a higher proportion of social and affordable housing on this part of the estate with 50% social and affordable housing proposed.

The revised proposal was exhibited from 8 March to 8 April and includes the following amendments to planning controls within the *Canterbury-Bankstown Local Environmental Plan 2023*:

- Increased maximum building heights from 11.5 m to part 42 m and part 29 m;
- Increased floor space ratio from 0.9:1 to 2.2:1
- Amendment of Schedule 1 to provide Additional Permitted Uses on certain lands.

The broader masterplan for the remainder of the Riverwood Estate no longer forms part of the SSP proposal and will be further refined in response to the submissions received from all stakeholders. Delivery of the masterplan for the wider Estate will be subject to further application to Government, including further consultation.

The Department's assessment has considered key issues raised in submissions including staging, built form, delivery of social and affordable housing and infrastructure delivery. The Department has recommended the proposal proceed with some further amendments to ensure that issues raised in submissions are appropriately resolved. The proposal will support the delivery of quality housing, including social and affordable housing, within proximity to Riverwood town centre and train station.

# 1 Introduction

The portion of the Estate of the revised scope is located within the previously exhibited master plan, shown on Figure 1. The revised proposal is generally consistent with the exhibited planning controls previously proposed for the wider Estate, with the exception of minor amendments to height and setbacks



**Figure 1: Location of revised proposal within the wider Riverwood Estate**

(Source: Architectus, as quoted in Response to Submissions Report, 2023)

The proposal was amended in response to the 2022 public exhibition process to improve alignment with community expectations and ensure supporting infrastructure via state and local contributions. The revised proposal enables the renewal of a portion of ageing social housing to meet the immediate housing needs of the local community.

The revised proposal involves construction of residential buildings as well as the realignment and upgrading of Virginia Place (within a 20 metre wide road reserve), associated landscaping and public domain upgrades. It proposes to deliver 420 new homes with a tenure mix of 50% social and affordable housing (including housing for key workers) and 50% private market housing. Select retail uses are proposed on the ground floors, including the potential for a supermarket and neighbourhood shops/food and drink businesses.

This report focuses on:

- Public exhibition and consultation undertaken for the revised proposal and the issues raised in the submissions received.
- The Department's consideration of the issues raised and amendments that have been made to address them.
- The Department's assessment of the proposed planning control amendments and design provisions.
- Consistency of the revised proposal in relation to relevant environmental planning instruments (EPIs) and policies.

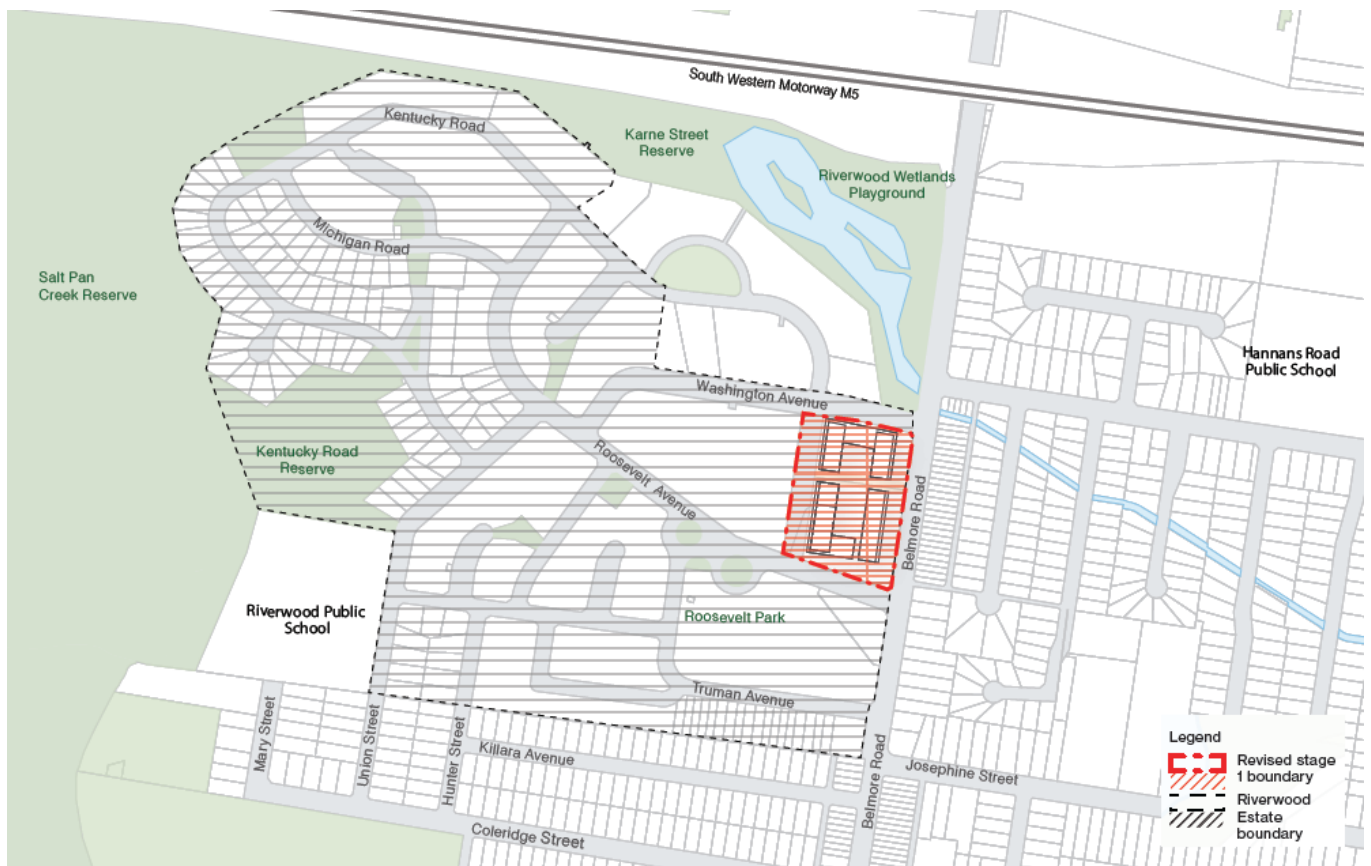
The Department's assessment of the revised proposal is based on documentation submitted by Homes NSW for exhibition, as well as feedback obtained during exhibition of the original and revised proposal and consultation with relevant State agencies and local government.

Careful assessment of the merits of the revised proposal has been undertaken, including compliance with relevant policies and its alignment with broader planning strategies. This information will form part of the Department's recommendation to allow determination by the Minister for Planning and Public Spaces.

# 2 Context

## 2.1 Site Context

The site is located 18 kilometres from the Sydney Central Business District (CBD) and is centrally located between the strategic centre/health and education precinct of Bankstown and the strategic centre of Hurstville.



**Figure 2:** Site context map (Source: Homes NSW Dec, 2023)

The site is well serviced by public transport, located on the T2 Airport, Inner West and South Line and by road with access provided by the M5 Motorway, Belmore Road and King Georges Road. There are several bus routes including services that traverse through the Estate as well as services along Belmore Road which provide connections to Riverwood train station to the south and other centres including Bankstown, Mortdale, Hurstville, Roselands and Campsie.

The site is located to the less than 200m north of the Riverwood Town Centre and connects to the centre via a public footpath at a relatively flat gradient.

The site is located immediately east of the Greater Sydney Green Grid Priority Corridor Salt Pan Creek, known for its parks, semi-urban wetlands, native habitat and mangrove forests which



provide unique amenities for the local community. Significant employment lands are located to the north including Riverwood Business Park within the Bonds Road Employment Area and Wiggs Road industrial precinct. Significant educational and medical facilities are also located close by including Western Sydney University (Bankstown Campus), South-Western Sydney TAFE Campus and Bankstown-Lidcombe Hospital.

Social infrastructure within or adjoining the Riverwood Estate includes Riverwood Public School, existing parks and community facilities including Riverwood Community Centre, Riverwood Library and Knowledge Centre.

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## 2.2 Existing Planning Controls

Existing planning controls for the subject site are contained in the *Canterbury-Bankstown LEP 2023* (LEP) and associated *Canterbury-Bankstown Development Control Plan 2023* (DCP).

The land to which the revised proposal applies is zoned R4 high density residential. The permitted building height is 11.5 metres and the maximum floor space ratio (FSR) is 0.9:1.

Relevant existing planning controls are provided in **Attachment A**.

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## 2.3 Original Rezoning Proposal

An overview of the original rezoning proposal, exhibited in 2022, is provided in **Table 1**.

**Table 1:** Overview of original rezoning proposal

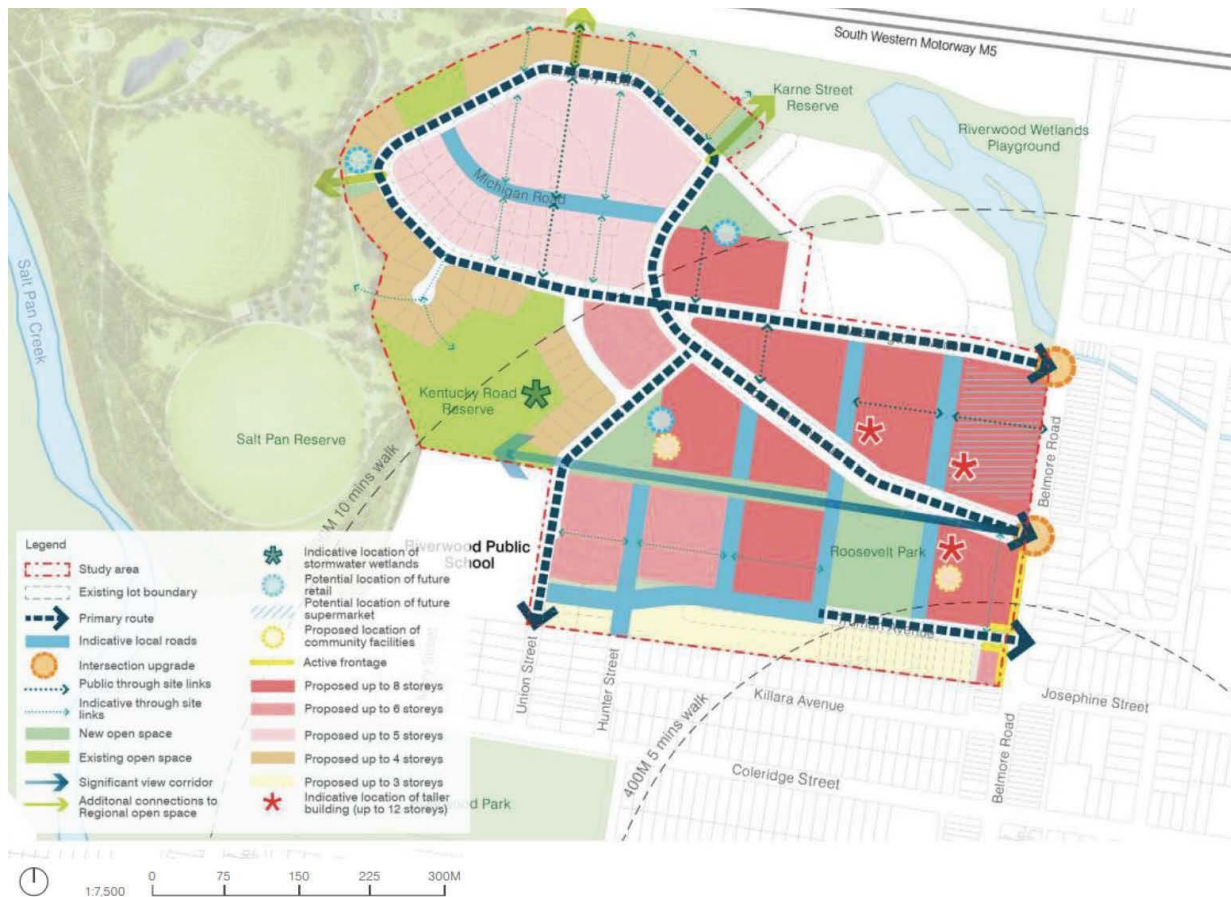
Site Area	hectares
Proposal summary (as exhibited in 2022)	<p>The original rezoning proposal, as exhibited, sought to deliver:</p> <ul style="list-style-type: none"><li>• Approximately 3,900 dwellings, ranging from three storeys (12 metres) and 12 storeys (41 metres)</li><li>• 4.8 hectares of open space, including almost 2.4 hectares of new open space in the form of Roosevelt Park (1 ha), the Community Greenway (0.5 ha) as well as pocket parks</li><li>• Realignment of existing streets and an improved cycleway and pedestrian network</li><li>• Up to 4,800m<sup>2</sup> of non-residential floorspace for local shops, cafes and services including child and health care</li></ul>

- Community spaces and facilities, including the potential for a new multi-purpose community hub co-located with new open space

The original exhibited masterplan is shown on [Figure 3](#) and [Figure 4](#). This was supported by technical studies and a draft Development Control Plan (DCP) which outlined proposed planning controls.



**Figure 3:** Original Vision for Riverwood Estate



**Figure 4:** Original Riverwood Estate Masterplan

## 2.4 Process and Governance

### 2.4.1 Collaborative working arrangements

Homes NSW consulted with relevant stakeholders throughout the development of the revised proposal. This included meetings with each Council, government departments, particularly TfNSW, and a presentation to a Project Review Panel (PRP).

### 2.4.2 Project Review Panel

A PRP meeting was held on 11 December 2023 which comprised representatives from Homes NSW as well as Canterbury-Bankstown Council, Georges River Council, NSW Government Architect and Department staff. A presentation of the revised proposal was made and various matters discussed. The PRP outlined a number of recommendations endorsed the exhibition of the revised proposal. These recommendations included updates to the draft site specific DCP to address tree retention, canopy cover, dwelling mix and clarify setbacks.

# 3 Planning and Policy Context

An appropriate planning framework must be established for the site, however, proposals must also respond to the broader strategic planning framework and the local policy context of the area. The applicable planning and policy documents relevant to the revised proposal are identified below.

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## 3.1 State Plans and Policies

### 3.1.1 Greater Sydney Region Plan: A Metropolis of Three Cities

The Greater Cities Commission prepared the Greater Sydney Region Plan (2018) to provide a 40 year vision for a metropolis of three cities: the Eastern Harbour City, the Western Parkland City and the Central River City, to boost Greater Sydney's liveability, productivity and sustainability by spreading the benefits of growth.

The Plan aims to integrate land use, transport links and infrastructure across three cities, where more people will live within 30 minutes to jobs, education and health facilities, services and great places.

The revised proposal for Riverwood Estate SSP is located on the edge of both the Eastern Harbour City and the Western Parkland City, within the South District. The key objectives relevant to Riverwood in the Greater Sydney Region Plan include:

- A city for people – provision of urban renewal must create great places for people with improved accessibility, promoting walking and cycling and co-located local services such as schools and community spaces within walking distance of residential development
- Housing the city – increasing housing supply (including social housing), providing a range of housing types in key locations and creating liveable neighbourhoods close to employment, public transport, walking and cycling infrastructure for well-connected communities.
- A city of great places – renewal and redevelopment must be supported by prioritising a people-friendly public realm, recognising the dual role of streets as places for people and movement, providing high amenity and walkability and integrating social infrastructure to support social connections
- A well connected city where most people live within 30 minutes of their jobs, education and health facilities.



- Importance of the Green Grid which provides a long term vision for a network of high quality green areas that will connect communities to green infrastructure, with Salt Pan Creek identified as a Priority Green Grid corridor.

### **3.1.2 South District Plan**

The South District Plan is a 20 year plan to manage growth in the context of economic, social and environmental matters to achieve the 40 year vision for Greater Sydney, and at a district level provides the bridge between regional and local planning. The vision for the South District Plan is to transform the district to provide residents with quicker and easier access to a wider range of jobs, housing types and activities, while improving lifestyle and environmental assets.

The population of the South District is projected to increase by approximately 200,000 people by 2038 with an additional 84,000 homes required. New homes are expected to be concentrated around centres with good transport connections, including Riverwood. The renewal of the Riverwood Estate SSP will assist in achieving this target and meet the growing demand for more diverse housing options within walking distance of the railway station, shops, and services.

The proposal supports the priorities of the South District Plan.

### **3.1.3 Future Directions for Social Housing in NSW**

This strategy sets out the Government's 10 year vision for social housing, announced in January 2016. It is underpinned by three strategic priorities – more social housing; more opportunities, support and incentives to avoid and/or leave social housing and to provide a better social housing experience. By 2025, work with non-government and private sector is proposed to deliver 23,000 new and replacement homes; transfer the management of government owned homes to the non-government sector and continue to introduce measures to make sure social housing meets the changing needs of the tenants.

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## **3.2 Local Policies and Strategies**

### **3.2.1 Canterbury-Bankstown Local Strategic Planning Statement - Connective City 2036**

This statement provides a strategic planning vision that guides the City's growth and focuses on sustainable development, preservation of the environment, the provision of housing for future generations and maximisation of employment opportunities. The Employment Lands, Housing and Affordable Housing strategies underpin Connective City 2036 LSPS.



# 4 Revised Proposal

## 4.1 Description

Homes NSW has submitted a reduced scheme covering approximately 1.6 hectares of the SSP located in the north eastern corner adjacent to Belmore Road, as shown on Figure 5. The revised proposal involves replacing the existing 60 dwellings in this area with 420 dwellings (with a tenure mix of 50% social and affordable housing and 50% private market housing). The controls are generally consistent with the original rezoning proposal, as exhibited.



**Figure 5:** Revised Proposal

Key features of the revised proposal are shown on Figure 6 and described in detail in Homes NSW's [Response to Submissions](#) document available on the NSW Planning Portal.



**Figure 6:** Revised Proposal Masterplan

## 4.2 Proposed LEP Amendments

A self-repealing SEPP under section 3.29 of the EP&A Act will amend the existing LEP. The amendments will relate to land located at 5-165 Belmore Road, comprising Lots 400, 401, and 402 in

DP 221230 in addition to a small portion of 4 Roosevelt Avenue, Riverwood, legally described as Lot 467 in DP 596801 to enable the realignment of Virginia Place.

Changes are required to height of buildings, floor space ratio and to allow for additional permitted uses within the R4 residential zone. No change to the land zoning is required as the land is already zoned R4 under the LEP.

### 4.2.1 Building Heights

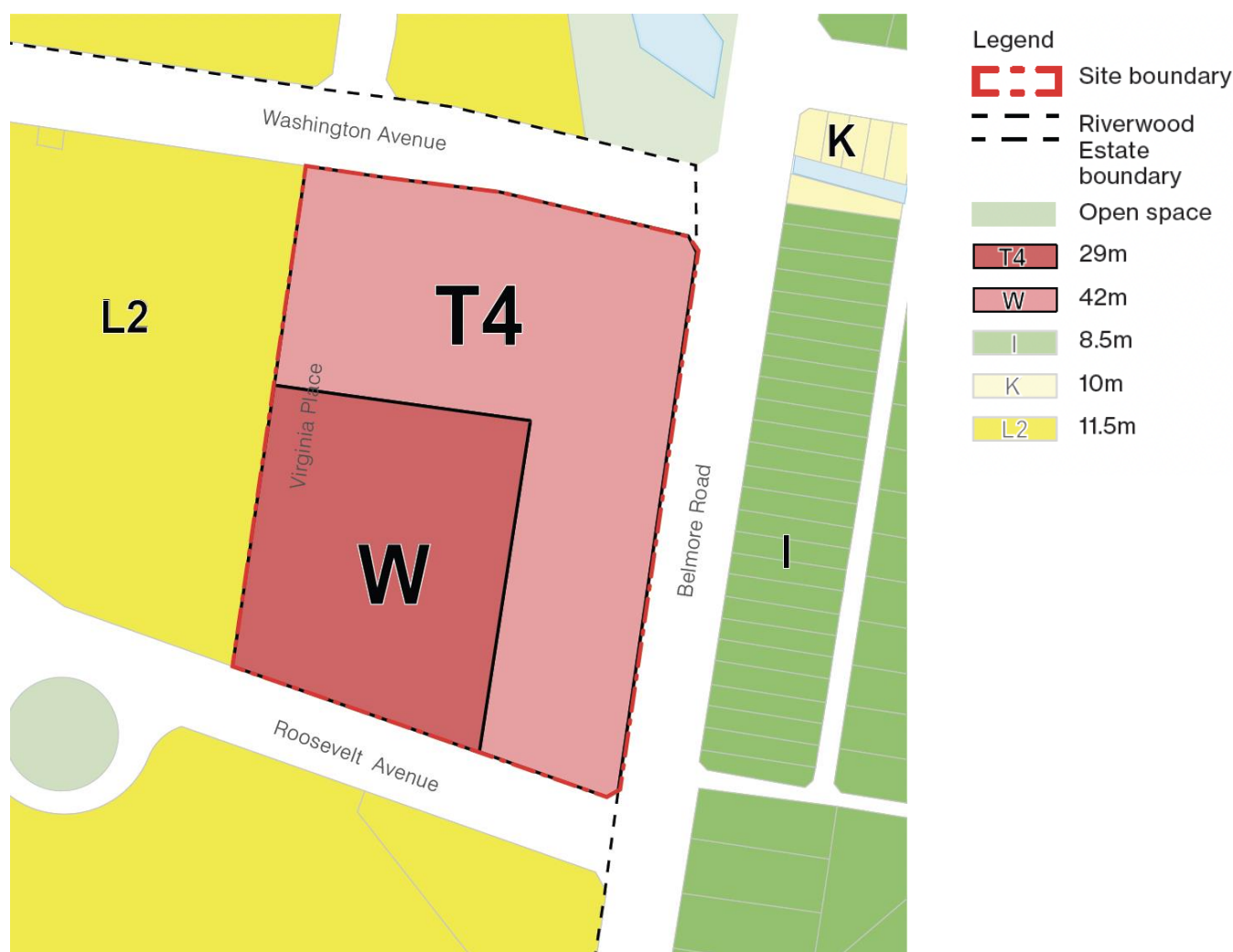
Existing maximum building height controls are 11.5 metres. The original rezoning proposal included changes to height controls across the masterplan area of between 12 metres (for three storey buildings) and 41 metres (for 12 storey buildings).

Recent changes to the *Building Code of Australia* and *National Construction Code 2022* require increased floor to floor heights. To meet this requirement, the maximum building heights within the revised proposal are 29 metres (for 8 storeys) and 42 metres (for 12 storeys).

The proposed height of 42 metres is one metre taller for the 12 storey building height previously exhibited for the original rezoning proposal.

The proposed height strategy ensures a suitable transition to the surrounding buildings to the east and higher built form to the north, south and west. The 12 storey building within the site is proposed in the south-western corner adjacent to Roosevelt Avenue and Virginia Place.

The two building height controls proposed are outlined in **Figure 7**.



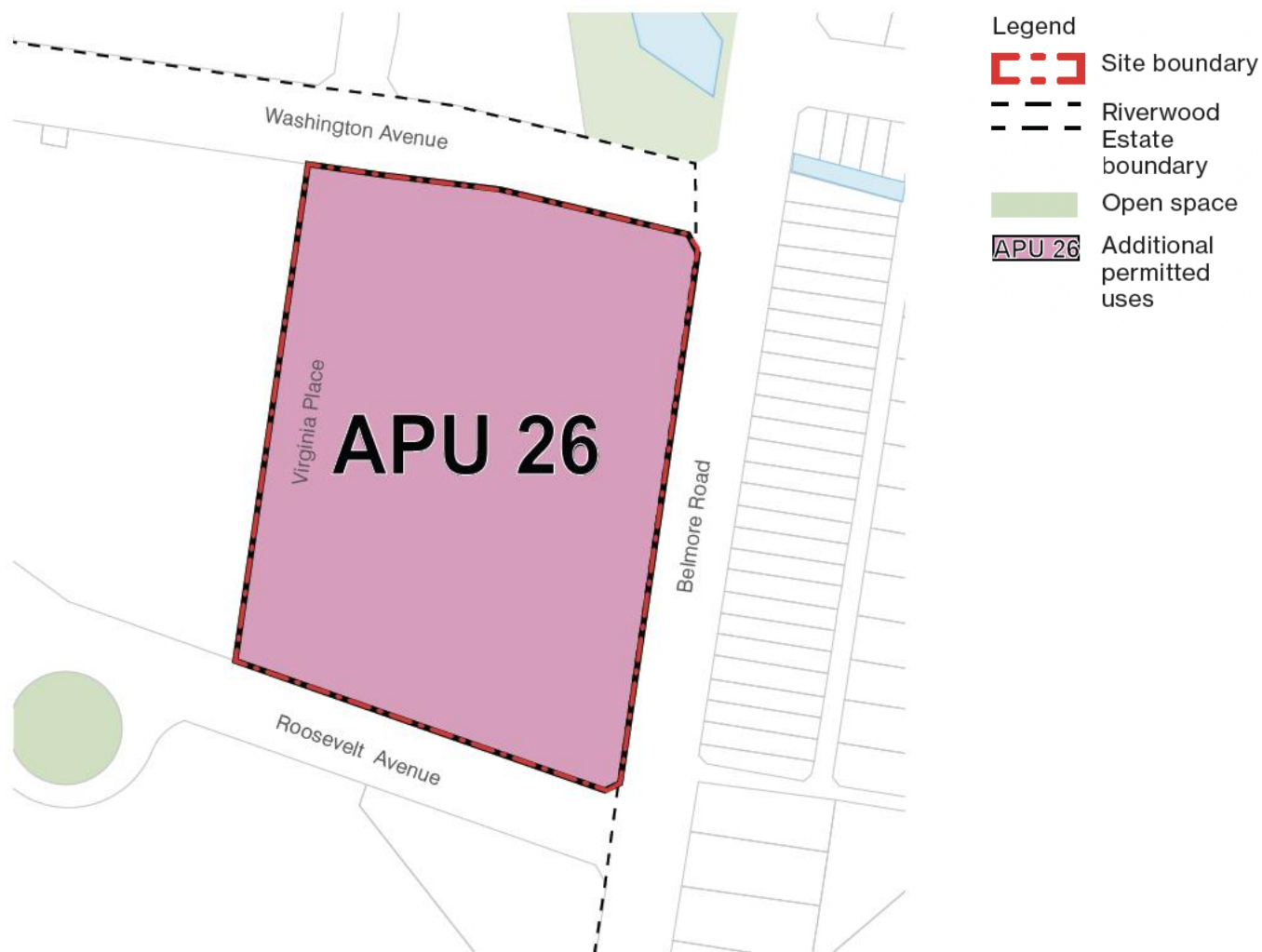
**Figure 7:** Proposed Maximum Height of Buildings

## 4.2.2 Floor Space Ratio

Existing FSR controls are 0.9:1. The previously exhibited original rezoning proposal divided this area of the site and proposed FSRs of 2.2:1 and 2.4:1. A reduced blanket FSR of 2.2:1 forms part of the revised proposal and includes the re-alignment of Virginia Place.

## 4.2.3 Additional Permitted Use

To support the revised proposal, one Additional Permitted Use (APU26) is proposed, as shown on Figure 8. APU 26 would allow a neighbourhood supermarket (maximum floor area of 1,000m<sup>2</sup>), neighbourhood shops (maximum floor area of 250m<sup>2</sup>) and food and drink premises (maximum floor area of 250 m<sup>2</sup>) as a additional permitted use on the site.



**Figure 8:** Additional Permitted Use



# 5 Exhibition of Revised Proposal and Issues Raised

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## 5.1 Public Exhibition

The revised proposal and Explanation of Intended Effect were publicly exhibited from 8 March and 8 April 2024. It included a Response to Submissions report from the exhibition of the original rezoning proposal which covered the entire 30 hectare Riverwood Estate. The revised proposal was also supported by technical information related to urban design, heritage, health, infrastructure (including social), stormwater, sustainability, traffic, climate change and economic matters, and a site-specific development control plan.

In total, 81 submissions were received from the community and other stakeholders.

## 5.2 Homes NSW Engagement Activities

Homes NSW conducted a range of engagement activities during the exhibition period including:

- Distribution of a newsletter in the form of a Community Update in March 2024
- An online community information session held on 19 March 2024
- Two in-person drop-in sessions held at the Riverwood Community Centre on Wednesday 20 March and Saturday 23 March 2024

## 5.3 Submissions

### 5.3.1 Original rezoning proposal

A total of 278 submissions were received from the exhibition of the original rezoning proposal which included 199 submissions based on a proforma, 63 unique submissions from the community, 13 from state government agencies (including utility/service providers), two from Councils and one from a community organisation (the Riverwood Community Centre). A summary of the issues raised for the wider masterplan is provided in **Attachment B**.

As the area of land for the revised proposal is located within the original SSP area, the Department has re-reviewed these submissions to ascertain whether any of the issues raised previously are relevant to the revised proposal. Where this is the case, these issues as well as

those from new submissions received from the most recent exhibition have been considered in the assessment.

### 5.3.2 Revised proposal

A total of 81 submissions were received from the exhibition of the revised proposal. These submissions comprised:

- 73 individual unique submissions from the community
- Four submissions from NSW Government agencies including Environment and Heritage Group (DCCEEW), Aboriginal Affairs NSW (AANSW), Transport for NSW (TfNSW), and Sydney Water
- One from the City of Canterbury-Bankstown Council
- One from Georges River Council
- One from SDN Children's Services who lease and manage the SDN Early Childcare Centre
- One from Shelter NSW, independent, not for profit policy and advisory body.

While some submissions supported the proposal, most of the submissions received raised issues of concern on matters including design, existing infrastructure capacity, issues related to social and affordable housing and impact on the existing child care centre.

### 5.3.3 Community Submissions

Of the 73 individual submissions from the community, 58 objected, 7 supported and 8 did not state a clear position but provided comments.

Of the individual community submissions, the main themes of concern included traffic, transport and movement, built form and character and social and affordable housing. Specific issues raised included:

- Concerns about future implementation of broader masterplan without supporting infrastructure.
- Excessive building height that is not compatible with local area and concerns about overshadowing.
- Impact on local character, including greenspace and changes to skyline.
- Concerns about anti-social behaviour and crime.
- Concerns regarding both insufficient and overconcentration of social and affordable housing.
- Pressure on existing local infrastructure including parking, medical centre, child care, public transport and retail.

- Ability for existing transport network to cope with increased population.
- Impacts on natural habitat and local ecosystems due to tree removal.
- Concerns about asbestos removal and surface soil remediation.

Twenty percent of community submissions (15 submissions) were concerned with the impact on the existing childcare centre with many considering that the revised proposal would result in the loss of the centre. Few submissions understood that Homes NSW has commenced relocation discussions and has committed to the opening of a new centre in the vicinity prior to the closure of the existing one, thereby ensuring no loss of child care services for the local community.

SDN Children’s Services stated that a new centre was required to be operational by the time the existing centre is demolished to provide continuity of care to the local community with the current number of spaces maintained or increased.

Shelter NSW indicated it does support the proposal in its current form and provided recommendations relating to the supply and governance of social and affordable housing and tenant allocation.

Consideration of these issues are discussed in **Section 6** of this report.

### 5.3.4 Agency Submissions

Four government agencies provided submissions on the revised proposal, as summarised in **Table 2**. These included DCCEEW, TfNSW, Aboriginal Affairs NSW and Sydney Water. In addition, **Table 2** also provides comments raised by government agencies for the original rezoning proposal that are considered relevant to the revised proposal. These comments are from EPA, NSW Health and NSW SES.

**Table 2: Summary of Issues Raised by Agencies**

Agency	Comments specific to the Revised Proposal	DPHI comments
DCCEEW	<p>DCCEEW made the following comments regarding flooding:</p> <ul style="list-style-type: none"> <li>• Flooding condition assessment and flood risk management planning to be based on relevant and recent guidelines;</li> <li>• Roads may transfer flooding problems elsewhere and detailed hydraulic assessment should be undertaken;</li> <li>• The performance of on-site detention (OSD) needs to be further evaluated;</li> <li>• Climate change metrics reported may change when models become available in 2024.</li> </ul>	<p>Refer Section 6.</p> <p>In addition, this issue would be addressed during the development application planning process.</p>

	<p>DCCEEW made the following biodiversity comments</p> <ul style="list-style-type: none"> <li>• Cumberland Plain Woodland (CPW) mapped at two discrete locations within the SSP would not be impacted but many of the native trees that were identified are species found within CPW and may be remnant vegetation. Unclear whether historical aerial imagery was reviewed to determine that there is no remnant vegetation impacted.</li> <li>• the Arboricultural Impact Assessment identified several high retention value trees in the revised proposal area that are found in CPW, including <i>Eucalyptus crebra</i> (tree 124, 269, 273), <i>Eucalyptus eugenoides</i> (tree 122), <i>Eucalyptus fibrosa</i> (tree 119, 268, 271, 274), <i>Corymbia maculata</i> (trees 264, 267, 275, 276) and <i>Eucalyptus sideroxylon</i> (tree 265). Proposal should avoid those areas that contain mapped threatened ecological communities and any remnant trees from these communities.</li> <li>• Biodiversity Assessment Report assumes all trees within the impact zone are planted, however CPW is listed as a serious and irreversible impact entity and any impacts to this community are to be avoided.</li> <li>• Unclear if the revised proposal impacts on potential habitat for the Cumberland Plain Land Snail – further information is required regarding where marginal habitat occurs.</li> <li>• Increased population on site may place additional pressure on Salt Pan Creek Reserve and other nearby open space areas.</li> <li>• Reiterated previous support to use local native provenance CPW species in landscaping works.</li> </ul>	
TfNSW	<p>No transport infrastructure improvements are required for the revised proposal.</p> <p>Concern about the piecemeal approach and would prefer an overarching masterplan be adopted before consideration of spot rezonings, supported by a Staging and Transport Infrastructure Delivery Plan.</p> <p>Concern about the Belmore Road setback without an agreed road design.</p>	<p>Refer to Section 6.</p> <p>Traffic impact assessment is a planning matter that would be addressed as part of the SSD planning process.</p>

Aboriginal Affairs NSW	More housing for Aboriginal people and that specific communication and engagement occur.  Proposal to consider Closing the Gap objectives under Priority Reform 5 (driving Aboriginal employment, business growth, and economic prosperity) and the <i>NSW Aboriginal Procurement Policy</i> .	Tenant allocation and procurement initiatives will be a matter for Homes NSW in the delivery phase of the project.
Sydney Water	The water supply zone and sewer system has the capacity to service the development, however, amplifications, adjustments or minor extensions may be required.	This issue would be addressed during the DA planning process and detailed design.

### 5.3.5 Council Submissions

#### Canterbury-Bankstown Council

Both City of Canterbury-Bankstown and Georges River Councils submission on the revised proposal supports the provision of social and affordable housing on the site. Other matters raised are identified in Table 3.

Comments on the Revised Proposal	DPHI comments
Canterbury Bankstown Council	
<ul style="list-style-type: none"> <li>Need for a comprehensive vision for redevelopment of the broader precinct to ensure integration with the surrounding community and plan for supporting infrastructure.</li> </ul>	Refer to Section 6.
<ul style="list-style-type: none"> <li>Requests LEP controls to ensure the delivery of social and affordable housing, with 40% social and 10% affordable housing recommended for the site.</li> </ul>	Refer to Section 6.
<ul style="list-style-type: none"> <li>Encourages Homes NSW to consider a draft Planning Agreement for contributions to infrastructure as the Canterbury Bankstown Local Infrastructure Contributions Plan 2022 did not address the increased population envisaged by the proposal.</li> </ul>	Refer to Section 6.
<ul style="list-style-type: none"> <li>Seeks commitment from TfNSW and Homes NSW to design and fund the Hannans Road/Belmore Road/Washington Ave intersection improvements.</li> </ul>	Refer to Section 6.



<ul style="list-style-type: none"> <li>Comments relating to the Development Control Plan provisions including waste collection, urban design, roads, cycling and pedestrian infrastructure, bus stop upgrades, stormwater provisions, open space and landscaping</li> </ul>	Homes NSW is in the process of refining and finalising the site specific DCP in consultation with Canterbury Bankstown Council.
Georges River Council	
<ul style="list-style-type: none"> <li>Council questioned how development contributions would be allocated between Canterbury-Bankstown and George River Council, suggesting a Joint Contributions Plan be prepared.</li> </ul>	Refer to Section 6.
<ul style="list-style-type: none"> <li>There is no requirement in the DCP for the findings of heritage investigations (including a Heritage Interpretation Plan) to be implemented.</li> </ul>	Further Aboriginal heritage investigations are required prior to the lodgement of the DA.
<ul style="list-style-type: none"> <li>Specific controls relating to sustainability should be addressed in the DCP (including use of recycled materials, embodied carbon, battery usage, EV charging infrastructure)</li> </ul>	Homes NSW is in the process of refining and finalising the site specific DCP in consultation with Canterbury Bankstown Council.
<ul style="list-style-type: none"> <li>Concerns on the loss of SDN Childcare Centre, and the demolition of buildings that contain Aboriginal and Torres Strait Islander community services</li> </ul>	Homes NSW has commenced relocation discussions and has committed to the opening of a new centre in the vicinity prior to the closure of the existing one
<ul style="list-style-type: none"> <li>Lack of public open space</li> </ul>	Refer to Section 6.
<ul style="list-style-type: none"> <li>Impacts on contamination migration from the former tip to Salt Pan Creek</li> </ul>	This would be addressed as part of any future DA planning process.

# 6 Consideration

The Department has considered issues raised in the submissions from the previously exhibited original rezoning proposal (as they relate to the revised proposal) and also those raised specifically about the revised proposal.

The following key assessment issues have been identified in relation to the revised proposal and are the considered in this report:

- Staging
- Tree Retention and Biodiversity
- Built Form and Density
- Social and Affordable Housing
- Setbacks
- Traffic and Transport

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## 6.1 Staging

### Issue

Several community submissions considered the revised proposal as being the initial stage of a much bigger redevelopment of the wider estate. This view was also shared by TfNSW and both Councils which were raised the lack of a holistic planning approach to the redevelopment and were particularly concerned about the lack of clarity about how the site would integrate with the wider estate.

### Assessment

The Department notes that a masterplan for the wider estate was previously prepared and exhibited in 2022. The revised proposal responds to community concerns about the proportion of new social and affordable homes to be delivered within the project and seeks to address the uncertainties and impacts the former plan would have had on community infrastructure over the next two to three decades.

The revised scope seeks to scale back redevelopment of the broader masterplan into known and manageable focus areas, that can be properly delivered with the right amount of supporting infrastructure and community facilities.

Homes NSW may consider the recreation of a wider masterplan for the balance of the estate in the future to ensure that it meets the aspirations of the local community. This is not included in the current scope and would require a separate planning process.

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## 6.2 Built form and density

### Issue

One of the most frequent issues raised by the community and other stakeholders in relation to the original rezoning proposal was that it would result in overdevelopment of the estate. Submissions regarding the revised proposal raised the concerns about the increased density of the site, potential overcrowding, impact of increased building heights and the high number of dwellings proposed. In terms of amenity, submissions raised concerns that the proposal provided little consideration to existing residents and would result in irreversible damage to community character, overshadowing impacts and alter the Riverwood skyline.

### Assessment

The revised proposal, adjacent to Belmore Road, is located within 450 metres of Riverwood train station, ensuring that future residents have easy access to existing public transport options (either bus or train) and are in proximity to other services including those in the Riverwood town centre and within walking distance of public open space.

While proposed building heights are significantly taller than current planning controls permit, changes have been made from the previously exhibited original rezoning proposal to reduce street wall heights along Virginia Place (reduced from six storeys to four storeys) at the street frontage. Lower street wall heights on the western side of the western buildings would ensure a transition to adjacent existing development and reduce impacts on existing amenity. These proposed street wall heights are included in the site specific draft DCP currently under consideration by Canterbury-Bankstown Council.

The Department considers that the revised proposal provides a range of building heights and that the siting of the tallest buildings in the south-western and western portion of the site would provide additional space between these buildings and existing low density development to the east.

The revised proposal has been designed to ensure no deterioration of direct sunlight access to public domain and neighbouring properties. The ADG requires that apartments provide a high level of residential amenity in terms of solar access and the revised proposal is considered compliant with these requirements.

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## 6.3 Setbacks

### Issue

While concerns regarding setbacks were raised by many in the community as part of the original rezoning proposal, only the Project Review Panel, TfNSW and one community submission raised the issue of setbacks in relation to the revised proposal.

### Assessment

In response to submissions received on the original rezoning proposal, Homes NSW amended the setback along Belmore Road as part of the revised proposal, from three to 15 metres (an increase of 12 metres) to provide for additional landscaping and improved street interface as well as accommodate building alignments to Washington Park immediately north of the site. The increased setback along Belmore Road would also accommodate a future widening of Belmore Road.

The Department notes TfNSW's concerns regarding the setback along Belmore Road as a road widening design has yet to be agreed. The revised proposal provides ample setback in this area to ensure that a future road design can be developed without building constraints. Given the importance of the setback, the Department has determined to include a provision to require a 15 metre setback to Belmore Road.

Setbacks and street wall heights have been designed to ensure that buildings appropriately transition and maintain amenity to surrounding residential development. Setbacks are compliant with the Apartment Design Guide (ADG).

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## 6.4 Biodiversity and Tree Retention

### Issue

A number of submissions raised the destruction of natural habitat, the removal of trees and the impact on native wildlife as issues of concern regarding the revised proposal. In addition, DCCEEW raised the issue of the need to protect biodiversity values, and specifically Cumberland Plain Woodland. It stated that many of the identified species within the area of the revised proposal were those found within Cumberland Plain Woodland and may be remnant vegetation. DCCEEW queried whether historical aerial photography was reviewed to determine that there was no remnant vegetation on the site and that the proposal should avoid those areas that contained mapped threatened ecological communities and remnant trees from these communities.

## Assessment

### Impact on Cumberland Plain Woodland

A Biodiversity Assessment Report and Arboricultural Impact Assessment was prepared by EcoLogical Australia for the Riverwood Estate and included an overlay of the tree survey and vegetation mapping with the 1955 and 1975 aerial imagery. The results of the assessment demonstrated that the site is highly modified and that the majority of canopy trees were planted post 1955. The assessment noted two patches of vegetation identified as PCT 849 – *Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain* in low to moderate condition in the vicinity of Salt Pan Creek Reserve and Kentucky Road Reserve. The assessment concluded that the remaining native canopy trees identified as potentially present in the 1955 aerial imagery were not considered remnant vegetation community, based on the following factors:

- The setting of these trees are in a highly modified environment, primarily located between buildings and most likely planted with early development of the site
- The trees included the presence of species not commonly found in the local region and were commonly planted native species
- Absence of ground cover and/or the presence of highly modified groundcover
- Absence of mid-storey and/or presence of highly modified mid-storey
- Long-term presence of highly permeable groundcover (including pavement, roads and other infrastructure) adjacent to these trees

These trees were not considered to be remnant vegetation of Cumberland Plain Woodland and did not constitute a plant community type in accordance with the guidelines and were therefore assessed as planted native vegetation.

In relation to the Cumberland Plain and Snail, Homes NSW confirmed on 5 March 2024 that Table 10 of the Biodiversity Assessment Report (v6 dated 14 June 2022) considers the potential marginal habitat for Cumberland Plain Land Snail and avoids it. The marginal Cumberland Plain Land Snail is the same as the areas of TEC shown in Figure 7 of the report.

### High Retention Value Trees

A High Retention Tree Preliminary Arboricultural Impact Assessment was prepared by Eco Logical for the entire Riverwood Estate SSP in 2022 which identified trees with a high retention value that should be retained and protected as part of any future development. Within the area of the revised proposal, 26 trees were identified of high retention value, with their locations shown on Figure 9.





**Figure 9:** Trees of high retention value within the revised proposal area

(Source: Eco Logical, 2022)

Of these trees, the following potential impact levels were identified from development within the revised proposal area, as shown on Figure 10:

- High impact - >20% tree protection zone (TPZ) encroachment (Tree IDs 114, 118, 121, 122, 123, 265, 270, 271, 272, 273, 277, 278, 279, 285, 286, 287, 288)
- Medium impact - <20% TPZ encroachment (Tree ID 280)
- Low impact - <10% TPZ encroachment (Tree IDs 266, 268, 269, 275)
- No impact (Tree IDs 124, 267, 274 and 276)



**Figure 10:** High retention value trees and potential impact levels

(Source: Eco Logical, 2022)

Notwithstanding no impact to the Cumberland Plain Woodland threatened ecological community, further investigations would be required during the SSD application stage to determine whether building designs could be refined such that high retention trees could be retained and protected as part of the development. Where this cannot occur, the removal of high retention trees would be required to be offset with replacement planting which would also contribute to the 30% tree canopy target of the development.

The draft DCP commits to the retention of high value trees as much as possible and that landscaping would contribute to the overall 30% tree canopy target on the site. Sufficient deep soil is required to support the healthy growth of mature trees. Areas of deep soil are proposed within the 15 metre setback along Belmore Road and within the courtyard areas between proposed building footprints. As discussed above, the Department has determined to include a provision to require a 15

metre setback to Belmore Road which will allow for deep soil areas and adequate planting to buffer the development to Belmore Road.

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## 6.5 Social and affordable housing

### Issue

A large number of submissions raised social and affordable housing as a key issue. Some submissions supported more social and affordable housing while others thought there was already too much social housing in the area and more would lead to an increase in anti-social behaviour and crime. Some existing residents said they felt unsafe and some stated that the proposed CPTED would not discourage human behaviour.

Aboriginal Affairs NSW stated that more housing should be provided for indigenous people and Shelter NSW indicated it did not support the proposal in its current form as it will create a denser precinct skewed towards smaller social housing dwellings and a net reduction of dwellings for families. It considers that the site should deliver 100% social and affordable housing or at the least 50% social housing and 20% affordable housing and that all affordable housing should be provided in perpetuity. It made specific recommendations including that the site should remain in public ownership and that it demonstrate superior environmental performance beyond minimum compliance.

### Assessment

Homes NSW has stated that 50% of the proposed 420 dwellings would comprise social and affordable housing, with the remaining 50% being private market housing. Of the 420 dwellings proposed, the indicative breakdown has been outlined as:

- 207 private market units
- 124 social housing units
- 83 affordable units, 50% of which will be units for eligible key workers

Recognising that a greater contribution for social housing is required, Homes NSW has committed to an affordable housing contribution of 50% of total residential floorspace which significantly exceeds the 5-10% affordable housing target in the Greater Sydney Commissions Greater Sydney Region Plan and also exceeds the contribution to affordable housing committed to in the original rezoning proposal.

Considering that the delivery of social and affordable housing is integral to the objectives of the proposal, as well as Homes NSW's commitment to its delivery, the Department has included an affordable and social provision in proposed SEPP to amend the Canterbury-Bankstown LEP.

The provision ensures that development consent is only granted if at least 50% of the gross floor area used for residential accommodation in any building on the land will be for the purposes of affordable housing provided by a public authority, social housing provider or registered community housing provider.

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## 6.6 Traffic and Transport

### Issue

Many community submissions were concerned about the capacity of the surrounding road network to cope with the increased population associated with the revised proposal. Submissions noted that the surrounding streets, particularly Belmore Road were already very congested and provided poor level of service during traffic peaks and that there was a need to improve both the road infrastructure and its operation along Belmore Road in the vicinity of the site.

A number of submissions also stated that it was difficult getting out of Washington and Roosevelt Avenues to Belmore Road and that the revised proposal should be a catalyst for traffic improvements in this area to minimise the queuing of vehicles. Submissions were also concerned that the revised proposal would impact on on-street parking.

### Assessment

#### Traffic

The revised proposal seeks to replace 60 existing dwellings with 420 dwellings, an increase of 360 dwellings or approximately 1,047 people based on an average occupancy of 2.91 people per dwelling. The assessment of the implications of this additional population on the network was completed as part of the Homes NSW application with the modelling demonstrating that the revised proposal would result in an additional two vehicles per minute which is considered low.

The assessment concluded that due to the low traffic generating nature of the revised proposal, no network improvements were required. No adverse impacts were also expected to increased train trips by residents or bus trips. TfNSW concurred with the assessment results and also stated that no transport improvements are required to be undertaken for the revised proposal.

TfNSW, however, did state that while the consideration of small scale developments may result in minimal traffic, cumulatively, they may trigger the required transport improvements outlined as part of the precinct wide traffic assessment. Notwithstanding, the Department considers that due to the small scale of this development and the results of traffic modelling, no adverse traffic impacts would result from the revised proposal.



Traffic, pedestrian and cyclist related safety concerns will be addressed as part of any future DA process.

### **Parking and Access**

The Department notes that Homes NSW has proposed that the minimum parking requirement for the revised proposal is 358 car parking spaces based on parking rates set out in Canterbury-Bankstown DCP 2023, TfNSW Guide to Traffic Generating Developments (GTTGD) 2002, Apartment Design Guide (ADG) 2015 and SEPP (Housing) 2021. In addition to the 358 parking spaces required, Australian Standards for Adaptable Housing (AS4299) requires that at least one accessible car parking space is provided for each adaptable unit.

The proposed onsite parking rates are considered acceptable.

In relation to the impacts to on-street parking arising from the relocation of Virginia Place, Homes NSW provided additional analysis on 22 April 2024. The analysis indicates that the existing 32 on street parking spaces can be replaced with approximately 34 spaces on either side of the newly re-aligned Virginia Place. This design would be subject to assessment through the development approval process.

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## **6.7 Infrastructure and Contributions**

### **Issue**

Submissions received from both Canterbury-Bankstown and Georges River Councils raised the issue of contributions to support local infrastructure.

### **Assessment**

In relation to infrastructure funding, Homes NSW proposes to pay local and state contributions, as required under Canterbury Bankstown Local Contributions Plan 2022 and the NSW Housing and Productivity Contribution that commenced 1 October 2023.

Canterbury-Bankstown Council's comments that the proposal was not envisaged when preparing Canterbury-Bankstown Local Contributions Plan 2022 are noted. Notwithstanding, Homes NSW will still be required to pay local contributions, where relevant which will go towards supporting development on the site and surrounding area.

Georges River Council considers that it too should be provided with contributions as a result of the proposal. The Department does not consider that the provision of an additional 420 dwellings would adversely impact on local infrastructure and services in the adjacent Council area. The supporting studies submitted with the rezoning package indicate that there is adequate infrastructure to support the additional population.



In relation to State infrastructure the development would be subject to the Housing and Productivity Contribution (HPC). While a HPC is exempt in relation to affordable and social housing when it is provided by or on behalf of a social housing provider, there is a requirement for a contribution to apply to dwellings in residential flat buildings for private housing.

The local contributions together with the HPC are considered appropriate mechanisms to ensure that the future development is well serviced and supported by infrastructure to meet the needs of future residents, workers and visitors.

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## 6.8 Other Issues

Some submissions raised a number of issues that while relevant to the revised proposal, would be addressed through subsequent stages of the planning process.

Specific design issues would be addressed through the mandatory involvement of a State Design Review Panel and other environmental matters not limited to heritage, flooding and stormwater management, contamination/remediation, flora and fauna impacts, CPTED, air quality and noise impacts would be addressed as part of the SSD planning process.

### Draft site specific development control plan

Homes NSW is in the process of refining and finalising the site specific DCP in consultation with Canterbury Bankstown Council. As this process remains underway, a provision has been included in the proposed SEPP to amend the Canterbury-Bankstown LEP requiring that a site specific DCP is in place prior to development on the site.

It is intended that the DCP will be adopted by Council and may be subject to further refinement and a consultation process by Council prior to its adoption. Under the SEPP (Planning Systems) 2021, development carried out by or on behalf of NSW Land and Housing Corporation that has a capital investment greater than \$30 million or comprise more than 75 dwellings can progress through the State Significant Development Assessment (SSDA) planning pathway. As such, approval to construct the development may proceed through a SSDA process where consideration of the Riverwood DCP would not be required from a statutory perspective. Nonetheless, the draft Riverwood DCP sets expectations and serves as a guide as to how LAHC intends to proceed with the detailed design of any future proposed development. It is also noted that any SSDA would require review by the NSW Government Architect (GANSW) State Design Review Panel (SDRP) before it is determined.

# 7 LEP Amendments

To facilitate the revised proposal, the following amendments are proposed to the Canterbury-Bankstown LEP 2023 to give effect to the controls that will support its delivery within the Riverwood Estate. These amendments will be given effect through a self-repealing and amending SEPP.

## 7.1 Canterbury-Bankstown Local Environmental Plan 2023

Amendments to Canterbury-Bankstown LEP 2023 will include changes to maps, existing clauses and the introduction of site-specific clauses for Stage 1 of the Riverwood Estate SSP. These changes are outlined in Table 3. The changes would only apply to the land described as Lots 400, 401 and 402 in DP 221230 and a small portion of Lot 467 in DP 596801.

Table 3: Proposed Amendments to Canterbury-Bankstown LEP 2023

Canterbury-Bankstown LEP 2023 Control	Proposed Amendment
Neighbourhood shops	<p><u>Amendment to Part 6 of the LEP</u></p> <p>New additional provision to be added to Part 6 of the LEP to ensure that the existing clause 5.4(7) of the LEP does not apply to the site of the revised proposal.</p> <p>that the clause specifies that development for the purposes of a neighbourhood shop on the site may have a retail floor area not exceeding 250m<sup>2</sup>.</p> <p>The intention of this change is for neighbourhood shops to be able to have up to 250m<sup>2</sup> in retail floor area. Currently clause 5.4(7) limits the retail floor area of neighbourhood shops to 100m<sup>2</sup>.</p> <p>The inclusion of this provision in Schedule 1 of the LEP is not suitable as neighbourhood shops are already permitted with consent in zone R4.</p>
Additional Permitted Use	<p><u>Amendments to Schedule 1 of the LEP</u></p> <p>A new provision is to be added to state that a neighbourhood supermarket and food and drink premises are permitted with consent on the site of the revised proposal.</p> <p>It is noted that the gross floor area of neighbourhood supermarkets is already limited by clause 5.4(7AA) to 1,000m<sup>2</sup> and that this control will apply to the supermarket on the site. No change is required to this control.</p>

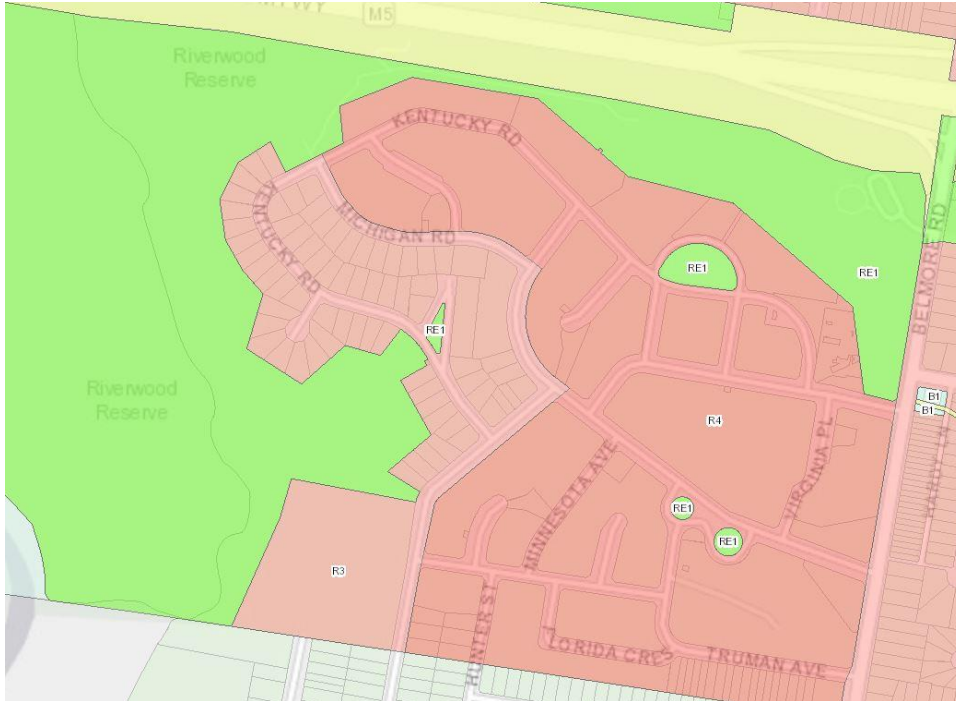
	<p><u>Mapping changes</u></p> <p>Mapping changes are proposed to the Additional Permitted Uses Map to identify “APU 26” on the map.</p>
<p>Height of Buildings</p> <p>Maximum Floor space ratio</p>	<p><u>Mapping changes</u></p> <p>The Maximum Building Height map and the Floor Space Ratio map is to be amended as follows in relation to the site of the revised proposal:</p> <ul style="list-style-type: none"> <li>• The maximum height of buildings will be 29 metres and 42 metres; and</li> <li>• The maximum floor space ratio will be 2.2:1.</li> </ul>
<p>Post-exhibition amendment</p> <p>Deferment of Development Consent for DCP</p>	<p>The Department has inserted a provision into the SEPP that Development consent must not be granted to development on the land unless a development control plan that provides for the following has been prepared for the land.</p>
<p>Post-exhibition amendment</p> <p>Affordable housing (including social housing)</p>	<p><u>Amendment to Part 6 of the LEP</u></p> <p>A new additional provision is proposed whereby development consent must not be granted to development on the site of the revised proposal unless the consent authority is satisfied that at least 50% of the gross floor area of all residential accommodation in any building will be used for affordable housing which is provided by or on behalf of a public authority, social housing provider or by a registered community housing provider.</p>
<p>Post-exhibition amendment</p> <p>Setback to Belmore Road</p>	<p>A new additional provision is proposed whereby development consent must not be granted to development on the site of the revised proposal unless the consent authority is satisfied that the development has a 15m setback to Belmore Road.</p>

## 8 Conclusion

The Department has undertaken a detailed assessment of the revised proposal and recommends that the proposal be supported to enable the renewal and revitalisation of a portion of the Riverwood Estate. The revised proposal will provide much needed social and affordable housing for those in need within the local community including key workers in a location that is well serviced by public transport.

The Department is satisfied that the issues raised are able to be addressed through changes to the LEP or subsequent stages of the planning process.

# Attachment A – Existing Planning Controls



Canterbury-Bankstown LEP 2023 - Land Zoning Map





Canterbury-Bankstown LEP 2023 – Height of Buildings Map



Canterbury-Bankstown LEP 2023 – Floor Space Ratio (FSR) Map

# 9 Attachment B – Original Public Exhibition and Issues Raised

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## Public Exhibition

A rezoning proposal, supported by a draft masterplan for the Riverwood Estate SSP was finalised in August 2022 and included a site specific DCP which outlined proposed planning controls relating to built form, building typologies and design, movement and access, public domain, landscaping, tree canopy and retention and open space.

Public exhibition of the documents and supporting technical studies occurred between 12 August and 25 September 2022 and 278 submissions were received from the community and other stakeholders.

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## Submissions Summary

The public exhibition resulted in a total of 278 submissions received. Of these:

- 63 were individual unique submissions from the community
- 199 were proforma submissions from the community
- 10 were from NSW Government agencies including Department of Climate Change, Energy, Environment and Water (DCCEE) formerly Environment and Heritage Group, Aboriginal Affairs NSW (AANSW), Aboriginal Housing Office (AHO), NSW Health, Heritage NSW (HNSW), NSW State Emergency Services (SES), Environment Protection Authority (EPA), Transport for NSW (TfNSW), Schools Infrastructure NSW (SINSW), and Crown Lands
- Three were from utility/service providers, APA Group, NBN Co and Sydney Water
- One was from the City of Canterbury-Bankstown Council
- One was from Georges River Council
- One was from the Riverwood Community Centre, a community organisation

No submissions were received from non-government organisations or industry bodies.

In addition to the submissions received, the Department received internal advice from its Hazards and Greener Cities branches.

While some submissions supported the proposal, most of the submissions received raised issues of concern on matters including design, infrastructure delivery and the provision of social and affordable housing.

## Community Submissions

Of the community submissions 37 objected, 15 supported and 11 did not state a position but provided comments. The proforma submission objected to the proposal with issues of concern mainly related to social housing. The main issue raised by the proforma submission was that the estate should remain in public ownership and not be privatised.

The main themes of concern from community submissions included urban design, place and built form, traffic, transport and movement and social and affordable housing. Specific issues raised were:

- Built form and density:
  - Impact of increased density
  - Impact of increased building heights
  - the high number of additional dwellings proposed
- Amenity:
  - overshadowing, privacy and noise impacts from the scale of proposed buildings
- Design:
  - Need for high quality residential dwellings, suitably designed for future residents
- Housing typology:
  - More medium density such as townhouses instead of predominantly high density residential
  - Need for a transition between development in the estate and surrounding lower density development.
- More services for residents such as cafes community facilities, improved lighting and increased footpaths
- Accessibility concerns for seniors and people with a disability
- Traffic, transport and movement:
  - Ability of existing network to cope with the proposed increased population leading to unacceptable traffic congestion

- Need for an all-day clearway along Belmore Road; the unsafe condition of Belmore Road for pedestrians and safety risks from more traffic congestion
- Inadequate parking provision and availability on on-street parking
- The need for infrastructure upgrades, increased road widths for bus operations and bus bays/shelters
- Social and affordable housing:
  - Shortage in housing supply and rising homelessness numbers
  - Support for an increase in social housing
  - Relocation process needs further explanation for existing social housing tenants
  - Tenure mix should be no more than 30% social housing to avoid overconcentration of socio-economic disadvantaged communities
  - An increase in social housing may result in increased anti-social behaviour and high crime rates with the installation of CCTV cameras recommended.

The Riverwood Community Centre stated that the existing social housing was well past its useful life and is no longer fit for purpose, supporting the renewal of the SSP. It raised a number of concerns including the need for a comprehensive relocation program, a variety of housing to cater for tenant needs and sizes and that a minimum 30% social housing should be provided with all new housing and supporting infrastructure delivered within five years of construction commencement.

## Agency Submissions

Government agencies raised various environmental issues associated with the renewal of the SSP. A brief summary is provided in the table below:

Agency	Issues Raised in Submission
EPA	<p>It recommended further contamination studies be undertaken for land in proximity to the former landfill and that appropriate siting and building design controls be considered.</p> <p>For noise, it recommended the spatial separation of incompatible land uses through zoning, minimising noise emissions at the source and reducing impacts through best practice design, siting and construction.</p> <p>Appropriate water quality targets be derived to support the key objectives of the Salt Pan Creek catchment and protect receiving waters</p>

TfNSW	<p>Specific comments about traffic and transport assessment, improving pedestrian and cycle connectivity, bus access and bus routes, and proposed transport infrastructure improvements including the removal of the Washington Avenue access.</p> <p>TfNSW supported a staged delivery with Belmore Road widened to install a raised concrete median to restrict movements at Washington Avenue to left in/left out, and improvements on Belmore Road including two northbound lanes and a dedicated right turn lane for Hannans Road.</p> <p>TfNSW also commented on the funding and delivery of transport improvements and stated that the total parking provision was too high given proximity of Riverwood railway station.</p>
DCCEEW	<p>DCCEEW required the protection of Cumberland Plain Woodland, listed as a critically endangered ecological community under the <i>Biodiversity Conservation Act 2016</i>; that the masterplan incorporate a biodiversity corridor within Salt Pan Creek Reserve for conservation purposes rather than public open space, and confirmed that building footprints would be outside the extent of flooding but recommended that any evacuation, shelter-in-place and site specific emergency management plans mitigate potential risk to residents.</p>
NSW Health	<p>NSW Health supported the proposal but said that 40% should be considered for social and a minimum of 25% for affordable housing. NSW Health also stated the need to upgrade current community spaces, provide additional childcare spaces to service future demand, and community space to be increased; space in the retail area be dedicated to primary health and a stronger focus be provided on walking/cycling/public transport strategies instead of road upgrades.</p>
Heritage NSW	<p>Heritage NSW supported the proposed future heritage interpretation and mitigation measures outlined in the ACHAR and supported test excavations in early stages of project planning in relation to the potential PAD. It also recommended that Aboriginal consultation is maintained.</p>
NSW SES	<p>NSW SES made comments in relation to flooding and provided recommendations about evacuation requirements and the need to locate certain land uses above target flood levels.</p>
Aboriginal Affairs NSW	<p>Aboriginal Affairs NSW requested commitments for more housing for Aboriginal people, that specific communication and engagement should occur and to investigate the importance of Salt Pan Creek on cultural values.</p>



Aboriginal Housing Office	Aboriginal Housing Office made specific comments regarding the two properties potentially impacted by the masterplan.
State Infrastructure NSW (SINSW)	SINSW stated that the students projected to be generated by the proposal could be accommodated within existing schools. It recommended measures to promote safety, access and pedestrian movement in relation to active transport.
Crown Lands	Crown Lands stated that the increased open space linking to Salt Pan Creek Reserve would contribute to the liveability of the social and private housing within the precinct.

## Council Submissions

City of Canterbury-Bankstown Council supported the renewal of the estate and the provision of new social housing, however, stated that it needed to be supported by infrastructure commensurate with the proposed population growth. Council considered that a minimum of 40% social housing be provided and a minimum 10% affordable housing. The remaining issues raised by Council mainly related to local and regional infrastructure contributions and the need to provide upgrades to road infrastructure to enable the network to function appropriately for later stages of the development. Council made specific comments regarding cycling and pedestrian infrastructure, the provision of open space, urban design and character, tree canopy and landscaping requirements, and the need to manage stormwater and the generation of waste. Detailed comments were received regarding proposed DCP controls.

Georges River Council supported the proposal but raised issues regarding the number of social and affordable housing dwellings (and considered the target should be at least 30%), that retail uses may compete with the Riverwood Town Centre, the capacity of existing roads to cope with the increased population, lack of information regarding contributions/funding arrangements, proposed community and social infrastructure and the need for a greater tree canopy target of 30%.

# Attachment C – Consistency with South District Plan Priorities

South District Plan Planning Priorities	Consistency of Revised Proposal
Planning Priority S1 – Planning for a city supported by infrastructure	The revised proposal is within walking distance of Riverwood train station and is well serviced by buses. The proposal new residential and employment uses and the through site link and upgrade of Virginia Place would provide improved walking and pedestrian/cyclist connections. The increased proposed setback along the eastern side of the site would accommodate the future widening and upgrade of the Belmore Road/Hannans Road intersection.
Planning Priority S2 – Working through collaboration	Homes NSW is the lead agency and has collaborated with the Department, Canterbury-Bankstown and Georges River Councils as well as a number of state government agencies including TfNSW.
Planning Priority S3 – Providing services and social infrastructure to meet people’s changing needs	The proposal involves the replacement of 60 existing ageing dwellings which are not fit for purpose with 420 high quality dwellings, improved connections, a new child care centre and opportunities for other retail uses.
Planning Priority S4 – Fostering healthy, creative, culturally rich and socially connected communities	A diversity of residential dwellings and opportunities for facilities and improved public spaces will be delivered while supporting potential employment that accommodates the needs of the wider community. Public domain improvements include a through site link from Belmore Road and Virginia Place, improved streetscape along Belmore Road and Virginia Place and shared paths to encourage walking, cycling and community interaction.

South District Plan Planning Priorities	Consistency of Revised Proposal
<p>Planning Priority S5 – Providing housing supply, choice and affordability, with access to jobs, services and public transport</p>	<p>A total of 420 new dwellings, with 50% proposed for social and affordable housing and 50% proposed market housing in close proximity to Riverwood train station and existing bus routes. This will contribute to housing supply, choice and affordability in a location with excellent access to jobs, services and public transport.</p>
<p>Planning Priority S6 – Creating and renewing great places and local centres, and respecting the District’s heritage</p>	<p>The assessment has considered heritage impacts. The entire Riverwood Estate is considered to have cultural heritage values as part of the wider Aboriginal cultural landscape including those from Aboriginal attachment to historical settlement and to historical and current social housing. Targeted consultation confirmed that the Estate is significant to Aboriginal people being located close to a waterway. No non-Aboriginal heritage-listed items are located in or in the vicinity of Riverwood Estate.</p> <p>The assessment identified potential interpretative options which would be considered as part subsequent planning stages (including the use of Aboriginal language/place naming, architectural design integration, functional elements, public art, interpretative panels, plantings and landscape design).</p>
<p>Planning Priority S9 – Growing investment, business opportunities and jobs in strategic centres</p>	<p>The revised proposal will increase the supply of new commercial floorspace through the Additional Permitted Use provision in the LEP allowing for a supermarket, neighbourhood shops and food/drink premises to be provided on the ground floor of the buildings.</p>
<p>Planning Priority S12 – Delivering integrated land use and transport planning and a 30 minute city</p>	<p>The delivery of 420 new dwellings (an increase of 360 dwellings in this area of the precinct) and potential opportunities for additional jobs in a location that is easily accessible to existing public transport services, bringing people closer to jobs, homes and services they need.</p>

South District Plan Planning Priorities	Consistency of Revised Proposal
<p>Planning Priority S13 – Protecting and improving the health and enjoyment of the District’s waterways</p>	<p>Future development applications and planning processes will consider a range of measures to ensure the protection of the surrounding catchment and nearby waterway of Salt Pan Creek.</p> <p>In accordance with Council requirements, onsite stormwater detention is required for all multi dwelling housing and residential flat buildings with a minimum of 75% of the site draining to the detention basin and designed such that stormwater flows do not exceed a permissible discharge of 150 L/s per hectare.</p>
<p>Planning Priority S14 – Protecting and enhancing bushland, biodiversity and scenic and cultural landscapes and better managing rural areas</p>	<p>The revised proposal contains no vegetation of ecological significance, although high retention value trees would be retained where possible. A tree canopy target of 30% is proposed.</p>
<p>Planning Priority S15 – Increasing urban tree canopy cover and delivering Green Grid connections</p>	<p>A tree canopy target of 30% is proposed which meets Council’s urban tree canopy target and this planning priority.</p>
<p>Planning Priority S16 – Delivering high quality open space</p>	<p>The proposed through site link between Belmore Road and Virginia Place would deliver green space within the development and Homes NSW has committed to provide high quality private open space with good solar access.</p>
<p>Planning Priority S17 – Reducing carbon emissions and managing energy, water and waste efficiently</p>	<p>This planning priority would be addressed in subsequent planning stages.</p>
<p>Planning Priority S18 – Adapting to the impacts of urban and natural hazards and climate change</p>	<p>This planning priority would be addressed in subsequent planning stages.</p>

# Attachment D – Consistency with State Environmental Planning Policies

SEPP	Comment
State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development	<p>SEPP 65 will apply to the residential flat building proposed in the Riverwood precinct.</p> <p>The proposed amendments will not contradict or hinder application of this SEPP.</p>
State Environmental Planning Policy (Housing) 2021	<p>The proposal includes provision to require at least 50% of the floor space used for residential accommodation must be used for affordable and social housing.</p> <p>The proposed amendments will not contradict or hinder application of this SEPP.</p>
State Environmental Planning Policy (Biodiversity and Conservation) 2021	<p>The proposed amendments will not contradict or hinder application of this SEPP.</p>
State Environmental Planning Policy (Planning Systems) 2021	<p>Clause 26 of Schedule 1 of the SEPP states that development is deemed SSD when carried out by or on behalf of the Aboriginal Housing Office or Land and Housing Corporation (now Homes NSW) where the estimated development cost is more than \$30 million or will result in more than 75 dwellings.</p> <p>Given the capital costs of the revised proposal is expected to be more than \$30 million and will comprise greater than 75 dwellings, it would be assessed as SSDA.</p>
State Environmental Planning Policy (Transport and Infrastructure) 2021	<p>The proposed amendments will not contradict or hinder application of this SEPP.</p>



# Attachment E – Consistency with s9.1 Ministerial Directions

Direction	Comment	Consistent
1.1 Implementation of Regional Plans	The planning amendments are consistent with the relevant aims, objectives and provisions of the Region Plan.	Yes
1.3 Approval and Referral Requirements	The planning amendments do not include concurrence, consultation or referral provisions or identify any developments as designated development.	Yes
1.4 Site Specific Provisions	<p>The objective of this direction is to discourage unnecessarily restrictive site-specific planning controls.</p> <p>The planning amendments are justifiably inconsistent with the direction as they seek to impose requirements for 50% of residential floor space to be used for the purpose of social and affordable housing. This is of minor significance and aligns with government priorities to promote social and affordable housing on government-owned land.</p>	Justifiably inconsistent

Direction	Comment	Consistent
4.1 Flooding	<p>The objectives of this direction are to ensure development of flood prone land is consistent with Government policy.</p> <p>The planning amendments enable intensification of development in this area. The proposal is supported by a Climate Change and Stormwater Assessment and a DCP that provides flooding controls and on-site water detention controls to mitigate and manage risks. The Flooding Report notes that flooding occurs outside the development footprint and that evacuation is available on roads surrounding.</p> <p>Future development applications will continue to be required to address flooding risks.</p>	Yes
4.5 Acid Sulfate Soils	<p>The objective of this direction is to avoid significant adverse environmental impacts from the use of land that has a probability of containing acid sulfate soils.</p> <p>The direction applies as the site is identified as being Class 5 on the Acid Sulfate Soils Map of the Canterbury Bankstown LEP 2023.</p> <p>Clause 6.1 of the Canterbury Bankstown LEP 2023 contains suitable provisions to ensure that acid sulfate soils are appropriately considered and addressed as part of any future development application involving any excavation of the site.</p>	Justifiably inconsistent
5.1 Integrated Land Use and Transport	<p>The objectives of this direction are to ensure that new development achieves access to housing, jobs and services, increases transport options and reduces dependence on cars, reduce travel demand, support public transport services and provide for efficient freight movement. The proposal is consistent with the objectives of this direction as it will enable delivery of housing close to existing public transport.</p>	Yes

Direction	Comment	Consistent
6.1 Housing	<p>The objectives of this direction are to encourage a variety and choice of housing types, make efficient use of existing infrastructure and services and minimise the impact of residential development on the environment and resource lands.</p> <p>The proposed planning amendments are consistent with the objectives of this direction because it will enable an increase in housing within 450m of a train station.</p>	Yes