

Riverwood State Significant Precinct Submissions

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Submission Number/ID: 91/444881

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of RIVERWOOD

Submitted: 3/8/2024 1:23:19 PM

Submission: I support it

I agree to the proposals.

Submission Number/ID: 92/445016

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Thaman Gurung of William Rd, Riverwood. NSW2210

Submitted: 3/9/2024 9:34:13 AM

Submission: I support it

In my thoughts, it would be great idea and more benefit to our community if we allow R4 zoning William Road, Riverwood. NSW 2210 because it is next to the train station, easy to get Airports, and easy to get on M5 via other side roads from William Road, Riverwood.

I strongly reccomend William Road, Riverwood to be upgrading R4 Zoning.

Regards,

Thaman Gurung

[REDACTED]

Contact: [REDACTED]

Submission Number/ID: 93/445836

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of RIVERWOOD

Submitted: 3/13/2024 10:25:40 AM

Submission: I object to it

This proposal is not at all suited to the environment next to Belmore Road. Riverwood will start to resemble Hurstville with roadside high rise creating a congested urban feel. Any proposal should be way back from the road. Looking at the map I don't see the rationale for having it roadside when such a large area is available. With such a small corner highlighted for development you can't help but wonder when another proposal is put forward for more development thus putting more than the original 3800 proposed dwellings. Belmore Road has become increasingly congested since opening the new M5 ramps and adding more residents will create further congestion and as a consequence more pollution. The area under proposal is in need of development and drug dealing and crime is well known so a better proposal would be welcomed to create a better community.

Submission Number/ID: 94/445846

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of RIVERWOOD

Submitted: 3/13/2024 10:26:30 AM

Submission: I object to it

This proposal is not at all suited to the environment next to Belmore Road. Riverwood will start to resemble Hurstville with roadside high rise creating a congested urban feel. Any proposal should be way back from the road. Looking at the map I don't see the rationale for having it roadside when such a large area is available. With such a small corner highlighted for development you can't help but wonder when another proposal is put forward for more development thus putting more than the original 3800 proposed dwellings. Belmore Road has become increasingly congested since opening the new M5 ramps and adding more residents will create further congestion and as a consequence more pollution. The area under proposal is in need of development and drug dealing and crime is well known so a better proposal would be welcomed to create a better community.

Submission Number/ID: 95/445851

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of RIVERWOOD

Submitted: 3/13/2024 10:27:11 AM

Submission: I object to it

This proposal is not at all suited to the environment next to Belmore Road. Riverwood will start to resemble Hurstville with roadside high rise creating a congested urban feel. Any proposal should be way back from the road. Looking at the map I don't see the rationale for having it roadside when such a large area is available. With such a small corner highlighted for development you can't help but wonder when another proposal is put forward for more development thus putting more than the original 3800 proposed dwellings. Belmore Road has become increasingly congested since opening the new M5 ramps and adding more residents will create further congestion and as a consequence more pollution. The area under proposal is in need of development and drug dealing and crime is well known so a better proposal would be welcomed to create a better community.

Submission Number/ID: 96/445861

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of RIVERWOOD

Submitted: 3/13/2024 10:28:26 AM

Submission: I object to it

This proposal is not at all suited to the environment next to Belmore Road. Riverwood will start to resemble Hurstville with roadside high rise creating a congested urban feel. Any proposal should be way back from the road. Looking at the map I don't see the rationale for having it roadside when such a large area is available. With such a small corner highlighted for development you can't help but wonder when another proposal is put forward for more development thus putting more than the original 3800 proposed dwellings. Belmore Road has become increasingly congested since opening the new M5 ramps and adding more residents will create further congestion and as a consequence more pollution. The area under proposal is in need of development and drug dealing and crime is well known so a better proposal would be welcomed to create a better community.

Submission Number/ID: 97/445866

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of RIVERWOOD

Submitted: 3/13/2024 10:30:04 AM

Submission: I object to it

This proposal is not at all suited to the environment next to Belmore Road. Riverwood will start to resemble Hurstville with roadside high rise creating a congested urban feel. Any proposal should be way back from the road. Looking at the map I don't see the rationale for having it roadside when such a large area is available. With such a small corner highlighted for development you can't help but wonder when another proposal is put forward for more development thus putting more than the original 3800 proposed dwellings. Belmore Road has become increasingly congested since opening the new M5 ramps and adding more residents will create further congestion and as a consequence more pollution. The area under proposal is in need of development and drug dealing and crime is well known so a better proposal would be welcomed to create a better community.

Submission Number/ID: 98/445886

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of RIVERWOOD

Submitted: 3/13/2024 10:30:38 AM

Submission: I object to it

This proposal is not at all suited to the environment next to Belmore Road. Riverwood will start to resemble Hurstville with roadside high rise creating a congested urban feel. Any proposal should be way back from the road. Looking at the map I don't see the rationale for having it roadside when such a large area is available. With such a small corner highlighted for development you can't help but wonder when another proposal is put forward for more development thus putting more than the original 3800 proposed dwellings. Belmore Road has become increasingly congested since opening the new M5 ramps and adding more residents will create further congestion and as a consequence more pollution. The area under proposal is in need of development and drug dealing and crime is well known so a better proposal would be welcomed to create a better community.

Submission Number/ID: 99/448651

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/14/2024 1:45:44 PM

Submission: I object to it

I am writing because the childcare centre my daughter attends (and my eldest daughter before her) will be significantly impacted by these changes. While I am pleased to see attention being turned to how to enliven this area & foster more cohesion and safety, I have grave concerns regarding one aspect of the proposed changes. SDN Riverwood have advised the centre would be demolished, and that there is not certainty that an alternative centre location would be found. This would be a huge loss to the Riverwood community. My children have attended multiple childcare centres over the years, and I can say with confidence SDN Riverwood is truly unique in its efforts to build a bridge to the local community and families. This is not a check the box exercise, but something they live and breathe. Not only have my children received a high quality education at the centre, but the care that they extend to families and the community has meant that we feel a part of this community. We moved to the area 2 years ago knowing no one locally and so this has been a significant impact for our family. Examples of this care and attention include their support of the one meal service at Riverwood community centre, and the way they rallied around a family recently when their child was injured in an accident. They have also gone to great lengths to establish a strong relationship with local schools and to foster opportunities for children to become habituated with these school environments to make their transition to school more seamless.

I would be truly devastated if my daughter could no longer attend SDN Riverwood. Their care and attention is second to none, and I feel they are truly uniquely placed to be a community hub that fosters positive outcomes - educational and social and emotional- for children and families. The regulatory authority agrees with me having recently awarded the centre an exceeding rating on all seven quality areas.

I trust this information will be considered alongside the submissions from other local families and SDN Riverwood, and the significant benefits the centre offers acknowledged in any decisions taken.

With thanks,

[REDACTED]

Submission Number/ID: 100/448691

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2211

Submitted: 3/14/2024 2:03:39 PM

Submission: I object to it

I have grave concerns about the removal of SDN Riverwood Children's Education and Care Service from the community. The centre provides invaluable early education and care as well as vital early intervention support for numerous families in the Riverwood community facing a range of disadvantages. I have seen first hand the crucial impact this service has had in improving the lives of children and families, providing vital support to the most vulnerable members of the community. The current plan provides no guarantee that the service will be guaranteed to continue, eg in a new location if necessary. The removal of this service would have a significant negative impact on many families in the Riverwood community for which SDN is a lifeline. SDN Riverwood also had a long history within the community, providing this support for generations and contributing to the broader community in many ways including through regular one meal food service. I ask that when finalising planning decisions you ensure that SDN Riverwood has a continued place within the community.

Submission Number/ID: 101/448876

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/14/2024 4:18:38 PM

Submission: I object to it

SDN childcare centre needs to be there to support Riverwood community.

Submission Number/ID: 102/448916

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Lan Gao of Riverwood/2210

Submitted: 3/14/2024 4:31:45 PM

Submission: I am just providing comments

We strongly need a high quality long day care in the local community and SDN has meet all the needs for my family.

Submission Number/ID: 103/449121

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Amanda Santos of Padstow

Submitted: 3/14/2024 7:12:39 PM

Submission: I object to it

SDN Riverwood has been a major support for my family over the past 8 years and I still have one child currently attending. The SDN team is amazing and to demolish such an integral part to the community would be devastating not only for my family, but every family enrolled and potential future families.

Submission Number/ID: 104/449526

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Mary Mizo of 2210

Submitted: 3/15/2024 3:53:04 PM

Submission: I object to it

Subject: Concerns Regarding Revised Rezoning Proposal for Riverwood Estate

Dear Laura,

I am writing to express my strong objections to the revised rezoning proposal for Riverwood Estate, which aims to build 420 new homes in the area. The proposed development poses significant concerns for the community and the well-being of residents, particularly in terms of traffic congestion, limited infrastructure, and potential safety issues.

One of the most pressing issues with this proposal is the anticipated increase in traffic congestion on Belmore Road, an area already heavily burdened with traffic problems. The addition of 420 new homes will only exacerbate the existing congestion, making it even more challenging for residents to commute and navigate the area safely.

Furthermore, the current lack of adequate shopping centers in Riverwood raises concerns about the strain that additional residents would place on the only existing shopping center in the area. Increased congestion in this space would not only inconvenience residents but also compromise their safety and well-being.

Another worrying aspect of this proposal is the potential impact on community safety. Riverwood already struggles with a high rate of violence, and the introduction of more social housing through this development could further escalate crime rates in the suburb. This poses a serious threat to the safety and security of residents and could make Riverwood an increasingly unsafe place to live.

Given the already challenging socio-economic background of the suburb, it is crucial that the authorities prioritise road safety and community well-being in any development plans for Riverwood. Rather than exacerbating existing issues, we urge decision-makers to consider alternative solutions that focus on enhancing infrastructure and community-based services/facilities to support the residents of Riverwood.

I implore you to carefully reconsider the implications of this rezoning proposal and prioritize the safety and well-being of the community above all else. It is essential that any changes made in Riverwood are aimed at creating a safer and more prosperous environment for all residents.

Thank you for your attention to this matter.

Sincerely,

Mary Mizo

[REDACTED]

Submission Number/ID: 105/449531

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Darren Giles of 2210

Submitted: 3/15/2024 3:54:26 PM

Submission: I object to it

Subject: Concerns Regarding Revised Rezoning Proposal for Riverwood Estate

Dear Laura,

I am writing to express my strong objections to the revised rezoning proposal for Riverwood Estate, which aims to build 420 new homes in the area. The proposed development poses significant concerns for the community and the well-being of residents, particularly in terms of traffic congestion, limited infrastructure, and potential safety issues.

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Given the already challenging socio-economic background of the suburb, it is crucial that the authorities prioritise road safety and community well-being in any development plans for Riverwood. Rather than exacerbating existing issues, we urge decision-makers to consider alternative solutions that focus on enhancing infrastructure and community-based services/facilities to support the residents of Riverwood.

I implore you to carefully reconsider the implications of this rezoning proposal and prioritize the safety and well-being of the community above all else. It is essential that any changes made in Riverwood are aimed at creating a safer and more prosperous environment for all residents.

Thank you for your attention to this matter.

Sincerely,

Darren Giles

[REDACTED]

Submission Number/ID: 106/449546

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Peakhurst

Submitted: 3/15/2024 4:30:29 PM

Submission: I object to it

Hi there,

My daughter goes to SDN and to know that they will close doors is absolutely heartbreaking. SDN is very important to the community and a place where kids feel safe and well looked after. To remove this would be an absolute heart break and a big disruption to our family. For this reason I object.

Thank you

Submission Number/ID: 107/449596

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Admir Camdzic of Riverwood

Submitted: 3/16/2024 1:05:52 PM

Submission: I support it

I support the proposal. However there must be plans put into place to widen or improve Belmore Road if these new dwellings are built. The road already suffers from congestion, and some intersections (such as Washington Avenue to Belmore Rd) are already difficult to turn into. A roundabout or lights there would greatly improve safety and visibility for this road. It is perhaps outside the scope of the proposal but an upgrade of the Riverwood shops right before the station would be greatly appreciated. They are run down and could use a facelift. Thank you.

Submission Number/ID: 108/449601

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of RIVERWOOD 2210

Submitted: 3/16/2024 1:13:40 PM

Submission: I object to it

The current infrastructure of Riverwood is not sufficient to accommodate much more population.

Submission Number/ID: 109/449616

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Ellena Vlahopoulos of 2210

Submitted: 3/16/2024 7:19:43 PM

Submission: I object to it

I strongly oppose the proposed demolition of SDN Daycare centre in Riverwood. The daycare should remain. I have lived in the Riverwood area my whole life. Upon walking into the centre there are portraits on the walls which display the rich history of the daycare in our community. My child attends this centre. It is rated as excellent by ASQA and definitely should not be demolished under any circumstances.

Ellena Vlahopoulos

Submission Number/ID: 110/449741

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Greenacre 2190

Submitted: 3/18/2024 10:40:51 AM

Submission: I object to it

To whom it may concern,

I hope this message finds you well. I am writing to express my concerns regarding the rezoning proposal currently under consideration. I deeply value the sense of community and the amenities that contribute to the well-being of families in our area.

One aspect of this proposal that particularly troubles me is its potential impact on childcare facilities in our neighborhood. As a parent, ensuring the accessibility and quality of childcare services for my children is of paramount importance. Any changes to zoning regulations that could disrupt or diminish the availability of such services would have a direct and significant impact on my family's daily life and well-being.

My children currently attend SDN Riverwood, which is located within the area affected by the proposed rezoning. The potential displacement or closure of this facility, or any increase in

traffic or congestion that may result from the proposed changes, would create considerable challenges for our family in terms of accessing reliable and convenient childcare.

I urge you to carefully consider the implications of this rezoning proposal on families like mine who rely on local childcare services. While I understand the need for development and progress, it is essential to prioritize the needs and concerns of the community, especially when it comes to the welfare of our children.

In light of these concerns, I respectfully request that the rezoning proposal be rejected or revised to address the potential impact on childcare facilities and the families they serve. Thank you for taking the time to consider my perspective on this matter.

Sincerely,

[REDACTED]

Submission Number/ID: 111/449791

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of PEAKHURST

Submitted: 3/18/2024 4:47:00 PM

Submission: I support it

My question is why did the proposal get knocked back from the original proposal. The area needs a huge infrastructure. Have you visited housing commission homes where people are being so disrespectful in the way they are treating homes. Rubbish all over the place. Have you visited housing down at the bottom of Shenstone Road Riverwood, houses at the beginning of Amy Road peakhurst it is disgraceful - people should be fined for being so disrespectful to homes and the environment. This is tax payers money.

Submission Number/ID: 112/449816

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood 2210

Submitted: 3/18/2024 9:14:04 PM

Submission: I object to it

I am against it

Submission Number/ID: 113/449821

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Benjamin Baran of 2210

Submitted: 3/18/2024 9:18:54 PM

Submission: I object to it

Your proposal will increase the crime rate of an already crime ridden area, and decrease the value of the apartments purchased before this plan was released due to this. I posit that this is purely profit driven and little forethought past that has been put into the plan, with no thought given to current residents. I firmly object.

Submission Number/ID: 114/449826

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Jian Ming Kong of 2210

Submitted: 3/19/2024 8:39:55 AM

Submission: I object to it

Dar Sir/ Madam

Riverwood papulation has increased dramatically over the last 10 years,

every street is fully park with cars, the street sweeper truck was not able to sweep my street for years.

we can not keep putting more people in this suburb.

my children do not feel safe to walk home from the train station after dark.

i am against for this proposal.

Submission Number/ID: 115/449831

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/19/2024 8:40:20 AM

Submission: I object to it

Dar Sir/ Madam

Riverwood papulation has increased dramatically over the last 10 years,

every street is fully park with cars, the street sweeper truck was not able to sweep my street for years.

we can not keep putting more people in this suburb.

my children do not feel safe to walk home from the train station after dark.

i am against for this proposal.

Submission Number/ID: 116/449856

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/19/2024 10:59:32 AM

Submission: I object to it

The revised plan is underwhelming. As a SSP, the revised plan doesn't address the current housing affordability issue that Australian are facing - not being able to afford to buy their own home.

This is a prime location, close to train station and just 30 - 40 minutes train trip to the Sydney CBD. Why does the government has to focus on the mix use residency, while most of the public housing residents doesn't not required to travel the CBD for work. Why not keep the previous plan and increase ratio for the affordable market housing for young Australian and young family.

Use government land to for affordable market housing is also a revenue stream for the government.

May I also add, the CPTED is not going to stop the crime and anti-social behaviours in Riverwood, as it happens in board daylight on the main street everyday! This this because the concentration of the social housing in this suburb. Not saying every social housing tenant is anti-social, but the population needs to be diluted and balanced. Plus 4 massage parlours in close approximate on the main street doesn't help, not sure why the council is allowing this to happen.

In terms of public area, its old and dated, people doesn't really shop in riverwood, they usually go to Roseland, Bankstown or Hurtsville for grocery. This place is desperately need a revitalise plan.

Submission Number/ID: 117/449861

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/19/2024 11:02:40 AM

Submission: I object to it

The density of this project is a concern. It will create traffic block and inconvenience to the existing residents. It will totally change the community vibe which is sad. The government would be better of selling the holding of the land in Riverwood to private, keep the zoning unchanged, use the proceed of land sales from Riverwood to build more affordable housing in an more affordable suburb than Riverwood.

Submission Number/ID: 118/449871

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Jeff Cheal of 2210

Submitted: 3/19/2024 11:50:59 AM

Submission: I object to it

The area around this revised proposal Is currently so congested with local and through traffic that it has become a bottleneck. The congestion is even more concentrated between Washington and Roosevelt Avenues which is right in the middle of the proposed Riverwood Estate. I can see no proposal to fix the current traffic problem, or any consideration given to the

increase traffic flow the new estate will bring to the area. Also, there is no mention or plans to increase the capacity of local schools to accommodate the influx of children that will move into this estate. Therefore, while not being against development of the area I am against development without the proper infrastructure being included as part of the proposal.

Submission Number/ID: 119/449881

CONFIDENTIALITY: No

Submission Type: I am submitting on behalf of my organisation

Name: Jackline Said of 2200

Submitted: 3/19/2024 12:16:27 PM

Submission:

Continue Sdn childcare center in same location don't demolished as it is my son center and it is exceeding center we need center like that in riverwood

Submission Number/ID: 120/450186

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/21/2024 5:43:59 PM

Submission: I object to it

Well you better add a traffic light at that intersection (Belmore and Washington) and synchronize it with Hannans road. Its already a mess without 400 additional units. Have you even seen the traffic flow trying to enter or exit Washington. The keep clear is usually disobeyed.

I would like for whoever is planning this project to actually drive their vehicle out of Washington Road and turn right Belmore road at 4pm.

Once these 400 units are built good luck trying to get out of Washington Road.

Im not against the units but a traffic flow plan will need to be spoken about as well as traffic flow during the build as Washington road is the main of this block.

Submission Number/ID: 121/450206

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Katherine Henriksen of 2209

Submitted: 3/21/2024 9:20:05 PM

Submission: I object to it

Of major concern to me, other than that current traffic congestion, is that my son's daycare (SDN Riverwood) is within the boundary of the proposed stage one development.

SDN Riverwood has been in it's current location for 50 years. In the local community, it has the largest outdoor play area. Many homes have little to no backyards and outdoor play is essential to a child's well-being, growth and development.

My son has attended SDN Riverwood for more than 12 months. He is autistic, has rigid, fixed behaviours and ideas. He has formed strong bonds with the staff who have greatly assisted his learning and development. The staff are highly experienced in engaging and educating children from all backgrounds in an inclusive environment. Despite my son's limited verbal skills, he asks for the staff by name and is excited to see them. I should add that I have had two older children (now in primary school) who also attended the centre. Despite being now 10 and 8 years of age, the long-term staff remember their names and show genuine interest in their ongoing development.

The centre has been key to supporting the local community and accepts referrals from Department Communities and Justice, providing a safe place for children to learn and grow. These vulnerable children would be considered at risk. The service supports and integrates families with various social events throughout the year.

SDN regularly assists Riverwood Community centre with donations and meal preparation for One Meal, in addition to serving these meals to the community. SDN also regularly participates in collating donations for Vinnies Riverwood, cementing their position in the community as more than a child care service.

The loss of this service would be felt deeply across the community. An equivalent parcel of land for a relocation appears to be non-existent, and there has been very little communication or consultation provided to them.

Further to the potential loss of SDN, the Riverwood Community is already choking with social issues. Adding additional housing to the area, will not result in positive outcomes. The area is frequent to horrific crimes, making news for the most heinous including the murder of a toddler in June 2023 and a couple in their Union Street home in October 2023.

In considering suitable areas for public housing, public transport and access to services (transport including trains, supermarkets etc) should be weighted heavily. Anyone thinking the location is suitable has not walked home with groceries.

Since the opening of the M5 entrance ramp, the volume of traffic has multiplied. Additional housing in this area would add to the congestion.

Submission Number/ID: 122/450211

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Katherine Henriksen of 2209

Submitted: 3/21/2024 9:20:57 PM

Submission: I object to it

Of major concern to me, other than that current traffic congestion, is that my son's daycare (SDN Riverwood) is within the boundary of the proposed stage one development.

SDN Riverwood has been in it's current location for 50 years. In the local community, it has the largest outdoor play area. Many homes have little to no backyards and outdoor play is essential to a child's well-being, growth and development.

My son has attended SDN Riverwood for more than 12 months. He is autistic, has rigid, fixed behaviours and ideas. He has formed strong bonds with the staff who have greatly assisted his learning and development. The staff are highly experienced in engaging and educating children from all backgrounds in an inclusive environment. Despite my son's limited verbal skills, he asks for the staff by name and is excited to see them. I should add that I have had two older children (now in primary school) who also attended the centre. Despite being now 10 and 8 years of age, the long-term staff remember their names and show genuine interest in their ongoing development.

The centre has been key to supporting the local community and accepts referrals from Department Communities and Justice, providing a safe place for children to learn and grow. These vulnerable children would be considered at risk. The service supports and integrates families with various social events throughout the year.

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In considering suitable areas for public housing, public transport and access to services (transport including trains, supermarkets etc) should be weighted heavily. Anyone thinking the location is suitable has not walked home with groceries.

Since the opening of the M5 entrance ramp, the volume of traffic has multiplied. Additional housing in this area would add to the congestion.

Submission Number/ID: 123/450236

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Tosca Galluzzo of 2210

Submitted: 3/22/2024 8:56:57 AM

Submission: I object to it

Riverwood has much potential, with already great infrastructure such as access to the M4, trains and parking.

The original plan to redevelop 3900 dwellings the whole of Washington Ave, Kentucky St, Virginia Pl etc would have got Riverwood up to its full potential.

If we go ahead with the 420 home we are missing an opportunity.

Is it possible to look at something like 2000 new dwellings if it is a cost and time issue?

Submission Number/ID: 124/450271

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood 2210

Submitted: 3/22/2024 6:12:05 PM

Submission: I object to it

As of currently, the tenants living in social housing in Riverwood has made the area more unsafe and threatening. The decreasing safety in the are was experienced by some of the residents who were threatened by social housing tenants when feeding stray cat colonies around the area where in one occasion the verbal abuse escalated to a physical assault and police were contacted.

An additional 420 housing commission dwellings would only add to the decreasing safety in the area. People who spent their hard earned money and purchased their home in Riverwood deserve to feel safe. Building more dwellings in Riverwood would also threaten the wildlife and greenery in the area. The birds living in the trees around Riverwood would lose their habitat and as a result the residents would lose their connection to these wonderful wildlife. This balance of natural and dwelling space was what attracted my family to live in Riverwood and this proposal will destroy the sense of connectedness and safety in living in this suburb.

Submission Number/ID: 125/450276

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Ying Wang of 2210

Submitted: 3/22/2024 10:57:15 PM

Submission: I support it

3900 dwellings or more is more suitable for this areas. Riverwood is convenience and affordable areas. Should intake more people in these areas

Submission Number/ID: 126/450291

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Rebecca Jones of 2010

Submitted: 3/23/2024 11:33:25 AM

Submission: I support it

I am glad to see that at least something is still proposed with this redevelopment plan. I was disappointed to see how the last proposal was shut down, and that it became a politicised issue. These buildings are all quite old, run down, and honestly just need to be demolished. I hope that smaller scale updates will lead to an overall redevelopment incrementally.

Submission Number/ID: 127/450296

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Lola Imawan of Riverwood, 2210

Submitted: 3/23/2024 1:25:36 PM

Submission: I am just providing comments

Dear NSW Planning Team

We write this submission as local community members living near the proposed rezoning area at Riverwood Estate. Given the lack of infrastructure to cater for this increase in population, we are concerned about appropriate road and transport development to cater for this. This rezoning proposal of 420 new homes will significantly increase the traffic and strain on these two key intersections.

We provide the following comments for your consideration:

1. Fix the Washington-Belmore-Hannans intersection:

The intersection between Washington Avenue and Belmore Road is an extremely busy one. There is frequently a heavy traffic bottleneck - particularly, with the immediate S-turn from Belmore Road onto Hannans Road. In its current state, it is extremely difficult for cars to turn left from Washington Avenue onto the right most lane, for an almost immediate right turn onto Hannans Road. It is also extremely difficult for cars to turn right from Washington Avenue onto Belmore Road towards Riverwood station. Not only are these intersections busy, but there is a concern for safety as well. We have frequently seen accidents occur here, and have personally experienced an accident here as well.

While we understand this may not fall within the remit of the rezoning proposal, we highly recommend that this is considered in any proposed development stages of the area. For example, one solution could be for a traffic light to be installed at the intersection of Washington Avenue and Belmore Road. This would help ensure safety and provide controls for any increased traffic in the area.

2. Widen Belmore Road:

We understand a setback of 15m has been proposed on Belmore Road. However, there is no current plan for widening of Belmore Road to accommodate the increased traffic and usage.

3. Redirect new resident cars onto Virginia Place and/or Roosevelt Avenue:

Furthermore, given the existing traffic bottleneck on Washington Avenue turning onto Belmore Road, future developments should have traffic flow and driveways directed onto Virginia Place and/or Roosevelt Avenue. This would reduce the existing strain on Washington Avenue.

We hope these concerns regarding infrastructure and safety are taken seriously, both in the current stage and in future states of development.

Submission Number/ID: 128/450301

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Lola Imawan of Riverwood, 2210

Submitted: 3/23/2024 1:25:59 PM

Submission: I am just providing comments

Dear NSW Planning Team

We write this submission as local community members living near the proposed rezoning area at Riverwood Estate. Given the lack of infrastructure to cater for this increase in population, we are concerned about appropriate road and transport development to cater for this. This rezoning proposal of 420 new homes will significantly increase the traffic and strain on these two key intersections.

We provide the following comments for your consideration:

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While we understand this may not fall within the remit of the rezoning proposal, we highly recommend that this is considered in any proposed development stages of the area. For example, one solution could be for a traffic light to be installed at the intersection of Washington Avenue and Belmore Road. This would help ensure safety and provide controls for any increased traffic in the area.

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3. Redirect new resident cars onto Virginia Place and/or Roosevelt Avenue:

Furthermore, given the existing traffic bottleneck on Washington Avenue turning onto Belmore Road, future developments should have traffic flow and driveways directed onto Virginia Place and/or Roosevelt Avenue. This would reduce the existing strain on Washington Avenue.

We hope these concerns regarding infrastructure and safety are taken seriously, both in the current stage and in future states of development.

Submission Number/ID: 129/450306

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Lola Imawan of Riverwood

Submitted: 3/23/2024 1:28:33 PM

Submission: I am just providing comments

Dear NSW Planning Team

We write this submission as local community members living near the proposed rezoning area at Riverwood Estate. Given the lack of infrastructure to cater for this increase in population, we are concerned about appropriate road and transport development to cater for this. This rezoning proposal of 420 new homes will significantly increase the traffic and strain on these two key intersections.

We provide the following comments for your consideration:

1. Fix the Washington-Belmore-Hannans intersection: The intersection between Washington Avenue and Belmore Road is an extremely busy one. There is frequently a heavy traffic bottleneck - particularly, with the immediate S-turn from Belmore Road onto Hannans Road. In its current state, it is extremely difficult for cars to turn left from Washington Avenue onto the right most lane, for an almost immediate right turn onto Hannans Road. It is also extremely difficult for cars to turn right from Washington Avenue onto Belmore Road towards Riverwood station. Not only are these intersections busy, but there is a concern for safety as well. We have frequently seen accidents occur here, and have personally experienced an accident here as well.

While we understand this may not fall within the remit of the rezoning proposal, we highly recommend that this is considered in any proposed development stages of the area. For example, one solution could be for a traffic light to be installed at the intersection of Washington Avenue and Belmore Road. This would help ensure safety and provide controls for any increased traffic in the area.

2. Widen Belmore Road:

We understand a setback of 15m has been proposed on Belmore Road. However, there is no current plan for widening of Belmore Road to accommodate the increased traffic and usage.

3. Redirect new resident cars onto Virginia Place and/or Roosevelt Avenue:

Furthermore, given the existing traffic bottleneck on Washington Avenue turning onto Belmore Road, future developments should have traffic flow and driveways directed onto Virginia Place and/or Roosevelt Avenue. This would reduce the existing strain on Washington Avenue.

We hope these concerns regarding infrastructure and safety are taken seriously, both in the current stage and in future states of development.

Submission Number/ID: 130/450311

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood 2210

Submitted: 3/23/2024 3:46:47 PM

Submission: I object to it

I have objections to the project, mainly due to concerns that the negative impact an increased density of people will cause. Infrastructure already struggles as the single lane Belmore Rd passes through Riverwood's main centre, often causing painfully slow traffic jams. A more densely populated area will only worsen this without expansion.

Also, being a resident here, I am aware there is already a relatively high number of social housing projects in this area. While I don't dismiss the importance of social housing in Sydney, first hand experience means that it has made it feel unsafe walking around this neighbourhood at night. I want my family to feel safe and secure in this neighbourhood, not continue to worsen it.

How will NSW Planning deal with these concerns? Is this suburb ready for another large influx of social housing and density increases with its infrastructure, public transportation, schooling and police presence?

Submission Number/ID: 131/450316

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood 2210

Submitted: 3/23/2024 3:47:49 PM

Submission: I object to it

I have objections to the project, mainly due to concerns that the negative impact an increased density of people will cause. Infrastructure already struggles as the single lane Belmore Rd passes through Riverwood's main centre, often causing painfully slow traffic jams. A more densely populated area will only worsen this without expansion.

Also, being a resident here, I am aware there is already a relatively high number of social housing projects in this area. While I don't dismiss the importance of social housing in Sydney, first hand experience means that it has made it feel unsafe walking around this neighbourhood

at night. I want my family to feel safe and secure in this neighbourhood, not continue to worsen it.

How will NSW Planning deal with these concerns? Is this suburb ready for another large influx of social housing and density increases with its infrastructure, public transportation, schooling and police presence?

Submission Number/ID: 132/450341

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/23/2024 8:54:43 PM

Submission: I object to it

I don't agree..... too many units make more traffic jam , too many population !

Submission Number/ID: 133/450346

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood 2210

Submitted: 3/23/2024 8:57:34 PM

Submission: I object to it

I object to it

Submission Number/ID: 134/450361

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/24/2024 12:34:09 PM

Submission: I object to it

I am against building new apartments as the area will become too crowded and I do not need more housing commission tenants in my area.

Submission Number/ID: 135/450366

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/24/2024 12:34:30 PM

Submission: I object to it

I am against building new apartments as the area will become too crowded and I do not need more housing commission tenants in my area.

Submission Number/ID: 136/450431

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood 2210

Submitted: 3/25/2024 11:26:42 AM

Submission: I object to it

The traffic congestion in Riverwood is already very bad, The Belmore Road N and Hannans Road traffic congestion turns a 5-minute trips into a 35 Minute ride, and you are planning to introduce and additional 420 houses without taking into account the effect on the road.

Your proposal is not viable, you can't keep adding people into Riverwood without fixing the roads to accommodate current traffic or the increase of traffic.

The traffic lights are in the wrong place, currently chocking the existing traffic. The traffic lights need to relocate and synced so they work together a allow the smooth flow of traffic. Per your proposal, it seem that whoever is making these plans are disconnected with reality and they are just adding people to location without thinking.

Submission Number/ID: 137/450486

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood 2210

Submitted: 3/25/2024 10:37:38 PM

Submission: I object to it

I object to it.

Submission Number/ID: 138/450491

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Joelene Yu of RIVERWOOD 2210

Submitted: 3/25/2024 11:59:52 PM

Submission: I object to it

In my opinion, I object to it. Thank you.

Submission Number/ID: 143/450591

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/26/2024 12:59:50 PM

Submission: I object to it

Resident of Vermont crescent, do not approve of new housing commissions

Submission Number/ID: 144/450721

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/27/2024 2:00:50 PM

Submission: I object to it

To : Director Eastern & South Districts –

Department of Planning, Housing and Infrastructure

I attended the 23.3.24 information session regarding the revised focus area within Virginia Place – Roosevelt Avenue – Belmore Road and Washington Avenue.

I object the rezoning proposal or redevelopment plan base on the following concerns :

I have been living in Riverwood for over 30 years and the traffic has been getting worse and worse especially the Bemore Road (from the community centre to Riverwood train station) and (Hannas Road to both community centre and Riverwood train station direction.

From a 56 apartments “rezoing boundary” to increase to 420 apartments, I have no confident how the infrustrusture can cope more than an increase of 1000 headcount . Please tell us more.

The plan which was killed in 2023 was for 3,900 based on the Riverwood Estate boundary. But now 420 (7.5 times more) just in the “rezoning boundary”. I am concerned what is the next plan ? This was not disclosed at the information session and the staff area unable to answer my questions. This new propoosal appeared to me the plan is reverting to the stage, which is over 6K apartments.

Can the department confirm that this 420 number is part of the 3,900 and not the 6,000 homes as per the original proposed master plan.

The killed plan was 30%/70% public and private tenure. Now it is 50%/50% - that will mean more public housing in the area. What is the beneift to the private properties onwers ? especially those 20+ home owners living in Kentucky Road.

The plan did not mention anything about the 944 bus running within the estate boundary or not even saying, will there be extra bus lines for the area. A number of 944 buses were already cancelled due to the shortage of staff, and it has already created a lot of inconvenience to the residents in the estate boundary, especially to Senior Citizens like myself who highly rely on the public bus. Please don't refer me to Punchbowl Bus for this question. This should be part of the Riverwood (Canterbury Punchbowl Council) job to help the resident to have a comfortable and convenient transport facility.

In the flyer, it mentioned there will also be “potential” for new retail premises. Where Washington Park library is now located, in the original plan there was a café – this was not happened – only a vacant shop space sitting idle in there for these years. Where the old Riverwood Library was located in Belmore Road, there was plan for 4 storey building with potential retail – this was not happened. Will the “potential new retail premises” just a talk only and will not happen? This is sort of like a carrot to the vulunerable residents (whether public or

private) to obtain their support to the rezoning plan hoping to see a big supermarket to be located near the community centre area, instead of the need to walk a long way to Woolworths and Aldi in the Riverwood Shopping Centre. For your information, it takes me 35 minutes work (as an oldy). Bus fare is \$2.50 and to Kentucky Road during the weekend, there is only one bus per hour. It is very inconvenience.

What is Homes NSW proposal to have the percentage of public / private housing in any further redevelopments in Riverwood ? Please explain how the proposed 50%/50% (and not 30%/70%) can help to create public safety and the potential for smooth out the anti-social behaviour.

How can the Riverwood Public School cope with the future increasing numbers of children need better education?

There are a lot of uncertainties in this rezoning boundary and any future plans to Riverwood redevelopment. Not until the residents can have a clear picture on what's going on, I object to any new Riverwood redevelopment at this stage.

The potential noise and air pollution during the construction, if it goes ahead, was not mentioned. Noting the geographic of Riverwood Estate boundary is a valley (sliding downwards from Belmore Road to Salt Pan Creek).

I cannot agree to a plan which has so many uncertainties and negative impacts.

[REDACTED]

[REDACTED]

Submission Number/ID: 146/450776

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Ayyah Al ayoubi of 2210

Submitted: 3/27/2024 6:55:45 PM

Submission: I object to it

It is important to highlight that we've seen the detriment of overdevelopment with inadequate infrastructure to support the growth of residents time and time again. I honestly believe it's a

repeated cycle that has been occurring across NSW. To start with 420 apartments seems like a drastic Improvement from the Initial proposal however this is only the start of the 'master plan', saying yes to this without serious consideration is paving the way for the inevitable overdevelopment of Riverwood in an area that is not equipped for an increase in residents. Rather than relentless rezoning to cater for population growth that usually just leads to overdevelopment maybe the government should address the root causes of this population growth and also update the infrastructure necessary first rather than doing it backwards. Riverwood is a beautiful community I'd be gutted to see it become another concrete jungle I've lived here for over 10 years there needs to be some sort of surety for residents that this master plan won't lead to an entire flip of Riverwood? What are the limits here? It's left me and many residents with anxiety of what's going to happen to us and when will it be us next? All I see is the continuous development of high rises and apartments and yet it never seems to be enough. I have been voicing my concern every time I thought last year would've given us some relief however less than a year later here we are again. Apologies for ranting on I hope this provides an inside view of how we feel as residents.

Submission Number/ID: 147/450786

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood

Submitted: 3/27/2024 9:10:31 PM

Submission: I object to it

In morning and evening peak hours will be traffic congestion along Belmore Rd and another issue for car parking for residential.

Submission Number/ID: 148/450996

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Lisel Liu of Riverwood 2210

Submitted: 3/28/2024 11:41:24 PM

Submission: I object to it

I object to this proposal. Riverwood is already very populated and 420 new residents will be too much for the infrastructure.

Submission Number/ID: 149/451001

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/29/2024 12:22:17 AM

Submission: I object to it

The plan to build the extra housing will put alot of pressure on our local roads and facilities. We can already see large congestion among the main road with everything slowing to a crawl. Adding the extra social housing will further slow transport within Riverwood

Submission Number/ID: 150/451031

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood

Submitted: 3/30/2024 6:42:26 AM

Submission: I object to it

I

Submission Number/ID: 151/451036

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood

Submitted: 3/30/2024 7:16:07 AM

Submission: I object to it

Riverwood will be overpopulated and congested.

Submission Number/ID: 152/451051

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/31/2024 3:53:05 PM

Submission: I object to it

too much traffic

Submission Number/ID: 153/451056

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 3/31/2024 3:54:56 PM

Submission: I object to it

too many people

Submission Number/ID: 154/451061

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Barbara Pan of Riverwood

Submitted: 3/31/2024 9:35:51 PM

Submission: I object to it

Objection to the proposal for new social and affordable housing.

Submission Number/ID: 155/451066

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood

Submitted: 3/31/2024 9:39:10 PM

Submission: I object to it

Strongly Disagree

Submission Number/ID: 156/451071

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 4/1/2024 11:31:10 AM

Submission: I object to it

I object

Submission Number/ID: 157/451081

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Grzegorz "Greg" Matuszyk of Riverwood

Submitted: 4/1/2024 2:05:03 PM

Submission: I object to it

Dear Sir/Madam,

I am writing to express my strong objection to the rezoning proposal in Riverwood that has been recently brought to light. As a concerned resident of this vibrant community, I believe that the proposed changes threaten to drastically alter the character and ecology of our beloved neighbourhood.

First and foremost, I am deeply troubled by the potential consequences of this rezoning on Riverwood's natural environment. The proposal, as it stands, would result in the removal of numerous tall native trees, which are not only essential for maintaining the biodiversity of our area but also play a crucial role in combating global warming. It is alarming to contemplate the transformation of our leafy suburb into a concrete jungle reminiscent of Alexandra, Mascot, or Wolli Creek.

I implore you to consider alternative approaches that would allow for development while preserving the spirit of Riverwood and safeguarding its precious wildlife. Why can't the development be planned in a way that respects the existing trees, integrating them into the design rather than sacrificing them in the name of progress? By building around these trees, we can ensure that Riverwood retains its unique charm and continues to provide a habitat for our native flora and fauna.

Furthermore, I believe that if there is a need for reconstruction and expansion, it should begin with a focus on areas where houses are concentrated (near Salt Pan Creek Reserve, where Kentucky Rd, Michigan Rd and Idaho Pl meet). By revitalizing these areas and constructing multi-family dwellings, we can accommodate more residents without sacrificing the natural beauty and low-rise character that define Riverwood. This approach would not only address housing shortages but also promote community cohesion and inclusivity.

In conclusion, I urge you to reconsider the current rezoning proposal and explore alternatives that prioritize the preservation of Riverwood's environment and community spirit. Our

neighbourhood deserves thoughtful planning that respects its heritage and values, rather than sacrificing it for short-term gains. Thank you for considering my objections.

Kind Regards,

Grzegorz "Greg" Matuszyk

Submission Number/ID: 158/451086

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Anonymous Anonymous of Riverwood

Submitted: 4/1/2024 2:12:28 PM

Submission: I object to it

I object

Submission Number/ID: 159/451111

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Marta Matuszyk of Riverwood 2210

Submitted: 4/1/2024 7:15:28 PM

Submission: I object to it

I am writing to oppose the Riverwood Rezoning Proposal currently under consideration. I firmly believe that if implemented, this plan will irreversibly mar the picturesque landscape of our community, transforming it into an unsightly concrete jungle.

The introduction of high-rise buildings as outlined in the proposal will drastically alter the character of the area. Instead of the serene and green environment we cherish, we will be met with towering structures that dominate the skyline, casting shadows over our homes and diminishing the natural beauty that makes Riverwood so special.

Moreover, the proposal's intention to clear trees, which serve as crucial habitats for our native wildlife, is unacceptable. By destroying these ecosystems, we not only endanger the diverse species that call Riverwood home but also disrupt the delicate balance of our ecosystem.

I implore you to reconsider this proposal and prioritise the preservation of our community's unique charm and natural heritage. Let us not sacrifice our environment and quality of life for development goals.

Thank you

Kind regards

Submission Number/ID: 160/451146

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 4/2/2024 12:08:21 PM

Submission: I am just providing comments

From year 2024, the recent limited land size rezoning boundary area for 420 new homes that looks like too crowd. Maybe half the numbers of new homes could be better. Please locate the traffic lights between the Roosevelt Avenue and Belmore Road for road and passengers safety as soon as possible.

Submission Number/ID: 161/451271

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Toby Stanford of PEAKHURST 2210

Submitted: 4/3/2024 10:07:48 AM

Submission: I object to it

I oppose the current proposal for rezoning, as with many other areas around South and Western Sydney the long term sustainability and infrastructure will be severely impacted.

Roads, trains and foot traffic is already very high, especially in peak hours.

We have seen that areas around Riverwood and Salt Pan Creek were prone to flooding in recent years and if the area is slowly transformed into higher density living we are only going to see this exacerbated.

Most significantly the SDN Child Care Centre is an incredibly important operation to the local community and development of future generations. The centre had won multiple awards and accolades in recent years, and has provided excellent education and development to children from all walks of life. The centre is connected with the community and is actively engaged with the area around it. I am strongly opposed to any disruption that would be caused to the children and staff by following through with this rezoning and redevelopment.

Submission Number/ID: 162/451291

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 4/3/2024 1:25:07 PM

Submission: I support it

Hi, my children attend SDN Riverwood daycare and I support the centre being demolished and rebuilt elsewhere: The building has aged terribly and the area is in desperate need of a new daycare which isn't built next to the water which attracts mosquitoes. There is an ongoing mosquito infestation issue biting the children daily and nothing can be done due to the location.

Please prioritize existing children who attend the daycare to be allocated to the new daycare.

Submission Number/ID: 163/451296

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 4/3/2024 1:26:58 PM

Submission: I support it

Hi, my children attend SDN Riverwood daycare and I support the centre being demolished and rebuilt elsewhere: The building has aged terribly and the area is in desperate need of a new daycare which isn't built next to the water which attracts mosquitoes. There is an ongoing mosquito infestation issue biting the children daily and nothing can be done due to the location.

Please prioritize existing children who attend the daycare to be allocated to the new daycare.

Submission Number/ID: 164/451361

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Amendra Singh of Riverwood

Submitted: 4/3/2024 6:15:52 PM

Submission: I object to it

This proposal is plainly made by persons who do not live or are familiar with the area.

The entire main roads in the vicinity of the proposal already do not have the capacity to cater for traffic. Parking for residents in these areas is very limited. Parking at the railway station is also limited. Indeed the entire area bounded by Belmore Road, Hannans Road, Josephine St, Bonds Road and Broadarrow Road is a traffic nightmare during peak periods. Entry to and egress from the proposed site is a hazard for motorists, pedestrians and cyclists. I live about 200 metres away from the proposal and have been living in Riverwood for the last 24 years. The suburb simply does not, in its current form, have the capacity to cater for 420 new homes.

Submission Number/ID: 165/451371

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2234

Submitted: 4/3/2024 10:14:22 PM

Submission: I object to it

I am writing to you today on behalf of our community to highlight the critical need for a childcare facility in Riverwood. As a resident deeply invested in the welfare and future of our neighborhood, I believe that continuing to have an established childcare center will not only address an immediate need but also foster a stronger sense of community and provide our children with a solid foundation for success.

Riverwood boasts a vibrant and diverse community, where families come together to support one another. However, one significant gap we will face is the absence of a dedicated childcare facility. This absence not only poses challenges for working parents but also limits opportunities for early childhood development and education for our children.

By continuing to have a childcare facility in Riverwood, we can create a supportive environment where families can thrive. Such a center would not only provide a safe and nurturing space for children but also offer opportunities for early learning and socialization, setting them on a path for future success.

Moreover, a childcare center in Riverwood would strengthen our community fabric by bringing families together. It would serve as a hub for parent networking, support, and collaboration, fostering deeper connections among residents and promoting a sense of belonging.

Investing in early childhood education and care is crucial for the long-term prosperity of our community. Studies consistently show that quality early childhood experiences lay the foundation for future academic success, social-emotional development, and overall well-being. By providing access to high-quality childcare, we can give our children a head start in life and ensure they reach their full potential.

In conclusion, I urge you to consider the need of a childcare facility in Riverwood as a priority for our community. By doing so, we can create a nurturing environment where children can thrive, families can flourish, and our community can grow stronger together.

Thank you for your attention to this matter. I look forward to your support and collaboration in making Riverwood a better place for all.

Submission Number/ID: 166/451376

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Joe Vo of 2200

Submitted: 4/3/2024 10:22:24 PM

Submission: I object to it

I am writing to you today on behalf of our community to highlight the critical need for a childcare facility in Riverwood. As a parent who sends their child to SDN Riverwood I am deeply invested in the welfare and future of our neighborhood, I believe that having a childcare center will not only address an immediate need but also foster a stronger sense of community and provide our children with a solid foundation for success.

Riverwood boasts a vibrant and diverse community, where families come together to support one another. However, one significant gap we will face is the absence of a dedicated childcare facility. This absence not only poses challenges for working parents but also limits opportunities for early childhood development and education for our children.

By continuing to have childcare facility in Riverwood, we can create a supportive environment where families can thrive. Such a center would not only provide a safe and nurturing space for children but also offer opportunities for early learning and socialization, setting them on a path for future success.

Moreover, a childcare center in Riverwood would strengthen our community fabric by bringing families together. It would serve as a hub for parent networking, support, and collaboration, fostering deeper connections among residents and promoting a sense of belonging.

Investing in early childhood education and care is crucial for the long-term prosperity of our community. Studies consistently show that quality early childhood experiences lay the foundation for future academic success, social-emotional development, and overall well-being. By providing access to high-quality childcare, we can give our children a head start in life and ensure they reach their full potential.

In conclusion, I urge you to consider the establishment of a childcare facility in Riverwood as a priority for our community. By doing so, we can create a nurturing environment where children can thrive, families can flourish, and our community can grow stronger together.

Thank you for your attention to this matter. I look forward to your support and collaboration in making Riverwood a better place for all.

Submission Number/ID: 167/451381

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Dana Hijazi of 2210

Submitted: 4/3/2024 10:37:05 PM

Submission: I object to it

The area needs SDN childcare center. It's a very high achieving center that contributes to our community.. it's detrimental that we have good quality child care in the area esp with the presence of the demographic around Riverwood.

Submission Number/ID: 168/451476

CONFIDENTIALITY: No

Submission Type: I am submitting on behalf of my organisation

Name: Catherine McMahon of 1481

Submitted: 4/5/2024 10:49:17 AM

Submission: I am just providing comments

Please find attached Georges River Council submission dated 5 April 2024

Attachment:

https://pp.planningportal.nsw.gov.au/system/files/webform/draft_plans_riverwood_estate/451476/letter-dated-5-april-2024-to-department-of-planning%2C-housing-and-infrastructure---revised-rezoning-proposal-at-riverwood-estate.pdf

Submission Number/ID: 169/451511

CONFIDENTIALITY: No

Submission Type: I am submitting on behalf of my organisation

Name: Therese Hastie of 2210

Submitted: 4/5/2024 3:53:46 PM

Submission: I object to it

SDN (formerly Sydney Day Nursery) have been a productive member of the Riverwood community since 1947.

SDN Riverwood has been awarded the Excellent rating by the Australian Children's Education and Care Quality Authority (ACECQA), the highest rating a service can achieve under the National Quality Framework, And, in February 2024 SDN Riverwood has received a rating of Exceeding the National Quality Standard' in all seven quality areas, following its assessment and rating process.

SDN Riverwood has been recognised for:

- inclusive partnerships with children and families
- positive workplace culture and organisational values, sustained commitment to professional development and support of educators practice and environments that enhance children's learning and growth.
- Service staff are mindful of creating a safe and secure learning environment for children and families experiencing disadvantage or vulnerabilities. The service empowers families to

build support systems through a buddy system initiative that partners similar families together. The aim of this initiative is for all families to have a sense of belonging and to be enriched by their buddy family's contributions. An SDNR outdoor bench is provided as a space for families to build these partnerships. The nominated supervisor also checks in with families to ensure they find the buddy partnership beneficial.

- The service has partnered with a local community organisation that helps to feed, clothe, and support residents facing hardship or disadvantage. The service provides meals and fresh fruit for their community every week.
- The team focused on defining, designing, and maintaining practices to sustain a positive team culture at the service, through sessions identifying:
 - o foundational concepts of a positive team culture, including acknowledging uniqueness amongst colleagues
 - o positive team culture behaviours, such as inclusion and flexibility
 - o possible outcomes of a positive team culture, including respect, growth, trust, and continuity of staff.
- As a leader in the sector, SDN Riverwood Children's Education and Care Centre is committed to sharing its practices with the wider education and care sector, helping to ensure its positive impact reaches beyond the children and families who access the service.
- We have worked in conjunction with many agencies (Housing Commission, Department of Communities & Justice, NSW Police, Department of Education, Riverwood Community Centre, plus many more) to help the families in need living within the Diverse Riverwood community.
- SDN would like to continue its collaboration with these agencies and the Riverwood families who are at their most vulnerable while living in Riverwood.
- SDN Riverwood has been instrumental in helping families 'get back on their feet'. We have been able to do this by;

- Providing care for children of families experiencing DFV, being instrumental to children who were getting abused by working very closely with DCJ.
- Being the family that these children and their families need to support them through these challenges.
- Providing nappies, meals, and clothing during their time at the service and also beyond that time.
- Helped families find housing.
- Supporting children from ATSI backgrounds
- Supporting children with additional rights (challenging behaviour, learning difficulties, physical, complex trauma or mental diagnosis)

SDN Riverwood and our Families actively seek to give back to the community:

- Regular Library Visits
- Regular visits to Salvation Army and Vinnies to donate resources that can be gifted to other families and children in need.
- Excursions for children to the local shopping precinct and Woolworths
- SDN Riverwood has been awarded the 11th Annual St. George Community Award.
- SDN Riverwood participated in leading Australian Research in 2022
- SDN Riverwood supported and continue to support Refugee families in our community.
- SDN Riverwood helped in suicide prevention for one of our parents at the service.

- SDN Riverwood connect families with services for support after every critical community incident.

Submission Number/ID: 170/451536

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Joni Carling of Riverwood

Submitted: 4/5/2024 10:16:28 PM

Submission: I object to it

I am a resident of [REDACTED]

Belmore road is congested enough as it is.

I am all for public and affordable housing and developing communities, but that cannot be at the cost of traffic congestion.

I object the proposal or any proposal that fails to develop the improvement of road and traffic management.

Submission Number/ID: 171/451546

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Brad Earl of Riverwood 2210

Submitted: 4/6/2024 11:41:00 AM

Submission: I object to it

As a homeowner in the area, I am highly concerned about a number of issues that would likely result if the proposed 'Revised Riverwood Plan' goes ahead.

I fully support the "Labor to 'scrap' rezoning mechanism" as outlined in the article 'High-rise promise' (The Leader, Wed July 18, 2018).

My concerns are not just limited to;

- Property values (for privately owned homes)
- The threat of being surrounded by tower blocks
- The traffic congestion and parking issues within this particular area that has narrow streets and cul- de- sacs
- An increase in the number of residents means an increase in problems associated with kerbside parking due to not enough parking spaces with the new structures.
- The increased traffic on Belmore Road which has already dramatically increased recently
- Pressure on the local infrastructure, ie; parking, medical centres, child care centres, public transport and retail outlets which haven't kept pace with development in the past
- The negative impact of the general quality of life in our area due to overcrowding

There is also the issue of residents being subjected to prolonged disruption due to construction work, ie; road closures, noise, lack of parking due to tradesmen's vehicles if the Revised Riverwood Plan proceeds. These were just some of the difficulties experienced by local residents during the recent construction of Washington Park.

I also draw to your attention to an article Court Victory for Tenants in the Canterbury Bankstown Torch (Wed, June 27, 2018) that outlines residents' issues such as building repairs, safety concerns and problems with lack of parking at Washington Park constructed in the Riverwood Plan area.

If the NSW Department of Family and Community Services cannot ensure the safety and maintenance of the existing Washington Park complex, how do they propose to cope with tower blocks up to twelve storeys high?

As David Coleman commented in The Leader, 20th March 2024 '...this 420 is just the first instalment in what will be a much bigger number . . . '

I believe the Government is misleading local residents by implying this is a new plan when in reality it is simply implementing the previous plan by stealth.

Brad Earl

Submission Number/ID: 172/451571

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood 2210

Submitted: 4/6/2024 10:37:05 PM

Submission: I am just providing comments

Thank you for the opportunity to comment. I have attached my submission. I am submitting as a local Riverwood resident with an interest in the proposal.

Attachment:

https://pp.planningportal.nsw.gov.au/system/files/webform/draft_plans_riverwood_estate/451571/riverwood-estate-proposal---2024.docx

Submission Number/ID: 173/451611

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: Muhammad Shahzaib of Riverwood 2210

Submitted: 4/8/2024 12:59:47 AM

Submission: I object to it

It is encouraging to witness the development of more affordable housing, especially as rents continue to rise each year.

Upon reviewing the details of the proposed development, I find it imperative to highlight certain missing aspects or details that may not have been addressed.

Firstly, while the Development Control Plan indicates pedestrian entrances for the proposed development, there is a notable absence of information regarding the entrance/exit points for

cars from the proposed stage 1 development. This is particularly concerning given the potential increase in traffic along the specific road.

It is crucial to recognize that both Washinton Ave and Belmore Road experience significant traffic congestion, especially during morning hours. The Level of Service (LOS) for Washinton Ave and Belmore Road is already classified as "E" during these peak times, as per the submitted report. Therefore, the absence of details regarding the entry/exit points for the planned development makes it difficult to assess its potential impact on the surrounding road infrastructure.

Furthermore, the Traffic Impact Assessment fails to account for any expected future growth within its assessment. Understanding the anticipated future growth of traffic within the suburb is essential, particularly concerning intersections such as Washinton Ave/Belmore Rd and Belmore Rd/Thurlow St, which frequently experience traffic queues. Considering that the proposed development's construction may commence in 2027-28, with a projected completion time of 3 to 4 years, it would be prudent for the Traffic Impact Assessment to incorporate future scenarios, including the impact of the Stage 1 development and expected suburban traffic growth.

Moreover, the purpose of providing two shared paths on Virginia Palace is unclear, especially considering the absence of a specific destination point. It is essential for shared paths/cycleways to lead to destinations to facilitate meaningful usage. I have submitted a sketch for consideration, proposing an extension of the shared path to the north, linking it with existing pathway infrastructure and ultimately connecting to the Riverwood Wetlands. Additionally, extending the shared path to the south could serve destinations such as the Child Daycare facility and the nearby bus stop at the corner of Roosevelt Ave & Belmore Road.

In conclusion, certain crucial details are missing from the proposal, such as car entry/exit points for the stage 1 development and the potential impact of increased traffic on already congested intersections. Furthermore, the proposed shared paths on Virginia Palace lack connectivity to a wider network of infrastructure, which is essential for promoting active transport. I recommend consolidating the shared path into a single 4m shared path at Virginia place, with increased landscaping on the opposing side of shared path at Virginia Place.

Attachment:

https://pp.planningportal.nsw.gov.au/system/files/webform/draft_plans_riverwood_estate/451611/riverwood-comments.pdf

Submission Number/ID: 174/451616

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Peakhurst

Submitted: 4/8/2024 9:16:28 AM

Submission: I object to it

Hi,

I strongly object to this redevelopment proposal for a few reasons:

1) Density and housing mix

The suburb is already so dense without being supported by the necessary infrastructure. There is also already significant amounts of social housing and aged care in Riverwood.

2) Traffic and transport

Traffic in and out of Riverwood and surrounding suburbs are already terrible. Roads are not maintained as is, adding a huge development is not going to further improve things.

Bus transportation has been atrocious ever since the recent change in bus operators which was supported by the local government. It will soon be a year with the supposedly 'temporary adjustment' to the bus schedules resulting in significantly longer wait times and less busses. Adding more people to a suburb that's already struggling with this issue isn't going to improve it.

3) Demolishing of SDN Riverwood daycare

SDN Riverwood is an 'excellent rated' daycare that is touted for demolishing if the proposal goes through. It's one of the very few daycares in the community or surrounding suburbs with this ranking and has been a part of the community for a long time.

Thanks

Submission Number/ID: 175/451626

CONFIDENTIALITY: No

Submission Type: I am submitting on behalf of my organisation

Name: Sydney Water Urban Growth Team Sydney Water Urban Growth Team of Parramatta

Submitted: 4/8/2024 11:31:20 AM

Submission: I am just providing comments

Please see attached document.

Attachment:

https://pp.planningportal.nsw.gov.au/system/files/webform/draft_plans_riverwood_estate/451626/swc-response---riverwood-revised-rezoning-proposal-signed.pdf

Submission Number/ID: 176/451641

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of 2210

Submitted: 4/8/2024 12:17:21 PM

Submission: I object to it

Riverwood is getting more and more crowded. There are too many government houses in this suburb. The more supplies will result in more residents who have less income living in this suburb. Riverwood has no reputable government schools. The government should invest more to Riverwood schools, not to build more apartments. Only good education can change the people of a suburb. The government should build government housing evenly spread to different suburbs to mix the people from all different backgrounds so that the society will not be split by the wealthy and the ordinary.

Submission Number/ID: 177/451646

CONFIDENTIALITY: No

Submission Type: I am making a personal submission

Name: O S of 2210

Submitted: 4/8/2024 12:32:14 PM

Submission: I object to it

420 dwellings of which 50% is social housing is far too many. Riverwood is already well known dumping ground for social housing, whilst most if not all public facilities are run-down. 1 more social housing is 1 too many let alone 210 units.

Crime rates in riverwood is the highest amongs neighbourhood of peakhurst, narwee, penshurst, padstow, partly driven by the number of social housing tenants in the area, mostly with nothing-to-lose attitude. To add, drugs remain a concern for the area, also partly driven by social housing tenants.

It is proven social housing does drive social issues.

Riverwood's stigma of where the needy resides is here to stay, this impedes growth of the suburb to be one vibrant, young and dynamic community. To add, the Belmore 'slumdog' road strips are in desperate need of a refresh.

At face value, this seemed merely 'stage 1' of the development, opening pathway for more, upcoming stages to crowd up to 30ha of council land.

State/ council to consider limiting planned social housing to not exceed 42 units (of the total 420 units).

Submission Number/ID: 178/451671

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood

Submitted: 4/8/2024 12:56:52 PM

Submission: I object to it

1. cause traffic issues
2. cause environmental issues or nature conservation
3. may increase crime rate

Submission Number/ID: 179/451676

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood

Submitted: 4/8/2024 1:00:42 PM

Submission: I object to it

1. increase traffic congestion and noise pollution
2. result in significant environmental damage, destroying natural habitats
3. cause negative social effects

Submission Number/ID: 180/451701

CONFIDENTIALITY: Yes

Submission Type: I am making a personal submission

Name: [REDACTED] of Riverwood

Submitted: 4/8/2024 4:10:13 PM

Submission: I am just providing comments

> Riverwood Estate Renewal

Hi LAHC, My feedback for the Riverwood Estate Renewal is to:

Not allow any current housing resident or future applicant to be considered for the new housing if they have a criminal record.

There are far too many junkies with criminal/antisocial behaviour around the area that make Riverwood not a very nice place to live. I have had many first hand experiences along with family/friends who also live in Riverwood - of several hostile encounters - being on the receiving end of abuse with these kinds of people.

Housing should be going to peaceful people who need it.

Thank you, Michael

Submission Number/ID: 181/451711

CONFIDENTIALITY: No

Submission Type: I am submitting on behalf of my organisation

Name: Cathy Callaghan of 2010

Submitted: 4/8/2024 4:59:23 PM

Submission: I object to it

Shelter NSW is unable to support this proposal in its current form.

Attachment:

https://pp.planningportal.nsw.gov.au/system/files/webform/draft_plans_riverwood_estate/451711/8_4-shelter-nsw---riverwood-estate-masterplan-rezoning-proposal-april-2024.docx

Submission Number/ID: 172/451571

Thank you for the opportunity to comment on this proposal. As a resident of Riverwood, I would like to offer feedback.

Belmore Road

Traffic on Belmore Road (not only at the boundary of the proposed project but between the M5 off-ramps and Riverwood Train Station as well) is notoriously heavy and is gridlocked during peak hour. This is due to its proximity to the M5 and Riverwood's commercial centre and high-density residential buildings. To facilitate the flow of traffic, I recommend a left-turn and right-turn lane at the T-Junctions of Roosevelt Ave and Washington Ave. This minimises the jamming of vehicles awaiting to turn left onto Belmore Road.

Parking

With the prospect of commercial real estate (including the prospect of a supermarket), there should be consideration for ample parking space. Improving accessibility to the Riverwood Estate will make it attractive for prospective tenants, both residential and commercial. It will also improve access to nearby facilities, especially the library, community centres, sporting facilities and parks and walking trails. There should be some allocated parking spaces for motorcycles only. The parking could be on either side or on Virginia Place.

Housing Mix

I call for diversity in the type of private housing available. Given the rise of working from home (WFH) and remote work spurred on by the Covid-19 pandemic, there is increased demand for home office space. I recommend that a number of apartments be built with a study room which can be used as a home office space. I also call for studio apartments as an affordable option for buyers and renters in the area. As there is demand for a property with outdoor space, I also recommend that some ground floor apartments be built with a yard. This would be a smaller, more affordable alternative to a detached, free-standing house.

Search Google Maps



Restaurants



Hotels



Things to do



Museums



Public transport



Chemist >



McLaughlin Oval

Kids Play

Riverwood Skate Park

Riverwood Community Center

Riverwood Community Plaza and Library

Existing Ped Crossing can be converted to Ped + Cycleway crossing

Riverwood Children Daycare

Road Reserve (Hopefully Council get it developed)

Community Gardens

Existing Connection through Underpass

Submission
Number/ID:
173/451611



Site



Possible Destinations



Possible extensions of share path



Planned Share path at Virginia Palace



Existing Cycle / pathway infrastructure

I am an urban designer with a background in architecture and 16 years of post-graduate experience internationally and within several states in Australia. I am a local resident of Washington Park since July 2018. One of the reasons my family chose to live in Washington Park were the projects in the pipeline for the surrounding area, including the Salt Pan Creek Master Plan and the Riverwood Estate Redevelopment Master Plan. My family and I welcome the plans for the redevelopment, despite the fact the construction process is highly likely to disrupt much of our daily routine and mobility around Riverwood for years to come. However, we see this an opportunity to live in a renewed community for the 21st century while enjoying the proximity to central Sydney and the coast.

The following pages outline my review of the Riverwood Rezoning Proposal documents available for consultation between late August and 25th September 2022. The review, comments and suggestions are my own and do not in any case reflect the opinions of my employer. No resources provided by my employer were used in the preparation of this review.

The review is focused primarily in the technical aspects of the master plan. Acknowledging previous stages of the master plan have been subject to a high level of scrutiny by the community, the current design would greatly improve by providing further detail and clarity in some key aspects such as:

- tree retention and tree canopy targets;
- impacts of underground basements and other infrastructure on trees;
- vehicle parking ratios and split;
- establishment of a supermarket and new shops;
- continuation of child care services within the neighbourhood from day 1 and throughout the construction process; and
- adjustments to built form outcomes in the transition to existing urban fabric to the south of the Estate.

Adjustments to the design details above will have impacts in the proposed built form and, by consequence, the proposed planning controls (FSR and building height) currently sought by LAHC.

The following review was based on the key documents composing the planning proposal as presented in the Department of Planning website.

Review Of Riverwood Planning Proposal Documents

Review of Explanation of Intended Effect

The potential location of future supermarket is indicated by Figure 3 in the block south of Washington Avenue. However, this block is not included in the zone B2 Local Centre indicated in Figure 4. These figures should be made consistent (i.e. extend B2 Local Centre zoning north, along Belmore Road to Washington Avenue). This would provide further flexibility in future for active uses to extend from Riverwood Train Station north to the Riverwood Community Centre. It also reinforces the intent behind APU 26 in Figure 7 additional permitted uses.

In considering Figure 6 FSR map, the transition between FSR 0.9 along Truman Avenue south, and FSR 2.3 or 2.4 along Truman Avenue north, results in abrupt change in built form between the two sides of the street. The inclusion of a frontage with same FSR density along Truman Avenue north

should be considered, and the balance of floor space should be dispersed throughout the other areas of the site, excluding FSR T2. This would provide a better response to *'the need for an appropriate interface to lower scale residential housing'* identified in the Executive Summary of the Urban Design Report.

In considering Figure 6 FSR map, there is a multi-storey building currently under construction at the intersection of Union Street and Pennsylvania Street, fronting Riverwood Public School. Assume residential flat building up to 5 storeys. Consideration should be given as to how this recent change to built form will impact the proposed plans.

Solar access to public open space Should be demonstrated as part of the Explanation of Intended Effect. This is a key item to understand the possible outcomes of built form impacts on the public realm.

The EIE does not seem to provide a complete summary or key findings of the supporting studies carried out as part of the master plan. The EIE should include information such as the proposed upgrades to intersections along Belmore Road, the proposed upgrades in terms of community facilities and services, the proposed upgrades in terms of public open space, and infrastructure, which will be required as part of the planning proposal.

Review of Urban Design Report

The Study Area Map in page 13 of the Report indicates a number of privately owned lots exist within the site. One of those lots at the intersection of Union Street and Pennsylvania Street, fronting Riverwood Public School is currently under development. Other lots exist at Kentucky Road and Truman Avenue. How will these be incorporated into the master plan? The illustrative master plan isometric view seems to indicate those lots will be replaced with residential flat buildings. Other information indicates the private owners will be part of the redevelopment at their own will. Is it ambitious to think all those owners will want to 'sell out' and allow for the lots to be amalgamated in order to 'unlock' the residential flat buildings? A more realistic approach would be to consider other building typologies (and densities) will develop within these lots. This will have an impact in the Master Plan in terms of the targeted floor space in order to develop 3,900 new dwellings, with further adjustment of floor space throughout the site.

The SDRP Recommendations plan in page 15 indicates a number of 'high value trees' (assumed existing trees) located within the courtyards formed by perimeter residential apartment blocks. This does not seem a very realistic approach considering the probability of those apartment blocks to have the need to build basement car parking which will have impacts on existing trees root systems.

The Strategic Context, page 31, should also provide reflection on the role of Belmore Road as an important artery establishing connections throughout the suburbs, from Lugarno in the south to Punchbowl in the north, and the crossing over Riverwood train station being one of the few north-south vehicle connections across both the T8 railway line and the M5. This further reinforces the role of Riverwood as a local centre, and the role of the development of the Riverwood Estate in the renovation and reinforcing the role of that centre in the wider southwest region, between Bankstown, Hurstville and Liverpool.

The CPTED Map on page 42 identifies an area of large unprogrammed building setback which is actually occupied by the SDN child care centre. This should be rectified, acknowledging the centre is

inward facing and the frontage to Roosevelt Avenue is largely inactive. The map should also provide an indication of areas which are covered by CCTV or other surveillance cameras.

Some of the local character photos shown in page 46 dated back to 2017 no longer convey the reality of the site. Suggest new photos be used to document this page.

The Summary of Key Findings Constraints page 56 would benefit from including the large unprogrammed building setbacks as part of the key constraints, and also, to map the concealed entries to walk-up apartments referred in page 49.

The Opportunities map on page 57 seems to provide a focus on east-west connectivity between Belmore Road and Salt Pan Creek, crossing some of the existing large lots at the centre of the site. A strong north-south axis should also be sought connecting Bennett Lane in the south to Kentucky Road in the north. This would promote an alternate access between the northwest of the site and the train station without necessarily travelling down Belmore Road. This seems to have been explored in previous options of the master plan as shown in pages 80 and 81, but not included in latter versions of the master plan nor the key moves. The establishment of a secondary north-south axis is key in alleviating possible congestion (vehicles and pedestrians) along Belmore Road.

The vision (page 69) indicates: 'New housing, transport and social infrastructure will support a growing and more diverse community with different housing needs' however, the social infrastructure component does not appear reflected project objectives or guiding principles. The objectives and guiding principles are very complete in terms of public realm, streets and parks. They would benefit from the added consideration of social infrastructure (i.e. how will the master plan impact the existing school and the existing child care services?).

The Structure Plan in page 83 does not identify opportunities for the location of a supermarket or the like. This would be a key element of the master plan, and would need to be consistent with the proposed land zoning maps. The location within the block south of Washington Avenue adjacent to Belmore Road can be a key site to form an anchor destination which balances the distance between the train station along Belmore Road and forms an entry to the future neighbourhood. The EIE figure 3 and the land use plan on page 134 indicate the future location of a supermarket. This should be made consistent in the structure plan, demonstrating commitment to the establishment of the future supermarket.

Block 28.1 and 28.2 within the indicative development yield table, page 137, do not include an allocation of non-residential uses. It would be important for the future of the master plan for LAHC to secure a supermarket within the development, allowing for the community to reduce its dependency on travelling by car to Riverwood Plaza, Mortdale, Oatley or Roselands for supplies. The local commerce along Belmore Road would also benefit from this as it would generate a second anchor between the train station and the new community, generating passing pedestrian traffic, which is needed to keep those shops and restaurants open.

The proposed child care centre would benefit from being considered as a stand-alone structure, not integrated within a building block. The existing child care centre currently occupies a lot with approximately 2,000 sqm, with considerable outdoor areas. The proposed child care centre would also benefit from dedicated kiss and ride parking bays. The location adjacent to Roosevelt Avenue would minimize the impact caused by for parents dropping off their children by car in the lower order residential streets, as currently proposed. The proposed child care centre would also benefit from a more central location within the overall master plan. The location of the potential child care

centre would benefit from closer proximity to Roosevelt Avenue. Suggestion to replace with the south edge of block 26.2, as shown in the development yields table page 137.

The existing SDN Childrens Services child care centre has a long history within the Riverwood community. It is recommended that LAHC engage with SDN with the aim of transferring the services to a new purpose built facility. Reviewing the Consultation Outcomes Report it doesn't seem this consultation has happened before. The new facility would have similar lot area and number of rooms, as a minimum, as the current facility. It is imperative to retain the services within the neighbourhood without interruption of their activities at any stage of the development, as indicated by the Social Infrastructure Study. The lot where the current child care centre is located is earmarked for redevelopment in stage 1. The relocation of the child care centre should be considered as one of the first actions to take place as part of stage 1. The south edge of block 26.2 is currently the approximate location of the off-street car park of the Jefferson building. This location would allow for relocation of the facility without impacting future stages of development. The residential floor space currently proposed for the south of lot 26.2 can be redistributed across the master plan, particularly the Garden Apartments character area.

The illustrative plan on page 86 shows Salt Pan Creek as the previous tip site. The illustration would benefit from showing the master plan for Salt Pan Creek Master Plan. It also shows the Riverwood Community Centre affected by flooding it would benefit from a minor graphical correction.

In considering the Garden Apartment typology in page 127 of the report, it is challenging to understand how this typology will provide for improved surveillance of streets and public realm. The building blocks do not seem to generate street frontages. It is unclear where the entrances to individual blocks would be located and how the transition between public/communal/private spaces would occur, particularly in the blocks facing the Kentucky Road loop. The master plan would benefit from a review of this built form as it maintains a similar type of constraint as the currently existing walk-up apartments.

In consideration of the street cross sections from page 113, lighting seems poorly integrated with the trees. This is one of the problems in Riverwood (inc. Washington Park development). There is poor street lighting which promotes a sense of insecurity after dark, particularly during the winter months. The Washington Park development was thought for the 21st century, but the street lights remained the same as the previous suburban condition, and lacking in upgrades. Street lighting should consider the needs of the vehicles as well as the needs of pedestrians, and visibility between the two. Currently the street sections seem to indicate only lighting will be provided for pedestrians which is positive, however, this will leave a large expanse of dark in the middle of the streets under the tree canopy. Suggestion is to consider street lighting alternating between the parking bays, and allow for two lamps at different heights – high lamp for vehicles, low lamp for pedestrians, sitting below the tree canopy.

The establishment of Truman Avenue with a 10m setback and terrace dwelling along one side and 3m setback with 6 storey street wall on the other side promotes poor integration with the surrounding character from Kilara Avenue. Even more considering some of the residential lots along the south side of Truman Avenue are privately own and will be harder to redevelop. Suggestion is to reconsider the north side of Truman Avenue, lower the building heights along that frontage and transfer the remaining floor space to other areas within the development, potentially along the Community Greenway, reenforcing its role as a major pedestrian promenade.

Tree retention plan on page 162 indicates a large proportion of significant trees being retained within the block courtyards. This doesn't seem to have been tested against the site levels, tying in with each individual block finished floor level, and the need for basement car parking within the apartment blocks. The tree canopy targets should be considered 'aspirational' targets. Also note the request from Design Review Panel Session 67 2nd December 2020 to assess tree retention in comparison with a grading plan. The design team response to the GANSW consultation outcomes indicates *'further refinement of the civil works and detailed grading plan will be submitted with each DA stage of development to highlight impacts on existing trees to be retained are minimised'*. This should not be considered an acceptable response. The efforts in assessing the level of impact to existing tree canopy should be included as part of the planning proposal as there is the risk of the tree canopy and tree retention targets becoming only 'aspirational', and when the development occurs it becomes reality that most of the trees can't actually be kept, either because of the site levels, or because of the introduction of basement parking. See also Consideration of DCP below.

Review of Demographics and Retail Study

It is difficult to comprehend how a project population of 7500 people requires such a low quantity of retail areas - 7500 people is the population of a town. If the vision is to generate a sustainable community, they should have ease of access to all their daily needs within a walking catchment of 5 to 10 minutes. The intention to maintain the *'retail offer for the incoming residents only'* seems narrow and missing an opportunity for both the development and for the wider Riverwood community.

The report seems focused on the impact the introduction of retail areas will cause in the existing retail, but offers little in terms of the opportunities which the added population would present to the local economy. How many shops does that level of demographic attract? What types of retail can be located on the site? What are the gaps in the surrounding area which can be fulfilled within the new development?

The location of a new supermarket within the development would also benefit the population of surrounding suburb, north of the rail line, west of Bonds Street and south of Wiggs Road. The residents of this area would no longer need to drive to Riverwood Plaza, Mortdale, Oatley or Roselands to have access to a supermarket. It would reduce the pressure on crossing Belmore Road and the bridge over the train line, and mitigate the impacts from traffic congestion which the development will cause. A supermarket operator would be pleased to have ready access to a population of 7500 people, not including the existing population in the surrounding areas.

The Strategic planning considerations seem flawed and biased towards a thinking that retail within new development will not be able to compete with the existing retail within the town centre. This will only be the case if it is not supported 100% from the 'get go'. The Riverwood Estate is a natural extension of the Riverwood town centre to the north. The introduction of the development should trigger much needed upgrades to the public realm along Belmore Road to the train station, and possibly further to the south. This would benefit more than the retail proposed by the development, but also the existing retail areas north of the train station, which would gain from the increase in pedestrian traffic accessing the station. There has been little investment in 'nurturing and growing' the Riverwood town centre. This is the opportunity for the centre to see some renovation and considerable change.

Review of Traffic and Transport Study

The study Executive Summary indicates:

'Consultation with TfNSW would be held to discuss the proposed public transport strategy to support the subject development.'

It is important for LAHC to commit to this engagement. The choice of the word 'would' does not convey a message of commitment. Establishing the upgrades to public transport network is key for the development of a '*accessible and welcoming neighbourhood*'. This becomes ever more relevant when approximately 1/3 residents of Riverwood work in Bankstown and almost 40% of the workers in Riverwood reside in Hurstville, where the main public transport connections are by bus.

In consideration of car parking, below are a few simple calculations based on numbers currently disclosed between the Urban Design Report and the Traffic Assessment report.

The 4,062 car parking spaces indicated in the Traffic Assessment report would require between 101,550 sqm and 121,860 sqm of floor space associated with car parking (assuming between 25sqm and 30 sqm per vehicle). The Urban Design Report indicates a maximum 346,267 sqm GFA. The ratio of floor space required for car parking over total GFA represents between 29.3% and 35.1% of additional floor area required for construction of car parking, on average, across the development. This is a considerable amount and consideration should be given at a conceptual design level for each of the blocks as how they will provide for vehicle parking within basements and within the surrounding streets. The inclusion of basements will have a considerable impact in deep soil zones, tree retention and tree canopy targets currently disclosed. These should be revised in order to be more realistic with the final outcome of the development, as well as, provide a more accurate strategy to deal with green infrastructure.

Considering 1 visitor bay per 5 units seems a high level of visitor parking. This equates to 20% of additional parking for visitors. Consideration should be given for a more realistic ratio of visitor parking, in consideration with the level of on-street parking. Within the Washington Avenue development a large proportion of visitor parking is actually used by the residents to avoid having to travel to their dedicated parking bay which is possibly located in basement level -2. This is a strata management issue, but also a planning and design flaw in that the level of visitor parking is over estimated.

Review of Canopy Cover and High Value Tree Report

The assessment of tree retention in Figures 8 to 15 should be refined to overlay the potential basement footprints vs. existing significant trees, as per previous considerations regarding basement car parking. This would provide a clearer picture of which trees can be retained on site, as well as, tree canopy targets.

Review of Heritage Impact Statement

There is mention of Aboriginal Cultural Heritage Assessment Report. This document is not included with the documentation for consultation. The Place Strategy indicates there was consultation with local groups in the preparation of the master plan. However, the results of such consultation are not publicly visible. Further, the consultation outcomes report indicates engagement with the First Nations community will occur concurrently with exhibition of the draft master plan and planning proposal. The information between the reports is confusing and it is not clear what consultation and reports were generated incorporating Aboriginal culture and heritage into the planning proposal.

The Place Strategy relies on the Government Architect Connecting with Country Draft Framework, to provide guidance in terms of future potential pathways for connection. The planning proposal should outline how these pathways actually connect and were informed with the outcomes of the consultation with local groups.

The design teams response to the Government Architect query regarding built form to *'Identify where basement car parks will be located'* is lacking. The response deviates the subject to *'Maps of basement entry locations'* which is not the subject of the concern. Acknowledging a level of detail usually required at DA stage is necessary to understand the accurate level of tree retention and canopy cover achievable on the site, as a minimum, a conceptual design and consideration of site grading and basement parking should be considered with the planning proposal. Otherwise, the ratios and targets currently shown are only aspirational and will not be achieved.

There were two topics described in the response to Government Architect Session 3 where the proponent indicates the studies were considered by the project team but not presented to the Government Architect. These topics should be the target of further investigation and disclosure by the project team, and further consultation with the Government Architect be sought.

Review of DCP

The DCP seems lacking in controls in a block-by-block basis to address the concerns of deep soil zones, tree retention and tree canopy. More robust DCP controls should be sought in order to guide the development for the next 20 years. A robust DCP should be accompanied with build form diagrams on a block-by-block basis indicating building envelopes, preferred location of non-residential uses, preferred location for driveways and servicing of blocks, location and anticipated number of basement levels, location of underground OSD's, location of deep soil zones and how the built form can be articulated to address the concerns with green infrastructure (tree retention, tree canopy, deep soil zones) within development sites. This would ensure Council will have the tools to properly assess and guide the approvals of future development. Only then can there be assurance the planning controls being sought by the planning proposal will have a translation through the detail design and implementation stages.

Review of Environmental Sustainability Study

The sustainability study provides initial guidance in terms of waste management. A precinct wide waste management strategy should be considered for the development prior to approval of the

planning proposal. The inclusion of 3900 dwellings and 7500 people within the site will increase pressure on council waste management services. The strategy should be considered and discussed with the relevant authorities and considered by DPIE prior to approval of the planning proposal. Large scale infill developments such as the Riverwood Estate should consider the inclusion of localised waste management facilities which promote alternate solutions for managing waste, reducing pressure from Council services.

Review of Water Quality and Storm Water Report

The summary Table 6 OSD indicates considerable volumes of water will be required to be stored on site during storm events, prior to discharging to the pit and pipe network downstream. The impact of this infrastructure on the development sites should also be considered as part of the DCP controls, particularly for lot identified as lot 1 with 402m³ of OSD required. The stormwater report is unclear about which lots each volume refers to. Figure 9 is cropped and only information for 3 of the 5 OSD sites is visible in the map. This should be rectified.

Attention of:
NSW Department of Planning and Environment
Via online submission form

Submission: Riverwood Estate SSP Rezoning Proposal

The Community Housing Industry Association NSW (CHIA NSW) welcomes the opportunity to provide a submission on the rezoning proposal for the Riverwood Estate State Significant Precinct.

CHIA NSW is the industry peak body representing registered, not-for-profit community housing providers (CHPs) in NSW. Our members currently own or manage more than 54,000 homes across NSW for individuals and families who cannot afford to rent or purchase a home on the private market. Since 2012, CHPs have delivered more than 5,300 new homes across NSW, representing an investment of over \$1.8 billion. Critically, these are new homes that the private sector cannot – or will not – deliver in response to housing need.

More than 50,000 people are currently on the waiting list for social housing in NSW, including approximately 4,852 in the four allocation zones surrounding the Estate. Furthermore, at the 2021 Census, 24,990 households in the Canterbury-Bankstown and Georges River council areas (40% of renting households) were experiencing housing stress. Therefore, increasing the amount of housing available to lower income households is an urgent priority.

Without significantly more affordable homes being built, some people will be left waiting for 10 years or more to be housed, forcing people to pay unaffordable rents, live in substandard housing, or, at worst, become homeless.

The renewal of public housing estates provides an opportunity to increase the supply and quality of social and affordable housing. The Land and Housing Corporation (LAHC) has stated it is committed to continuing to provide social housing in the precinct. However, given the extent of housing needs that exists in the area, it is disappointing that the rezoning proposal does not commit to a clear target for the provision of social and affordable housing.

LAHC argues that the final housing mix is a ‘portfolio demand decision’ and should not be dictated by a planning control. However, this is inconsistent with established planning policy and practice, including:

- *Strategy 11.1 of the Greater Sydney Region Plan*, which recommends affordable rental housing targets of between 5% and 10% be applied to precincts being rezoned, subject to viability testing. CHIA NSW notes that the 5%-10% rate outlined in the Greater Sydney Region Plan is an indicative benchmark in the context of privately owned land. It should not be used to limit provision on government-owned land.
- *Action 1.1 of Future Directions for Social Housing in NSW*, which seeks to increase the supply of social housing in NSW through redevelopment of LAHC properties. This includes by ensuring

large developments target a 70:30 ratio of private to social housing to enable more integrated communities, with an increased number of social housing where practicable.

- Recent rezoning proposals for other state significant precincts have prescribed minimum targets for social and/or affordable housing. This includes the renewal of Waterloo Estate (South), for which planning controls are proposed requiring at least 35.7% of residential floorspace to be provided as social and affordable housing.
- Further, it is noted that the Greater Cities Commission's Six Cities Region Discussion Paper is proposing a target of 30% for the proportion of social and affordable housing in residential development on government land.

The Estate, being a large-scale Government owned precinct, presents a real opportunity to maximise the delivery of social and affordable housing, particularly given the scale of development uplift being proposed. CHIA NSW's strong view is that the renewal of the Estate must commit to delivering an increase in social and affordable housing. This aligns with project objectives, which include *"increasing housing supply, diversity and affordability in a mixed tenure development that meets the needs of current and future residents"*.

Prescribing clear targets for social and affordable housing as part of the rezoning will provide certainty to stakeholders, the community and future development partners as to the housing mix outcomes to be delivered on the site. Such an approach will support the establishment of a socially diverse and prosperous community on the Estate.

CHIA NSW recommends that the rezoning proposal is amended as follows:

- Include a site-specific LEP provision requiring an increase in the quantity of social housing dwellings on the site, with a target of least 30% of dwellings on the government owned land in the precinct to be provided as social housing.
- To improve housing diversity within the precinct, the site-specific LEP provision should also require at least 5% to 10% of dwellings to be provided as affordable rental housing. The final target should be determined through viability testing.
- Maximising social and affordable housing needs to be included as a matter for consideration in assessing design excellence within the precinct.
- The development control plan (DCP) for the precinct should include a requirement for future development applications to demonstrate how social and affordable housing provision has been maximised. This should include consideration of the potential for a development site within the precinct to be earmarked for delivery by the community housing sector. CHPs can maximise the impact of government investment by leveraging their development capacity and financial benefits, including tax exemptions and lower cost finance available through the National Housing Finance and Investment Corporation. Not-for-profit CHPs will redirect the value of their tax exemptions and their developer margins into additional housing supply. In this way, the dedication of land in the precinct for delivery by CHPs will unlock opportunities for additional affordable housing.
- The DCP needs to include a requirement that any affordable housing delivered is managed and owned by a CHP that is registered under the National Regulatory System for Community

Housing. Such an approach will reduce ongoing costs to government and maximises the impact of government investment by providing CHPs with additional capital they can leverage to deliver additional homes in the local area. It is also consistent with the NSW Housing Strategy, which aims to support the growth of the community housing sector. The dedication of dwellings to CHPs can be subject to appropriate controls to ensure the affordable housing is retained long-term.

- Where mixed-tenure development is considered suitable, the DCP needs to require early engagement with the end owner/manager of the social and affordable housing component in the design of the scheme. This is essential to ensure the needs of future tenants are accounted for, operational costs are reasonable, and to consider management and maintenance arrangements. Similar planning controls are proposed for other estates undergoing renewal, including the Waterloo Estate (South).

CHIA NSW appreciates the opportunity to provide feedback on the rezoning proposal for the Riverwood Estate State Significant Precinct. We would be happy to discuss any of the recommendations further with the DPE.

Kind regards,



Public Exhibition of the Riverwood Estate Masterplan and Rezoning Proposal

SHELTER NSW SUBMISSION

8 April 2024



About Shelter NSW

Shelter NSW has been operating since 1975 as the state's peak housing policy and advocacy body. Our vision is to create a sustainable housing system that provides secure homes for all.

We pursue our vision through critical engagement with policy and practice and thought leadership. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality.

We are especially concerned for low-income households which struggle to afford good-quality and well-located housing in the private market.

Shelter NSW is concerned about the housing crisis in NSW and the rising trends in homelessness; housing rental stress as well as the impacts of poor-quality housing, particularly on low-income households. Lower-cost properties are being steadily replaced with new ones at higher rents, and new concentrations of disadvantage have been created across our major cities and towns as low-income households are displaced.

We have an established interest in the development of social (public and community housing) and affordable housing, including policies and practice around public housing estate renewal and associated property development. Our submissions can be found on our [Shelter NSW website](#)

Shelter NSW welcomes the opportunity to make a submission regarding the proposal to redevelop the Riverwood Estate in Sydney's south west and thank the Department of Planning, Housing and Infrastructure for the opportunity.

Background to the NSW Government's proposal

The NSW Government ('the Government') is proposing to rezone and redevelop a small section of the Riverwood Estate ('the site') to create a mix of social, affordable and private housing¹.

This proposal substantially revises an earlier 2022 proposal taking in the entire 30 hectare public housing site. The redevelopment would have seen public land sold and 1,100 public housing dwellings demolished to create 3,900 social and private dwellings over the next 15 to 20 years. Consistent with the *Communities Plus* model applied at the time, 30% of the dwellings (just 1,170 social homes) would have resulted. In 2022 Shelter NSW formally noted its lack of support for that masterplan, primarily on the grounds that it would see the complete loss of public land, virtually no increase in social housing (public and/or community)

¹ NSW Department of Planning (2024) – Riverwood Estate State Significant Precinct (SSP) accessed 5/4/24 [Riverwood Estate SSP | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

and that affordable rental housing was not even being considered (in addition to social housing)². We had other comments about the need for consideration of the needs of the large current and very diverse public housing community.

This revised and scaled-down 2024 proposal would see 60³ current public housing dwellings replaced by 420 homes where 50% is intended to be social and affordable housing in a range of housing types⁴. The proposal maintains the existing R4 High Density zoning and seeks to increase the maximum building heights from 11.5m to part 42m (12 storeys) and part 29m (8 storeys). Construction is expected to start in 2026/27.

According to information provided to Shelter NSW, the site is currently home to 95 people and consists of 57 dwellings (and childcare centre) in a variety of configurations – from one bedroom (no studios) to four bedroom dwellings.⁵

The Government has not explicitly stated its plans for the proposed dwelling sizes (bundling social, affordable and key worker dwellings) but we note the following information provided in the proposal documents. Even the most cursory examination indicates a proposed skewing to smaller dwellings (and thereby fewer tenants per dwelling) and a net loss of three-four bedroom dwellings available for social and affordable tenancies.

Taking account of proposed social housing dwelling sizes we estimate a future social housing tenant population somewhere between 211 – 264 people on this site. In other words, this redevelopment could see as few as 116 additional people living in the social housing dwellings.

Dwelling Size (Bedrooms)	Current Site (CS)	Current (%)	Proposed Social or Affordable	Proposed (%)	Proposed Private Dwellings	Proposed (%)
Studio/One	10	17%	82	40%	52	25%
Two	25	42%	110	53%	135	65%
Three	21	36%	14	7%	20	10%
Four	1	1%	0	0	0	0
Total	57		207		206	

Table 1: adapted by Shelter NSW from information provided by Homes NSW.

² Shelter NSW (2022) - *Submission on the Riverwood Estate Masterplan & Rezoning* - accessed from the [Shelter NSW website](#)

³ Note – public documentation says 60 dwellings but Shelter NSW directly advised by Planning staff there are 57-59 residential dwellings and one child care centre currently on site.

⁴ NSW Government, Department of Planning, Housing & Infrastructure (DPHI) – accessed 27 March 2024 <https://www.planning.nsw.gov.au/plans-for-your-area/priority-growth-areas-and-precincts/riverwood>

⁵ Information provided by Homes NSW - Community Engagement on request. Supplied 2/4/24

The proposal also intends to facilitate a variety of other outcomes relating to parks, streets, footpaths, solar access, street trees and other accessible public spaces.⁶

The proposal notes that Homes NSW intends to apply its traditional approach to tenant relocation which culminates in tenants being formally provided with six months' notice prior to relocation.

The site is situated at the eastern side of the large Riverwood Estate sits, within the Canterbury Bankstown LGA as noted below:



Figure 1: [Riverwood State Significant Precinct – Revised Rezoning Proposal \(amazonaws.com\)](https://www.amazonaws.com)

⁶ Department of Planning, Housing & Infrastructure (DPHI) (Feb 2024) *Riverwood Estate State Significant Precinct – Revised Rezoning Proposal, Explanation of Intended Effect* at p5, accessed 27 March 2024 [Riverwood State Significant Precinct – Revised Rezoning Proposal \(amazonaws.com\)](https://www.amazonaws.com)

Scope and approach of our submission

Overall, we note that while a dramatically smaller and quite confined proposal the overall approach *is intended to facilitate early delivery of an exemplar development to set a precedent for the Riverwood estate.*

For this reason, this submission will address broader and precedent-setting issues that we believe ought to be noted at this stage.

Our submission:

- **is for the attention of the NSW Government and especially Homes NSW (not just DPHI).** We will explore a wide range of issues and in some cases, address our recommendations to the NSW Government – landlord of the current tenants; asset owner of the current public land and housing and provider/funder of many public and community services required to support the new development and community in Riverwood.
- **will primarily focus on the housing provisions described in the proposal** but notes and welcomes other important elements of the proposal associated with improved connectivity, access to facilities and the provision of a child care centre⁷ but will not explicitly address those issues.
- **will often refer to data for the broader Riverwood Estate (and Canterbury Bankstown LGA) area.** Over time, planning for the broader Riverwood estate has moved from the broader area to smaller elements. As with many Homes NSW projects, this forces a project-by-project response by organisations like Shelter NSW. While we appreciate that this may be easier for planners, financiers and future developers we do think this approach has restricted a more fulsome consideration of the cumulative opportunities and risks presented by specific proposals like this one for (a very small part) of the Riverwood Estate. We are however, encouraged by the Government's recognition of this project as a precedent-setting *exemplar development*.
- **notes the NSW Government's current housing supply, density and diversity program across Sydney,** including the south west where Bankstown station has been identified as an Accelerated precinct⁸ along with Canterbury and Wiley Park train stations. More broadly, the Canterbury Bankstown Corridor Strategy remains an overarching plan, still noted by Canterbury Bankstown Council ('Council') as bringing

⁷ Canvassed in LAHC (October 2023) *Social Infrastructure Study* prepared by Cred Consulting – accessed 27/3/24 https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/NSW+Planning+Portal+Documents/Social+Infrastructure+Assessment+Addendum.pdf

⁸ NSW Department of Planning, Housing & Infrastructure: <https://www.planning.nsw.gov.au/policy-and-legislation/housing/transport-oriented-development-program/accelerated-precincts> accessed 28/3/24

an additional 35,000 people into the corridor⁹.

- **will consider the impact of this proposed development on the public housing tenants directly impacted by this proposal**, who will be required to relocate as well as public housing tenants in the remainder of the estate who will know that their time will come.
- **will not, as the proposal does, treat ‘social/affordable (and occasionally ‘key worker’) housing as single type**. Shelter NSW recognises social (public and community housing) and affordable rental housing as distinct tenures, responding to very different cohorts, means and needs.

Executive Summary

In 2016, the Canterbury-Bankstown Council (‘the LGA’) identified that an additional 50,000 dwellings would be required to accommodate over 100,000 extra people (28% growth) by 2036^{10 11}. It assessed the need for emergency housing, social housing, low cost rental housing and affordable housing for key workers as high¹².

The 2023 Rental Affordability Index identified large parts of Sydney’s South West’s **private rental market to be severely–extremely unaffordable** for many lower income households including pensioners and single parents working part time (Appendix 1).

Waiting lists and wait times for social housing are large and unabating. Across South Western Sydney there are currently over 10,621 households approved and waiting for as long as ten years for social housing. Excluding applications from singles or couples, 6,500 of those households likely include children (refer Appendix 3).

In NSW there is close to 58,000 households waiting for social housing¹³. The stock of social housing has not kept up with demand or population and now languishes at well under 5% (4.5% at June 2023) of all housing stock in NSW.

We appreciate that the NSW Government is challenged to meet the demand for this important government service and infrastructure (after a decade of neglect by the State and Commonwealth) but ask this: **where will the large required increases in both public and community housing (social housing) come from if not from redeveloped sites like this at the Riverwood Public Housing Estate?**

⁹ Canterbury Bankstown Council website accessed 28/3/24 [Sydenham to Bankstown Corridor \(nsw.gov.au\)](https://www.sydenham-to-bankstown-corridor.nsw.gov.au)

¹⁰ Canterbury-Bankstown Council (2020) [Draft Canterbury Bankstown Housing Strategy](#) accessed 23/9/22

¹¹ Canterbury Bankstown: [population profile](#) accessed 23/9/22 from Council site

¹² Op. Cit. at p15

¹³ NSW Government (Feb 2024) – accessed 8/4/24 [Social housing waiting list data | Family & Community Services \(nsw.gov.au\)](#)

This revised and scaled-down 2024 proposal would see 60¹⁴ current public housing dwellings replaced by 420 homes where 50% is intended to be social and affordable housing (30% and 20% respectively presumably) and the remainder private market dwellings in a range of housing types¹⁵. We estimate the following: 126 social, 84 affordable rental and 210 private dwellings. Shelter NSW assumes that this ratio is intended to be applied to future proposals for the site.

Shelter NSW welcomes the focus on creating more diverse housing stock right across the housing market and often observes that the private housing market is an unreliable supplier of the 'right type of housing, in the right place, at the right time'. Our hope is that government redevelopment projects don't replicate this market failure.

We note with some concern that this **proposal pays little regard to the large families in Sydney's South West juggling the twin stresses of unaffordable rents and overcrowding**. Shelter NSW research into severe overcrowding in Sydney's south west noted that 13.6% of NSW's severely overcrowded households reside in the Canterbury Bankstown LGA. The research also documented the existence and case studies of large families living in overcrowded dwellings within the broader Riverwood Estate (refer Appendix 3)¹⁶.

This proposal will create a denser precinct skewed towards smaller social housing dwellings (studio/1/2 bedrooms) and more concerningly, the net reduction of 3 bedroom social dwellings (from 21 – 14) and the loss of the only 4 bedroom dwelling. What precedent is being set here?

While Shelter NSW does not disagree that there is a need for more smaller dwellings for single households, especially for an aging population, we fear that **the proposal will not be able to accommodate the needs of large families already living in the wider estate as well as the needs of other large families on the social housing waiting list (now and in the future)**.

At Shelter NSW, we advocate for Affordable Rental Housing - in addition to social housing, not instead of it. We commend the Government for requiring affordable rental homes on this site. It responds to an important group that is often overlooked – financially stressed renters in the insecure, private residential housing market (renters who otherwise generally don't qualify for social housing). And it also caters for important key workers, including many from the government's own direct and allied workforces who are best placed if they live and work in the same area. As the proposal notes, the Riverwood Estate is well-located to key transport, employment and services – very suitable for the lower-income workers in the south-west. The proposal to require a substantial number of affordable rental dwellings is commended but in no way should it be seen as an alternative for those seeking

¹⁴ Note – public documentation says 60 dwellings but Shelter NSW directly advised by Planning staff there are between 57-59 residential dwellings and one child care centre currently on site

¹⁵ NSW Government, Department of Planning, Housing & Infrastructure (DPHI) – accessed 27 March 2024 <https://www.planning.nsw.gov.au/plans-for-your-area/priority-growth-areas-and-precincts/riverwood>

¹⁶ Judith Stubbs & Associates (2023) report prepared for Shelter NSW: *Understanding overcrowding in south-west Sydney – stage 2 report* – accessible here [Microsoft Word - FINAL STAGE 2 REPORT 220214 \(shelternsw.org.au\)](#)

social housing.

In this submission however, we will call for a greater level of assurance. Specifically, any **affordable housing ought to be required to be in perpetuity**, owned and managed by a Tier 1 or Tier 2 Not-for-profit Community Housing provider (CHP) and be **rented to very low to moderate income households for no more than 30% of household income**.

Shelter NSW commends the NSW Government for abandoning the requirement that Homes NSW (previously known as the Land and Housing Corporation) be self-funding. That requirement gave rise to the public/private partnership '*Communities Plus*' (70:30) model where valuable public land and dwellings were sold in order to fund the expansion and upgrade of existing and new social housing stock across the state. It generally ignored the need for affordable rental housing as a separate but valuable offering. In our view, the business model capped the ambition for these types of public housing renewal sites. In 2021 Shelter NSW commissioned research, calling on the then NSW Government to rethink and abandon its traditional Communities Plus approach.

While this current proposal for the Riverwood Estate has technically broken with the 70:30 approach, we note with some concern, that the requirement for a bundled 50% social and affordable dwelling is actually not so far from the *Communities Plus* approach. And while the current documentation does not explicitly confine the social requirement to just 30% of all dwellings we note a recent proposal for Explorer Street, South Eveleigh that does¹⁷.

So, in this submission we will continue refer to that research and call on the NSW Government to take a more innovative and long-term commercial public housing estate renewal approach in order to preserve valuable public land assets, while delivering substantially more social housing (both public and community).¹⁸

The NSW Government acknowledges that's its tenancy populations are increasingly vulnerable, requiring significant support. While Shelter NSW does not assert that high-rise living is, by definition, unsuitable for lower income people, it is well understood that the downsides of this type of living are most keenly felt by that cohort: *"it's not just the buildings, high-density neighbourhoods make life worse for the poor"*^{19 20} This is especially acute for those experiencing the compounding challenges associated with poor mental or physical health; loneliness and isolation. Given the proposed density of the site, care must be taken to create a place where large numbers of vulnerable people and lower-income people in general can reasonably live whether they be in social, affordable or private housing.

¹⁷ Shelter NSW (2023): [231201_Shelter-NSW-submission-Explorer-Street-South-Eveleigh-rezoning-1.pdf](https://sheltersnsw.org.au/231201_Shelter-NSW-submission-Explorer-Street-South-Eveleigh-rezoning-1.pdf) (sheltersnsw.org.au)

¹⁸ Murray,C. & Phibbs,P. (2021) *Reimagining the economics of public housing estate at Waterloo – a report for Shelter NSW* [access via sheltersnsw](https://sheltersnsw.org.au)

¹⁹ Easthope,H., Troy,L. & Crommelin,L. (2017) [It's not just the buildings, high-density neighbourhoods make life worse for the poor \(theconversation.com\)](https://theconversation.com/its-not-just-the-buildings-high-density-neighbourhoods-make-life-worse-for-the-poor-2017-08-22) article in The Conversation published 22 August, 2017 accessed 28/4/22

²⁰ Easthope,H., Troy,L. & Crommelin,L. (2017) [This is why apartment living is different for the poor \(theconversation.com\)](https://theconversation.com/this-is-why-apartment-living-is-different-for-the-poor-2017-08-21) article in The Conversation published 21 August, 2017 accessed 28/4/22

The essential argument of our submission is therefore, that the NSW Government has the power and the opportunity to demand more of this redevelopment proposal.

Beyond the specifics of increasing its ambition for the social and affordable housing on the site, but especially the social component, we see a major opportunity to develop ambition for the 'private component'; with a view to developing a high-functioning, connected and diverse community in Riverwood that will grow and change over time.

We call on the NSW Government to commit the necessary funds required to support the: successful relocation of the currently impacted public housing tenants (including large families); the influx of many hundreds of new residents (social, private owners and renters) and the growth of a vibrant, supportive community, building on the cultural, social and community heritage of the suburb of Riverwood.

Commensurate with the desire that this be an exemplar development, we encourage the NSW Government to apply best practice tenant engagement approaches. We note that the decision to move on a smaller redevelopment will provide greater opportunities for impacted tenants to relocate within the broader estate, actively engage in any consultation (including co-design) and, if planning to return, watch their new homes being built.

We believe there is a significant requirement that the proposal makes a substantial and far greater contribution to increasing the stock of social housing in the south west of Sydney – commensurate with a large and growing unmet demand, planned population increases (including the Government's own TOD program) and the capacity of Government to drive a better outcome in the broader public interest. This is especially the case if this relatively small redevelopment is to serve as a template for the broader estate.

The proposed development is on NSW public land within a broader estate, home to hundreds of public housing tenants and a long-standing diverse, multicultural community. We commend the NSW Government for committing itself to delivering an exemplar redevelopment but encourage a number of changes and explicit commitments.

For these reasons, Shelter NSW is unable to support the proposal in its current form.

Recommendations

In this submission Shelter NSW is calling on the NSW Government to:

- **explain why it cannot deliver 100% social and affordable dwellings on this site**, but failing that;
- **increase its commitment for social and affordable housing on the site to: at least 50% social housing, at least 20% affordable rental housing and 30% private housing** commensurate with the current and growing demand for social housing in Sydney's South West and to support low-moderate key/essential workers to live in the new estate
- **retain the site in public ownership (through leasehold arrangements rather than sale if necessary)**
- **apply an innovative commercial, funding and tendering** model to the development of this site to maximise social and affordable housing and other 'diverse' forms of housing (including within the 'private' housing component).
- **require all Affordable Rental Housing be in perpetuity**, owned and managed by a Tier 1 or Tier 2 Not-for-profit Community Housing provider (CHP) and be **rented to very low to moderate income households for no more than 30% of household income**.
- **leverage other government programs (State and Commonwealth) to maximise diverse housing within the 'private' dwellings**. For example, Shared Equity home purchase; disability and aged care subsidies.
- **ensure dwelling size across all tenures but especially social and affordable housing can accommodate large and changing family sizes and circumstances**. This is required in order to provide a meaningful 'right of return' to existing tenants and to add to the diversity of dwellings in the broader estate and local area. This might include 'dual key' designs to enable more flexible configurations; larger or multiple living areas to house transient family visitors²¹.
- **explicitly resolve the current incidence of severe overcrowding within the Riverwood Public Housing Estate**.
- Ensure that the current numbers of **3-4 bedrooms social housing dwellings on the site is not reduced**.
- **ensure lower-income residents (overwhelmingly renters) whether in social, affordable or private dwellings are a key focus for the precinct, building and**

²¹ WSP SIA at p 60

dwelling design considerations (taking account of the overlaying housing diversity and adaptability needs that arise from disability, cultural considerations, family size and the desire to age in place). This may require challenging the traditional narrow focus of private developers, often catering more for investors when designing new apartment buildings leading to limited variation in apartment designs and sizes available ²²

- **commit to demonstrating a superior environmental performance in the redeveloped estate** (beyond minimum compliance) to support the health and well-being of lower-income residents (in all tenures), reduce energy bills and generally increase the long-term resilience of the community. Include design provisions to minimise urban heat effect.
ensure any embedded networks are not allowed to act in a monopolistic way, locking tenants, and especially low-income tenants into costly energy contracts.
- As low-income tenants enter/transfer/return to the Riverwood Estate, **incorporate a general appliance replacement program directed to lower-income households.**
- **ensure 100% of social and affordable dwellings is delivered to the liveable Housing Guideline Gold level**, and require that all private market housing should achieve minimum Silver level (with 10% platinum)
- **adopt a new and best practice model of tenant engagement and co-design - beyond the principles set out in the *Compact for Renewal*** ²³ (which essentially argues for tenant consultation in the relocation and resettlement process). With a much smaller redevelopment within a larger estate there is a unique opportunity for genuine consultation and co-design especially taking account of diverse culture, ability, age and family size requirements of current and future tenants.
- as a matter of priority, **establish a Riverwood Estate Tenant Relocation Advisory Group**, with the assistance of the long-running and respected Riverwood Community Centre (RCC) located adjacent to the site. Shelter NSW (long-term member and Co-Chair of the Waterloo Residents Group) is well-placed to also support this advisory group. This recommendation aligns with the earlier recommendations of the Riverwood Community Centre (RCC)²⁴.

²² Easthope, H., Crommelin, L., Troy, L., Davison, G., Nethercote, M., Foster, S., van den Nouwelant, R., Kleeman, A., Randolph, B., and Horne, R. (2020) *Improving outcomes for apartment residents and neighbourhoods*, AHURI Final Report 329, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/finalreports/329>, doi: 10.18408/ahuri-7120701

[Improving outcomes for apartment residents and neighbourhoods—Executive Summary \(ahuri.edu.au\)](http://www.ahuri.edu.au/research/finalreports/329)

²³ Shelter NSW, Tenant's Union of NSW & City Futures Research Centre (2017) – What tenants want from renewal accessed from [A-compact-for-renewal-what-tenants-want-from-renewal](#)

²⁴ Achitectus (2023) *Response to Submissions Section 5.2.2 Tenant Relocation*, Accessed 8/4/24 [Response+To+Submissions-v2.pdf \(amazonaws.com\)](#)

1. The stock of diverse Social Housing (public and community) needs to grow in Sydney's south-west

– **Current demand for social housing is not being met.** According to the NSW Government's own social housing waitlist data ²⁵ there was on June 30, 2023 over 4,852 households in just four local housing allocation zones close to Riverwood, approved and waiting for social housing. Given that each application represents a household we can conservatively estimate that as many as 5,000 households (say 9,000 people) are waiting as long as 10 years to access secure, affordable social housing.

<i>Allocation Area</i>	<i>General (households)</i>	<i>Priority (households)</i>	<i>Waiting times for all dwelling types (years)</i>
Riverwood	200	18	10+ (5-10 years for Studio/1bdr)
Bankstown	2,046	96	10+ (5-10 years for Studio/1bdr)
Canterbury	694	108	10+
St George	1,408	282	10+
Total	4,348	504	4,852

Table 2: Social housing applicants by allocation zone adapted from NSW Government data (30 June 2023)²⁶

Across the broader South Western Sydney there are currently over 10,621 households approved and waiting for as long as ten years for social housing. Excluding applications from singles or couples, 6,500 of those households likely include children (refer Appendix 3).

– **People seeking homelessness services being turned away in NSW.** As detailed in our Shelter NSW Pre Budget Submission²⁷, close to 50% of the over 47,000 people seeking accommodation assistance from the Specialist Homelessness Sector (SHS) in NSW during

²⁵ Department of Communities and Justice [Expected waiting times | Family & Community Services \(nsw.gov.au\)](https://www.nsw.gov.au/family-community-services/expected-waiting-times) accessed 27 April 2022. Allocation zone CS01. Note each application represents a household.

²⁶ NSW Government (Feb 2024) accessed 8/4/24 [Social housing applicant households on the NSW Housing Register by Allocation Zone \(as at 29 February 24\) | Family & Community Services](https://www.nsw.gov.au/family-community-services/social-housing-applicant-households-on-the-nsw-housing-register-by-allocation-zone-as-at-29-february-24)

²⁷ Shelter NSW (2022) *Prebudget Submission to NSW Department of Treasury* available at www.sheltersnsw.org.au

2020-21 were turned away)²⁸. This has steadily worsened since 2015-16 where 15,471 or 34.2% had the same experience. Over the last decade, each year, at least 45,000 people present at SHS services seeking help (with Aboriginal & Torres Strait Islander people consistently overrepresented at nearly a third of all SHS clients). Many of these SHS service operate in Sydney's south west and report the lack of medium-long-term social housing as a key barrier to resolving client needs.

1.1 Key and Essential Workers suffering acute housing stress across Sydney – including in Sydney's south west

Recent research by Gilbert, Nasreen and Gurran²⁹ has highlighted the extent to which key workers in Sydney are struggling to find appropriate and affordable housing. These include teachers, nurses, community support workers; ambulance and emergency officers; delivery personnel and cleaners. These are the very types of workers needed to support the large and growing residential populations and commercial operations that exist across the Sydney.

The report has found that 20% of key workers across Sydney experience housing stress. Concerningly, the report notes that difficulties accessing appropriate and affordable housing is extending well beyond households traditionally considered in need of welfare into moderate incomes brackets. They found that there are no LGAs in the Sydney metropolitan region with a median house price that is affordable to an early career registered nurse, and only a few LGAs having affordable unit prices.

In 2020 the Canterbury Bankstown Council noted in its Affordable Housing Strategy LGA noted a number of worrying signs, including:³⁰

- Housing is severely unaffordable for people in lower income areas. As an example, less than 1% of the two-bedroom units in the LGA rental market is affordable for a very low-income household
- Redevelopment and gentrification threaten the loss of even the limited affordable options currently available to very low and low-income households
- Significant numbers of people (about 25%) work in 'key workers' industries, including with the LGA itself and that many of them were lower-income people. The demand for affordable key worker housing is significant

Council formally acknowledged in its AHS that 'housing stress is negatively affecting households in the LGA and the private market and social housing pipeline is unlikely to meet

²⁸ Productivity Commission (2021) *Annual Report on Housing and Homelessness*

²⁹ Gilbert, C., Nasreen, Z. and Gurran, N. (2021) *Housing key workers: scoping challenges, aspirations, and policy responses for Australian cities*, AHURI Final Report No. 355, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/355>, doi:10.18408/ahuri7323901.

³⁰ Sourced from the Canterbury Bankstown Affordable Housing Strategy

the current and future need for affordable rental housing without intervention.

1.2 Housing stock (current and planned) is not meeting the needs of large families in Riverwood

Shelter NSW has completed research into the phenomena of severe overcrowding, especially within multicultural communities and has commissioned research by a social planning and social research consultancy firm Judith Stubbs & Associates (JSA) (Judith Stubbs BSW PhD MPIA and Colleen Lux BA MSc (Environmental Studies)). The Canterbury-Bankstown LGA was the focus of its study – chosen for its size and cultural diversity; and prevalence of overcrowding/severe overcrowding and the extent to which population and dwelling growth is planned for the LGA. Research has included in-depth qualitative research with families currently living in overcrowded dwellings across the LGA and within the Riverwood public housing estate.

Findings of this research point to the serious short-comings/failures of the Riverwood planning proposal and master plan currently on exhibition, particularly that:

- *The proposal does not acknowledge, or consider the needs of, the significant number of existing large families residing on the Riverwood social housing estate.*
- *The proposal does not provide any larger dwellings (4+ bedrooms) private or social, and a very limited supply of three-bedroom social housing dwellings. This lack of larger dwellings fails to meet existing and future social and affordable housing needs including:*
 - *the expressed housing need of existing large families living in the Riverwood estate, or other large families on the social housing waiting list,*
 - *the unexpressed housing need of large families currently living with overcrowding in private rental in the wider community of southwest Sydney and Canterbury Bankstown LGA, and*
 - *future social and affordable housing need of large households in southwest Sydney and Canterbury-Bankstown LGA, including (but not limited to) future migrants/refugee/humanitarian entrants to Australia.*
- *Due to the lack of larger dwellings, the proposal will result in adverse social impacts for existing large families who will most likely be re-housed out of the local area away from strong service, social and community supports that they have built over many years and rely upon for their individual and family's health and wellbeing*

2. Supporting a diverse, future Riverwood Community with many lower-income renters (in the private rental market)

According to AHURI research by Easthope et al³¹, 10% of the Australian population lives in an apartment (and increasing), mainly in capital cities (85%). Our interest at Shelter NSW is with the 39% of households living in high-density apartments from lower income households.³² And while we are not against high rise living *per se* we note the research finds that these lower-income households, *over-represented compared to other dwelling types are disproportionately affected by challenges associated with apartment living*. Importantly these researchers have noted that, *“it’s not just the buildings, high-density neighbourhoods make life worse for the poor”*^{33 34}

The experiences of apartment living for lower-income apartment residents are influenced by factors such *infrastructure provision, urban design, building design and management, neighbourhood amenities and facilities, and ongoing place management and community engagement*. Tensions can arise from a variety of sources – whether it be noise, conflict over shared spaces like gardens and laundries or the management of safety and security issues. And of course, these tensions are in many cases landing on people already stressed by the pressures of poverty, insecure work and any number of personal or health circumstances.

Navigating these issues is difficult for most people, but lower income renters whether social, affordable or private, have less flexibility and capacity to simply move if the situation becomes untenable. This is especially the case in a tight rental market with limited options for low-income people (let alone those with families, disabilities, carer responsibilities or other complicating factors).

At Shelter NSW, our focus is on people from the bottom two quintiles of household income. We are concerned that the failure to provide enough social and affordable housing across this future large precinct of Riverwood will see a great many lower income renters exposed to the insecurity and unaffordability of the private rental market as illustrated in the 2022 *Anglicare Rental Affordability Snapshot*³⁵.

Beyond issues of affordability, we are also concerned that this development, effectively

³¹ Easthope, H., Crommelin, L., Troy, L., Davison, G., Nethercote, M., Foster, S., van den Nouwelant, R., Kleeman, A., Randolph, B., and Horne, R. (2020) *Improving outcomes for apartment residents and neighbourhoods*, AHURI Final Report 329, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/finalreports/329>, doi: 10.18408/ahuri-7120701

[Improving outcomes for apartment residents and neighbourhoods—Executive Summary \(ahuri.edu.au\)](http://www.ahuri.edu.au/research/finalreports/329)

³² Easthope, H., Troy, L. & Crommelin, L. (2017) AHURI research funded by Shelter NSW *Equitable Density: The place for lower-income and disadvantage households in a dense city* sourced from UNSW City Futures Research Centre: <https://cityfutures.adfa.unsw.edu.au/research/projects/equitable-density-place-lower-income-and-disadvantage-households-dense-city/>

³³ Easthope, H., Troy, L. & Crommelin, L. (2017) [It's not just the buildings, high-density neighbourhoods make life worse for the poor \(theconversation.com\)](https://theconversation.com/its-not-just-the-buildings-high-density-neighbourhoods-make-life-worse-for-the-poor) article in The Conversation published 22 August, 2017 accessed 28/4/22

³⁴ Easthope, H., Troy, L. & Crommelin, L. (2017) [This is why apartment living is different for the poor \(theconversation.com\)](https://theconversation.com/this-is-why-apartment-living-is-different-for-the-poor) article in The Conversation published 21 August, 2017 accessed 28/4/22

³⁵ Accessed 28/4/22 <https://www.anglicare.asn.au/research-advocacy/rental-affordability/>

outsourced to the private sector, will not directly address the needs and concerns of future lower-income renters. And not just as ribbons are cut but over time as the estate buildings and community ages and changes. As Easthope et al note ³⁶ *underpinning the high-density development of Australian cities is a policy orthodoxy that privileges market-led housing delivery and a reduced government role in direct housing provision and management... policy interventions directed at lower-income apartment residents have been limited.* They also note the narrow focus of developers, often catering more for investors when designing new apartment buildings leading to limited variation in apartment designs and sizes available.

As noted by Easthope et al, successful high-density redevelopment needs to consider the impact on lower-income and vulnerable residents of factors at the building, neighbourhood and metropolitan scales. Given the risks of creating a future, denser precinct that makes *'life worse for the poor'* we encourage the Government to step in at this early stage and ensure the Riverwood development puts lower-income people front and centre. Failure to attend to *the needs of lower-income high-density residents risks undermining the prosperity and cohesion of Australian cities in future years.*³⁷

If the NSW Government proceeds with this development it needs to formally and transparently justify that a precinct of this density and socio-economic makeup can support such a large, lower-income renting population (including vulnerable people in social housing). Furthermore, we call on the Government to actively assess and commit the necessary funds required to support the: successful relocation and potential return of current public housing tenants; the rapid influx of many thousands of new residents (social, private owners and renters) and the growth of a vibrant, supportive community, building on the cultural, social and community heritage of the suburb of Riverwood.

3. Environmental performance of the Riverwood buildings and homes

Across the general community there is a deepening realisation of the cost of living with rising temperatures and energy-inefficient homes and appliances; a challenge disproportionately felt by lower income households. These households have the least financial ability to adapt and respond ³⁸ and spend a disproportionately large part of their disposable income on energy costs (6.4% versus 1.2%).³⁹ Beyond the financial impacts, these households are challenged to deal with the health and well-being impacts of rising temperatures and rising energy costs ⁴⁰ Whether as private or social/affordable housing renters or low-income

³⁶ Easthope et al (2020) op. cit. Executive Summary at p3

³⁷ Easthope et al (2017) article in The Conversation op. cit.

³⁸ Deloitte (2021), *The economic impacts of the National Low-Income Energy Productivity Program*, report prepared for the Australian Council of Social Service [Link to report accessed 27 Jan 2022](#)

³⁹ Australian Energy Regulator 2019, *Affordability in retail energy market*, Commonwealth of Australia, Canberra.

⁴⁰ Grey, C.N.B. et al 2017, 'Cold homes, fuel poverty and energy efficiency improvements: A longitudinal focus group approach, *Indoor and Built Environment*, vol. 26, iss.7, pp.902-913. doi:[10.1177/1420326X17703450](https://doi.org/10.1177/1420326X17703450)

homeowners, these households often have little control over the energy efficiency of their homes and little financial capacity to upgrade old, inefficient appliances such as water and space heating/cooling systems.

The broader Riverwood Estate will be redeveloped over the next 15-20 years. We contend that the NSW Government ought to be a sustainability leader, especially given what is likely to be a large residential population which relies on well-built, designed and maintained buildings and dwellings in order to mitigate the impacts of climate change and rising energy costs. We contend that the proposal should require more than minimum compliance and consider applying a BASIX 'stretch bonus' to relevant residential development in order to ensure a superior environmental performance

4. Need for a more innovative and commercial business model

In 2021 Shelter NSW released research calling on the (then) NSW Government to rethink its traditional approach to supplying social housing across the state – an approach that we asserted, was holding back its key agency LAHC and compromising the delivery of enough social housing to make a material difference to the housing crisis in NSW⁴¹. In our public commentary⁴² we observed that the *Communities Plus* model had become so entrenched (we believed) it had also stymied creative thinking about how a project like the Waterloo South development could be delivered for the greater public good.

While the current Government has changed approach to public housing estate redevelopment, we believe there are still other options for consideration. The research for example, asserted that public land should not only be retained but leveraged.

By way of illustration for Waterloo South for example, it proposed an alternative *model whereby 50% of new dwellings are public housing, 25% are retained by LAHC as build-to-rent housing at market prices, and 25% are sold by LAHC to the private market ... using low-cost leverage to generate positive cashflow and maximises exposure to long-term capital gains for LAHC*.

In a similar sense, Professor Bill Randolph and Dr Laurence Troy⁴³ in their submission to the Waterloo South Independent Advisory Group (IAG) asked why the adoption of a private sector model, *as the only mechanism through which either plan is enacted* had not been debated? They made a strong case for a Not-for-Profit led renewal of Waterloo South as a clear and viable alternative to the public-private partnership development

⁴¹ Murray, C. & Phibbs, P. (2021) https://shelternsw.org.au/news_items/reimagining-the-economics-of-public-housing-estate-renewal-and-the-role-of-government-new-research/)

⁴² Morton, R (March 5 2022) The Saturday Paper [Exclusive-leaked-documents-show-public-housing-plan-halved](#) (paywalled)

⁴³ Randolph, B. & Troy, L. (2021) [Appendix A Submission to the Waterloo South Independent Assessment Panel.pdf](#)

model pursued under the *Communities Plus* scheme. Under their proposal, delivery of a substantial component of Affordable Housing by the Community Housing Provider (CHP) sector would open new possibilities for the commercial, financial and operational delivery of the project. We look to the awarding of the ⁴⁴ contract to develop the mixed-use Elizabeth Street, Redfern project to CHP Bridge Housing as a good example of this approach.

5. What tenants want from renewal

The eventual transfer processes connected with the Riverwood Estate project will be very disruptive to the lives of existing tenants. The JSA submission has provided compelling case studies of the extent to which large families, as an example, already living on the estate have established themselves and supported each other.

Notwithstanding that formal LAHC documentation reminds people that relocation is some time off, the disruption has already begun. They are already feeling the impact of being told that they will need to leave their current homes and community. Some are employed and wonder how this renewal will affect their employment. Many are highly engaged in the social and community networks of the suburb and their neighbourhood and wonder what will happen when they move. Many worry about how they will maintain practical access to trusted doctors and other support services they have come to rely on. Those with small children wonder where they will start and finish their schooling. Some are houseproud and wonder how their personal investment in their homes will be recognised and compensated.

With the benefit of having observed the progress and impact of a number of *Communities Plus* renewal projects, Shelter NSW encourages the NSW Government to actively engage and support community members, but especially current residents in the design of their future homes and community. We have heard directly from public housing tenants who have or are already part of an estate renewal project in other parts of Greater Sydney. They have told us what works well, and what doesn't – for residents and the overall project.

We recommend that any tenant engagement would logically include residents from the Washington Park Estate who would be a great source of feedback.

Shelter NSW recognises that the level of engagement we are advocating for requires the partnership between the Departments of Planning, LAHC and the Department of Families, Communities and Justice (DCJ), the 'landlord' of any current and future social housing

⁴⁴ Bridge Housing 2022 - [media announcement](#)

residents across the life of the project. We offer the [Compact for Renewal](#) ⁴⁵ as a template for how the NSW Government might best engage with the Riverwood Estate community from this early stage right through to relocation and possible return.

⁴⁵ *Compact for Renewal – What Tenants Want from Renewal*. These are the principles for a proposed *Compact for Renewal* between agencies undertaking urban renewal and social housing tenants affected by renewal. The Compact is the result of consultations with social housing tenants under a project carried out by Shelter NSW, Tenants' Union of NSW and the City Futures Research Centre at UNSW

Appendix 1 – Rental Affordability Index (RAI) South Western Sydney (Q2 2023)

RAI produced by SGS Economics & Planning for organisations including National Shelter. Live data set available at: <https://sgsep.com.au/projects/rental-affordability-index>

TABLE 1. RENTAL AFFORDABILITY INDEX AND SEVERITY OF RENTAL UNAFFORDABILITY

Index score	Share of income spent on rent	Relative unaffordability
<50	60% or more	Extremely unaffordable rents
51-80	38-60%	Severely unaffordable rents
81-100	30-38%	Unaffordable rents
101-120	25-30%	Moderately unaffordable rents
121-150	20-25%	Acceptable rents

Riverwood, Peakhurst & Lugarno

Postcode: 2210

Household Type	Indictive gross annual income	RAI Score	Rent as a share of income	Relative Unaffordability Category
Single person on Jobseeker	\$22,100	24	60% or more	Extremely unaffordable
Single pensioner	\$36,700	42	60% or more	Extremely unaffordable
Single part-time worker parent on benefits	\$44,800	43	60% or more	Extremely unaffordable
Pensioner couple	\$54,300	53	60% or more	Extremely unaffordable
Hospitality worker	\$62,800	84	30-38%	Unaffordable rents
Student sharehouse	\$84,800	72	38-60%	Severely unaffordable
Minimum wage couple	\$91,800	87	30-38%	Unaffordable rents

Bankstown & Condell Park

Postcode: 2200

Household Type	Indictive gross annual income	RAI Score	Rent as a share of income	Relative Unaffordability Category
Single person on Jobseeker	\$22,100	33	60% or more	Extremely unaffordable

Single pensioner	\$36,700	58	38-60%	Severely unaffordable
Single part-time worker parent on benefits	\$44,800	52	38-60%	Severely unaffordable
Pensioner couple	\$54,300	63	38-60%	Severely unaffordable
Hospitality worker	\$62,800	115	25-30%	Moderately unaffordable
Student sharehouse	\$84,800	75	38-60%	Severely unaffordable
Minimum wage couple	\$91,800	104	25-30%	Moderately unaffordable

Punchbowl & Roselands
Postcode: 2196

<i>Household Type</i>	<i>Indictive gross annual income</i>	<i>RAI Score</i>	<i>Rent as a share of income</i>	<i>Relative Unaffordability Category</i>
Single person on Jobseeker	\$22,100	30	60% or more	Extremely unaffordable
Single pensioner	\$36,700	52	38-60%	Severely unaffordable
Single part-time worker parent on benefits	\$44,800	56	38-60%	Severely unaffordable
Pensioner couple	\$54,300	69	38-60%	Severely unaffordable
Hospitality worker	\$62,800	104	25-30%	Moderately unaffordable
Student sharehouse	\$84,800	70	38-60%	Severely unaffordable
Minimum wage couple	\$91,800	112	25-30%	Moderately unaffordable

Canterbury, Hurlstone Park & Ashbury
Postcode: 2193

<i>Household Type</i>	<i>Indictive gross annual income</i>	<i>RAI Score</i>	<i>Rent as a share of income</i>	<i>Relative Unaffordability Category</i>
Single person on Jobseeker	\$22,100	21	60% or more	Extremely unaffordable
Single pensioner	\$36,700	37	60% or more	Extremely unaffordable
Single part-time worker parent on benefits	\$44,800	38	60% or more	Extremely unaffordable
Pensioner couple	\$54,300	37	60% or more	Extremely unaffordable
Hospitality worker	\$62,800	74	38-60%	Severely unaffordable
Student sharehouse	\$84,800	58	38-60%	Severely unaffordable
Minimum wage couple	\$91,800	76	38-60%	Severely unaffordable

Wiley Park & Lakemba
Postcode: 2195

<i>Household Type</i>	<i>Indictive gross annual income</i>	<i>RAI Score</i>	<i>Rent as a share of income</i>	<i>Relative Unaffordability Category</i>
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Single person on Jobseeker	\$22,100	33	60% or more	Extremely unaffordable
Single pensioner	\$36,700	58	38-60%	Severely unaffordable
Single part-time worker parent on benefits	\$44,800	58	38-60%	Severely unaffordable
Pensioner couple	\$54,300	71	38-60%	Severely unaffordable
Hospitality worker	\$62,800	115	25-30%	Moderately unaffordable
Student sharehouse	\$84,800	73	38-60%	Severely unaffordable
Minimum wage couple	\$91,800	115	25-30%	Moderately unaffordable

Appendix 2 – Social Housing Residential Dwellings Dashboard (June 2023)

Social housing residential dwellings dashboard produced by DCJ. Live data set available at: https://public.tableau.com/app/profile/dcj.statistics/viz/Social_Housing_Residential_Dwellings_17032188360200/Dashboard?publish=yes

<div> <div>DCJ District</div> <div>Tenancy managed by</div> <div>Dwelling type</div> <div>Number of bedrooms</div> </div>						
<div> <div>South Western Sydney</div> <div>(All)</div> <div>(All)</div> <div>(All)</div> </div>						
Tenancy managed by	Dwelling type	Studio/1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms	Total
Public housing (PH)	Unit	4,129	2,385	497	23	7,034
	Villa	460	589	559	39	1,647
	Townhouse	20	718	2,145	271	3,154
	Cottage	12	1,422	5,277	1,638	8,349
	Sub-total	4,621	5,114	8,478	1,971	20,184
Community housing (CH)	Unit	1,519	1,502	191	10	3,222
	Villa	49	242	168	20	479
	Townhouse	124	225	554	96	999
	Cottage	35	186	891	395	1,507
	Sub-total	1,727	2,155	1,804	521	6,207
Aboriginal Housing Office (AHO)	Unit	23	23	<5		49
	Villa	7	12	6		25
	Townhouse		14	34	<5	49
	Cottage		7	239	97	343
	Sub-total	30	56	282	98	466
Aboriginal Community Housing (ACH)	Villa		<5			<5
	Townhouse			<5		<5
	Cottage		9	46	32	87
	Sub-total		10	50	32	92

Appendix 3 - Severe overcrowding in Sydney's South-West (January 2023)

Extract from Understanding Overcrowding in South West Sydney: Stage 2 Report. Prepared for Shelter NSW by Judith Stubbs & Associates. Accessible at: [Microsoft Word - FINAL STAGE 2 REPORT 220214 \(shelternsw.org.au\)](#)

Table 3.1: Top 20 LGAs by No. of Persons in Severely Crowded and Crowded Dwellings (need 3 & 4+ more b/r) & SEIFA Disadvantage

	Total Severely Crowded Dwellings	% of All Severely Crowded Dwellings in NSW	Total Severely Crowded + Crowded Dwellings	% of All Severely Crowded + Crowded Dwellings in NSW	SEIFA Disadvantage (% for Australia)
Canterbury-Bankstown	224	13.6%	749	12.5%	24
Cumberland	197	12.0%	684	11.4%	22
Fairfield	133	8.1%	518	8.7%	8
Blacktown	103	6.3%	349	5.8%	58
City of Sydney	105	6.4%	385	6.4%	83
Liverpool	61	3.7%	248	4.1%	35
Parramatta	57	3.5%	203	3.4%	87
Campbelltown (NSW)	49	3.0%	161	2.7%	33
Bayside (NSW)	49	3.0%	240	4.0%	94
Georges River	45	2.7%	194	3.2%	94
Penrith	29	1.8%	122	2.0%	68
Burwood	42	2.6%	121	2.0%	68

Table 3.2: No. of Persons in Severely Crowded Dwellings (need 4+ more bedrooms)

	Bankstown SA3	Canterbury SA3	Auburn SA3	Fairfield SA3	Greater Sydney
2016	787	998	1,537	1,613	15,488
2021	812	1,007	940	1,153	11,986

Source: ABS Census 2016, 2021

Table 3.4: Number of severely crowded dwellings (need 4+ more bedrooms)

	Bankstown SA3	Canterbury SA3	Auburn SA3	Fairfield SA3	Greater Sydney
2016	94	125	195	173	1,896
2021	86	114	110	121	1,353

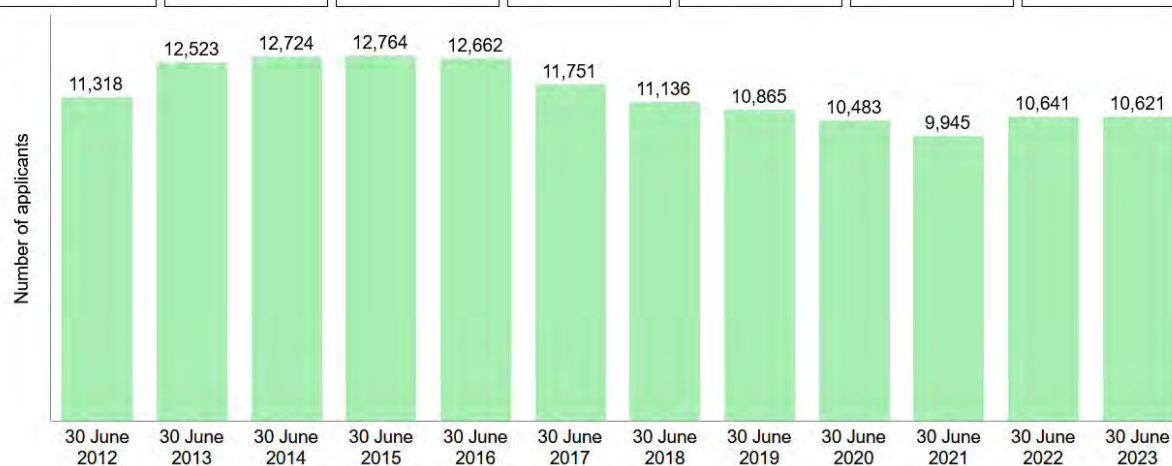
Source: ABS Census 2016, 2021

Appendix 4 – Social housing applicants in South Western Sydney as at 30 June 2023)

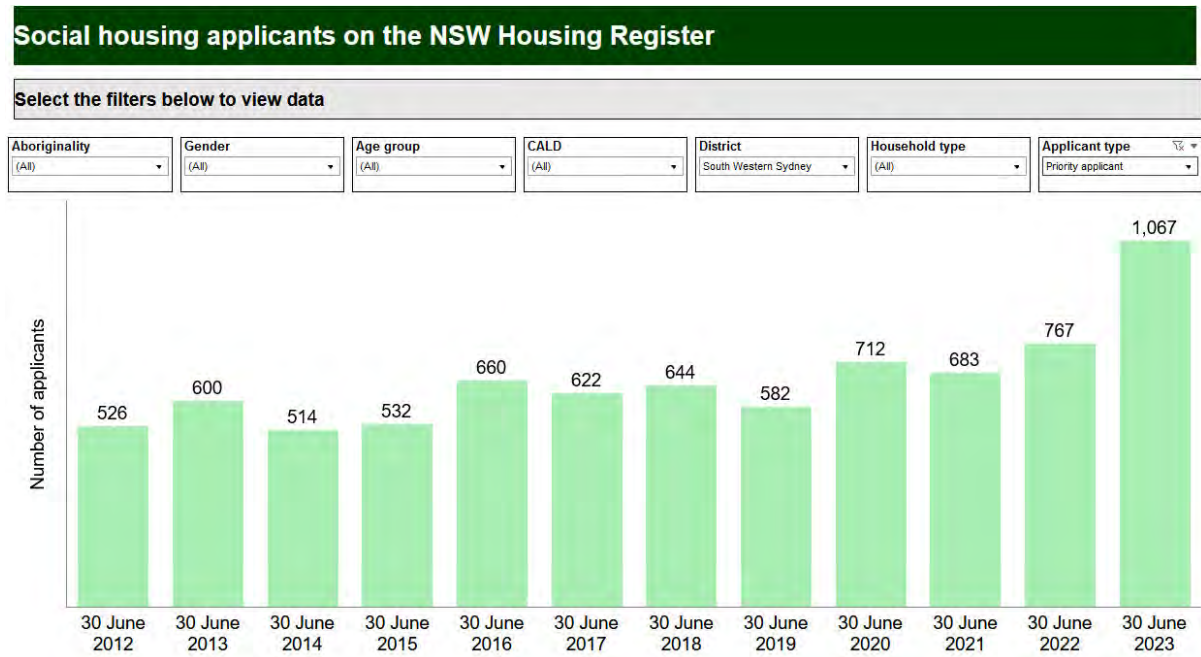
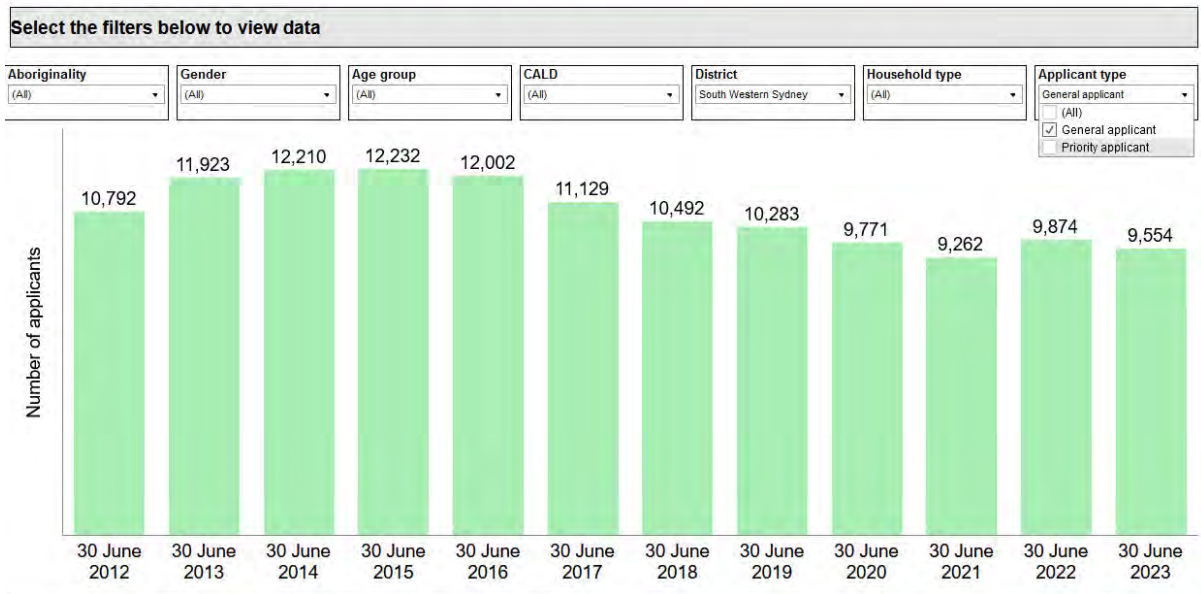
Social housing applicants on the NSW Housing Register

Select the filters below to view data

Aboriginality (All)	Gender (All)	Age group (All)	CALD (All)	District South Western Sydney	Household type (All)	Applicant type (All)
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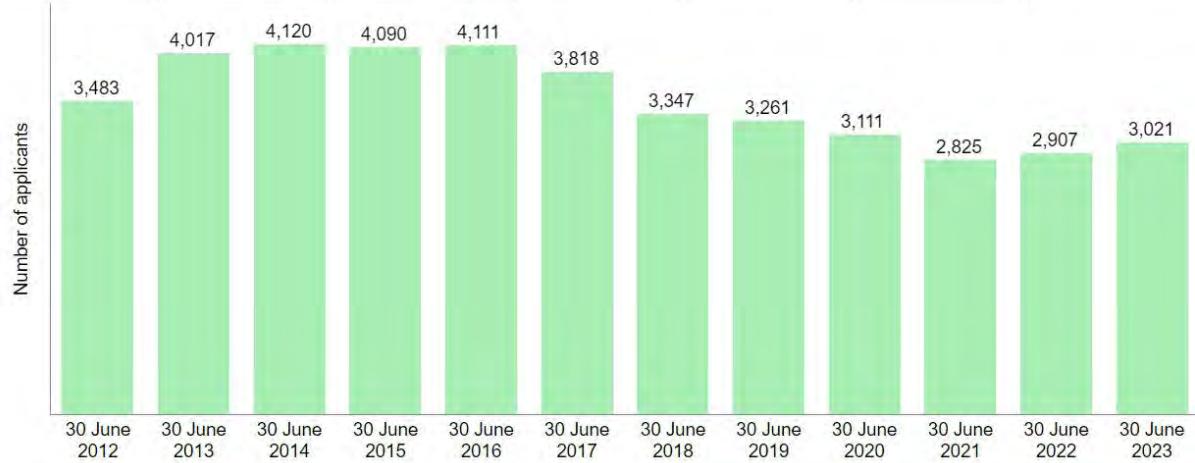
Social housing applicants on the NSW Housing Register



Social housing applicants on the NSW Housing Register

Select the filters below to view data

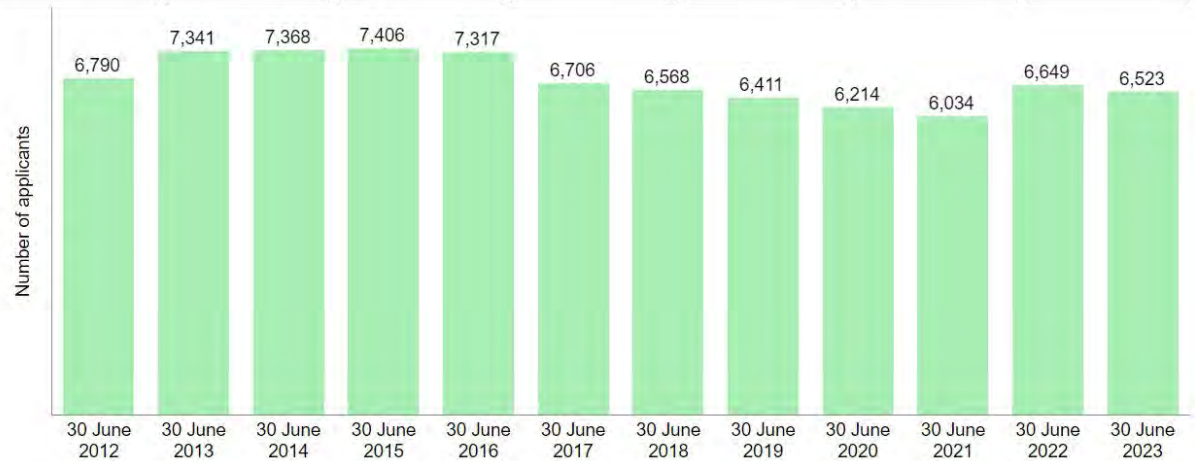
Aboriginality (All)	Gender (All)	Age group (All)	CALD (All)	District South Western Sydney	Household type Single only	Applicant type (All)
------------------------	-----------------	--------------------	---------------	----------------------------------	-------------------------------	-------------------------



Social housing applicants on the NSW Housing Register

Select the filters below to view data

Aboriginality (All)	Gender (All)	Age group (All)	CALD (All)	District South Western Sydney	Household type Multiple values	Applicant type (All)
------------------------	-----------------	--------------------	---------------	----------------------------------	-----------------------------------	-------------------------



Household type: Single parent with dependent children, single parent with dependent children other households. Excluding couple only & single only

Submission to Riverwood Estate SSP (Rezoning Proposal & Master Plan): Failure to consider housing needs of large families & households living with overcrowding



September 2022

This report has been prepared for
NSW Department of Planning and Environment

by



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1 Introduction

1.1 Judith Stubbs and Associates & Shelter NSW research into overcrowded living

Judith Stubbs and Associates (JSA) is a social planning and social research consultancy. We undertake research, planning and policy development for local, state and federal government clients; community and business clients. We are acknowledged experts in housing research, policy and strategy development. We have a particular focus on affordable and diverse housing for people earning low to moderate incomes, people with special needs and people with experience of homelessness.

JSA has recently been engaged by Shelter NSW to undertake research to better understand the characteristics, experiences and needs of people living in overcrowded housing in southwest Sydney, particularly in the Canterbury-Bankstown LGA.

This project has included quantitative and qualitative research methods including interviews with service providers and discussion groups with people living in crowded households. To date, all participants of these discussion groups have been migrants to Australia from countries including Indonesia, Lebanon, Palestine, Pakistan, Myanmar (Burma) and Sudan.

1.2 Research findings reveal failures of the Riverwood SSP planning proposal & master plan

Findings of this research have revealed current short-comings/failures of the Riverwood SSP planning proposal and master plan currently on exhibition, particularly that:

- The proposal does not acknowledge, or consider the needs of, the significant number of **existing large families** residing on the Riverwood social housing estate.
 - Whilst the project documentation notes that **10% of existing households on the estate are 'large families'**, the characteristics and circumstances of these families are not described or mentioned further in the documentation.
 - ABS 2016 Census shows that 29% (n=256) of households living in social rental dwellings on the Riverwood estate are families with children and other family types (such as sibling and other family members living together without children, excludes couple only households). Of these households, 28% have 5 or more people usually resident. Noting that detailed ABS 2021 Census data was not available at the time of writing this submission.
- The proposal does not provide any **larger dwellings (4+ bedrooms)**, whether private or social, and a very limited supply of three-bedroom social housing dwellings. This lack of

larger dwellings **fails to meet, or prepare for, existing and future social and affordable housing needs of large families** including:

- the expressed housing need of existing large families living in the Riverwood estate, or other large families on the social housing waiting list,
 - the unexpressed housing need of large families currently living with overcrowding in private rental in the wider community of southwest Sydney and the Canterbury-Bankstown LGA, and
 - the future social and affordable housing need of large households in southwest Sydney and Canterbury-Bankstown LGA, including (but not limited to) future migrants/refugee/humanitarian entrants to Australia.
- Due to the lack of larger dwellings, the proposal will result in **adverse social impacts for existing large families** who will most likely require re-housing out of the local area away from the well-established and strong services, social and community supports that they have built over many years and rely upon for their individual and family health and wellbeing.

The proposal, as exhibited, does not sufficiently contribute to meeting the existing or future housing needs of the existing Riverwood estate community or some of our most disadvantaged families in southwest Sydney and the Canterbury-Bankstown LGA currently living with overcrowding.

We feel that these failures are serious enough to warrant this submission.

We recommend that:

- The complex needs of many of the existing large families on the Riverwood estate be acknowledged and carefully considered in future planning and re-housing throughout the redevelopment process to ensure that the services, social and community supports that have been established are able to be maintained.
- The master plan and future housing mix of Riverwood SSP area include some larger social housing dwellings (4+ bedrooms) designed to suit large families, including multi-generational families.
- Some larger family dwellings (4+ bedrooms) are provided in the early redevelopment stages to enable existing large families, particularly those currently living with overcrowding, to be re-housed as soon as possible in the redeveloped Riverwood SSP area should they choose to.

2 Failure to consider needs of existing ‘large families’

The proposal does not acknowledge, or consider the needs of, the significant number of large families currently on the Riverwood social housing estate.

Whilst the project documentation notes that **10% of existing households on the estate are ‘large families’**, the characteristics and circumstances of these families are not described or mentioned further in the documentation.

We know that many of the existing ‘large families’ are living with overcrowding, mould and moisture issues in their walk-up units. Many have been waiting for a transfer to a larger, more suitable dwelling for years. They have reportedly been told by DCJ that there are no such dwellings available in the local area and that they will just have to wait until one, somewhere, becomes available.

Many of these large families are migrants who came to Australia on refugee and humanitarian visas. A key cohort of families came to Australia from Sudan. They have experienced significant hardship and trauma in their lives. Settling in Riverwood alongside other Sudanese families who speak their language, come from the same country and understand all that they have been through has supported their integration into an Australian way of life.

Their children are settled into, and supported by, local public schools.

Families rely on the support of neighbours, who are trusted friends they now consider as family, to assist with caring for children and other family members with disabilities.

Women are connected and close to trusted, local doctors who have an understanding of their unique physical and mental health needs.¹

The Riverwood Community Centre² and the NSW Health Healthy Homes and Neighbourhoods (HHAN) Integrated Care Initiative³ (which has been partially based at the Riverwood Community Centre) have close connections with, and provide comprehensive services and supports to, many families living in social housing in Riverwood Estate.

Riverwood Renewal FAQs notes that,

¹ Fotheringham, P., Raymond, D., Khanlari, S., Jiang, W., Gleeson, S., Miller, E., & Eastwood, J. (2021). A qualitative study into the health and social care needs and barriers to service access for Sudanese women living in a socioeconomically disadvantaged area of Sydney, Australia. *International Journal of Integrated Care*, 20(S1), 5. DOI: <http://doi.org/10.5334/ijic.s4005>; Deslyn Raymond, Erin Miller, Dan Sprange, Robert Borg, Elaine Tennant, John Eastwood, Developing new pathways to Health and Social Care for vulnerable clients in targeted Primary Schools; Raymond D, Miller E, Davis A, Sprange D, Eastwood J. Development and enhancement of pathways created to Health and Social Care for clients in areas of family disadvantage in targeted Primary Schools in Sydney, Australia. *International Journal of Integrated Care*. 2021;20(S1):6.

² Riverwood Community Centre, <https://riverwoodcommunity.org.au/>

³ <https://aci.health.nsw.gov.au/projects/social-determinants/initiatives/red-link>, accessed 23/09/2022.

“Residents will be able to express their interest in returning to the Riverwood estate if they continue to meet the eligibility criteria.”⁴

With no larger 4+ bedroom dwellings, and few three-bedroom social housing properties proposed, many existing ‘large households’ will be unlikely to meet future ‘eligibility criteria’ due to overcrowding and will be required to be re-housed elsewhere.

As many large families have been waiting for a transfer to a larger dwelling for years, it is highly unlikely that they will be able to remain in the local area.

Leaving the local area will have adverse social impacts on many of these families.

2.1.1 Proposal does not acknowledge existing large households

The Existing Community Profile presented in the Planning Report identifies the Study Area as the TZ2646, which includes the estate and Washington Park development area, with an estimated population of 1,700, living in 1,019 social housing dwellings and 60 privately owned dwellings. The Planning Report states that,

“Within the Study Area, 60% are single-person households, 10% are large households and 50% are aged 65 years or older.”⁵

This equates to around **100 to 110 existing ‘large households’** in the Study Area.

These large households are neither defined nor discussed further in the Planning Report.

The Demographics and Retail Analysis prepared by SGS Economics and Planning (2021) considers the current and future population and employment profile of the TZ2646⁶, Riverwood SA2 and benchmark areas by population, age groups and employment industry groups.

SGS states that the TZ2646 is reportedly the smallest geographical boundary at which the projected data is available.⁷ The analysis provides no description or assessment of current or projected household composition or family types within the Study Area.

Elsewhere in the project documentation, the Equity-Focused Health Impact Assessment (HIA) prepared by Cred Consulting reports that,

⁴ NSW DPE, Riverwood Renewal: Frequently Asked Questions, July 2022.

⁵ Architectus (2021) Planning Report, Pg 28.

⁶ Transport for NSW, Travel Zone Projections 2019 (TZP19), Transport for NSW produces Travel Zone Projections (for population, dwellings, workforce and employment) as an input into the Strategic Travel Model (STM). The projections are also used for a range of other strategic and policy work across government and the private sector, <https://www.transport.nsw.gov.au/data-and-research/forecasts-and-projections/travel-zone-projections-2019-tzp19>, accessed 05/09/2022.

⁷ SGS Economics and Planning (2021) Riverwood Estate State Significant Precinct Demographics & Retail, prepared for NSW LAHC, 18 October, Pg 28.

“LAHC internal research has identified (September 2021) that the population is characterised by approximately: 60% are single-person households, 10% are large households, 50% are aged 65 years or older”.⁸

There is no further mention of the 10% large households in the HIA.

However, the HIA does note the impacts associated with rehousing of current social housing tenants particularly that:

- **Some social housing tenants may experience psychological distress associated with any required rehousing and the wait to be rehoused; and**
- **Tenants who relocate may lose important social ties and supports (e.g. reduced social capital) which may lead to diminished wellbeing and feelings of isolation.**

The HIA reports that the likelihood of such impacts is ‘high’ and lists a proposed mitigation measure that,

“LAHC advises that all social housing residents will have the option to return to the redeveloped Study Area if a suitable property is available. It is anticipated that some residents will be able to move directly from their old home to a newly built home within the Study Area.”⁹

If a suitable property is available.

The HIA further identifies that,

“There is demand for dwellings to support existing families living in the Study Area and to support the inclusion of families in the renewal, including those on the waiting list for social housing, and those families looking for affordable private housing in a convenient location.”

The likelihood of this impact is also noted as ‘high’ with the proposed mitigation measure that,

“Consideration should be given to providing a mix of social housing dwelling including accommodating family households.”¹⁰

In our view, the proposal as exhibited does not adequately consider or respond to the impacts and associated mitigations identified by the HIA.

⁸ Cred Consulting (2022) Equity-Focused Health Impact Assessment – Riverwood Estate State Significant Precinct, prepared for NSW LAHC, June, Pg 22.

⁹ Cred Consulting (2022) Equity-Focused Health Impact Assessment – Riverwood Estate State Significant Precinct, prepared for NSW LAHC, June, Pg 7.

¹⁰ Cred Consulting (2022) Equity-Focused Health Impact Assessment – Riverwood Estate State Significant Precinct, prepared for NSW LAHC, June, Pg 9.

2.1.2 What do we know about large households living on the Riverwood estate?

ABS 2016 Census (most recent data available)

While the Travel Zone Projections geographies used by SGS may be the smallest geography available for projected population data, ABS Census data is available at the Statistical Area 1 level that can tell us a great deal about the characteristics of the existing Riverwood estate population.

As at September 2022, detailed ABS data for the 2021 Census is not yet available. As such, 2016 Census data is the most recent available. From this data, the following characteristics about the Riverwood estate population¹¹ are important to note:

- 64% of residents of the Riverwood estate were born overseas, with most common countries of birth as at 2016 being China, Lebanon, Vietnam, Hong Kong, Indonesia, New Zealand, Greece and Sudan.
- 29% (n=256) of households living in social rental dwellings on the Riverwood estate are families with children and other family types (such as sibling and other family members living together without children, excludes couple only households).
- Of these family with children/other family households in social rental housing:
 - 62% are living in a 3BR dwelling, 33% are living in a 1 or 2BR dwelling and 3% are living in a 4BR dwelling.
 - 21% have 5 or more persons usually resident in the dwelling and 7% (n=19) have six or more persons usually resident (**28% of children/other family households in social rental housing on the Riverwood estate have 5 or more people usually resident**).
 - 20% need one or two extra bedrooms to be suitably housed as defined by the ABS.¹²

Many 'large households' have complex needs and are living with overcrowding

As part of the research for Shelter NSW, JSA carried out an interview with Deslyn Raymond, Senior Social Worker with the NSW Health integrated care initiative, Healthy Homes and Neighbourhoods Program based at Riverwood.

Deslyn Raymond has over 30 years' experience of social work practice in different social settings predominantly working with women, children and families. Through the program, Deslyn works closely with many families in Riverwood and has undertaken further research with Sudanese

¹¹ ABS (2016) Census of Population and Housing, data obtained through TableBuilder Pro for the Statistical Area 1's that comprise the Riverwood social housing estate including 1137308, 1137309, 1137310, 1137312, 1137314 and 1137313. See Appendix A for Map.

¹² ABS (2016) Housing Suitability (HOSD) is a measure of housing utilisation based on a comparison of the number of bedrooms in a dwelling with a series of household demographics, such as the number of usual residents, their relationship to each other, age and sex. The criteria are based on the Canadian National Occupancy Standard (CNOS). This variable can be used to identify if a dwelling is either under or over utilised.

women into the barriers and health and social needs for women who have experienced female genital mutilation, particularly how to make services better for them.¹³

Many of the families she works with are migrant families who have come to Australia on refugee and humanitarian visas. She has written many support letters for families in Riverwood to accompany their request to DCJ for transfer due to overcrowding. The following case study illustrates the complex needs of many such families, and the difference a larger and more suitable dwelling can make.

One of my clients from a country in the Middle East has complex PTSD after years of family violence and abuse. She finally left her partner and was ostracised by the family for leaving. She and her three children were able to get a tiny two-bedroom unit in Riverwood.

The house she left from her marriage was large with four-bedrooms, but it was all for show as she was made to feel like a servant. It was not her 'home'. The small unit in Riverwood was a hovel in comparison. The ex-partner would say, 'You have brought my children to this horrible place. Look what you have done.' She was doubly shamed.

One of the children also has complex medical conditions. We were finally able to get the family a transfer to a larger social housing townhouse in Riverwood. It is one of the best outcomes that we have had. When that happened, she and the children got a huge psychological boost. Now we can work on addressing the other chronic health issues.

The successful transfer for the family described above is rare. There are many other large families in Riverwood who continue to wait for a transfer whilst living with overcrowding.

JSA recently held a discussion group with a group of Sudanese women who are **living with overcrowding on the Riverwood estate**. The following case studies illustrate the challenge of living with overcrowding whilst waiting for a transfer, as well as the value of local supports and connections.

¹³ Fotheringham, P., Raymond, D., Khanlari, S., Jiang, W., Gleeson, S., Miller, E., & Eastwood, J. (2021). A qualitative study into the health and social care needs and barriers to service access for Sudanese women living in a socioeconomically disadvantaged area of Sydney, Australia. *International Journal of Integrated Care*, 20(S1), 5. DOI: <http://doi.org/10.5334/ijic.s4005>; Deslyn Raymond, Erin Miller, Dan Sprange, Robert Borg, Elaine Tennant, John Eastwood, Developing new pathways to Health and Social Care for vulnerable clients in targeted Primary Schools; Raymond D, Miller E, Davis A, Sprange D, Eastwood J. Development and enhancement of pathways created to Health and Social Care for clients in areas of family disadvantage in targeted Primary Schools in Sydney, Australia. *International Journal of Integrated Care*. 2021;20(S1):6.

Family of six in a two-bedroom unit in Riverwood

Amal lives with her husband and four children (aged 3 to 12 years old) in a small two-bedroom unit on level four of a walk-up in Riverwood. 'With all the children and the shopping, walking up those stairs is a problem!' Her unit has no balcony and the lounge room is very small. Two of her children share one of the bedrooms with their parents, while the two other children share the second bedroom which is only large enough to fit a single bed. 'It is very hard. You can't do anything. The children want to play soccer but there is no space. There is just enough space for them to have a few toys to play with. I have old people living downstairs. I cannot have the children making too much noise for them.'

Amal laughs with the other ladies when they think back to the challenges and the seemingly absurd things that the families did to get by in their small units during the Covid lockdowns. 'You cannot imagine what it was like for our families! All the neighbour kids would normally play all together and they could not. My kids love to go with me to do the shopping, they could not. We did not have devices for our children to do their home schooling. The schools were very good. They care about the families. We had to collect paper work for all the children, and then work with each one of them. It was very hard.'

The future prospect of being re-housed away from the area and each other is not something she likes to think about, 'Our kids are all friends. We get together often with the kids. We don't want to lose this social and community support. It is so important to us.'

Family of six in a two-bedroom unit in Riverwood

Hiba lives with her husband and four children (aged 4 months to 12 years old) in a small two-bedroom unit on the second level of a walk-up in the Riverwood estate. She works as a support worker in aged and disability care. She is working fewer shifts these days because she has a new baby.

'My house is very bad, but they [DCJ] do not fix it. We have been waiting for four years for a transfer. They just tell us that you are going to move eventually, so you just have to wait. I am very tired of cleaning all the mould every day. Water comes in through the window in the bathroom. It is very hard to use the space we have as a family. The

living space is very small. The bedrooms are very small. There is no outdoor space where the kids can play. I don't know how much longer we can stay in this two-bedroom unit. If we are still in this situation by the time my baby is 5 years old, we may just have to go. I just can't imagine moving to another part of Sydney or moving outside of Sydney. If it was just me and not my kids, I would try. But my kids, they have friends here and are happy at school here. It is very hard for them to contemplate moving, and for me too actually. My work is here. My friends are here and my family is here. It would be very hard to go to another area, and have to find other friends there. Especially as I need someone to help me and my husband take care of the kids. Sometimes I need to be at work and cannot pick up the kids from school and my friends here take care of my kids. So, it is very hard to think about going to another area and to be looking again for friends. It takes time to get to know what kind of a friend someone will be, and to know if I can leave my kids with them or no. It would be very difficult.'

The ladies laugh as Hiba recalls a conversation she had with the local DCJ worker about her transfer application and being re-housed out of the area, away from each other, as part of the redevelopment.

'They [DCJ] say there is no availability in this area, you will have to leave the area to say Campbelltown or Blacktown. We say, 'If you transfer all of us together, then we will go.' They [DCJ] just laugh, because they know that is impossible even if they can sympathize with us. They [DCJ] have new areas a bit far from here, after Liverpool, after Blacktown, after Campbelltown, miles away. It is new and good, but we laugh when we say, 'We will go if you take all of us together. But otherwise, I cannot go by myself out there. I cannot imagine leaving them [my friends in Riverwood].'

2.1.3 Proposal must consider the social impacts of relocation on existing large households

The health, social and community services and support networks that wrap around many individuals and families in Riverwood is critical to the health and wellbeing of many existing large families.

Deslyn Raymond describes how important maintaining existing connections to services and supports is for the families she works with through the Healthy Homes and Neighbourhoods Program.

"The principals of the two local primary schools in Riverwood support the families fully with additional supports, engage private Allied Health services, provide practical help

with food and other preventive programs and with holistic care. Disconnection from this universal and trusted community site would be very detrimental for our large families who are established in this area and especially as they are not provided for in the redevelopment.”¹⁴

It is recommended that:

- The complex needs of many of the existing large families on the Riverwood estate be acknowledged and carefully considered in future planning and re-housing throughout the redevelopment process to ensure that the services, social and community supports that have been established, and relied up on by many individuals and families, are able to be maintained.

¹⁴ Interview and correspondence between JSA and Deslyn Raymond, Senior Social Worker, Healthy Homes and Neighbourhoods - Riverwood, NSW Health, May-September 2022.

3 Failure to provide larger dwellings

The proposal fails to provide any larger dwellings (4+ bedrooms), and a very limited supply of three-bedroom social housing dwellings, to address existing or future housing needs including:

- the expressed housing needs of the existing large families or other large families on the social housing waiting list,
- the unexpressed housing needs of large families currently living with overcrowding in the wider community of southwest Sydney and Canterbury Bankstown LGA,
- future social housing need of large households, including (but not limited to) migrant/refugee/humanitarian entrants to Australia.

3.1.1 What larger dwellings are proposed for Riverwood SSP

Proposal documentation reports that future dwelling mix will be flexible to meet market demand at the time of development and to provide social housing dwelling mix required to meet the housing needs of LAHC's portfolio.

The Planning Report describes a range of dwelling mix scenarios that have been tested to respond to market housing demand and LAHC portfolio requirements, which result in recommended private dwelling mix that includes “a greater provision of 2-bed and 3-bed requirements when considered against LAHC requirements” and that final dwelling mix is subject to a range of factors.¹⁵

That said, there is indicative dwelling mix for the 3,926 future dwellings presented at Table 22, which looks at future travel mode share. This table shows that no four-bedroom dwellings, private or social, considered in the dwelling mix; and that there is very little provision of three-bedroom social housing dwellings (n=52, 5% of social housing dwellings).¹⁶ If this mix of social housing dwellings presented eventuates, there would be very few existing large families that would be able to be re-housed in Riverwood. The following table is derived from the dwelling numbers presented in Table 22.

	Market		Social		Total dwelling
Studio	-	-	104	10%	104
1 bedroom	723	25%	415	40%	1138
2 bedroom	1,878	65%	466	45%	2344
3 bedroom	289	10%	52	5%	341
Total dwellings	2,889	100%	1,037	100%	3,926

Source: JSA 2022; Architectus 2022, Pg 112.

¹⁵ Architectus, Riverwood Estate State Significant Precinct, Planning Report, 5.9 Dwelling Mix, Pg 82.

¹⁶ Architectus, Riverwood Estate State Significant Precinct, Planning Report, Table 22, Pg 112.

3.1.2 Expressed need for larger social housing dwellings in the area

The Planning Report notes that future dwelling mix will respond to market demand and the housing needs of LAHC's portfolio. Detailed data on LAHC's dwelling portfolio, and the characteristics of households on the social housing waiting list, particularly at local/small geographic levels is not publicly available.

LAHC Local Area Analysis: Canterbury-Bankstown LGA

LAHC has prepared a Local Area Analysis for the Canterbury-Bankstown LGA that is available online.¹⁷ Figure 7 (below) shows the types of social housing dwellings available in the LGA compared with the waiting list. The mismatch between the explanation above the figure regarding 'the greatest demand is for smaller dwellings for one or two people' and the figure itself, which **quite clearly shows expressed demand for 4-bedroom dwellings well exceeding supply of larger dwellings** (identified by JSA with orange circle), and a higher level of priority housing demand for four-bedroom dwellings compared to 0-1 bedroom dwellings in this area. The share of priority waitlist demand for four-bedroom dwellings is not much smaller than share of demand for two and three bedroom dwellings.



Figure 3.1: Type of NSW LAHC properties available in Canterbury-Bankstown LGA compared with waitlist

Source: NSW LAHC (2021), Pg 18.

¹⁷ NSW LAHC (2021) Local Area Analysis

DCJ Expected Waiting Times for social housing (as at 30 June 2021)

Expected waiting times for general social housing applicants by allocation zone is presented online by DCJ, with the most recent data available as at 30 June 2021. The following figures show that the expected waiting time for 4+ bedroom property in the Riverwood and Canterbury allocation zones is 10+ years.



Figure 3.2: Expected waiting times for social housing, Riverwood allocation zone

Source: <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times>, accessed 15/09/2022



Figure 3.3: Expected waiting times for social housing, Canterbury allocation zone

Source: <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times>, accessed 15/08/2022

Many of the participants interviewed for the overcrowding study are living in private rental. Some have not applied for social housing, either because they may not be eligible due to their residency status or because they do not feel that “social housing is for people worse off than me and my family.” Many others interviewed report that they have been waiting on the social housing waiting list for over 10 or 15 years, since first arriving in Australia. They do not believe that they will ever receive an offer for social housing. They also know from others who have received an offer, that it is likely to be for a dwelling very far from where they have created their new home in Australia, in the Canterbury-Bankstown LGA.

3.1.3 Unexpressed need for larger social/affordable dwellings in the area due to overcrowding in private rental housing

Severe overcrowding is a problem that has been growing over time in outer metropolitan areas of Australia, particularly in Sydney and Melbourne. The number of people living in severely overcrowded dwellings has increased in the last two census periods.

While there are different ways to define and characterise overcrowding, ‘severe overcrowding’ is a form of homelessness as defined by the ABS.¹⁸ One of the NSW Premier’s Priorities is to reduce homelessness, particularly to ‘reduce street homelessness across NSW by 50% by 2025’.¹⁹

Groups more likely to experience severe overcrowding have been identified including recent migrants to Australia, Indigenous people and tertiary students. Economic drivers of severe overcrowding including poor housing affordability and tight housing markets have been explored and documented. Parts of southwest Sydney, like Canterbury-Bankstown LGA, are areas where the combination of low incomes, high rents and a limited supply of, and access to, suitably sized housing for large families/households further driving overcrowded living.²⁰

Social and cultural drivers of overcrowding including migration, family growth, temporary mobility (especially in Indigenous contexts) and cultural considerations, norms and expectations; and particularly the nuances of these factors for different groups are less well-understood and documented in the Australian context, although recent research has been done.²¹

Adverse impacts of living in overcrowded situations are explored in international and Australian literature with particular concerns identified related to health and wellbeing, child development and education, household conflict and increased risk of forced mobility/homelessness. Such adverse impacts are exacerbated by the severity and persistence of the overcrowding. Positive impacts/benefits of living in overcrowded situations identified including pooling finances, reduced costs and resultant improved housing stability, sharing caring responsibilities and maintaining

¹⁸ ABS (2016) Estimating homelessness. “People living in crowded dwellings represent a continuum within the scope of those who are marginally housed. In the context of the elements developed for the ABS definition of homelessness, people living in ‘severely’ crowded dwellings are considered to be homeless because they do not have control of, or access to space for social relations. In ‘severely’ crowded dwellings inhabitants are generally unable to pursue social relations, or have personal (i.e. family or small group) living space, or maintain privacy, nor do different family / groups within the dwelling have exclusive access to kitchen facilities and a bathroom. In such circumstances, if people had accommodation alternatives it would be expected that they would have exercised them.” <https://www.abs.gov.au/statistics/people/housing/census-population-and-housing-estimating-homelessness/latest-release#overcrowding>, accessed 16/09/2022.

¹⁹ <https://www.nsw.gov.au/premiers-priorities/reducing-homelessness>, accessed 16/09/2022.

²⁰ Parkinson, S., Batterham, D., Reynolds, M. and Wood, G. (2019) The Changing Geography of Homelessness: A Spatial Analysis from 2001 to 2016, AHURI Final Report 313, Australian Housing and Urban Research Institute Limited, Melbourne. Brackertz, N., Davison, J., Borrowman, L. and Roggenbuck, C. (2019) Overcrowding and severe overcrowding: an analysis of literature, data, policies and programs, report prepared by AHURI Professional Services for NSW Department of Communities and Justice, Australian Housing and Urban Research Institute Limited, Melbourne.

²¹ Dockery, A.M., Moskos, M., Isherwood, L. and Harris, M. (2022) How many in a crowd? Assessing overcrowding measures in Australian housing, AHURI Final Report No. 382, Australian Housing and Urban Research Institute Limited, Melbourne.

family/social/cultural/community connections are also less well-understood and documented in the Australian context.

The research JSA has been undertaking for Shelter NSW aims to make a contribution to our understanding of the experience of people living with overcrowding in the Australian context.

The quantitative findings of our research show that at the time of the 2016 Census, there were a total of 15,122 people living in severely crowded dwellings (needing four or more additional bedrooms to be suitably housed) in Greater Sydney. Canterbury SA3 had 6.5% of all people in Greater Sydney living in severely crowded dwellings, whilst Bankstown accommodated 5.2% of this group, and were ranked 6th and 7th of all SA3s in terms of the number of people living in severe overcrowding in Greater Sydney.²²

Whilst an area like Canterbury-Bankstown is relatively lower cost in terms of rental compared with Greater Sydney, it is not affordable to low-income households. As at the ABS 2016 Census, a median priced two-bedroom unit was only affordable to the upper 35% of the low-income band in Canterbury-Bankstown LGA, and a three-bedroom house was only affordable to the upper 60% of moderate-income households. Housing stress was much higher than average in both Bankstown and Canterbury SA3s, likely due to the lower than average incomes in these areas as well as the higher than average concentration of very low and low income households. In Canterbury SA3, 54% of all renting households were in rental stress compared with 42% for Greater Sydney. Very-low-income households were the most likely to be in rental stress, with 33% in moderate stress and 55% in severe stress (88% in total). Low-income households also had a high rate of rental stress (66%), with 55% in moderate stress and 11% in severe stress. The lack of affordability in the private rental market as has been documented elsewhere is a key driver of overcrowding.

The qualitative findings of the research help to paint the picture of this culturally rich part of Sydney, with its strong social and cultural ties that bind people to the area. For many, it is their first point of settlement in Australia and a safe haven after years of war, trauma and displacement. People choose to stay in this area, despite their unmet housing needs, due to the proximity to employment and educational opportunities and public transport; these social and cultural ties and supports; as well as the schools, medical services, places of worship and other services where trusted professionals speak their language and have some understanding of their lives and complex needs.

Places like Lakemba and Riverwood mean so much to people. Many people do not drive and rely on walking or public transport to do their shopping, take their children to school, attend a medical appointment and regularly attend the mosque or other place of worship.

People report that they feel connected to, and they feel safe in, their community.

“If my daughter is coming home late at night from University, I know that my neighbours will be out and people will be looking out for her. I do not have to worry about her. That is why we live here. I would not want to live somewhere

²² Judith Stubbs and Associates (2021) DRAFT Understanding Severe Overcrowding in Southwest Sydney, Report 1: A Quantitative Analysis, April, Report prepared for Shelter NSW.

else.” (Participant in discussion group for women living with overcrowding in Lakemba).

They will put up with very poor housing to stay in their new community. Some would not choose to leave the area, even if there was something more affordable and suitable, as they perceive that the social costs to them and their family would be too great. *“We would not leave this area with a happy heart” (Participant in discussion group for women living with overcrowding in Lakemba).*

Many of the participants in the study have a story about a family who has moved from the area in search of more suitable housing, either because they finally received an offer of social housing or they choose to take up a more suitable private rental dwelling further out. A common theme among these stories, is that many of the families are reportedly struggling to settle into their new area due to the dislocation from community and cultural services and supports. The following is one such story.

Large family of 9 receives social housing offer after 16 year wait, must leave local supports to accept

Elham and Abdel have seven children ranging in age from 14 to a new baby born in 2022. The couple came to Australia from Palestine in 2005 and settled in Lakemba. They applied for social housing when they first arrived. They waited sixteen years before an offer of social housing was made in 2021. The family was living in a cramped unit in Lakemba and accepted the offer to move to a four-bedroom, one bathroom home in Miller provided by the Department of Communities and Justice, as if they did not accept there would not be another offer.

Miller is 25km due west, or a 30-minute drive, from Lakemba. Miller is a long way from the bustle of Haldon Street in Lakemba with its Ramadan evening street food festival, Islamic bookstores, Lebanese sweetshops, Bengali and Afghan restaurants and importantly multiple support services for Muslim and/or Arabic speaking people and families, particularly for women like the Tripoli and Mena Association, Muslim Women Australia, Islamic Women’s Welfare Association and a few female GPs in the area that provide culturally appropriate care in community languages.

It has been difficult for the family to leave their community in Lakemba. They are all finding it hard to make friends and the older children are struggling to settling into their new school. Elham continues to make the 30-minute drive to Lakemba to attend the Women’s Group with one of the local services every Friday morning after she has seen the children off to school from 10am until 12pm. Around a dozen women meet each week to share their daily worries and triumphs with each other while creating small artworks organised by the unflappable community worker who facilitates the group and

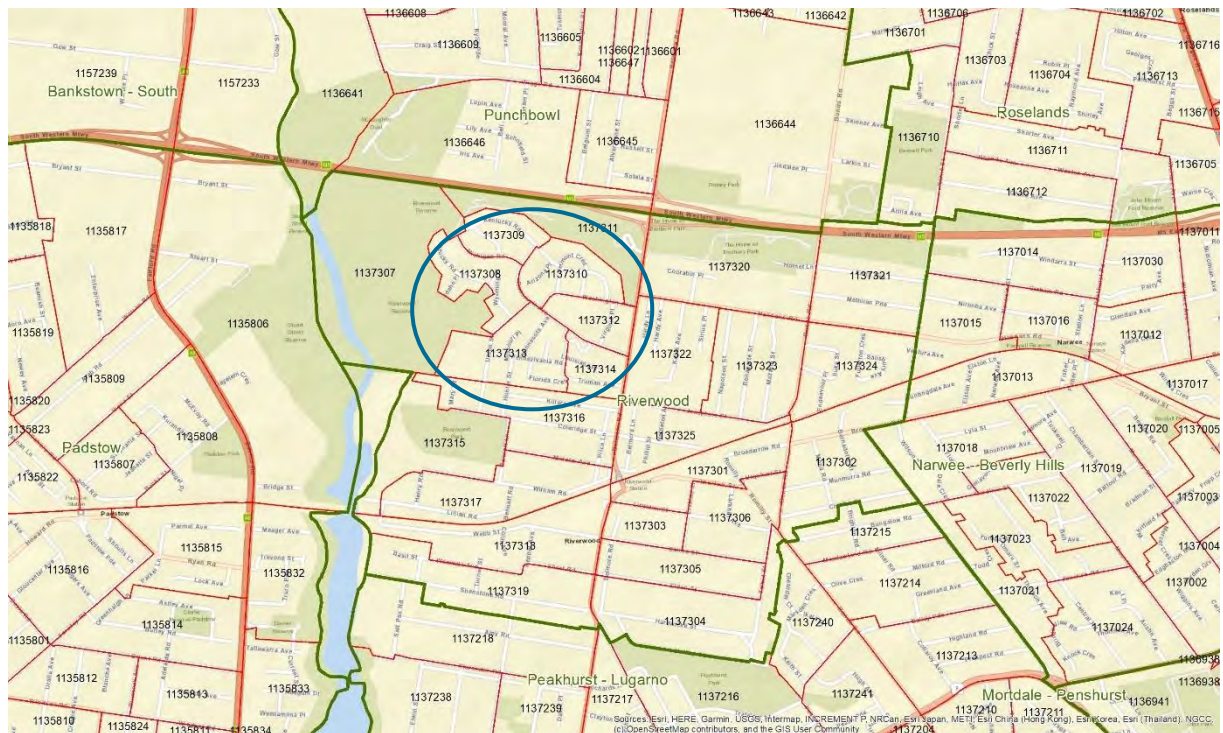
at the same time provides practical support and problem-solving such as translation and assistance filling in forms for Centrelink, housing applications for DCJ and help with real estate agents.

Elham does not speak English. The community worker interprets what she has to say about her new home in Miller, “The house is okay. The bedrooms are very small and there is no garage.” The group wraps at 12pm sharp so that the women can return home to prepare the house and evening meal for their families by the time the afternoon school bell rings. Elham has found nothing like this group in Miller. She will continue to make the drive to Lakemba each week for as long as she can.

It is recommended that:

- The master plan and future housing mix of Riverwood SSP area include some larger social housing dwellings (4+ bedrooms) designed to suit large families, including multi-generational families; to meet the needs of large households on the waiting list particularly those with an allocation zone preference of Riverwood and/or Canterbury.
- Some larger family dwellings are provided in early redevelopment stages to enable existing large families, particularly those currently living with overcrowding, to be re-housed as soon as possible in the redeveloped Riverwood SSP area should they choose to.

Source: JSA 2022; ABS 2016



Source: JSA 2022; ABS 201



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5 April 2024

Feedback on Riverwood Estate rezoning proposal

SDN Children's Services is a not-for-profit organisation with more than 118 years' experience serving and supporting local communities. The centre is a 58 place long day care centre for children from birth to school age located within the current Riverwood estate. We have operated SDN Riverwood on its current site since 1974 and have been in the community since 1947.

The centre is located on the corner of Belmore Road and Roosevelt Avenue, inside the area proposed for the first stage of rezoning, and the proposal would require the centre to be demolished.

SDN's feedback on the proposal

We are pleased to note that there are references in the supporting documentation for the rezoning proposal to a new long day care centre that will be built in the vicinity to replace SDN Riverwood.

However, we would welcome on behalf of the community a firm commitment to not only building a replacement long day care centre, but also ensuring that this centre is operational by the time the current SDN Riverwood is demolished so there is continuity of care.

SDN Riverwood has strong demand from the local community and a large waiting list for places. This centre has recently been re-rated as Exceeding the National Quality Standard in all seven quality areas.

It is vital that the current number of long day care places available be maintained, if not increased, and that these places continue to provide high quality, inclusive care that reflects and supports the needs of the community.

About SDN Riverwood

SDN Riverwood is surrounded by public housing, and we support many local families who are facing challenges. The centre is spacious and well-equipped, with a large, mature, natural outdoor space vital for children living in apartments and town houses.

We offer high quality early childhood education and care with 58 places available daily. As at the end of March 2024 we had an average of 50 children attending each day, with 77 children in total enrolled across the week (most children attend for more than one day). The profile of the children includes:

As at March 2024	Number of children in total	Average number attending each day	% total enrolled
CALD children	48	42	65%
Child at Risk	4	4	5%
Children with Disabilities	7	4	9 %
Children seeking diagnosis of a disability	4	4	5%

Forty percent of the children attending SDN Riverwood (30 children) are from families who receive a higher rate of the Child Care Subsidy (CCS) based on having a low household income. The income profile of families based on the amount of CCS they qualify for indicates that 30 earn a combined family income of less than \$70,015 per annum and are subsidised up to 85%. Another 3 children received Additional Child Care Subsidy (which means they are currently significantly challenged or disadvantaged).

History of SDN Riverwood

SDN has been in the Riverwood community since 1947, when the suburb was called Herne Bay, operating in an old army barracks that SDN maintained until it was declared structurally unsound. SDN then sourced a grant from the Commonwealth Government to build a new purpose-built child care centre elsewhere in Riverwood. The building is owned by SDN and we fully maintain the property however we have leased the land from Homes NSW since 1974.

SDN is committed to the Riverwood community and our longstanding presence and ongoing working relationship with Homes NSW means we are well placed to understand the need for inclusive, supportive long day care in the community.

About SDN

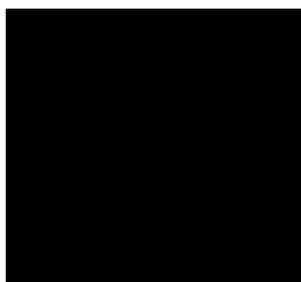
SDN is a not-for profit organisation that has been providing quality services for children and their families since 1905. We work across Sydney, regional NSW and the ACT offering:

- 26 high quality, inclusive early childhood education and child care centres (23 long day care centres and 3 preschools)
- early childhood intervention and therapies for children and young people with disabilities and developmental delays, as a registered NDIS provider
- NSW and federally funded support services for families with vulnerable children and young people.

All of SDN's high quality early childhood education and care centres have a focus on integration of children with disabilities, the inclusion of children from vulnerable backgrounds and Aboriginal children. SDN values inclusion and diversity and makes a point of reaching out to those children and families who will most benefit.

Our family support programs include being a lead agency within the NSW Department of Communities and Justice (DCJ) Family Preservation program. Since 2006 we've been funded to provide case management, home visiting, child care and parenting support to families who are just below the threshold for Risk of Significant Harm. We are also a provider for the SafeCare program in NSW.

The Riverwood community deserves to be able to access high quality services that meet its needs and we hope that as the rezoning progresses, continuity of early childhood education and care and quality of care continue to be at the forefront of decision-making about services for the community.



Chief Executive Officer

10 May 2024

██████████
NSW Department of Planning and Environment
4 Parramatta Square, 12 Darcy St
Parramatta NSW 2150
Sent via email

Dear ██████████

Riverwood State Significant Precinct - Submission to the State Significant Development Application (Stage 1) – Canterbury Bankstown City Council

Council appreciates the opportunity to provide a submission on the revised scheme for the Riverwood Estate Renewal – Stage 1 proposed by Homes NSW. Following our review of the documentation made available on the Planning Portal, this letter provides Council Officers key issues (below and held at Attachment A) with the revised scheme and requests clarification, additional information and revisions before the scheme is determined.

Council looks forward to working with Homes NSW and the Department of Planning, Housing and Infrastructure to ensure the issues raised in this submission are addressed to our satisfaction before a final decision is made on the proposal.

1. Need for a Comprehensive Vision for Redevelopment of the Site

Council Officers express concern regarding the absence of a comprehensive vision for the entire site redevelopment. While the provision of social and affordable housing is supported, the piecemeal approach of separate planning proposals is not supported as it lacks clarity on how this large site will be integrated into the surrounding community and it impairs the ability for Council to properly plan for new and improved public infrastructure in the area.

Council Officers request that regardless of the final decision for this Stage 1 proposal that Homes NSW engages with Council and other key stakeholders to develop a precinct plan for the entire site within the next 12 months and that the next stage of the project involves the preparation of LEP and DCP controls for the entire site.

2. Social and Affordable Housing to be LEP Controls

Council seeks certainty for the delivery of social and affordable housing on the site and requests that the proposal amends the Canterbury Bankstown LEP 2023 to include a clause that clearly stipulates the minimum amount of floorspace that is required for these types of housing. For reference, Council notes that the wording in Clause 7.29 'Waterloo Estate (South)—Area 1' in the Sydney Local Environmental Plan 2012 could be used as a precedent of how such a clause could be applied to the Canterbury Bankstown LEP 2023. Using the Waterloo Estate (South) example, the following wording can be inserted as a new 'Riverwood Estate' clause in Council's LEP:

- (a) *at least 40% of residential floor space will be used for the purposes of social housing premises,*
- (b) *at least 10% of residential floor space will be used for the purposes of affordable housing that is owned and managed by a registered community housing provider.*

Council's requested percentages for social and affordable housing are consistent with the Council's submission provided to the previous scheme in 2022.

3. Design and fund the Hannans Road/Belmore Road/Washington Avenue Intersection improvements

Council seeks clarification and a firm commitment from TfNSW and Homes NSW on Belmore Road upgrades, including road widening and a new signalised intersection at Roosevelt Ave/Belmore Road that would be delivered as part of the Riverwood housing estate redevelopment. Consideration must also be given to either closing Washington Avenue at Belmore Road, installing traffic signals at the Roosevelt Avenue/Belmore Road or the Washington Avenue/Belmore Road intersection to manage increased traffic generated by the site. Council requests the proposal is revised to outline how this issue will be resolved to rectify a history of traffic congestion issues that are likely to be exacerbated as a result of the additional housing proposed on this site.

Council remains concerned that the proposal makes no effort to address the long standing traffic issues relating to the Hannans Road/Belmore Road/Washington Ave dog-leg intersection. This intersection is located immediately adjacent to the subject site and if not addressed as part of this proposal, Council has little confidence that it will be dealt with in the future.

4. Letter of Offer for required public infrastructure

Council encourages Homes NSW to consider submitting a Letter of Offer that will set out a commitment to work towards a draft Planning Agreement for contributions to regional open space and other community infrastructure that will be required to cater for the future significant demand when the entire site is redeveloped. Council maintains that the redevelopment is the commencement of a substantial population increase of up to 3,900 dwellings, not specifically addressed in the Council's Local Infrastructure Contributions Plan. Council requests that Homes NSW reconsider its stance and contribute to regional open space or provide funds.

Council notes that any new landscaped areas may impose a significant burden on Council staff to maintain in perpetuity. Council requests that the provision of new landscaping on Council owned land is designed to be low maintenance to Council's satisfaction. Where landscaping is required to be more substantial and require ongoing maintenance Council requests that Homes NSW enters into a Planning Agreement to contribute to maintain such areas or contributes to funding and/or resources to Council to ensure street landscaping, parks and gardens are maintained to a high standard expected of Council.

5. Urban Design, Achieving Design Excellence and Ongoing Maintenance

Prior to any development consent being granted by the Minister, Council raises the following matters:

- Design excellence must apply to the site to reflect the requirements of Clause 6.15 of the Canterbury Bankstown LEP 2023. Council requests there is a requirement for at least two different architectural firms to design the buildings on the site.
- The ability for the site to achieve a 30% canopy coverage is questioned given the spacing and location of certain trees, the impact of the future basement levels on deep soil areas and the loss of substantial planting due to the future widening of Belmore Road.
- Under-grounding of all powerlines must occur as part of the redevelopment of the site.
- The development is to achieve a 6 star Green Star Building rating as an example of the world's best practice in building sustainability in design, construction and operation.

Where applicable Council will seek to include these requirements in the site specific DCP. Refer to the details in Attachment A.

As part of any future DA consents issued, Council requests that maintenance plans and schedules are tied to any approval to ensure the buildings constructed on the site receive ongoing maintenance to maintain a positive appearance to the site and surrounding suburb.

6. Confirmation of new location of 'SDN Riverwood' childcare centre

Council seeks clarification from Homes NSW on the new location of the 'SDN Riverwood - Children's Education and Care Centre' which is currently located on the southern end of the site. Council requests a commitment from Homes NSW for a plan to be prepared to manage and minimise any disruption to existing enrolled children and their families and assistance provided to families to find alternative childcare facilities in the local area prior to any works commencing on site.

If you require any clarification or have any enquiries regarding the feedback provided, please feel free to contact [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Attachments:

A – Council submission to Riverwood State Significant Precinct Revised Scheme – Stage 1

Attachment A – Council Comments on Riverwood State Significant Precinct Revised Scheme – Stage 1

Key Issue	Council's comments
Waste	<p>1. Council requests that all sites incorporate onsite waste collection. The suggested verge treatments, including shared zones, seating, vegetation, and parking bays, pose challenges for council waste services to efficiently 'collect and return' bins. This limitation arises from exceeding the 10-meter carting route for bin collection before reaching the building. Additionally, concerns include waste trucks blocking roads during collection and bins being placed out by cleaners a day in advance, obstructing shared paths. Visual representations of these scenarios are provided in the images below for reference.</p>

Figure 3: Virginia Place Cross Section



2. Council requests the following waste controls to be inserted within the Site-Specific DCP.
- Objectives**
- O1. To safeguard the visual amenity, safety, and functional integrity of the entire development
 - O2. To optimise waste collection logistics and to minimise truck movements to reduce traffic congestion, noise pollution, poor amenity, and environmental impact within the community
 - O3. To enable food waste and garden organic waste collection servicing

Controls

Waste Management Controls:


- C1. Ensure that waste collection activities exclusively occur on-site via an HRV per the Australian Standards 2890.2 preventing disruptions to roads, laneways and maintaining the visual and functional quality of these spaces.

Key Issue	Council's comments
	<p>C2. Mandatory separation of food and garden organic waste at its source is required to meet the EPA FOGO Mandate and align with council's commitment to fostering a circular economy.</p> <p>C3. To align with Councils Waste Guide 2023</p>
	Residential development
	Internal waste storage
	<p>C1 Each dwelling is to have suitable space within the kitchen for a caddy to collect organic waste.</p> <p>C2 Development must comply with the requirements of the applicable Waste Design for New Developments Guide.</p>
	Multi Dwelling Housing and Residential Flat Buildings
	<p>C1 In addition to clauses 1.1-1.4, the waste management system is to be designed to incorporate one of the following waste management solutions:</p> <ul style="list-style-type: none"> a. A communal bin storage room on the ground floor or within the basement footprint of the development, b. A waste services room on each individual residential level, or c. An alternative solution that incorporates a well-designed innovative waste and recycling facilities within the development that caters for all three waste streams: general waste, recycling, food organics and garden organics. <p>C2 In selecting an appropriate waste management system for the development, the following is to be demonstrated:</p> <ul style="list-style-type: none"> a. The waste management system is integrated into the overall design of the development and takes into consideration all users (including residents, caretaker/building manager and waste collection staff; b. The waste management system maximises waste separation and resource recovery and minimises waste going to landfill; c. The waste management system caters for all three waste streams: general waste, recycling and food organics (and garden organics); d. Supports waste management and collection services to occur in a safe, efficient, cost-effective and timely manner; and e. The waste management system protects resident health, safety and amenity (in terms of noise, odour, visual impacts).
	Waste Service Rooms
	<p>C1 A waste service rooms on each habitable floor is to be provided that can store up to three days of general waste (or chute hopper) and recycling for the number of dwellings on that floor, and one 240L bin for FOGO.</p> <p>C2 The waste service rooms must be of sufficient size to accommodate all allocated bins, and the location and design is to meet the following requirements:</p> <p>C3 Must be conveniently located for residents on each residential level of the development (maximum distance of 30m);</p> <p>C4 Access is to be in accordance with AS 1428 (Set) - 2003: Design for access and mobility; and</p> <p>C5 Only contain general waste (or chute hopper), recycling and FOGO bins;</p> <p>C6 Must be of adequate size to accommodate one 240L bin for FOGO and the required number of general waste (or chute hopper) and recycling bins, which allows for three days of general waste and recycling generated by the number of dwellings on that floor;</p>

Key Issue	Council's comments
	<p>C7 Signage is to be placed on the room on every residential level indicating how to use the system effectively;</p> <p>C8 A site caretaker will be required to rotate general waste, recycling and FOGO bins from the cupboards to the bin storage area as a minimum every three days; and</p> <p>C9 A communal bin storage area on the ground floor is to be provided for the collection of bulk 660L and 1,100L bins by collection staff.</p> <p>C10 The room is to be designed so the doors are of sufficient width to allow the transfer/rotation of 240L bins;</p> <p>C11 Incorporate lighting that is controllable from inside and outside the room. Sensor lights may also be installed;</p> <p>C12 Incorporate temperature control devices;</p> <p>C13 A separate ventilation system to comply with AS 1668 – The use of mechanical ventilation and air-conditioning in buildings satisfies the requirements of the Building Code of Australia; and</p> <p>C14 The floor is to be constructed of a durable and impervious material with a smooth finish.</p> <p>Subdivisions</p> <p>C1 Subdivision design and road layout is to ensure that a HRV as per Australian Standard 2890.2 Parking Facilities: Off Street Commercial Vehicle Facilities can enter and exit the development (the subdivision) in a forward direction without the need to reverse.</p> <p>C2 For developments incorporating cul-de-sacs, plans illustrating turning paths for a HRV are to be provided to demonstrate that the vehicle can safely manoeuvre with no reverse vehicle movements.</p> <p>C3 Temporary turning facilities and access roads for a HRV are to be provided for staged subdivision development where the entire road network will not be completed as part of Stage 1. This will ensure waste collection vehicles are able to enter and exit the development in a forward direction and can continue to service existing buildings.</p> <p>Laneways</p> <p>C1 Laneways are of sufficient width to accommodate a HRV (as per AS2890.2) collection vehicle movements entering and exiting and required manoeuvring to service future dwellings.</p> <p>C2 Laneways are to be sufficiently wide for a vehicle to pass a stationary waste truck.</p> <p>C3 Length of laneways need to be considered to ensure collection staff are able to maintain appropriate and safe sight distances to view any obstructions.</p> <p>C4 Waste collection vehicles have sufficient overhead clearance. Collection points needs to be located away from any overhead wires, street tree canopies, building awning and overhangs and other structures that can impede waste collection access.</p>
Urban Design and Design Excellence	<p>3. Council acknowledges the revision of the masterplan's scope by the applicants, introducing a staged approach to precinct delivery. Consequently, Council requests that the proposed design outcome must align with the overall precinct vision while maintaining sensitivity to its existing context.</p> <p>4. Council observes that continuous facades exceeding 45m contravene the ADG recommendation. Council requests that the proposal should consider incorporating indentations in the building envelope approximately every 40-45 meters, with a width-to-depth ratio of at least 2:1 or 3:1. This approach aims to enhance the architectural form and introduce visual interest.</p>

Key Issue	Council's comments
	<p>5. The proposed six-storey street wall along Belmore Road and Washington Avenue surpasses the existing built form, which permits up to three stories within the surrounding R3 zone. Council requests to reduce the street wall height to four stories to establish a more human scale for pedestrians and ensure a smoother transition into the surrounding context.</p> <p>6. Council notes insufficient building separation between the southern buildings in the proposal. Council requests that all building envelopes adhere to the building separation requirements outlined in the ADG.</p> <p>7. The northern communal space is heavily shaded throughout the day. Consequently, Council requests the incorporation of additional rooftop communal spaces on level four of the northern building.</p> <p>8. Council encourages the integration of additional rooftop gardens/courtyards throughout the design.</p> <p>9. Council proposes consolidating deep soil zones to maximise ecological benefits</p> <p>10. The proposal designates two deep soil zones within the northern and southern communal courtyards. Council requests maximising deep soil along the perimeter of the street boundaries, considering potential basement car park constraints within the communal spaces. Additionally the design of the residential buildings should accommodate retention of significant trees within the proposed courtyards with provision of deep soil zones located to avoid any proposed basement parking.</p> <p>11. The proposal indicates the Belmore Road setback as partially deep soil and the buffer along other street frontages as potential deep soil. Council requests creating a consistent deep soil zone along the buffer of all street boundaries to facilitate a generous landscaped buffer with substantial canopy trees.</p> <p>12. Achieving design excellence is a key objective for the site. To ensure the objectives of Clause 6.15 'Design excellence' of the Canterbury Bankstown LEP 2023 are met, and given the significance of the site, Council considers the buildings could benefit from the appointment of two or more architects to design each of the residential buildings.</p>
Under-grounding of power lines	<p>13. Under-grounding of all powerlines along the street frontages of the site must be undertaken as part of the redevelopment of the site. Council will require DCP controls to be included to require this outcome not the site.</p>
Roads and Cycling infrastructure	<p>14. Council requests that internal road widths must accommodate servicing needs, such as garbage truck movement, and provide sufficient street parking to prevent overflow into surrounding streets.</p> <p>15. Council requests that pedestrian/cycling requirements and the need for street furniture (seats, bus shelters, etc.) should be assessed in conjunction with the proximity to the station, both internally and externally along Belmore Rd, due to significant intensification.</p> <p>16. Council requests that the pedestrian/cycling links to Georges River boardwalks should consider potential widening of the Salt Pan Creek bridge for increased capacity.</p>

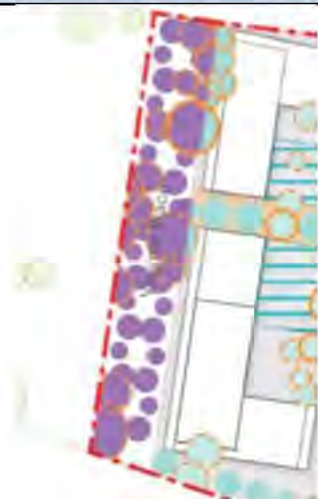
Key Issue	Council's comments
	<p>17. Council requests Homes NSW to provide a cross-sectional illustration depicting the potential future Belmore Road widening and the corresponding placement of footpaths.</p> <p>18. The Belmore Rd/Roosevelt Ave intersection is recommended for a signalised upgrade by 2031, serving as a gateway intersection to the proposed development.</p> <p>19. Council requests the acceleration of intersection improvement works is prudent given the Study Area's intensification and existing traffic congestion.</p> <p>20. Given the high-density development and a focus on promoting walking and cycling, Council requests that road design elements should incorporate relatively wide footway areas, appropriate street trees for shade, and strategically placed seats for resident and visitor meeting points.</p> <p>21. Council requests that street lighting is provided at a level conducive to encouraging street activation and fostering vibrant community interaction.</p> <p>22. The report suggests a shared path width of 2.5m to 3.5m. However, Council requests that shared user paths should adhere to a minimum width of 4.0, as per the <i>Cycleway Design Toolbox 2020</i>.</p> <p>23. The one-way street option, identified as the preferred choice, illustrates the placement of large trees within parking lanes. Council notes that this is undesirable, as over time, it may result in a reduction of available parking areas.</p> <p>24. Council notes that the TfNSW Guide states that no more than 45 vehicles/hr should pass the intersection of continuous footpaths and roads. Michigan Road at Kentucky Rd is likely to have more than 45 veh/hr.</p> <p>25. Council requests that marked pedestrian crossings are not to be installed right at the non-signalised intersections (on side roads) to minimise vehicle/pedestrian conflicts. Instead, Council requests that the crossings should be setback by min 5m (one car length) from the intersection.</p> <p>26. Council requests that all signalised intersections across Belmore Road should be upgraded to have pedestrian crossing across all legs.</p> <p>27. Council requests that bus zones within the scheme area should be identified and signposted adequately.</p> <p>28. Council requests the consideration of a 30kph speed limit in the scheme area to improve safety of all road users. This will require well thought traffic calming treatments other than speed humps.</p> <p>29. Council has investigated the existing road widths along Virginia Place. The findings reveal that the current road corridor width is approximately 23 meters. This contrasts with Homes NSW's representation in the Virginia Place diagram, which indicates a corridor width of 19.9 meters. In light of these disparities, Council requests Homes NSW to provide justification for the observed differences in this representation. Council does not support the reduction of the road reserve.</p>

Key Issue	Council's comments
	<p>30. The revised Virginia Place alignment appears to remove existing car parking spaces without clarity on the concept plans where the car parking will be relocated. To ensure Council is able to review sufficient detail on the design of Virginia Place, it is requested a design drawing is provided.</p> <p>31. Council notes that a travel lane width of 5.5m is deemed inadequate for accommodating two-way vehicle movements. The recommended minimum travel lane width is 6.0m to ensure suitable traffic flow</p>  <p>32. In line with Council's previous recommendation in August 2022 for the widening of Kentucky Rd, it is essential to note that all other roads within this new development area necessitate repairs and resurfacing. Council requests that the design for pavement resurfacing/rehabilitation should be subject to approval by Council.</p>
Traffic	<p>33. Council notes there is a proposal by Transport of NSW to install a Traffic Signals at the intersection of Roosevelt Ave and Belmore Road. Council requests that this is considered as part of the Revised Rezoning Proposal.</p> <p>34. Council remains concerned that the proposal makes no effort to address the long standing traffic issues relating to the Hannans Road/Belmore Road/Washington Ave dog-leg intersection. This intersection is located immediately adjacent to the subject site and if not addressed as part of this proposal, Council has little confidence that it will be dealt with in the future. As a part of dealing with this intersection, Council requests consideration of Traffic Signals are installed at the intersection of Washington Avenue and Belmore Road to address the right-of-way conflicting movements of traffic at this intersection.</p> <p>35. Council notes that access in and out of the proposal has not been consistently demonstrated i.e report recommending Roosevelt Avenue whilst the master plan indicates internal lane. Council requests that these issues are rectified to address any discrepancies between documentation sets.</p> <p>36. Council requests that a swept path analysis is provided to demonstrate the ability for large vehicles to enter the Stage 1- middle lane in a forward direction along with bypass opportunity provision.</p>
Footpaths and Kerb ramps	<p>37. Council requests that all footpaths should be constructed in specific areas and incorporated into the plan.</p> <p>38. Council requests that kerb ramps that require replacement are to comply with DDA standards.</p>

Key Issue	Council's comments
	39. Council requests that all powerlines are undergrounded along all site frontages to allow for future road widening and public domain improvements.
Bus Stops	40. Council notes that specific bus stops require upgrades and the replacement of old bus shelters must be carried out in accordance with DDA compliance guidelines.
Stormwater	<p>41. Council notes that Washington Avenue (along the north) and Belmore Road (along the east) are both subject to overland flow and mainstream flooding up to the PMF event. As a result, Council requests that the proponent provides a detailed flood impact and risk assessment (FIRA) as per DPE's FIRA guidelines. Flood risk for the Stage 1 development should be managed as per provisions found in the Flood Risk Management Manual (2023) and Council's DCP (2023).</p> <p>42. Council requests that a climate change assessment should be undertaken as per recommendations of ARR 2019.</p> <p>43. Council requests that a copy of the following documents is provided:</p> <ul style="list-style-type: none"> a. Riverwood Estate State Significant Precinct Water Quality and Stormwater Report (Mott MacDonald, 2022) b. Response to Submissions: Engineering Items (Mott MacDonald, 2022) <p>44. Council notes that the Stormwater Report states a PSD (Permissible Site Discharge) of 150l/s/ha which is incorrect. Council requests that the PSD shall be determined based on Council's latest consolidated DCP requirements (Development Engineering Standards Guide 2023.)</p> <p>45. Council requests that consideration is given to the future widening of Belmore Road which may impact the proposed location of the OSD for Stage 1. It is recommended that an alternative OSD location and WSUD Facility shall be sought.</p>
Open Space	<p>46. Council notes the extensive roadside planting appears to be heavy on maintenance for Council. Consequently, Council requests that roadside and streetscape planting will need to be reduced to key gateway locations and the final design will need to be completed in close consultation with Council's Parks Operations who will oversee ongoing area beautification and maintenance.</p> <p>47. Council requests that non-gateway locations are to be turfed.</p> <p>48. Council requests that all street and other outdoor furniture will need to be incorporated with Council's furniture pallet.</p> <p>49. Council requests that all tree survey and condition information is shared with Council's Tree Management Team.</p> <p>50. Council requests that the placement of large trees along parking lanes be avoided where possible. Uncontrolled spread of tree roots could reduce effective use of parking lanes.</p>

Key Issue	Council's comments
	51. Council requests that the allocation of bin areas should not jeopardise future infrastructure such as pedestrian crossing facilities.
Structure Plan, Street and Block Layout	<p>52. Council requests that all new streets intended for dedication to Council must be free from any basement or underground encroachments.</p> <p>53. Council requests that Section 3.1 C3 is amended to include tree plantings to provide shading and reduce urban heat impacts in areas of public pedestrian and cycle access.</p>
Through site links	54. Council acknowledges the proposed through site link between Belmore Road and Virginia Place. Council requests that instead of dedication to Council, a Public Access mechanism be registered on the title to ensure public accessibility.
Landscaping	<p>55. Council requests Homes NSW to create a clear top-down concept diagram illustrating the indicative locations for tree plantings. This diagram should provide a visual representation that clearly communicates the proposed areas where tree plantings will be implemented.</p> <p>56. Council notes there is a misalignment between the indicative deep soil zones and the location of existing high-value trees earmarked for retention. Council advocates for the synchronisation of these elements to maximise the retention rate.</p> <p>57. Council acknowledges a discrepancy in the revised landscaping diagrams where deep soil zones are depicted conflicting with the presence of basements beneath the site. Accordingly, Council requests that these diagrams be revised to accurately account for the basements, ensuring proper representation of indicative tree retention and canopy cover.</p> <p>58. Council acknowledges the inclusion of canopy cover primarily within the road reserve, proposed for dedication to Council. In an effort to alleviate pressure on the road reserve, Council requests that a substantial portion of this canopy cover be situated within the lot boundary and not along road reserves.</p> <p>59. A substantial amount of potential future canopy coverage along the Belmore Road frontage of the site will be lost as part of the Belmore Road widening when considering the new cycling path and footpaths. Canopy coverage for the site should aim to achieve the 30% canopy coverage target in Council's Local Strategic Planning Statement (p5) for medium to high density areas. Based on Council's comments in this submission, achieving the 30% canopy coverage is questioned and further information from Homes NSW is required before a determination is issued.</p> <p>60. Council notes that there is insufficient separation among trees along the road reserve, hindering their potential for robust growth. To address this concern, Council requests an increase in tree separation to allow for adequate space and healthy development.</p> <p>61. Council requests the following additional controls are included within Section 3.5 of the site specific DCP:</p> <ul style="list-style-type: none"> • <i>C4 Development must be designed to retain existing high value canopy trees on the site where possible.</i> • <i>C5 To ensure continuous canopy coverage street trees should be provided at least 10-15m intervals either on the landscaped verge or in the parking lane.</i> • <i>C6 Trees in the public domain (streets and parks) are to be installed with a pot size of 200L.</i>

Key Issue	Council's comments
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62. Council intends to minimise the use of kerbside plantings due to the significant maintenance burden they place on Council. While kerbside planting does provide a positive visual impact in some locations to assist with delineation and directing pedestrians, they also add additional maintenance.

The photo below is located within the 'Washington Park' area adjacent to the Riverwood Housing Estate:



63. The gardens in the above photo are maintained by the Council's outdoor staff and the landscaping helps direct pedestrians and contributes to the appearance of the town centre, whilst being within immediate proximity of one councils community services, Riverwood Library. In this type of location, the provision of such landscaping is appropriate for Council to maintain.
64. However, it is Council's experience that similar kerbside plantings installed in some of the more residential areas of the 'Washington Park' development have not been maintained. After the developer's maintenance contract ceased, so did the maintenance of the kerbside landscaping. The various body corporates (or Homes NSW where relevant) have not maintained the kerbside gardens. Council was expected to pick up this maintenance however it is simply not viable based on the limited staff numbers and capacity of the Council's maintenance teams. Over time, Council removed the kerbside gardens in the residential areas and replaced them with grass. The various body corporates and/or Homes NSW now maintain these grass nature strips, not Council.

Key Issue	Council's comments
	<p>65. Council will request that should any proposed landscaping involve more than minimal maintenance that would typically be carried out by the body corporate or Homes NSW (e.g. more than lawn mowing), that a Planning Agreement is entered into to ensure sufficient funding and resources are allocated by Homes NSW to ensure the maintenance of kerbside landscaping and other landscaping features located away from Council's public and community infrastructure are maintained in perpetuity without additional costs to Council.</p>
Sustainability	<p>66. Council requests the following objective to be included within Section 5 of the site specific DCP:</p> <ul style="list-style-type: none"> • <i>O8 Prioritise electric-only developments and allow flexibility in the design for the uptake of future technologies that reduce carbon emissions (e.g. rooftop solar PV, battery systems).</i> <p>67. Council requests the following controls within Section 5 of the site specific DCP to be consolidated and amended to reflect as follows:</p> <ul style="list-style-type: none"> • <i>C4 Consider strategies to incorporate renewable energy design features, such as solar panels.</i> • <i>C5 Consider strategies to remove the requirement for gas appliances in new buildings.</i> • <i>NEW C4 All new residential developments must be designed as all-electric buildings, with future capability to be completely offset by renewable energy i.e. reach net zero carbon emissions.</i> <p>68. Council requests the following additional controls are included within Section 5 of the site specific DCP:</p> <ul style="list-style-type: none"> • <i>C11 Drainage systems should be sized to consider increases in rainfall intensity, frequency and duration under future climate change.</i> • <i>C12 All residential developments are to have roofing materials installed with compliant three-year Solar Reflectance Index (SRI):</i> <ul style="list-style-type: none"> (a) <i>Roofs pitched <15°: three-year SRI > 64</i> (b) <i>Roofs pitched >15°: three-year SRI > 34</i> <i>The incorporation of solar PV panels into the design is an acceptable deviation from the specifications.</i> • <i>C13 All public domain lighting should be powered by a PV and battery system.</i>
Onsite Stormwater Detention (OSD)	<p>69. Council requests further clarification to be provided on the OSD provision across the site, particularly in relation to the status of the precinct based OSD proposed on Kentucky Avenue.</p> <p>70. Council notes the DCP fails to provide objectives and controls for On-Site Detention and Water Sensitive Urban Design (WSUD) that are specific to this site. Council intends to work with Homes NSW to develop controls to apply specifically to this site where required.</p>
Draft DCP - Figure 9	<p>71. Council requests an adjustment in Figure 9, suggesting that the reference to "existing building" be revised to "property boundary."</p>

5 April 2024

Attention: Director Eastern & South Districts
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Dear Sir/Madam

Revised Rezoning Proposal at Riverwood Estate

I refer to the exhibition of the revised rezoning proposal in Riverwood Estate, between Virginia Place and Belmore Road, at the north-eastern corner of the precinct. Council notes that the revised proposal seeks to facilitate the first stage of renewal for the Riverwood Estate, to deliver 420 dwellings; with a target housing tenure of 50% social and affordable housing and 50% market housing. Council also notes that the revised scope for Stage 1 sits within the exhibited Master Plan.

Council supports the target of 50% social and affordable housing in this first stage; however the abandonment of a master plan for the Riverwood Estate that has statutory input from all stakeholders (including the community) and approval by the NSW State Government will not allow the impacts of its redevelopment to be considered and addressed holistically.

Page 39 of the document - *Response to Submissions* prepared by Architectus – states: *The broader master plan for the remainder of the Riverwood Estate will be further refined in response to community concerns and serve as guidance for any future redevelopment. However, LAHC will not seek statutory approval for the broader master plan at this stage, to ensure future infrastructure needs can be appropriately assessed and delivered in tandem with future growth.*

The redevelopment of the Riverwood Estate will be planned on a piecemeal basis without addressing all the issues and concerns previously raised by stakeholders including Georges River Council. Council still has concerns regarding impact of non-residential Additional Permitted Uses, inappropriate interface to adjacent R2 zone, tree canopy target, visibility of Roosevelt Park, traffic and transport impacts, heritage, infrastructure provision – community, social, health and green etc.

In respect of Stage 1 Council provides the following comments:

Urban Design:

Council notes:

- The proposed density is reduced slightly from the previously exhibited version from 2.4:1 to 2.2:1 FSR.
- Proposed Stage 1 provides a generous 15m front setback from Belmore Road. This is encouraged to provide a landscaped buffer to the main road for better occupant amenity. The provision of 30% tree canopy on the development site is also highly commended and will contribute to meeting the 40% canopy target across Greater Sydney.
- The retention of APU No. 26 will continue to permit the provision of a maximum 1,000sqm small-scale supermarket on the Stage 1 site. This was previously supported by Georges River Council in light of the future demand for a small-scale supermarket within the Estate.
- Due to its location, the proposed built form has no direct impact on the Georges River LGA.

Heritage:

Council has reviewed the documents and note the responses provided to Council's previous heritage comments. Council is concerned that NSW Land and Housing Corporation have not taken on many of the previous heritage recommendations, deferring them to subsequent project phases.

The draft DCP provided is still very generic and requires a lot of further investigations to be undertaken, which should be carried out at the strategic stage to inform the DCP, rather than left as a document to be submitted as part of a DA.

There is no requirement in the DCP for the findings of the further investigations (including Heritage Interpretation Plan) to actually be implemented, so there is concern that this will just be a 'check box' exercise to satisfy the DA requirements.

The wording of C3 under section 6.1 European Heritage should also require implementation of the Plan into the design of the DA, or at least 'inform' any future DA as the wording of C1 under 6.3 Connecting with Country.

It is not clear what the extent of a 'precinct wide' Archaeological Research Design (ARD) will be for C2 under section 6.1 European Heritage. Does this mean the entire



precinct formerly identified, or only the 'site' outlined in blue in Figure 1? The Precinct is not defined or mapped in the DCP.

Council's previous comment that further archaeological investigations be carried out, has not been implemented. The wording in the DCP does not even require this, only saying '*Any Aboriginal heritage investigations in the Riverwood Estate should include an updated extensive search of the AHIMS database in order to determine if new sites have been registered in the precinct or its immediate surrounds*'. The control should be clear whether any further Aboriginal heritage investigations are needed prior to lodging a DA.

Sustainability

Council suggests that controls be addressed in the DCP:

- use of recycled materials
- embodied carbon of resources used in construction and development.
- battery usage and/or design for possible future battery usage
- Electric Vehicle charging infrastructure or future proofing for Electric Vehicle charging infrastructure

Social Infrastructure

In their Social Infrastructure Addendum (Attachment H) Homes NSW outline the additional services, community spaces and open space for the additional 420 dwellings to be built (estimated additional 1,047 people more than currently live on the Stage 1 site).

Stage 1 involves the demolition of:

1. The early learning service (ELS) on the site which contains 60 places. Although Homes NSW have recommended a ELS be built in the proposed Stage 1 development, what will happen to the 60 children who currently utilised the ELS during the rebuilding of a new ELS?
2. Buildings that contain Aboriginal and Torres Strait Islander community services on the adjoining street that is being realigned (Virginia Place).

With the two large social housing towers adjacent to the site, in addition to the proposed development having 50% social and affordable house (approx. 210 dwellings), the relocation of these services could impact the need to utilise services in the Georges River Council side of Riverwood. Council has limited community



facilities in the northern part of the LGA and the loss of the ELS and the Aboriginal and Torres Strait Islander community services will add additional pressure.

It is noted that for the impacts on the rest of the social infrastructure Homes NSW have recommended that these impacts be looked holistically with the overall Riverwood Estate redevelopment, and any development contributions either be used to enhance surrounding social infrastructure now, or for Canterbury/Bankstown Council to pool the contributions to be used once the full redevelopment is approved.

This does not address the impact on the Georges River LGA's social infrastructure. An additional 1,047 people to the north of the Georges River LGA will potentially require further investment in GRC assets.

Open Space

Council's recently completed *Community Infrastructure Needs Assessment and Acquisition Area Strategy* indicates that Riverwood is an area that is lacking in public open space, containing pockets of low accessibility and private properties greater than 400 metres from open space.

Health

Based on a review of the documentation lodged, the following comments are provided to assist the Department:

1. The Stage 2 Contamination Report should consider if the proposed works will have any impacts on contamination migration from the tip to Salt Pan Creek.
2. Sampling of the site for asbestos to be undertaken in accordance with NSW EPA Sampling Guidelines Part 1 for soils suspected to be contaminated with asbestos.
3. During construction the sediment and erosion control is to be conducted in accordance with *Managing Urban Stormwater: Soils and construction – Volume 1* (2004).--

Allocation of development contributions

Council again raises the following issues:

- Lack of information on options for suitable funding arrangements and how development contributions will be allocated between Canterbury Bankstown Council and Georges River Council.



- Council requests that the Department require that a joint contributions plan be prepared for the Site's development so that Georges River Council can fund local infrastructure and services such as road network upgrades, public domain improvements and embellishment to existing services to cater for the additional population resulting from the additional 3000 dwellings.

Should you require any further information, please contact me on 9330 6260.

Yours sincerely



Catherine McMahon
Manager Strategic Planning



Department of Planning and Environment

DOC23/1058098

Ms Hannah Darwin
Eastern and South District
Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2124

15 December 2023

Subject: EHG comments on Response to Submissions on Riverwood State Significant Precinct – rezoning proposal

Dear Ms Darwin

Thank you for your email of 29 November 2023 requesting advice on the Response to Submissions (RtS) on the Riverwood State Significant Precinct (SSP) rezoning proposal – Stage 1.

The Environment and Heritage Group (EHG) has reviewed the RtS and provides its comments and recommendations at Attachment A.

If you have any queries regarding this matter, please contact rog.gsrplanning@environment.nsw.gov.au.

Yours sincerely,



Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation

Subject: EHG comments on Response to Submissions on Riverwood State Significant Precinct – rezoning proposal – Stage 1

The Environment and Heritage Group (EHG) has reviewed the following reports:

- Response to Submissions report (RtS) – Riverwood Stage 1 - 17 November 2023
- A – Riverwood -Response to Submissions – Addendum to the Urban Design Report - Stage 1 – 16 November 2023
- B – Stage 1 Riverwood Estate Development Control Plan (DCP) – Part X, Section X – draft Issue D - 17 November 2023
- E – Connectivity with Country
- I - Riverwood Stage 1 Response to Stormwater Matters
- J - Riverwood Stage 1 Response to Climate Change Matters
- Biodiversity Assessment Report (BAR) – 14 June 2022
- Canopy Cover Assessment
- Green Infrastructure Study – 10 June 2022
- High Retention Tree Preliminary Arboricultural Impact Assessment (HRTPAIA) – 22 April 2022

and provides the following comments.

Background

EHG previously made submissions on the exhibited Riverwood Estate Masterplan and draft planning controls in 2022 (letters dated 23 September and 28 September 2022) in relation to biodiversity and flood related issues. The masterplan exhibited in 2022 has now been revised to reflect an amended scope.

The Response to Submissions (RtS) focuses on the delivery of the first stage of the project. Stage 1 is in the north-east of the Riverwood Estate. Stage 1 will deliver approximately 420 new homes. Delivery of the master plan for areas of the Riverwood Estate outside of Stage 1 will be subject to a further application.

The RtS indicates a Summary of Submissions Report has been prepared by DPE Planning and can be found on the NSWPlanning Portal and Riverwood project website, together with the submissions received. EHG queried this in an email to DPE Planning on 4 December 2023 as EHG could not find the Summary of Submissions Report on the Planning Portal. In an email reply on 8 December DPE Planning advised that LAHC has made an error on the RtS package and that this document is currently not public and it may go with the exhibition package in February.

Department of Planning and Environment

Flood

The revised rezoning site will be confined in an area bounded by Washington Avenue, Roosevelt Avenue, Belmore Road and Virginia Place. Stage 1 is located on the eastern side of the Riverwood Estate, which has less flood affectation compared to the northern location of the Estate. The flood affectation would mainly be confined at the intersection of Washington Avenue and Belmore Road.

EHG has the following comments based on the submitted documents.

- 1) EHG's comments in response to the exhibition of the masterplan in 2022 are still valid.
- 2) Flooding condition assessment and the flood risk management planning at the Riverwood Estate need to be based on the Flood Risk Management Manual 2023, the Flood Prone Land Package 2021, and relevant and recent guidelines.
- 3) The applicant outlined the options for the management of localised flooding at low points of stormwater networks. One of these options is to regrade the roads at these low points. This may transfer the flooding problems elsewhere, which would require a detailed hydraulic assessment prior to undertaking any regrading works. The other option is the provision of overland flow paths at low points to divert flows. This may be a better option, which would improve the environmental and water quality conditions of the development site.
- 4) The applicant outlined the inclusion of an onsite detention (OSD) strategy in drainage networks located in the eastern catchments of the Riverwood Estate to improve the performance of drainage networks. It should be noted that Canterbury-Bankstown Council commissioned a study in 2022 to evaluate the performance of OSD in the Prospect Creek Catchment using a 1D-2D modelling configuration. The performance of some OSDs has been found to be less effective and hydraulically deficient. The performance of proposed OSD sites in the Riverwood Estate should be evaluated by using hydraulic models prior to selecting the sites for OSD construction.
- 5) The projected climate change metrics reported by the proponent may change when the results from updated climate models become available in 2024. The applicant needs to update the metrics to support the climate resilience and adaption works in the future stages of the Riverwood Estate.

Biodiversity

EHG previously raised several biodiversity related issues in its submissions on the Riverwood Estate. The RtS notes that when appropriate, LAHC will review the masterplan, in consultation with stakeholders to address matters relating to other areas of the Riverwood Estate outside of the Stage 1 Scope (section 5.1.2, page 18 of RtS).

This piecemeal approach to planning the site could result in increased impacts on biodiversity values instead of identifying biodiversity issues across the entire Riverwood Estate. If the Stage 1 planning proposal is approved, EHG requests that its previous comments (where they are not also relevant to Stage 1) are addressed as part of the master planning for the remainder of the Riverwood Estate.

Department of Planning and Environment

The area subject to the original master plan included mapped Cumberland Plain Woodland (CPW) which is listed as a critically endangered ecological community (CEEC) under the *Biodiversity Conservation Act 2016* (BC Act). CPW was mapped within the BAR in two small discrete locations within the Riverwood Estate and would not be impacted by the proposal. EHG advised many native trees found within the Riverwood Estate, including Stage 1, were identified in the HRTPAIA as species found within CPW.

EHG advised that on review of historical aerial photography, a portion of the trees on the site appear to have endured changes on the site over this time and that several the trees may be remnant native vegetation.

The RtS states there is no remnant vegetation within Stage 1 (section 5.6.2, page 38). It is unclear if historical aerial imagery was reviewed to determine if any of the trees within Stage 1 are remnant native vegetation as previously advised by EHG. Clarification is required.


Based on the Arboricultural Impact Assessment (dated 22 April 2022), several the high retention value trees which occur within the Stage 1 area are species found within CPW including

- *Eucalyptus crebra* (trees 124, 269, 273)
- *Eucalyptus eugenioides* (tree 122)
- *Eucalyptus fibrosa* (trees 119, 268, 271, 274) and
- *Corymbia maculate* (trees 264, 267, 275, 276).
- *Eucalyptus sideroxylon* (tree 265) – (see table below)

As previously advised by EHG

- While Stage 1 of the Biodiversity Assessment Method (BAM) should be undertaken to support any planning proposal, it is beneficial to the applicant to consider the potential impacts to biodiversity values and what statutory requirements will be required to be addressed for future development applications (DAs). The proposal should avoid those areas that contain mapped threatened ecological communities (TECs) and any areas of remnant trees from these communities.
- The BAR assumes that all trees within the impact zone are planted, and it is likely that the future BAM requirements have not been adequately considered. CPW is listed as a Serious and Irreversible Impact (SAIL) entity, and any impacts to this community are required to be avoided. Section 7.16 of the BC Act states that “the consent authority must refuse to grant consent...if it is of the opinion that the proposed development is likely to have a serious and irreversible impact on biodiversity values”. The BAR does not address this requirement and so it is not known whether the removal of any remnant CPW on this site will constitute SAIL for future DAs.

Department of Planning and Environment

High Retention value trees that occur in Stage 1 Area (Tree Number and species)	CPW Species	
118 - <i>Liquidambar styraciflua</i>		
119 - <i>Eucalyptus fibrosa</i>	Yes but less frequent	
121 - <i>Melaleuca decora</i>		
122 - <i>Eucalyptus eugenioides</i>	Yes	
123 - exotic		
124 - <i>Eucalyptus crebra</i>	Yes	
264 - <i>Corymbia maculata</i>	Yes but less frequent	
265 - <i>Eucalyptus sideroxylon</i>	Yes but less frequent	
266 - <i>Corymbia citriodora</i>		
267 - <i>Corymbia maculata</i>	Yes but less frequent	
268 - <i>Eucalyptus fibrosa</i>	Yes but less frequent	
269 - <i>Eucalyptus crebra</i>	Yes	
270 - <i>Lophostemon confertus</i>		
271 - <i>Eucalyptus fibrosa</i>	Yes but less frequent	
272 - <i>Eucalyptus saligna</i>	This species is associated with Turpentine Ironbark Forest which has also been recorded in the locality	
273 - <i>Eucalyptus crebra</i>	Yes	
274 - <i>Eucalyptus fibrosa</i>	Yes but less frequent	
275 - <i>Corymbia maculata</i>	Yes but less frequent	
276 - <i>Corymbia maculata</i>	Yes but less frequent	
277 - <i>Eucalyptus botryoides</i>		

Source – Figure 7 in Arboricultural Report
Retention values

278 - <i>Liquidambar styraciflua</i>		
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A Biodiversity Development Assessment Report (BDAR) may be required for subsequent DAs and would be required to address Stage 2 of the BAM. Stage 2 includes the impact assessment and the requirement to avoid and minimise impacts to biodiversity. Given potential impacts to remnant CPW trees by the current proposed Stage 1 and the broader Riverwood Estate proposal in the future, the applicant would be unlikely to be able to demonstrate how impacts have been avoided and minimised to biodiversity values on the site. If additional remnant trees from CPW are located, the proposal does not address avoiding locations with significant biodiversity values. Areas containing native vegetation or corridors within or between them should be avoided to demonstrate compliance with the avoid and mitigation requirements of the BAM 2020.

Cumberland Plain Land Snail

The BAR indicated potential marginal habitat for Cumberland Plain Land Snail has been avoided (section 2.1.1, Table 10 of BAR) but it provided no further details in relation to this. The RtS indicates any potential impacts to fauna will be considered at the broader masterplan for the remainder of the Riverwood Estate. It is unclear if Stage 1 could provide potential habitat for the Cumberland Plain Land Snail, and this needs to be addressed as the BAR does not give an account of where the “marginal” habitat occurs.

Microbats

The Planning Report notes the project includes the demolition of existing buildings. It is unclear if the buildings on the site are currently vacant and if the buildings to be demolished provide potential habitat for microbats as the BAR has not addressed this. The RtS indicates any potential impacts to fauna will be considered by the broader masterplan for the remainder of the Riverwood Estate. This needs to be addressed as part of Stage 1 and not deferred to broader masterplan.

Surveys for microchiropteran bats should be undertaken in accordance with the Bat survey guidelines while undertaking Stage 1 of the BAM - (*Species credit’ threatened bats and their habitats NSW survey guide for the Biodiversity Assessment Method* (OEH 2018)).

If microbats are found, enough time needs to be provided to allow for the preparation of a Microbat Management Plan (MMP) including consultation with EHG. The MMP will need to address how abandoned buildings and structures will be demolished if microbats are utilising them as habitat and what actions are required to avoid and mitigate impacts to microbats.

Open Space Areas and Salt Pan Creek Reserve

EHG previously advised it is unclear if an adequate area of open space is proposed to be provided for the increased number of residents as at the completion of the project there will be approximately 7,500 people residing within the study area compared to the current 1,700 residents. The RtS notes the revised proposal seeks to deliver approximately 420 new homes and that the

Department of Planning and Environment

Stage 1 development will result in an estimated population of 1,222 persons, which when adopting a benchmark percentage of 15-20% of the site, would generate demand for an additional 0.3 ha of public open space within the locality (page 33).

EHG raised concern that the proposed rezoning and increase in population on the site will place additional pressure on the Salt Pan Creek Reserve, which is located to the west of the Riverwood Estate site, and other nearby open space areas.

It is noted in the RtS that the Georges River Council has also raised concern that the population growth arising from the development will place additional pressure on nearby areas open space, which already has a shortfall of open space (page 23). In response the RtS indicates the revised scope does not seek to provide any new areas of public open space and it states “the revised proposal is supported by an addendum to the SIA prepared by Cred at Appendix G which provides there is sufficient existing open space within the locality to service the proposed Stage 1 development. Existing areas of open space within the locality including however not limited to, Salt Pan Creek Reserve, Kentucky Road Reserve, Riverwood Park and Karne Street Reserve are considered sufficient to service future residents of the proposed development.” DPE Planning needs to be satisfied with this response in the RtS.

The RtS refers to Canterbury-Bankstown Council’s recently adopted master plan for the significant upgrade of the Salt Pan Creek Reserve, to incorporate a high quality, multi-purpose recreational space and that LAHC will continue to work closely with Canterbury-Bankstown Council, as part of the delivery of this master plan for the Salt Pan Creek Reserve. EHG considers it is important the masterplan for the upgrade of the Salt Pan Creek Reserve ensures sufficient land is set aside to incorporate a biodiversity corridor along Salt Pan Creek and that the width of the corridor is as wide as possible and the corridor is rehabilitated with fully structured native vegetation from the relevant native vegetation community that once occurred at this location for the full length of the reserve to improve connectivity for fauna movement, waterway health, habitat and local biodiversity. The corridor should be for conservation purposes rather than for public open space purposes, particularly as Stage 1 and the broader Riverwood Estate has the potential to impact the rehabilitation of a biodiversity corridor by significantly increasing the number of people that will potentially use the reserve for recreational/open space purposes.

Rehabilitation of CPW

The Green Infrastructure Study stated, “The proposal should also seek to enhance the existing CPW community onsite and ensure that it is not negatively impacted by the proposal” and the previous BAR included a mitigation measure that landscaping in the development site is to use locally derived native species and those found within the plant community types (PCT) present (CPW 3320 and 3319) to manage impacts (see Table 16 of BAR, page 22). EHG’s previous submission supported the use of local native provenance CPW species at the site and recommended the draft DCP be amended to reflect this.

Department of Planning and Environment

The RtS notes that Georges River Council has recommended that “plant species from the Turpentine-Ironbark Forest community that once dominated this site within the subject site be selected” for landscaping on the site (section 5.6.4, page 40). Appendix E also indicates that prior to colonisation, the land on which the Riverwood Estate is located would have been covered in a tall open Turpentine-Ironbark Forest (page 9), but the previous BAR did not address this.

Despite the differences in the identified PCT by the different agencies and reports, any rehabilitation should utilise the locally occurring native vegetation community that once occurred on the site which will be confirmed through on-ground site investigations and be addressed in the BAR.

EHG recommends further details are provided on the native vegetation communities that once occurred on the Riverwood Estate site and the Stage 1 area:

DRAFT DEVELOPMENT CONTROL PLAN FOR STAGE 1

EHG previously provided comments on the draft Development Control Plan for Riverwood Estate. The RtS indicates the DCP has been updated to reflect the revised Stage 1 scope and that provisions relating to areas outside of the Stage 1 scope have been removed from the DCP. EHG considers its previous comments relating to the DCP for the broader Riverwood Estate are also largely applicable to the DCP for Stage 1 and the DCP should incorporate EHG’s recommended amendments.

End of Submission



SF20/60
BR22/5345

[REDACTED]
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124
Via email riverwood.ssp@dpie.nsw.gov.au

Re: Riverwood Estate Rezoning

Dear [REDACTED]

Thank you for the opportunity to provide feedback on the Riverwood Estate Rezoning Proposal. The Sydney Local Health District supports the proposal and amendment of the Planning Systems to include the Riverwood State Significant Plan (SSP) on the State Significant Development Sites Map, however, the following issues relating to the proposed Estate require further consideration:

Social and affordable housing

- The provision of a mix of private and public housing is supported as this will promote diversity in the community, inclusiveness, and strengthened relationships.
- However, it is of concern that there is no expansion of the quantum of social housing on this large area of publicly owned Government land. It is recommended that 40% of the housing be considered for social housing. There is a lack of social housing available for vulnerable communities within the Sydney metropolitan area, and this negatively impacts mental and social health, contributes to homelessness and impacts on the effective delivery of acute and community health services (including hospital discharges). This is a relatively rare opportunity to expand the social housing supply within an area of high need.
- It is also of concern that no affordable housing has been included in this proposal. The District recommends that a minimum of 25% affordable housing be considered for the redeveloped Riverwood Estate. Affordable housing supply is critical for recruitment to lower income positions including essential health workers (cleaners, porters, nursing assistants) for Canterbury Hospital, a major supplier of health services for people in this area. A major redevelopment of the Canterbury Hospital and Health Services is currently being planned with NSW Health and will result in a significant expansion of health services requiring an increased, sustainable workforce.
- Clearly, the impact of this proposal on the Riverwood Estate community will need to be considered at every stage of the development. It is strongly recommended that transparent and consistent communication with all social housing residents, throughout all stages of the development (including DA processes), be undertaken to address the known psychological distress associated with the required rehousing and the wait to be rehoused.

Health services and social infrastructure

- The Riverwood Estate community is one of high health need, low socioeconomic status and vulnerability. The population of Riverwood has the lowest SEIFA score within the

within the Sydney Local Health District¹, with 30-34% of households having an average income of less than \$500 a week².

- Canterbury-Bankstown LGA has 22% of NSW recipients of disability support pensions (10,873) and 23% of NSW recipients of carer payments and carer allowance (9,191)³.
- The Sydney Local Health District provides a range of health services for the current residents of the Riverwood Estate the precinct and surrounding Riverwood area including Mental Health, Drug Health, Child and Family Health and Youth Health services and programs.
- The significant increase in the population of people living in Riverwood will impact on the requirements for public and primary health care. Vulnerable communities such as Riverwood, have poorer health status and require increased access to health and hospital services and programs. This requirement impacts hospital care, outpatient services, oral health services, and community-based health services.
- To address the future significant health needs of the Riverwood community, the Sydney Local Health District has identified Riverwood as a priority site for a Community Health Hub (HealthOne). The proposed HealthOne would include health and wellbeing services to assist people across the life span, with a strong emphasis on vulnerable populations. Sydney Local Health District would welcome the opportunity to discuss the possibility of siting such a health service within the planned precinct.
- In addition to the proposed HealthOne, dedicated spaces/rooms will be required across the Precinct to embed specific and targeted community health services. The current community spaces need to be upgraded.
- The Riverwood Community Centre also requires expansion to support the proposed population increase and the likely associated increased demand for services and programs, particularly for children, young people and elderly people. The Riverwood Community Hub also requires upgrading.
- It is recommended that space within the retail precinct be dedicated to primary health and community service centres e.g. pharmacy, GPs. These should also include rooms that are adaptable for clinical support and assessment by visiting healthcare providers and relevant NGOs, such as AA, Headspace and Grow.
- The replacement within the precinct of the Men's Shed is a priority to support social cohesiveness and community capacity building. As there are no arts or cultural facilities within 5km of the Estate, SLHD Population Health Unit supports recommendations made in the Equity Focused Health Impact Assessment⁴ that the new Men's Shed be provided within the Estate in a facility (1,268 m²) that includes a purpose built creative arts space and space for capacity building programs.
- The 1,200m² that has been proposed in the Riverwood Master Plan for Community space and facilities is supported, however, it is considered that an additional total of 1,268m² of community and cultural facility floor space is required, including^{5,6}:
 - 600m² community floor space
 - 518m² library floor space
 - 150m² indoor communal spaces connected to open space for cultural activities, music practice, children's parties or study programs.
- An additional 85 childcare places required to service future demand at the Riverwood

² Commonwealth of Australia, ABS.Stat 2019, SEIFA 2016 by Local Government Area (LGA), available at:

http://stat.data.abs.gov.au/Index.aspx?DataSetCode=ABS_SEIFA_LGA#

³ Australian Gov. 2021, Disability Pension, Available at <https://data.gov.au/dataset/ds-dga-cff2ae8a-55e4-47db-a66d-e177fe0ac6a0/details?q=disability%20pension>.

⁴ Cred Consulting, 2022, Equity-Focused Health Impact Assessment, Riverwood SSP, June

⁵ Cred Consulting, 2022, Equity-Focused Health Impact Assessment, Riverwood SSP, June

⁶ Cred Consulting, 2022, Social Infrastructure Report, Riverwood SSP, June.

Children's Education and Care Centre (total 145 places)⁷.

- Additional outdoor spaces are required to provide liveability and promote social interaction⁸:
 - An outdoor covered multipurpose outdoor area and could be shared use for outdoor markets, tai chi and dance and other cultural and community programs and events entertainment
 - A multipurpose outdoor sports court
- To support work from home practices and social media interaction, the District supports enhanced NBN coverage throughout the precinct and free Wifi hubs in community/common areas.
- The provision of social infrastructure should be provided at the early stages of the development to maintain existing programs and services, and to replace any lost infrastructure. Staging should ensure the continuity of groups, activities and services through providing replacement or temporary social infrastructure before existing spaces are lost.

Movement networks

- The 40% benchmark for work trips to be undertaken by public or active transport modes is supported. It is noted that in 2011 Riverwood LGA had the highest proportion of residents without a car (25%)⁹.
- To achieve this benchmark, it is recommended that an "envision and plan" approach be adopted. The development of a vision, in consultation with stakeholders, will identify the desired lifestyles and health of the community, which is used to inform future planning.
- Assumptions on the future transport modalities and destination of future Riverwood residents appear to have been based on the mobility choices of nearby residents, rather than the existing Estate residents. Therefore the proposal includes costly new proposals for infrastructure and upgrades to accommodate the assumed growth in motor vehicle ownership/traffic of the new development, including excessive basement car parking, road/intersection capacity increases, and new traffic signals. Planning for the development needs to reflect that in practice, mobility/destination choices are not a given, rather they are shaped by the relative attractiveness/utility of different options¹⁰.
- If the increases to the proposed car parking and road/intersection capacity are implemented, motor vehicle ownership/driving may become more attractive, resulting in more driving trips and therefore more traffic. Increased traffic, with the associated delays created by the new traffic signals, will in turn, make walking/cycling (including access to public transport) less attractive, further increasing traffic and further impact health.
- It is of concern that the Traffic and Transport Assessment models the level of service/delay for motor vehicles at intersections but not the impact on pedestrians. This may influence resident choice to walk or cycle.
- The District does not support the proposed clearway on Belmore Road. A clearway will contribute to additional motor vehicle traffic with the associated health impacts (road trauma, noise pollution, ambient air pollution)¹¹ in particular for those people living next to and/or walking on Belmore Road. A clearway will also significantly diminish amenity

⁷ Cred Consulting, 2022, Equity-Focused Health Impact Assessment, Riverwood SSP, June

⁸ Cred Consulting, 2022, Equity-Focused Health Impact Assessment, Riverwood SSP, June

⁹ ABS Stats 2011

¹⁰ Handy, S., Cao, X. and Mokhtarian, P., 2005. Correlation or causality between the built environment and travel behaviour? Evidence from Northern California. *Transportation Research Part D: Transport and Environment*, 10(6), pp.427-444.

¹¹ Duranton, G. & Turner, M., 2011. The fundamental law of road congestion: Evidence from US cities. *American Economic Review*, 101(6), pp.2616-52.

and street activation, impacting on businesses and reducing resident access to shops and services.

- Traffic filtering measures are recommended to encourage active school transport and discourage unsafe pedestrian environments¹². The restriction of through-traffic and intra-precinct private car trips is supported through the implementation of mid-block crossings at least every 80 metres, and ensuring that all side streets have continuous footpath treatments and a small kerb radius. A 30 km/h speed limit within the precinct and on Belmore Road will also help to limit road trauma and traffic noise.
- The proposed traffic signals on Belmore Road will induce additional traffic¹³, as well as impose delays on pedestrians. Consideration should be given to redesigning these intersections as protected roundabouts, with pedestrian priority on all arms.
- A large proportion of the site will be over 800 metres (10 minutes) to Riverwood train station. Further consideration should be given to way finding to local public transport options, the provision of additional bus connections to Riverwood town centre, improved bus scheduling and routes within the precinct and an improved cycling network.
- To support visiting community health practitioners, dedicated roadside visitor parking within the precinct is recommended. This parking should be close to residential entrances and well lit.

Providing safe communities

- The Precinct is currently identified as an area of high crime activity, as reported on the 2020 NSW Bureau of Crime and Statistics and Research crime maps¹⁴. Consultation with the Riverwood community in 2017 indicated that some residents, particularly women, felt unsafe walking through the area with poor lighting and poor casual surveillance a contributing factor¹⁵.
- Implementation of environmental design strategies to support resident safety including improved lighting and movement networks between new residences, community centres and the Riverwood Centre is strongly recommended for integration into all future infrastructure^{16,17}.

Green space

- The provision of 4.8 hectares of open space, including almost 2.4 hectares of new open space and local parks of between 0.3ha and 2ha in the proposal is supported. Access to open/park space within 200m of the high density dwellings is extremely important to support child health and development.
- The inclusion of additional park facilities that support social connectedness and active lifestyles, including outdoor exercise stations, public toilets, community gardens, fixed benches and water fountains is supported.
- Additional design measures to enable adult surveillance of child play areas e.g. placement of family units on ground levels with windows facing onto shared courtyards or play spaces, are important and will promote a healthy higher density living for children¹⁸.
- An additional off-leash area for dogs will provide a safer community setting. Dog ownership supports mental health and wellbeing.
- It is also recommended that the developer levies leveraged from future DAs are used to support enhancements to the nearby sports fields, specifically Riverwood Park,

¹² NSW Government Department of Health. 2009, Healthy Urban Development Checklist.

¹³ Duranton, G. and Turner, M.A., 2011. The fundamental law of road congestion: Evidence from US cities. *American Economic Review*, 101(6), pp.2616-52.

¹⁴ Cred Consulting, 2022, Equity-Focused Health Impact Assessment, Riverwood SSP, June

¹⁵ Architectus, 2022. Place Strategy, Riverwood SSP, June.

¹⁶ Safer by Design Guidelines, https://www.police.nsw.gov.au/safety_and_prevention/policing_in_the_community/safer_by_design

¹⁷ Clancey G, et al (2018). Lost in implementation: NSW police force crime prevention officer perspectives on crime prevention through environmental design DOI:10.1057/s41300-018-0043-x

¹⁸ Shepard, T. & Matthews, T. (2016) Auckland Design Manual: High density family housing. Auckland: Auckland Council.

McLaughlin Oval and Kentucky Reserve to accommodate the increase in the local population.

Site contamination

- The Urban Design Report indicates that groundwater impacts are likely to migrate west towards Salt Pan Creek and are unlikely to impact the site, however it is recommended that where there is any potential for landfill gasses, leachate or contaminated groundwater to migrate eastwards towards the new precinct development, regular assessment and testing is undertaken. This should occur throughout the development stages to ensure the area is safe for sensitive receivers, in particular children, who may be spending a considerable amount of time outside in the area's green space, gardens, and parks.
- There may be a requirement to undertake remediation of asbestos contaminated soils to make the land suitable for continued residential use. Adherence to the SafeWork NSW 'Managing asbestos in or on soil' is required to ensure the site is safe for residential use¹⁹.

Air and noise quality

- As only a qualitative desktop Air Quality Study Report was undertaken, it is recommended that onsite air quality measurements be undertaken. As there is no safe or threshold level below which exposure to air pollution is not associated with adverse health effects, the maximum reduction in air pollution is sought during the design stage in order to limit adverse health effects for future residents of this precinct.
- Infection control mitigation strategies to minimise the transmission of airborne diseases, including COVID-19, should be incorporated into the ventilation design including fresh air to the door.
- It is noted that the Preliminary Noise Impact Assessment report states that facades facing Belmore Road and the M5 Motorway require windows and doors to be closed in order to achieve required noise levels. It is recommended that balconies and bedrooms facing the M5 Motorway, Belmore Road, or Roosevelt Avenue be relocated to another façade to minimise noise disturbance, and if supplementary ventilation systems are required, the air intake should be situated as far as practicable from these busy roads.
- Open spaces and childcare centres should also be located as far as is practical from the M5 and Belmore Road.

Water management

- The use of water-sensitive design and collection of rainwater, stormwater and water recycling is supported, however, public health risks from using recycled water will need to be managed appropriately, including approval by the appropriate regulatory authority²⁰.
- Introducing green infrastructure such as rain gardens and wicking beds are also supported, however, strategies to reduce, control and monitor potential mosquito breeding habitats, due to the potential for mosquito-borne disease particularly in the setting of climate change, will need to be implemented.

The Sydney Local Health District supports in principle the rezoning proposal for the Riverwood Estate site. However, the redevelopment of the Riverwood Estate needs to provide a healthy built urban environment that supports the current and specific future

¹⁹ https://www.safework.nsw.gov.au/_data/assets/pdf_file/0005/329171/Managing-asbestos-in-soil-guide.pdf


²⁰ Independent Pricing and Regulatory Tribunal (IPART) under the Water Industry completion Act 2006

healthcare needs of the vulnerable Riverwood community. In summary it is therefore recommended that the proposal further considers the following:

- The provision of a higher proportion social housing.
- The provision of a minimum of 25% affordable housing.
- The inclusion of acoustic treatment and ventilation management into the design of all residences facing the M5 Motorway, Roosevelt Ave, and Belmore Rd.
- Consideration of infection control measures in the ventilation design of all closed public spaces.
- Strategies to mitigate the public health risks of re-cycled water and green infrastructure.
- Adoption of crime prevention strategies through environmental design, including improved lighting and movement networks.
- Discussions regarding the potential establishment of a HealthOne within the Precinct
- Commitment to upgrade the existing Riverwood Community Centre
- Enhanced NBN coverage throughout the precinct and free Wifi hubs in community/common areas.
- The provision of spaces within the retail precinct dedicated to primary and community health and community service centres.
- The provision of additional child-care places to service future demand.
- Design measures that enable adult surveillance of child play areas.
- Replacement of the Men's Shed by a facility (1,268 m2) that includes a purpose built creative arts space and space for capacity building programs.
- The provision of an additional covered outdoor multipurpose outdoor area and a multipurpose outdoor sports court.
- Additional off-leash areas for dogs.
- A stronger focus on walking/cycling and public transport access strategies, including traffic filtering measures.
- No proposed clearway on Belmore Rd.
- The enhancement of park facilities adjacent to the Estate to accommodate the proposed increase in the local population.
- Undertaking regular soil and noise assessment and testing throughout the development stages.

It would be greatly appreciated if the District could be kept informed of the planning timeframes associated with the relocation of current residents of the Riverwood Estate. Sensitive communication and consultation with the community will be key during this period, and the Sydney Local Health District will continue to be closely involved in providing support for the community during this time of change, particularly for existing tenants, many of whom already have significant and complex health issues.

Thank you for the opportunity to provide feedback on the planning proposal for the Riverwood Estate. Please contact Dr Pamela Garrett, Director Planning, Sydney Local Health District at either pam.garrett@health.nsw.gov.au or 0477 333 863 should you require any further information.



Date: 18.9.22

6 April 2024

Our Ref: 214009

Department of Planning, Housing and Infrastructure

riverwood.ssp@dpie.nsw.gov.au

RE: Riverwood Revised Rezoning Proposal (IRD23/42184)

Thank you for notifying Sydney Water of the Riverwood Revised Rezoning Proposal.

The revised rezoning proposal seeks to make modifications to the rezoning approach of the Riverwood SPP Rezoning Proposal that was originally exhibited in 2022. The original proposal sought to deliver approximately 3,900 dwellings and encompassed the 30ha site.

The revised proposal seeks to:

- limit the proposed rezoning to a part of Riverwood Estate with a site area of 16,265 sqm at 163 & Lot 400 Belmore Road, Punchbowl, and a small section of 4 Roosevelt Avenue, Riverwood
- maintain the existing R4 zoning increase the maximum building heights from 11.5m to part 42m (12 storeys) and part 29m (8 storeys)
- increase the maximum floor FSR from 0.9:1 to 2.2:1
- permit up to 250 sqm of neighbourhood shops, a 1,000 sqm supermarket, and food and drink premises.

The proposed changes should facilitate the delivery of approximately 420 new dwellings, with an anticipated tenure mix of 50% social and affordable housing, and 50% market housing.

We have reviewed the application based on the information supplied and provide the following comments for your information to assist in planning the servicing needs of the proposed development.

Water Servicing

- The proposed development site is under East Hills - Wiley Park EI (East Hills) Water Supply Zone (WSZ). This Water Supply Zone has the capacity to service the development.
- This development could be serviced by the existing DN200 watermain that encircle the site in Washington Avenue, Roosevelt Avenue and Belmore Road.
- Amplifications, adjustments, and/or minor extensions may be required.

Wastewater Servicing

- The proposed development site is under Upper North Georges River Submain catchment in the Malabar sewerage network. This sewer system has the capacity to service the development.
- Amplifications, adjustments, and/or minor extensions may be required.

Critical Assets

- Sydney Water has a critical trunk wastewater main (East Bankstown Submain) traversing the north west corner of the development site. While Sydney Water understands no physical works will be undertaken at this stage, future development must consider Sydney Water's [Technical guidelines – building over and adjacent to pipe assets SW269 \(sydneywater.com.au\)](#) and all future referrals should note this asset.

The development servicing advice provided is not formal approval of our servicing requirements and is based on the best available information at the time of referral (e.g. planning proposal). It is important to note that this information can evolve over time in tandem with the progression of other development projects in the catchment, changes within the local systems and receiving works. This is particularly important in systems with limited capacity. Furthermore, Sydney Water does not reserve or hold capacity for proposed developments, regardless of whether the area has been rezoned or not. To ensure accuracy and alignment with current conditions, it is best to approach Sydney Water for an updated capacity assessment particularly if an approval letter is more than 12 months old.

If you require any further information, please contact the Growth Planning Team at urbangrowth@sydneywater.com.au.

Yours sincerely,

A large black rectangular redaction box covering the signature area.A small black rectangular redaction box covering the name.A black rectangular redaction box covering the title.

City Growth and Development, Business Development Group
Sydney Water, 1 Smith Street, Parramatta NSW 2150

17 November 2023

TfNSW Reference: SYD21/00364



[REDACTED]
[REDACTED]
Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Attention: Carina Lucchinelli

RIVERWOOD SSP REVISED STAGE 1 PLANNING PROPOSAL

Dear [REDACTED]

Reference is made to your email correspondence of 10 October 2023 seeking comment from Transport for NSW (TfNSW) for a revised Stage 1 planning proposal for 420 dwellings and retail space at the Riverwood SSP Estate.

TfNSW appreciates the opportunity to provide comment and notes that the planning proposal is seeking a revised Stage 1 rezoning from 3,900 dwellings and other land uses under the Draft Riverwood SSP Masterplan, to the following:

- 207 private units
- 83 affordable housing units, 50% of which are keyworker housing units
- 124 social units, and
- Potential for a small supermarket with a 1,000m² GFA.

The agency has reviewed the planning proposal and provides detailed preliminary comments (**Attachment A**) prior to the revised proposal's public exhibition in early 2024. TfNSW welcomes a further opportunity to review the proposal during public exhibition.

Thank you for the opportunity to provide advice on the subject planning proposal. Should you have any questions or further enquiries in relation to this matter, please contact [REDACTED]
[REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]
[REDACTED]
Planning and Programs, Greater Sydney Division

ATTACHMENT A – PRELIMINARY TfNSW COMMENTS TO RIVERWOOD SSP REVISED STAGE 1 PLANNING PROPOSAL (November 2023)

1. TfNSW notes the planning pathway for Riverwood SSP Estate that consisted of 3,900 residential dwellings and other land uses has been revised to a Stage 1 proposal for approximately 420 dwellings and small retail only. Based on this development concept, transport infrastructure improvements are not required to support development of Stage 1. The proposal sits within the broader Riverwood precinct which has been the subject of comprehensive TfNSW comments in late 2022 and part of a broader draft masterplan that guides future development uplift of the precinct. TfNSW has been advised by DPE that the draft Riverwood SSP masterplan is currently on hold with potential for it to be considered in the future when market conditions improve.

TfNSW notes this revised approach however, has concerns that key issues around the precinct's staging, land acquisition, transport infrastructure delivery and funding has yet to be finalised. TfNSW would prefer that the broader overarching masterplan is adopted prior to consideration of spot rezonings (noting a masterplan has no statutory weight rather it provides guiding principles and a planning framework for future development) and supported by a Staging and Transport Infrastructure Delivery Plan. This would allow future rezonings to be considered consistent with the broader masterplan and supporting strategic plans and in line with property market growth.

2. TfNSW considers the proposed approach for this rezoning as piecemeal which sets a precedent for consideration of other spot rezonings within the site being lodged ahead of and in the absence of a masterplan and supporting strategic plans. DPE will need to consider at what point in the rezoning process the draft masterplan and supporting strategic plans should be considered and/or adopted before other spot rezonings are lodged by LAHC. TfNSW is concerned that spot rezonings on their own merits may have little traffic impact, however, cumulatively may trigger transport improvements consistent with those measures identified in the precinct-wide traffic impact assessment.
3. It is noted that as part of TfNSW's assessment of the broader precinct, that future road widening and a road design for Belmore Road has not yet been agreed. The location of Stage 1 fronting Belmore Road will require a strategic approach to ensure a future property boundary that takes into account future road widening of Belmore Road associated with the ultimate development of 3,900 dwellings. The TIA (pg 2) outlines a 9m setback along Belmore Road will be provided for future road widening however, there is no analysis as to the future road design the proposed 9m setback will accommodate. Furthermore, the draft DCP outlines a setback to Belmore Road of 15m which TfNSW assumes includes the proposed 9m setback outlined in the TIA.