



Planning &
Infrastructure

**MAJOR PROJECT ASSESSMENT:
Stage 1 of Riverwood North Estate
Residential Renewal Project
Kentucky Road and Washington Avenue,
Riverwood
(MP 10_0181)**



Director-General's
Environmental Assessment Report
Section 75I of the
Environmental Planning and Assessment Act 1979

November 2011

ABBREVIATIONS

CIV	Capital Investment Value
Department	Department of Planning & Infrastructure
DGRs	Director-General's Requirements
Director-General	Director-General of the Department of Planning & Infrastructure
EA	Environmental Assessment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
MD SEPP	State Environmental Planning Policy (Major Development) 2005
Minister	Minister for Planning & Infrastructure
PAC	Planning Assessment Commission
Part 3A	Part 3A of the <i>Environmental Planning and Assessment Act 1979</i>
PEA	Preliminary Environmental Assessment
PFM	Planning Focus Meeting
PPR	Preferred Project Report
Proponent	Housing NSW
RtS	Response to Submissions

Cover Photograph: View from Garden Square looking south-west towards Buildings A & B (*Source: turner + associates*)

© Crown copyright 2011
Published November 2011
NSW Department of Planning & Infrastructure
www.planning.nsw.gov.au

Disclaimer:

While every reasonable effort has been made to ensure that this document is correct at the time of publication, the State of New South Wales, its agents and employees, disclaim any and all liability to any person in respect of anything or the consequences of anything done or omitted to be done in reliance upon the whole or any part of this document.

*NSW Government
Department of Planning & Infrastructure*

EXECUTIVE SUMMARY

This report is an assessment of a major project application by Housing NSW seeking approval for the delivery of Stage 1 of the Riverwood North Estate Residential Renewal Project, pursuant to Part 3A of the Environmental Planning and Assessment Act 1979 (EP&A Act).

The Riverwood North Estate Residential Renewal Project concept plan was approved on 15 July 2011 and consists of the staged redevelopment of the site for residential purposes including: 650 dwellings with a maximum 63,500 sqm of gross floor area (GFA) comprised of 150 social housing dwellings and 500 privately owned dwellings; maximum building envelopes; car parking; landscaping; open space; infrastructure works; and public domain improvements. The site fronts Kentucky Road, Washington Avenue and Vermont Crescent, Riverwood.

The major project application seeks approval for Stage 1 of the concept plan which consists of construction of three residential flat buildings in the south-eastern portion of the site providing a total 13,287 sqm of GFA for the social housing dwellings (Buildings A, B & C); basement car parking for 30 car spaces; site preparation works including remediation and excavation; landscaping and public domain improvements across the site; and consolidation of the site and super lot subdivision of the site into nine lots.

The Capital Investment Value (CIV) of the proposal is \$61.95 million. The proposal would create 360 full time equivalent construction jobs.

On 17 October 2010, the Executive Director, Major Projects Assessment, as delegate of the Minister, formed an opinion that the Riverwood North Estate Residential Renewal Project is a Major Project under clause 13 of Schedule 1 of the MD SEPP, as it is a residential, retail or commercial development and has a CIV of greater than \$100 million. As Director General's Environmental Assessment Requirements were issued for Stage 1, the project has been identified as a transitional Part 3A project as a result of the repeal and transitional arrangements adopted on 1 October 2011 relating to the repeal of Part 3A. The application will be determined by the Planning Assessment Commission (PAC) by special delegation from the Minister dated 5 November 2011. The Minister has delegated determination to the PAC as the private sector partner has made a political donation disclosure; and the PAC determined the original concept plan application.

The site is zoned Residential 2(c4) and Open Space Existing Recreation 6(a) under the Canterbury Planning Scheme Ordinance and multi-unit housing is permissible within the residential zone. No residential building works are proposed for the open space zone.

The proposal was exhibited from 17 February 2011 to 2 April 2011. The department received four submissions from public authorities being Roads and Traffic Authority, Department of Transport, Sydney Water and the Office of Environment and Heritage. Comments regarding promotion of public transport and water and drainage connections were provided as well as recommended conditions.

On 5 August 2011, the proponent submitted a Preferred Project Report to address issues raised by the department and public authorities. The key modifications

included increased car parking from 15 to 30 car spaces, consolidation of the two basement car parks under Buildings A and B into a single basement car park, provision of additional privacy measures in Building A, reduction in the parapet height of Building B by 100mm and Building C by 300 mm, revised apartment layouts in Building B to improve solar access for seven units, modified subdivision layout with the amalgamation of the two formerly separate proposed lots for Buildings A and B.

Council reviewed the PPR and acknowledged that Stage 1 addresses the concept plan requirements, including additional car parking and privacy measures. Council also requested: that further design details for the civil works and stormwater management be submitted to council; a rainwater tank be provided for Building C; consideration be given to the relocation of the vehicle entry for Buildings A and B to avoid potential pedestrian and vehicle conflict in the shared zone; the bio-retention swales and any water sensitive urban design measures be located on private land; and clarification regarding which open space areas will be dedicated as public land.

The department has assessed the merits of the proposal and the key issues associated with the project include built form and urban design, environmental and residential amenity, transport and traffic impacts and development contributions. The department is satisfied that the impacts of the proposed development have been addressed via the Environmental Assessment, Preferred Project Report and Statement of Commitments, and can be adequately managed through the recommended conditions of the project approval.

The department is also satisfied that the site is suitable for the proposed use. The proposal is consistent with the approved Riverwood North Estate Residential Renewal concept plan, strategic planning objectives including NSW 2021, as it would result in the direct delivery of affordable housing. The proposal would also contribute toward the dwelling targets set in the Metropolitan Plan for Sydney 2036 and the draft South Subregional Strategy. Consequently, the department considers the project is in the public interest and recommends that that the major project be approved, subject to conditions.

TABLE OF CONTENTS

1.	BACKGROUND	1
1.1	Site Location and Description	1
1.2	Surrounding Development	4
2.	PROPOSED PROJECT	5
2.1.	Project Description	5
2.2.	Project Need and Justification	7
3.	STATUTORY CONTEXT	7
3.1.	Major Project	7
3.2.	Delegation to the Planning Assessment Commission	8
3.3.	Permissibility	8
3.4.	Concept Plan	9
3.5.	Environmental Planning Instruments	9
3.6.	Objects of the EP&A Act	10
3.7.	Ecologically Sustainable Development	10
3.8.	Statement of Compliance	11
4.	CONSULTATION AND SUBMISSIONS	11
4.1.	Exhibition	11
4.2.	Public Authority Submissions	12
4.3.	Proponent's Response to Submissions	13
5.	ASSESSMENT	15
5.1.	Built Form and Urban Design	15
5.2.	Environmental and Residential Amenity	19
5.3.	Transport and Traffic Impacts	28
5.4.	Development Contributions	29
5.5.	Draft Conditions	29
6.	CONCLUSION	29
7.	RECOMMENDATION	30
APPENDIX A	ENVIRONMENTAL ASSESSMENT	31
APPENDIX B	PROPONENT'S RESPONSE TO SUBMISSIONS	32
APPENDIX C	SUBMISSIONS	33
APPENDIX D	CONSIDERATION OF ENVIRONMENTAL PLANNING INSTRUMENTS	34
APPENDIX E	POLITICAL DONATION DISCLOSURE	38
APPENDIX F	RECOMMENDED CONDITIONS OF APPROVAL	39

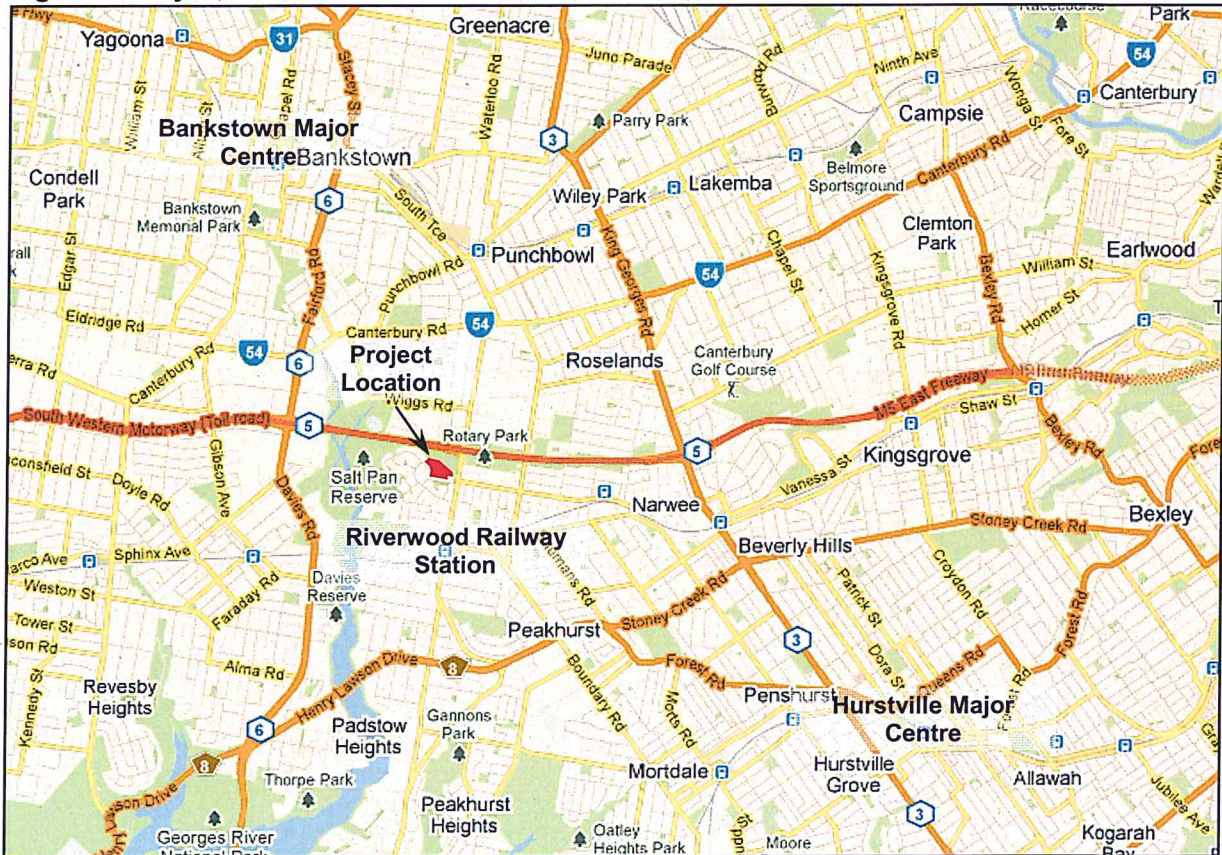
1. BACKGROUND

Housing NSW (the proponent) proposes to deliver Stage 1 of the Riverwood North Estate Residential Renewal Project, at Kentucky Road, Washington Avenue and Vermont Crescent, Riverwood.

The Riverwood North Estate Residential Renewal Project concept plan was approved on 15 July 2011 and consists of the staged redevelopment of the site for residential purposes including: 650 dwellings with a maximum 63,500 sqm of gross floor area (GFA) comprised of 150 social housing dwellings and 500 privately owned dwellings; maximum building envelopes; car parking; landscaping; open space; infrastructure works; and public domain improvements.

The proponent seeks approval for Stage 1 of the concept plan which consists of construction of three residential flat buildings in the south-eastern portion of the site providing a total 13,287 sqm of GFA for the social housing dwellings (Buildings A, B & C – Phase 1); basement car parking with 30 car spaces; site preparation works including remediation and excavation; landscaping and public domain improvements across the site; and consolidation of the site and super lot subdivision of the site into nine lots. The project location is shown in Figure 1.

Figure 1: Project location



1.1 Site Location and Description

The project site is 3.55 hectares in size and is legally described as lots 445-446, 450, 459-460 and 464 and part lots 449 and 458 in DP 243672. The site is owned by Housing NSW, Canterbury City Council and Energy Australia. The site forms part of the north-eastern precinct of the Riverwood Estate (see Figure 2).

Figure 2: Riverwood Estate boundary and project site



The site falls from south-west to the north-east. The site is now vacant land as the previous residential flat buildings have recently been demolished (see Figures 3-5).

Figure 3: Currently vacant land at the location of Buildings A and B



Figure 4: Currently vacant land at the location of Building C**Figure 5: Currently vacant land for Phase 2 private housing development**

The site is located 700 metres from the Riverwood Railway Station and 500 metres from the Riverwood retail centre. The site is also supported by major road infrastructure with access to the M5 Motorway located approximately 300 metres to the north. The Riverwood Estate is generally surrounded by Salt Pan Creek Reserve to the north and the west, including Salt Pan Creek to the west. The Estate is generally surrounded by low and medium density residential development, with pockets of light industrial uses and business parks located north of the motorway and west of the creek. The site is also well serviced by public schools, with Riverwood Public School located 300 metres to the south-west, Hannans Road Public School located 500 metres to the east of the site, Georges River College Peakhurst Campus located 2.4 kilometres to the south and Beverly Hills Girls High School located 2.5 kilometres to the east.

1.2 Surrounding Development

Located immediately to the north of the site is a community garden and the Salt Pan Creek Reserve; to the east is the Riverwood Community Centre, including a skate park, and the council operated seniors citizen's centre; to the south are two 9 storey Housing NSW residential flat buildings; and to the west are three storey walk up flat buildings (see Figures 6 to 11).

Figure 6: Community Gardens



Figure 7: Salt Pan Creek Reserve



Figure 8: Riverwood Community Centre



Figure 9: Senior Citizen's Centre



Figure 10: Nine storey Housing NSW Residential Flat Buildings



Figure 11: Three storey Housing NSW Residential Flat Buildings



2. PROPOSED PROJECT

2.1. Project Description

The project application seeks approval for:

- construction of Phase 1 of the concept plan comprising three residential flat buildings for social housing purposes, comprising 13,287 sqm of GFA (Buildings A, B & C) including basement car parking for 30 car spaces
- site preparation works across the entire concept plan site, including remediation and excavation
- landscaping and public domain improvements across the entire concept plan site
- consolidation of the concept plan site and super lot subdivision into nine lots.

The proposed buildings A and B will be located on proposed Lot 1 and Building C would be located on proposed Lot 8. The project layout is shown in Figures 12 to 13 and the proposed subdivision plan is shown in Figure 14. The key components of the project as they relate to the Phase 1 buildings are listed in Table 1.

Table 1: Key Project Components

Aspect		Description					
		Building A		Building B		Building C	
Units		67		56		27	
No. of 1 and 2 Bedroom Units		1 Bed 45	2 Bed 22	1 Bed 47	2 Bed 9	1 Bed 27	2 Bed -
Site Area		4,046 sqm				1,060 sqm	
GFA		5,801 sqm		5,243 sqm		2,243 sqm	
FSR		2.7:1				2.1:1	
Building Footprint		1,081 sqm		735.75 sqm		546.5 sqm	
Car parking spaces		30				0	
Height	Storeys	Part 6 and part 7		Part 7 and part 9		4	
	RL	6 storey 32.6 m	7 storey 35.5 m	7 storey 35.7 m	9 storey 41.5 m	26.7 m	
Total car parking spaces		30					
Total GFA		13,287 sqm					
CIV		\$61.95 million					
Jobs		360 full time equivalent construction jobs					

Figure 12: Phase 1 building layout

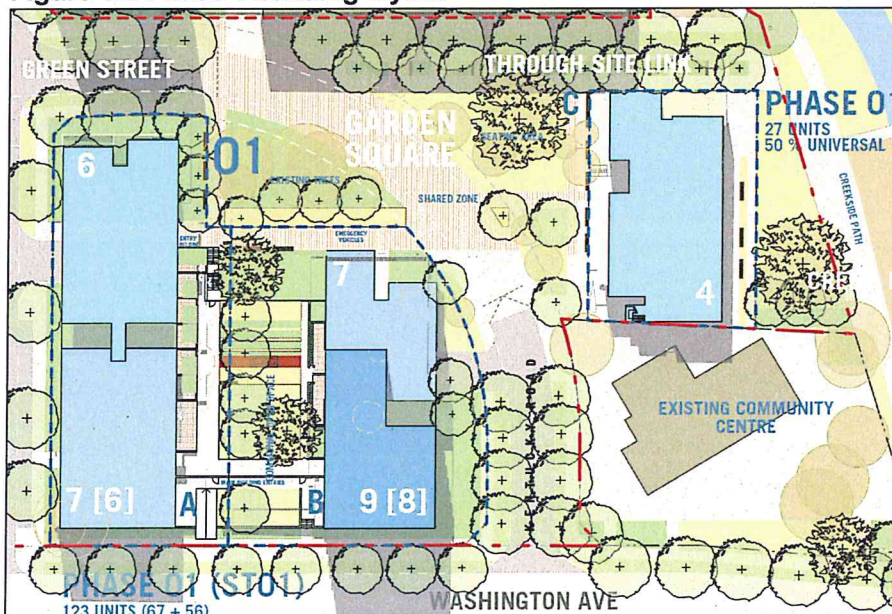


Figure 13: Stage 1 public domain works and landscaping

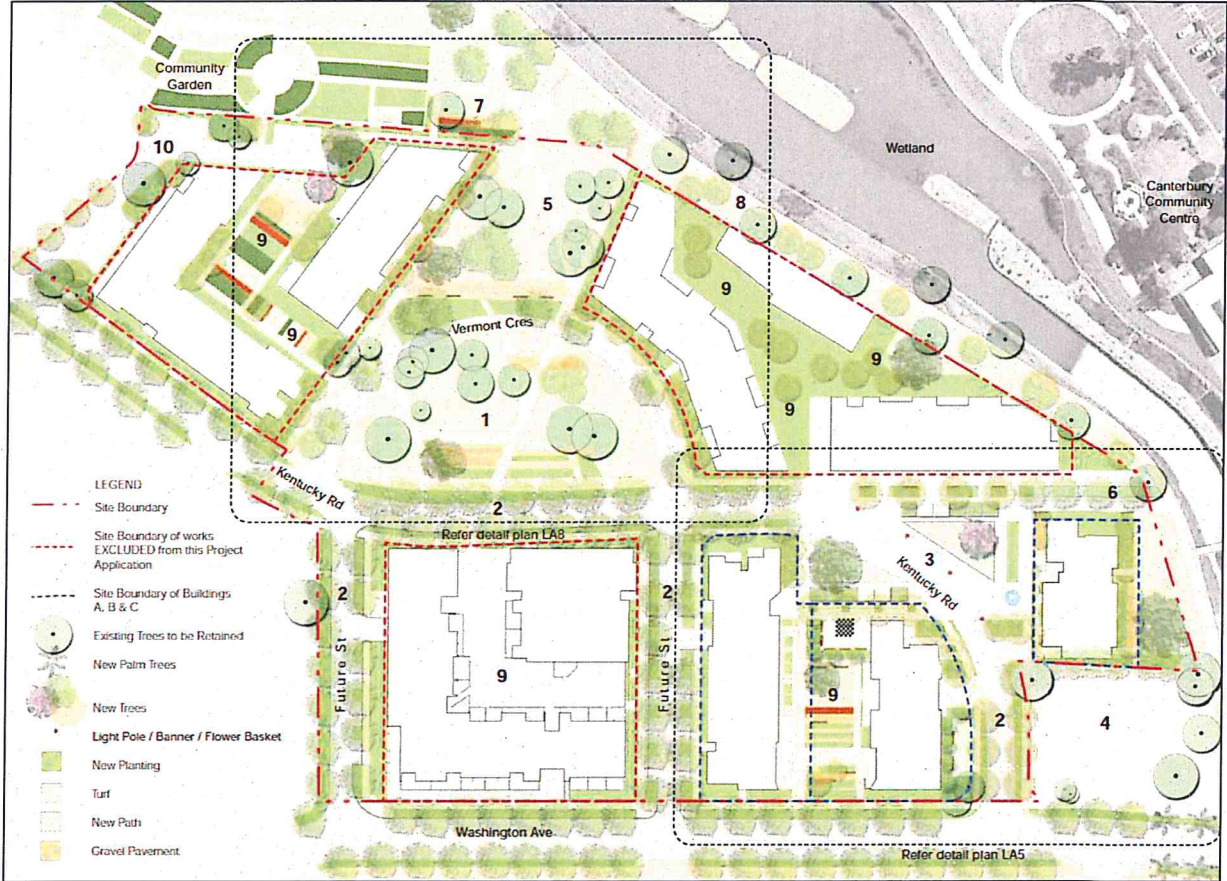
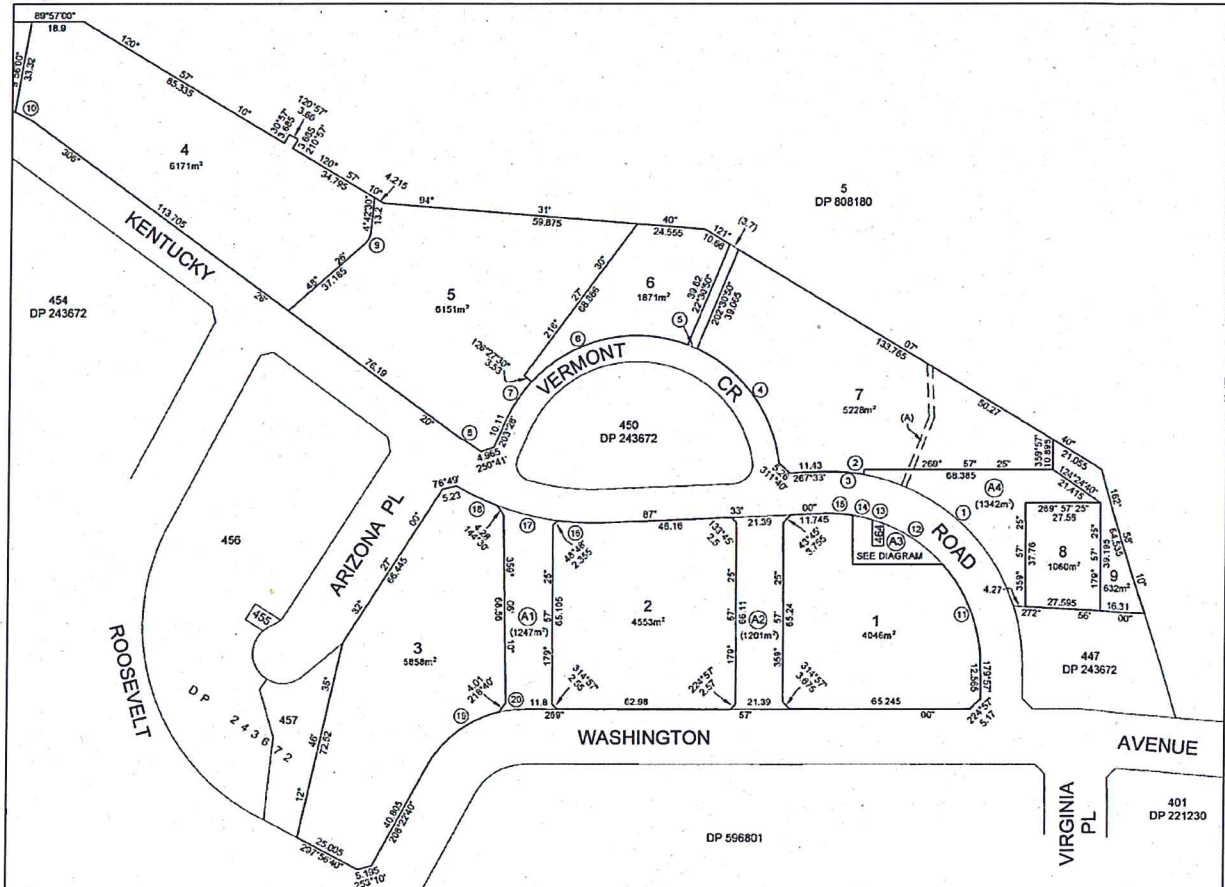


Figure 14: Super lot subdivision



2.2. Project Need and Justification

Stage 1 of the Riverwood North redevelopment would provide a public benefit to the community by providing new social housing dwellings to replace ageing and dated social housing stock as well as public domain upgrades. The Phase 1 housing will be directly providing affordable housing by delivering one and two bedroom apartments, instead of bedsits and three bedroom apartments, housing that is more suitable to the needs of the Housing NSW clients. The dwellings are designed to meet the requirements of those most in need including seniors and persons with a disability. Over 85 per cent of the dwellings will be developed specifically to address the needs of these groups by adopting a universal design. Universal design is similar to the design of adaptable units and ensures the units and environments are designed to be usable by all people, to the greatest extent possible, without the need for expensive modifications or specialised design.

The proposal is consistent with the aims and objectives of NSW 2021, including:

- direct delivery of affordable housing
- facilitating the delivery of 25,000 new homes by consolidating the social housing and allowing the orderly and economic development of the remainder of the site for additional private dwellings
- increasing housing within 30 minutes by public transport to major centres.

The site is suitable for social housing as it is well situated in close proximity to the Riverwood retail centre, identified as a "Small Village" in the draft Subregional Strategy where local retail services are available as well as strong public transport linkages. The site is also located in close proximity to a number of community facilities, including the Riverwood Community Centre, public schools, community gardens, open space areas and recreation facilities.

The Metropolitan Plan for Sydney 2036, developed to support the continuing economic growth of Sydney and enhance its standing as a global city, places the Canterbury City Council area in the south subregion. The draft South subregional strategy that is informed by the overarching Metropolitan Plan for Sydney 2036 prescribes a housing target for the subregion of 35,000 new dwellings in existing areas by the year 2031. The draft South Subregional Strategy also identifies the Canterbury LGA contributing 7,100 of those dwellings. The consolidation of the social housing dwellings which enables private housing development on the remainder of the Riverwood North Estate would therefore assist in contributing to dwelling targets for the Canterbury LGA and the South Subregion.

3. STATUTORY CONTEXT

3.1. Major Project

On 17 October 2010, the Executive Director, Major Projects Assessment, as delegate for the Minister for Planning, formed an opinion that the project is a major project under clause 13 (residential, commercial or retail projects) of Schedule 1 to the MD SEPP, as it would be development for the purpose of residential, commercial or retail with a capital investment of more than \$100 million and authorised the submission of a concept plan for the proposal. On 15 July 2011, the Planning Assessment Commission, as delegate for the Minister for Planning and Infrastructure, approved a concept plan for the Riverwood North Estate Residential

Renewal project under Part 3A of the *Environmental Planning and Assessment Act 1979* (the Act).

Part 3A of the Act, as in force immediately before its repeal on 1 October 2011 and as modified by Schedule 6A to the Act, continues to apply to transitional Part 3A projects. Director-General's environmental assessment requirements (DGRs) were issued in respect of this project prior to 8 April 2011, and the project is therefore a transitional Part 3A project.

Consequently, this report has been prepared in accordance with the requirements of Part 3A and associated regulations, and the Minister (or his delegate) may approve or disapprove of the carrying out of the project under section 75J of the Act.

3.2. Delegation to the Planning Assessment Commission

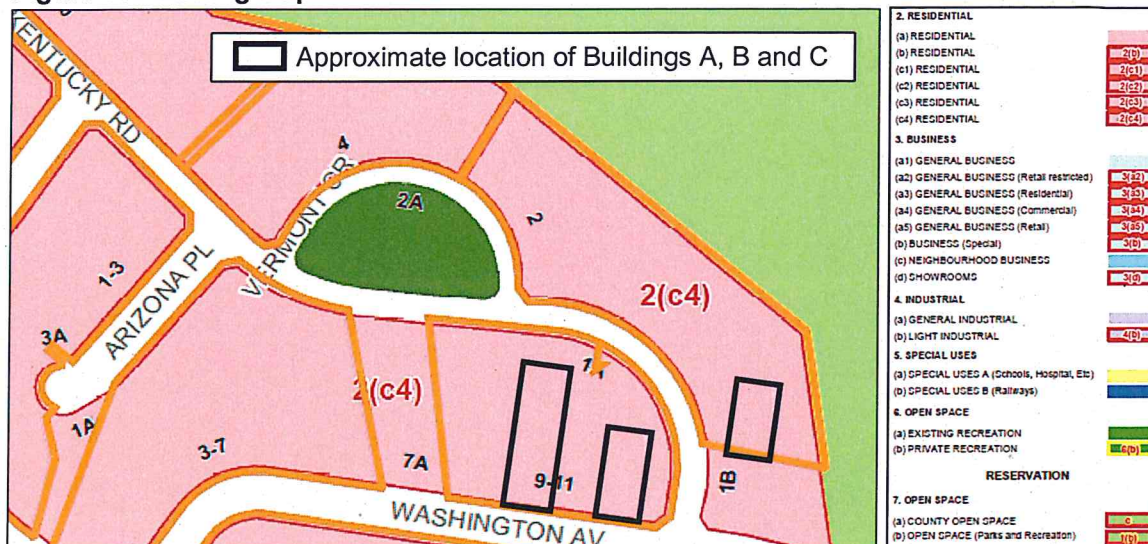
On 14 September 2011, the Minister delegated his powers and functions under Part 3A of the Act to the Planning Assessment Commission effective from 1 October 2011 for applications made before or after 1 October 2011 (including reportable political donation applications) other than applications made by or on behalf of a public authority. As the proponent is a public authority, this delegation does not apply.

The development overall (although not this stage) is a joint venture with Payce who has made a statement disclosing a reportable political donation lodged with this application (see Appendix E). The related concept plan application was determined by the PAC (due to the disclosure of political donations). The department considers it is appropriate that the PAC determine the subject project application. Therefore, the department recommended that the Minister delegate his functions under section 75J to the PAC for determination of the subject project application in order to maintain consistency and transparency. On 5 November 2011, the Minister delegated his functions under section 75J in respect of the subject transitional Part 3A project to the PAC accordingly.

3.3. Permissibility

The site is zoned Residential 2(c4) and Open Space Existing Recreation 6(a) under the Canterbury Planning Scheme Ordinance (CPSO) (see Figure 15). The proposal is permissible under the Residential 2(c4) zoning and no residential building works are proposed for the Open Space Existing Recreation 6(a) zone. Furthermore, the approved concept plan for the site establishes the location of residential uses and open space areas across the site. The proposed buildings and public domain works are consistent with the uses permitted under the concept plan.

Figure 15 – Zoning Map



3.4. Concept Plan

On 15 July 2011, the Planning Assessment Commission, as delegate for the Minister for Planning and Infrastructure, approved a concept plan for the Riverwood North Estate Residential Renewal project under Part 3A of the Act. The concept plan was modified on 29 September 2011 to amend height limits for the private housing building envelopes (Phase 2).

The Riverwood North Estate Residential Renewal concept plan establishes the framework for the staged redevelopment of the site for residential purposes. The main parameters approved in the concept plan include:

- (a) a maximum 650 dwellings comprised of 150 social housing dwellings and 500 privately owned dwellings
- (b) a maximum gross floor area of 63,500 sqm
- (c) building envelopes including a maximum overall building height of:
 - i) 9 storeys for Phase 1 Stage 1
 - ii) 4 storeys for Phase 1 Stage 2
 - iii) 10 storeys for Phase 2 Stage 1
 - iv) 9 storeys for Phase 2 Stage 2 & 3
 - v) 9 storeys for Phase 2 Stage 4
- (d) car parking at a rate of one space per five dwellings for the social housing component and car parking rates consistent with Council's guidelines for the private housing component
- (e) landscaping, open space, and infrastructure
- (f) public domain improvements.

The proposed buildings and public domain works are consistent with the development parameters established under the concept plan.

3.5. Environmental Planning Instruments

Under sections 75I(2)(d) and 75I(2)(e) of the EP&A Act, the Director-General's report for a project is required to include a copy of, or reference to, the provisions of any State Environmental Planning Policy (SEPP) that substantially governs the carrying out of the project, and the provisions of any environmental planning instruments (EPI) that would (except for the application of Part 3A) substantially govern the carrying out

of the project and that have been taken into consideration in the assessment of the project.

The department's consideration of relevant SEPPs and EPIs is provided in Appendix D and include:

- State Environmental Planning Policy (Major Development) 2005
- State Environmental Planning Policy (Infrastructure) 2007
- State Environmental Planning Policy No. 55 - Remediation of Land
- State Environmental Planning Policy No 65 - Design Quality of Residential Flat Development
- State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004
- Canterbury Planning Scheme Ordinance.

3.6. Objects of the EP&A Act

Decisions made under the EP&A Act must have regard to the objects of the Act, as set out in Section 5 of the Act. The relevant objects are:

- (a) *to encourage:*
- (i) *the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,*
 - (ii) *the promotion and co-ordination of the orderly and economic use and development of land,*
 - (iii) *the protection, provision and co-ordination of communication and utility services,*
 - (iv) *the provision of land for public purposes,*
 - (v) *the provision and co-ordination of community services and facilities, and*
 - (vi) *the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
 - (vii) *ecologically sustainable development, and*
 - (viii) *the provision and maintenance of affordable housing, and*
- (b) *to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and*
- (c) *to provide increased opportunity for public involvement and participation in environmental planning and assessment.*

The department has considered the objects of the EP&A Act and considers that the application is consistent with the relevant objects. The assessment of the application in relation to these relevant objects is provided in Section 3.7 and Section 5 of this report.

3.7. Ecologically Sustainable Development

The EP&A Act adopts the definition of Ecologically Sustainable Development (ESD) found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- (a) *the precautionary principle,*
- (b) *inter-generational equity,*
- (c) *conservation of biological diversity and ecological integrity,*
- (d) *improved valuation, pricing and incentive mechanisms.*

The proposal is located within an urban footprint on a previously developed and disturbed site and will not result in the loss of any threatened or vulnerable species, populations, communities or significant habitats. The site is also unlikely to be impacted by changes in sea level resulting from climate change.

The proposal sets out the following ESD initiatives that will be incorporated into the design of future buildings:

- natural cross-flow ventilation to habitable rooms
- maximise northerly orientation to maximise solar access
- provision of gas boosted solar hot water
- provision of solar shading devices including sliding louvres to north facing properties to minimise solar penetration and glare
- provision of water efficient fixtures
- provision of energy efficient lighting and other electrical fittings
- harvesting of rainwater for landscaping
- use of low embodied energy and recycled/reused materials
- provision of bicycle storage to promote sustainable transport options
- water sensitive urban design measures as part of the public domain works.

The Phase 1 buildings will achieve thermal performance, energy efficient and water efficient ratings in accordance with BASIX requirements as outlined in Table 2.

Table 2 – BASIX Performance Targets

BASIX Requirement	BASIX Target	Proposal
Thermal Performance	Satisfactory	Satisfactory
Water Rating	40%	44%
Energy Rating	30%	31%

The department is satisfied that the proposal adequately incorporates ESD principles into the Stage 1 redevelopment of the site.

3.8. Statement of Compliance

In accordance with section 75I of the EP&A Act, the department is satisfied that the Director-General's environmental assessment requirements have been complied with.

4. CONSULTATION AND SUBMISSIONS

4.1. Exhibition

Under section 75H(3) of the EP&A Act, the Director-General is required to make the environmental assessment (EA) of an application publicly available for at least 30 days. After accepting the EA, the department publicly exhibited it from 25 May 2011 until 24 June 2011 (31 days) on the department's website, and at the department's Information Centre and at Canterbury City Council's offices. The department also advertised the public exhibition in the Canterbury-Bankstown Express on 24 May 2011 and in the Daily Telegraph and Sydney Morning Herald on 25 May 2011.

Adjoining landholders and relevant state and local government authorities were also notified in writing.

The department received four submissions during the exhibition of the EA from public authorities. No submission was received from Council. A summary of the issues raised in submissions is provided below.

4.2. Public Authority Submissions

A total of four submissions were received from public authorities.

The **Roads and Traffic Authority (RTA)** does not object to the project and reiterated that the following comments and recommended conditions provided in response to exhibition of the concept plan are still applicable:

- traffic signals at the intersection of Roosevelt Avenue and Belmore Road are not required as the intersection would continue to operate satisfactorily and the traffic/pedestrian movement and number of accidents at this intersection do not meet the relevant criteria to justify the installation of traffic signals
- off-street car parking provisions and loading areas shall be provided in accordance with the department's and council's requirements
- layout of car parking, loading areas and driveways shall be designed in accordance with Australian Standards
- disabled car parking spaces should be clearly marked
- a construction traffic management plan is required prior to construction certification
- traffic control during construction must be carried out by accredited RTA approved traffic controllers
- the proposal requires further consideration of pedestrian safety
- the swept path of the longest vehicle and manoeuvrability through the site is to be in accordance with AUSTRROADS and is to be endorsed by council
- all loading and unloading shall be contained within the site and the loading bay is to be clearly signposted and line marked
- all vehicles to enter and exit the site in a forward direction
- all works/ signposting to be at no cost to the RTA.

Office of Environment and Heritage (OEH) does not object to the project and raised no issues.

Transport NSW does not object to the project and provided the following comments and recommended conditions:

- a travel access guide shall be prepared for future residents
- bicycle storage facilities should be provided at key locations within the site.

Sydney Water does not object to the project and provided the following comments and recommended conditions:

- the drinking water system has limited capacity to service the development and two new 200mm water mains would need to be constructed and the existing 150mm main would need to be upgraded to a 200 mm water main
- the wastewater system has limited capacity to service the development and an upgrade of the existing wastewater main to 300mm is required and the extension

of this main to within the site is required as well as internal waste water infrastructure in accordance with the Sewerage Code of Australia

- the proponent is required to obtain a section 73 certificate and Sydney Water will further assess the impact of individual developments when the proponent applies for a section 73 certificate
- the proponent must fund any adjustments needed to Sydney Water infrastructure.

4.3. Proponent's Response to Submissions

4.3.1 Preferred Project Report

Housing NSW provided a response to the issues raised in submissions (see Appendix B) on 5 August 2011. The response included a Preferred Project Report which incorporated the following changes:

- increase in car parking from 15 to 30 car spaces and subsequently the amalgamation of the two basement car parks under Buildings A and B into a single basement car park under Buildings A and B and their communal open space area
- provision of additional privacy measures on the southern and northern elevations in the separation between the two towers of Building A
- reduction in the parapet height of the northern part of Building B by 100 mm and Building C by 300 mm
- removal of the western basement car park entry and consequent modifications to the façade of the western elevation of Building A
- modified layout of seven units within Building B to improve solar access
- modified subdivision layout with the amalgamation of the two formerly proposed separate lots for Building A and B to form one lot due to the common basement car park
- modified design of the mail rooms to facilitate easier mail delivery and access
- minor layout changes to ensure alignment between levels
- additional window to the community room
- minor modifications to the landscaping including removal of existing substation, removal of gravel pavements, removal of BBQ areas, removal of trees, relocation of trees, additional planting, additional street furniture and revised WSUD elements.

Council's comments

The department forwarded the PPR to council for review. Council provided the following comments:

- acknowledged that Stage 1 had been revised to address concept plan modifications which required additional car parking and privacy measures between the two towers of Building A
- identified that further design details for the civil works and stormwater management are required to be provided to council for approval prior to commencement of works including whether the trunk drainage system forms part of Stage 1
- requested confirmation that a rainwater tank will be provided for Building C and the proposed location of the tank
- the proposed location of the vehicle entry for Buildings A and B should be relocated to the western edge of Building A as the current location would potentially result in pedestrian and vehicle conflict given it adjoins the proposed shared zone

- does not support bio-retention swale within the road reserve and any water sensitive urban design measures shall be located on private land to minimise any ongoing maintenance requirements for any land to be dedicated to council as public land and any measures located on public land will need to be approved by council prior to commencement of works
- further clarification regarding which open space areas will be public open space or open space areas accessible to the public or communal private open space.

Proponent's further response

The department forwarded council's comments to the proponent. The proponent provided the following response to council's comments:

- a revised ground floor plan has been provided showing the location of rainwater tank for Building C
- the civil works, stormwater management works and water sensitive urban design measures have been resolved in consultation with council and whilst the PPR did not provide the details, the original plans in the environmental assessment addressed council's requirements, and further detailed designs at Construction Certificate stages would be subject to further council approval including the trunk drainage
- the location of the vehicle entry for Buildings A and B has been situated on the eastern boundary of Building A as a western entry on Building B would require a significant increase to the height of the building beyond the approved building envelope to address flood clearance requirements from stormwater overland flow
- whilst the eastern entry is located in the vicinity of the shared zone, the shortest, most common and logical route to main access roads would be via Washington Avenue thereby limiting potential pedestrian conflict as vehicles would have minimal need to traverse the shared zone.

Department comment

The department considers that the civil works, stormwater management works and water sensitive urban design measures have been designed to address council's requirements and future detailed design stages would confirm that they meet council's design specifications. As the future ownership and ongoing maintenance of these works would be the responsibility of council, as it is envisaged that these areas will be dedicated to council, the department has recommended that the detailed designs and drainage systems be approved by council prior to commencement of works. In regards to the vehicle entry the department accepts that the location would not pose a substantial risk given vehicle activity within the shared zone is expected to be minimal.

5. ASSESSMENT

The department considers the key environmental issues for the project to be:

- built form and urban design
- environmental and residential amenity
- transport and traffic impacts
- development contributions.

5.1. Built Form and Urban Design

5.1.1 Bulk and scale

The approved concept plan for the Riverwood North Estate establishes the framework for the redevelopment of the site including the maximum building envelopes. The maximum building envelopes ensure that the bulk and scale of future development within the site is managed appropriately and therefore established appropriate maximum height and floor space ratio limits. The proposed Phase 1 buildings are located within the envelopes and comply with the height and floor space restrictions (see Table 3).

Table 3 – Consistency with concept plan building envelopes

	Proposed	Concept Plan Limits	Compliance
Height			
Building A (see Figure 16)	part 6 part 7 storeys RL 32.6 / RL 35.5	part 6 part 7 storeys RL 32.7 / RL 35.7	Yes
Building B (see Figure 17)	part 7 part 9 storeys RL 35.7 / RL 41.5	part 7 part 9 storeys RL 35.7 / RL 41.5	Yes
Building C (see Figure 18)	4 storeys RL 26.7	4 storeys RL 26.7	Yes
GFA			
Building A + B	11,045 sqm	11,045 sqm	Yes
Building C	2,243 sqm	2,243 sqm	Yes
FSR			
Building A + B	2.7:1	2.7:1	Yes
Building C	2.1:1	2.1:1	Yes

Figure 16: Building A west elevation



Figure 17: Building B east elevation

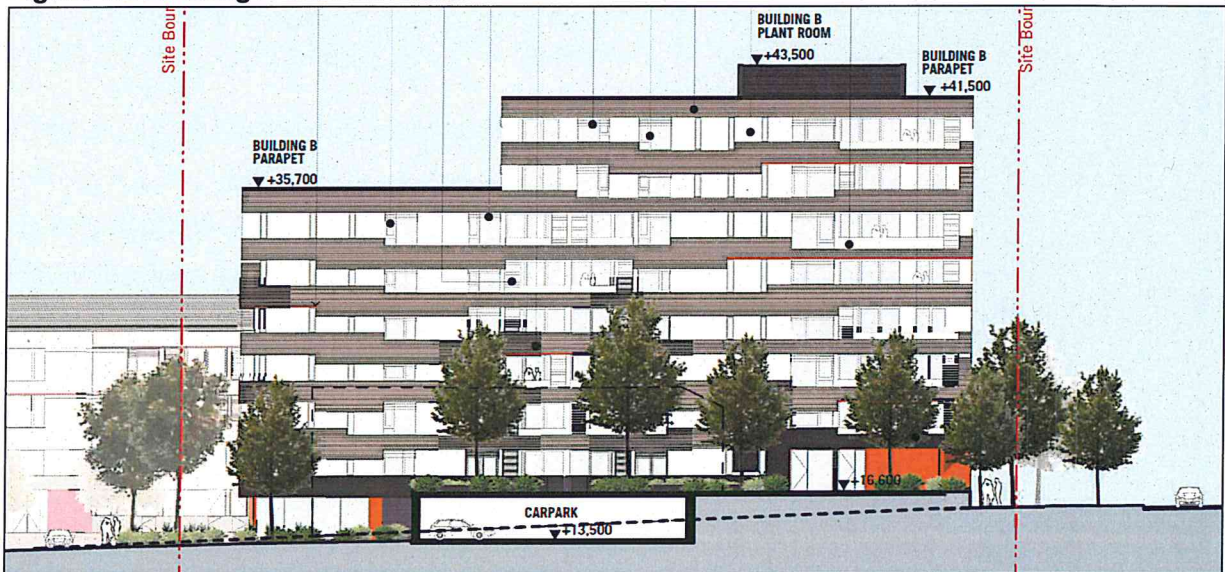
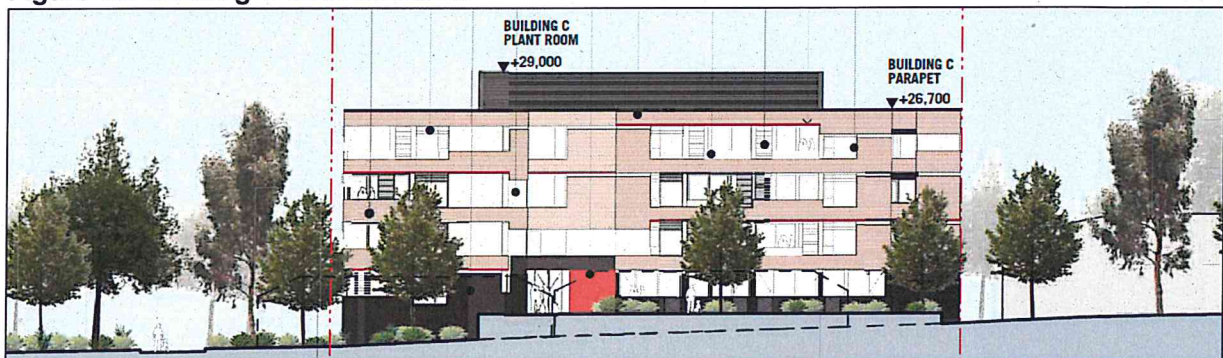


Figure 18: Building C west elevation



The bulk and scale of the proposed buildings within Phase 1 are comparable with the nine storey residential flat buildings to the south and the future development envisaged for the site. The proposed heights provide a transition from the existing nine storey residential flat buildings. Nine storeys is provided within the southern portion of Building B to provide an appropriately scaled interface with the existing buildings, which then transitions to seven and six storeys to the west (Building A), seven storeys to the north (northern portion of Building B) and four storeys to the

west (Building C). This ensures that the Phase 1 buildings step down towards the north and east to provide a varied skyline and a transition to the east where lower scale development and open space areas adjoin the Riverwood North site.

Additional architectural design measures have been incorporated into the design of the buildings to minimise the bulk and scale of the development. These features include modulation of the facades, recessed balconies, separation of the two cores within Building A, stepped heights of Buildings A and B, articulation of the façades and the use of varied materials to minimise the uniformity and solid appearance of the longer eastern and western elevations of the three buildings.

The department considers the scale of development would provide an appropriate interface with the existing and future high density residential development. The proposal also supports a transition, both within the site and to the surrounding lower scale buildings and open space areas. The proposal would result in a varied skyline that provides relief in the massing of the development across the site. As recognised in the concept plan approval, the proposed density is required to support urban renewal, regeneration of social housing stock and increased housing supply.

Accordingly, the department considers the bulk and scale generally acceptable as:

- it is consistent with the building envelopes in the concept plan
- it is contributing to the revitalisation and renewal of an area identified as suitable for a higher density urban character
- it is comparable to the development immediately to the south of the site
- the site is supported by highly accessible services and infrastructure
- the open space and community areas to the east would assist in mitigating the bulk and scale impacts and would indirectly benefit from increased patronage and passive surveillance from the development
- the proposal would have acceptable amenity impacts given the general buffers provided by open space areas and the existing and proposed road network
- an assessment against the SEPP 65 principles and the Residential Flat Design Code (RFDC) best practice guides demonstrates that the proposal can provide adequate amenity outcomes for future residents (see Section 5.2).

5.1.2 Layout

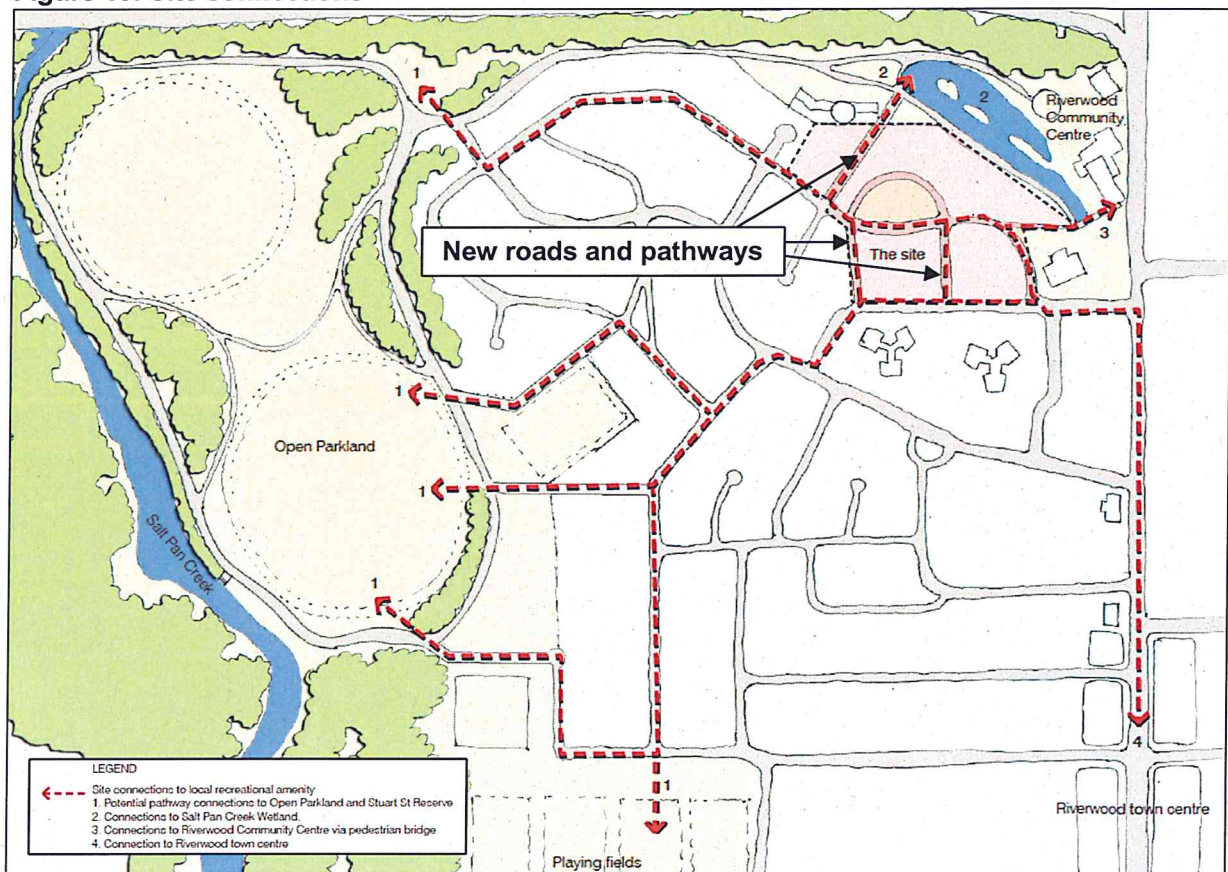
The existing street layout of the site has similar characteristics of social housing estates where permeability is impeded through the use of winding roads and cul-de-sacs, which is further evident in the remainder of the Riverwood Estate. Stage 1 seeks to provide new linkages and public domain upgrades to support the Phase 1 residential buildings and to prepare the site for future private development stages. The provision of the public domain upgrades as part of Stage 1 is consistent with the staging in the concept plan. The new streets and the layout are also consistent with the concept plan and will support greater connectivity and permeability.

The proposed development provides a more regular pattern with new streets and open space areas proposed to break up the existing blocks and provide more direct linkages to open space areas (see Figure 19). The previous development on the site comprised larger blocks with pathways that would traverse through private communal open space areas. The smaller blocks and clearer delineation between private and public open space areas will address the visibility of the communal open space area and help reduce anti-social behaviour.

The revised layout will support crime prevention through environmental design (CPTED) principles by:

- reinforcing boundaries through the orientation and alignment of new buildings along street edges and open space areas which also supports a high level of passive surveillance for public domain areas
- establishing clearer delineation between private open space, communal private open space and public open space
- restricting access to private communal open space areas to reinforce boundaries between public and private areas which will also foster a stronger sense of ownership over the private communal open space areas
- directing access around the new buildings by providing smaller blocks and establishing more direct and clear pathways along the block boundaries
- increased activation through provision of direct entries for a substantial portion of the ground floor apartments and direct entries into the buildings from the public domain interface
- increased activity and surveillance in active open space areas by attracting and promoting use of these areas through increased landscaping, furniture and recreational equipment.

Figure 19: Site connections



The department considers the proposed layout and public domain improvements in Stage 1 are appropriate and will promote clearer linkages and provide improved permeability. The department also considers the design is suitable for the site as it adopts CPTED principles and seeks to achieve the orderly and economic development of the land.

5.2. Environmental and Residential Amenity

The design quality principles of SEPP 65 and Residential Flat Design Code (RFDC) aim to ensure adequate environmental and residential amenity can be achieved in new residential flat buildings. The RFDC sets out a number of 'rules of thumb' which provide numeric guidelines for residential flat development that would ensure the development complies with the intent of the SEPP 65. Provided in Table 4 is a summary of the proposal's compliance against the RFDC.

Table 4: Proposed buildings compliance with RFDC requirements

RFDC Requirements		Proposed	Compliance
Building depth	18 m	Approx. 18.7 m	No
Separation up to 4 storeys (up to 12 m)	12 m between habitable rooms / balconies	23.5 m between Buildings A and B 27.9 m between Buildings B and C 3.9 m between two towers of Building A	Partial compliance
Separation between 4 and 8 storeys (12 m - 25 m)	18 m between habitable rooms / balconies	23.5 m between Buildings A and B	Complies
Floor to ceiling	2.7 m	2.7 metres	Complies
Units per core area	Max. 8	Building A – Max. 6 units Building B – Max. 8 units Building C – Max. 7 units	Complies
Solar access	70% of units to achieve 2 hours in mid-winter	Building A – 72% Building B – 62% Building C – 52%	Building A – Complies Building B – No Building C – No
Cross-ventilated units	60%	66%	Complies
Communal open space	25%- 30% of site	1,385 sqm	Complies
	25% deep soil planting	1,317 sqm	Complies
Private open space	Courtyards - 25 sqm and 4m depth	Varies (see Section 5.2.3)	Building A – No Building B – No Building C – Complies
	Balconies – 2 m depth	Varies – Min. 2 m	Complies
Unit size	1 bedroom – 50 sqm	Varies – Min. 52.5 sqm	Complies
	2 bedroom – 70 sqm	Varies – Min. 70 sqm	Complies
Storage	1 bedroom – 6 sqm	6 sqm	Complies
	2 bedroom – 8 sqm	8 sqm	Complies
Single aspect units	Max 8 m depth	Varies – Max. 7.97 m	Complies
	Max. 10% south facing	Nil	Complies
Kitchen to window	Max. 8 m	Varies - Max. 8 m	Complies
15 m cross-through units	Min. 4 m width	4 m	Complies
Ground floor units	20 % barrier free access	100%	Complies
Vehicle access	Min. width 6 m	6 m	Complies

The proposed Phase 1 buildings are generally consistent with the concept plan building envelopes which have been established to achieve the desired future character for the area. The minor variation to the maximum building depth of all three buildings by approximately 0.7 metres is considered acceptable as the proposed

dwellings will still achieve an adequate level of ventilation and solar access. The non-compliances with the 'rules-of-thumb' prescribed in the RFDC are discussed in the following sections.

5.2.1 Solar access and overshadowing

The concept plan approval required the proponent to demonstrate in future applications that the proposal could achieve RFDC guidelines. The RFDC recommends that in dense urban areas a minimum of two hours of solar access should be provided between 9 am and 3 pm during mid-winter to the living rooms and private open spaces areas of 70 per cent of all apartments. A total of 72 per cent, 62 per cent and 52 per cent of units will receive two hours of solar access during mid-winter for Buildings A, B and C, respectively.

The proponent has argued that whilst the number of units that receive solar access does not strictly comply with the numerical requirements of the RFDC, a total of 75 per cent of all apartments would receive solar access between 8 am and 4 pm during mid-winter. The proponent has also argued that this would be acceptable due to the site constraints and retention of the existing road layout and the design does not result in any apartments with solely a south facing aspect.

The department is satisfied that the SEPP 65 intent to optimise solar access has been achieved for Building A as it complies with the RFDC requirements.

As 62 per cent of units receive solar access between 9 am and 3 pm during mid-winter, Building B does not comply with the recommendations of the RFDC. The department considers that whilst Building B does not achieve the minimum sunlight required in the RFDC, dwellings within Building B are still able to achieve a satisfactory level of amenity. A total of 62 per cent of the units are able to achieve the solar access requirements in the RFDC and to improve the outcomes for Building B to up to 70 per cent, would potentially require the redesign of the column of units directly to the south of the void (see Figure 20). This would require the living areas to be reconfigured to a similar layout like the column of units to the north of the void where primary access to balconies is provided from bedrooms (see Figure 21), which is not desirable. The units to the south of the void currently receive just below two hours of solar access between 9 am and 3 pm, and would receive a minimum two hours if sunlight from 8 am was factored in.

Figure 20: Floor layout of units in the column to the south of Building B void

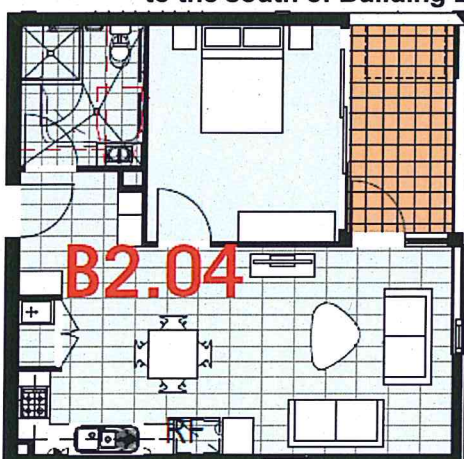
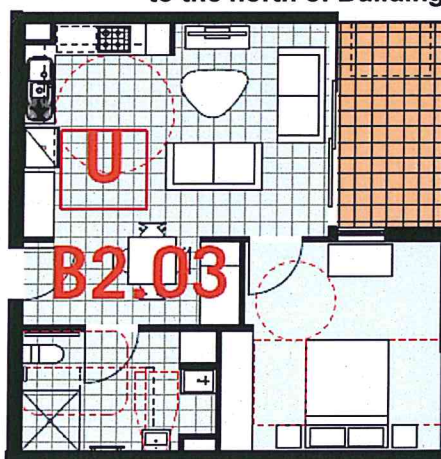


Figure 21: Floor layout of units in the column to the north of Building B void



Therefore, given the existing layout of these units provide a better amenity outcome in terms of living room access to private open space, the department considers that within the overall context of amenity for these units, the level of direct solar access is adequate and the layout should not be changed to require strict compliance with the RFDC for these reasons. The department considers the solar access for Building B is generally consistent with the concept plan requirements.

The department considers that whilst Building C does not achieve the minimum level of solar access required in the RFDC, dwellings within Building C are able to achieve a satisfactory level of amenity as:

- 52 per cent of the apartments are able to achieve the solar access requirements in the RFDC
- a further 15 per cent of the units in Building C are cross-through apartments and whilst not receiving two hours of solar access to living rooms, the minimum two hours of solar access would be provided to the private open space areas
- the living rooms of the cross-through units would still receive just below two hours of direct solar access between 9 am and 3 pm and would receive a minimum two hours if sunlight from 3 pm to 4 pm was factored in
- there are no single aspect south facing units.

The Phase 1 buildings would have minimal overshadowing impacts on the surrounding area as the shadows from Phase 1 buildings generally fall onto roads, communal private open space areas and the existing senior citizen's centre (see Figures 22 to 28). All communal open space areas forming part of Phase 1 would receive a minimum two hours of solar access during mid-winter.

Figure 22 – Overshadowing mid-winter 9 am

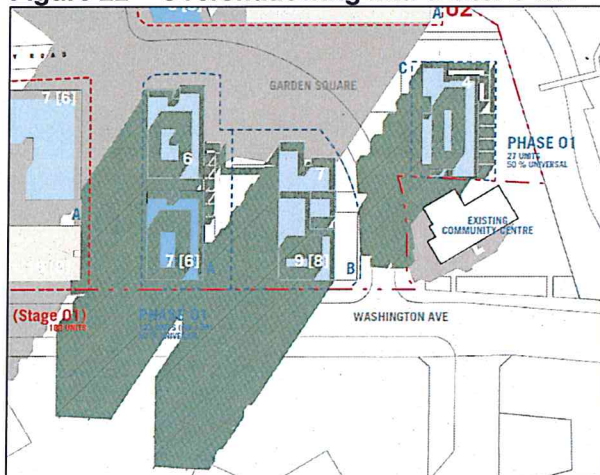


Figure 23 – Overshadowing mid-winter 10 am



Figure 24 – Overshadowing mid-winter 11 am

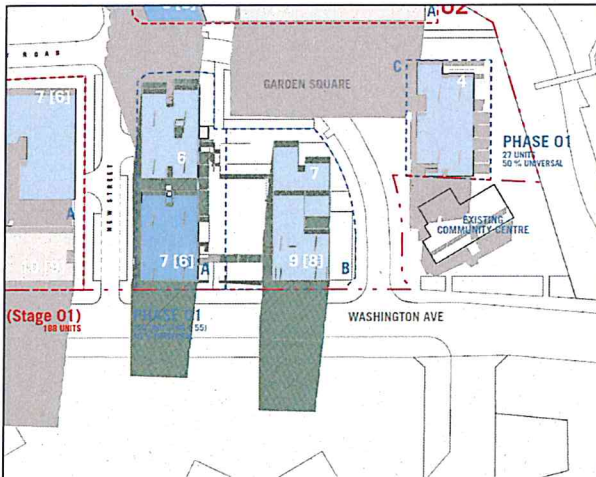


Figure 25 – Overshadowing mid-winter 12 midday

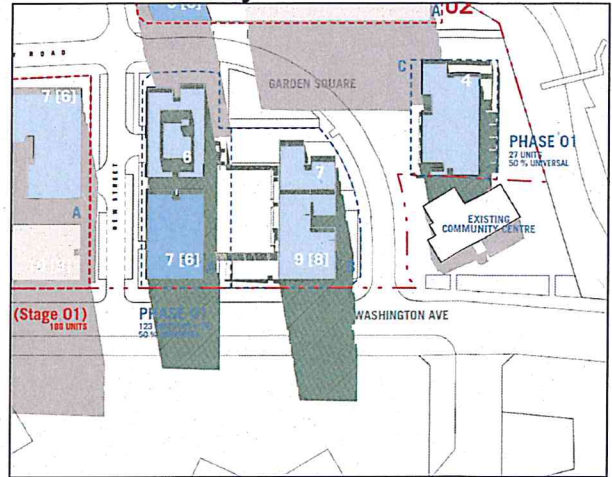


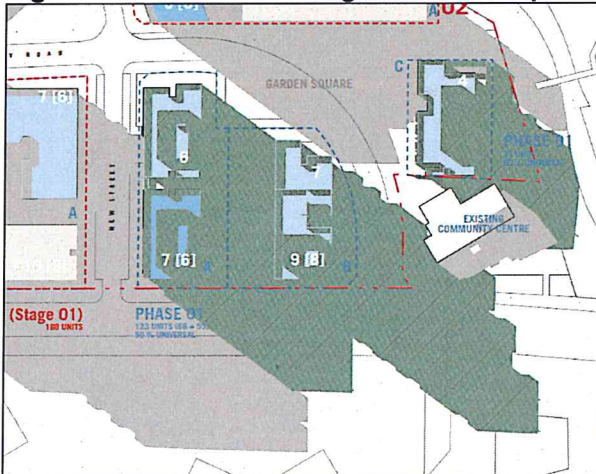
Figure 26 – Overshadowing mid-winter 1 pm



Figure 27 – Overshadowing mid-winter 2 pm



Figure 28 – Overshadowing mid-winter 3 pm



In terms of amenity impacts on existing residential dwellings, the Phase 1 buildings would result in partial overshadowing of the nine storey residential flat building located immediately to the south of Buildings A and B. A small portion of the dwellings within the nine storey residential flat building would experience minor overshadowing for less than an hour between 9 am and 10 am during mid-winter. Any properties that would be affected by the development would still maintain a minimum of two hours of sunlight during mid-winter. Whilst the communal private open space areas for the nine storey residential flat building would experience partial

overshadowing through out the day during mid-winter, the department notes that the areas overshadowed only form a small portion of the communal open space and is heavily shaded by the existing vegetation along the northern boundary.

Whilst the overshadowing impacts would most heavily impact the senior citizen's centre, the centre is only partially overshadowed during different times of the day during mid-winter and is expected to still receive an appropriate level of solar access throughout the day.

The department is satisfied that solar access to surrounding residential properties will not be unreasonably affected as the main living areas/private open space areas of all dwellings affected by the proposal would still be able to maintain a minimum of two hours of direct sunlight between 9 am and 3 pm during mid-winter, as recommended in the RFDC.

5.2.2 Noise impacts

The proponent has provided a noise and vibration assessment that indicates that the measures recommended in the concept plan are appropriate to mitigate potential noise impacts for future residents of Phase 1 buildings. The attenuation measures recommended in the concept plan, including 6 mm glazing thickness and acoustic seals, were considered adequate for the proposed buildings to mitigate traffic noise from the M5 Motorway. The proponent has committed to incorporating these treatments in the construction of the new buildings. Accordingly, the department is satisfied that future residential internal acoustic amenity will be acceptable.

The construction noise impacts would affect the amenity of the existing residents, however, the construction impacts can be readily managed and mitigation measures identified at the concept plan stage would need to be adopted to protect the amenity of existing residents. The department notes that with the demolition of all the existing residential dwellings within the site, it would facilitate the mitigation of the noise as the most sensitive receivers are no longer present during construction of Phase 1 buildings. However, impacts to the dwellings immediately to the south would need to be managed during construction of Phase 1 buildings and residents to the west and south would need to be managed for the public domain works. The proponent has committed to preparing a noise management plan to outline measures to be adopted during construction including acoustic barriers, silencer devices, alternate appliances or processes for piling and excavation, noise checks, and establishing complaints handling procedures.

The department considers that the construction impacts can be managed and mitigated to ensure satisfactory level of amenity can be maintained during construction for surrounding residents and has recommended that the mitigation and management measures outlined in the acoustic assessment in the concept plan be incorporated in the construction management plan.

5.2.3 Landscaping and open space

The public domain improvements include works to provide a total 7,255 sqm of public open space comprising the new Garden Square (see Figure 29), Main Park and the new through-site connections to the community gardens (see Figure 30). This is consistent with the public domain provisions identified in the concept plan.

Figure 29: Garden Square

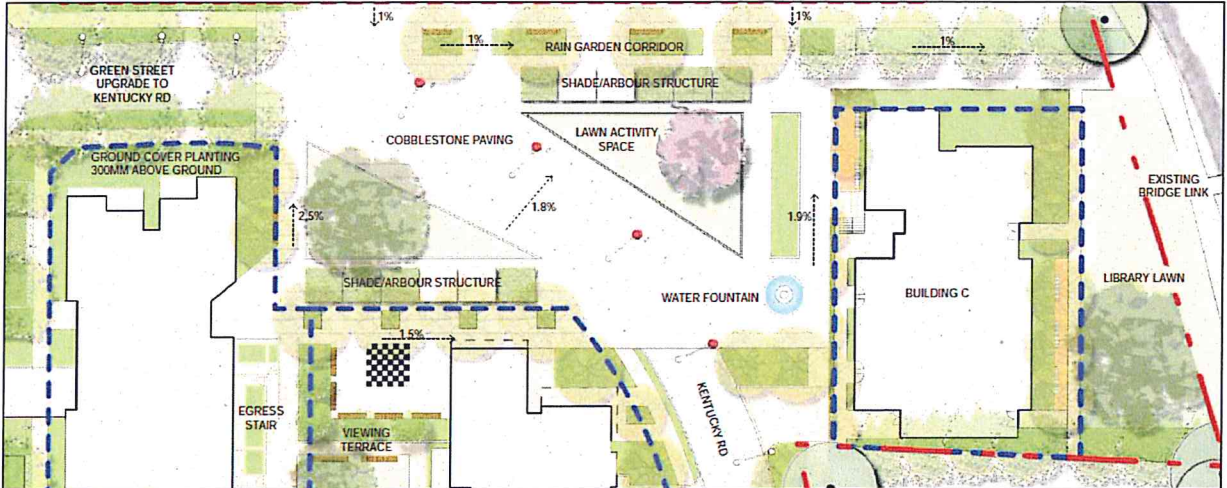


Figure 30: Main Park and through site connection to community gardens



The public domain improvements include:

- embellishments to the Main Park including connecting pathways, terraces, seating, and tree planting (see Figure 31)
- creation of a Garden Square with cobblestone paving, lawn areas, tree planting, seating and raised shared pedestrian and vehicular zone (see Figure 32)
- a through-site connection to the community gardens including tree planting, lawn areas, terraces, connecting pathways to the playground and community garden

- increased tree planting to create green streets including two new streets to provide improved connections between Kentucky Road and Washington Avenue
- a formal pedestrian link between the existing wetland bridge to the community centre and Garden Square
- community garden break out space including tree planting, seating and connecting pathways to the public car park.

Figure 31: View of Main Park



Figure 32: Perspective of Garden Square



The private open space areas also provide appropriate amenity for future residents within Buildings A, B and C, the majority of which comply with the 'rules of thumb' in the RFDC. Minor non-compliances are evident in the private courtyards within Building A where the size of the individual courtyards for the cross-through units does not meet the minimum 25 sqm. However, the combined total of the front and rear

courtyards of these units meet the minimum 25 sqm required. A total of four other units (two in Building A and two in Building B) also do not comply. However, three of the four courtyards are essentially balconies as these units are not level with the ground level of the adjoining public domain. To attain compliance, the courtyards of these units would need to encroach into the front building setbacks and require additional fill. The front setbacks as proposed provide a uniform and straight edge.

The department considers the non-compliance in these instances acceptable as these units provide private open space areas consistent with the size of the balconies in the units in the column above and promotes a safe public domain interface as clear vision is protected along the boundary of the buildings. All the balconies meet the minimum depth requirement of 2 metres. Accordingly, the department considers the private open space provisions appropriate for the site.

The RFDC recommends 25-30% of the area of development sites be provided as communal open space. The proposed communal open space across Phase 1 represents approximately 27 per cent of the area of proposed super lots 1 and 8 (see Figure 14). Therefore, Phase 1 complies with the minimum recommended in the RFDC.

Buildings A and B provide a large formal shared communal open space area that is centrally located between the two buildings and is supported with the provision of landscaping, BBQ areas, seating, terrace, paving and lawn areas (see Figure 33). Building C provides a small formal communal terrace to the north of the site (see Figure 34). Phase 1 is also characterised by non-formal areas of communal open space around the three buildings providing further opportunities for passive use of these areas.

Figure 33: Building A and B communal open space

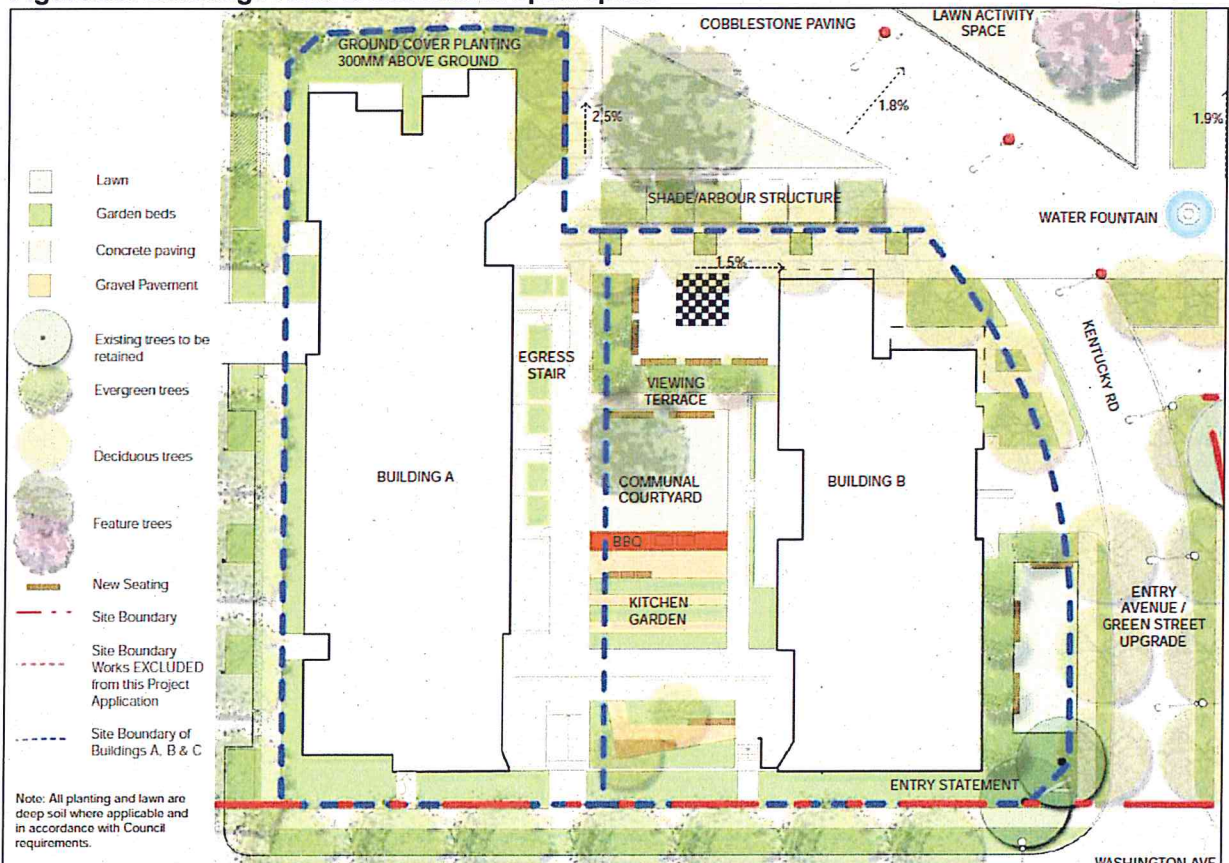
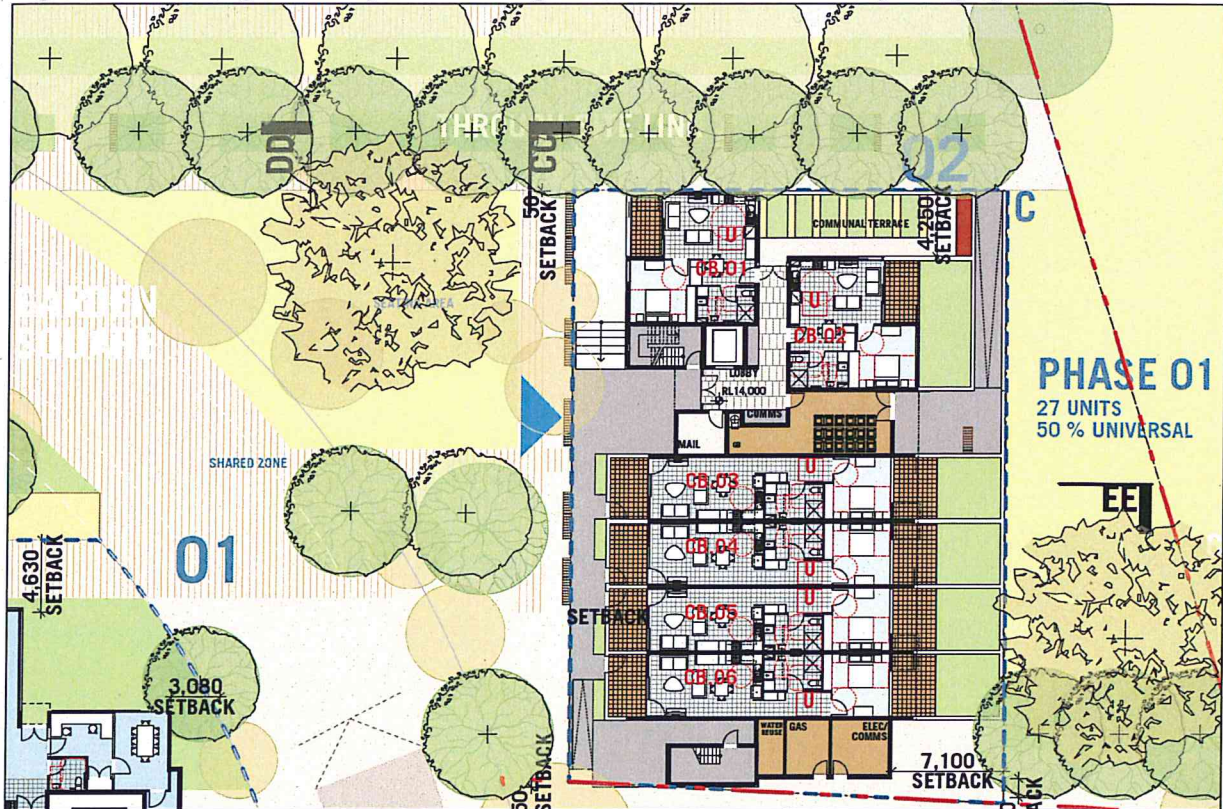


Figure 34: Building C site layout including communal terrace and adjoining open space areas

The proposed smaller designated communal open space area for Building C is acceptable given that: Building C's communal open space will be offset with larger private courtyards that exceed the minimum RFDC requirements; the communal open space is partially offset by the provision of the adjoining areas of public open space; and Building C is located on a smaller lot with limited opportunity to provide useful communal open space centrally within the site.

The department considers adequate amenity is provided for future residents and the communal open space is appropriate in the context of the Phase 1 site. Residents will experience a high level of amenity through the wide variety of passive recreation and gathering places delivered within Phase 1.

The concept plan also required a public domain plan with the first application for development. The proponent has provided detailed landscape plans. The department considers these plans satisfy the concept plan requirements and recommends that a final detailed plan be endorsed by council given the open space areas including the WSUD measures will be dedicated to council. The proponent has also illustrated that an appropriate interface will be provided between the private and public domain. The department recommends that detailed design plans with levels be submitted to council for approval prior to commencement of the public domain works.

5.2.4 Privacy

Visual and acoustic privacy for surrounding properties is not considered to be unreasonably affected due to the orientation of the buildings, orientation of the existing residential buildings, adequate setbacks, separations provided by the existing and future road network and landscaping treatments. The closest residential flat buildings are located approximately 50 metres to the south and proposed buildings are separated by a minimum of 24 metres.

The department notes that where units oppose each other within the centre of Building A (i.e. on either side of the proposed central void), solid walls or privacy screens are proposed to ensure that balconies have adequate levels of privacy. These privacy screens would also assist in the mitigation of noise emanating from the balconies and ensure adequate acoustic privacy for dwellings on either side of the separation.

5.3. Transport and Traffic Impacts

5.4.1 Traffic impacts

The proponent's traffic assessment concluded that the proposal would generate 15 additional vehicle trips per hour during the peak periods based on 0.1 vehicle trips per dwelling for the social housing. The proposal is not expected to increase traffic generation as the proposal replaces social housing dwellings.

The additional traffic would be predominantly concentrated at the Belmore Road/ Hannans Road, Belmore Road/ Washington Avenue and Belmore Road/ Roosevelt Avenue intersections. The traffic report concluded that the traffic efficiency would still maintain existing levels of service of 'good' and 'good with acceptable delays'.

Accordingly, the department considers the traffic impacts would be acceptable as the level of service would remain at acceptable levels.

5.4.2 Parking

The proposal provides 30 car parking spaces for Phase 1 which is consistent with the 1 space per 10 dwellings required in the concept plan. This is also consistent with rates recommended in the:

- Affordable Rental Housing SEPP which for social housing requires a minimum one space per five dwellings which equals 30 car spaces;
- Housing NSW's guidelines for social housing development, which also require one space per five dwellings as parts of the site are located further than 400 metres from a centre; and
- RTA's guideline which requires a rate of one space per 10 dwellings and an additional one visitor space per 10 dwellings which equates to a total car parking requirement of 30 car spaces.

Accordingly, the department considers the proposal would provide adequate car parking for future residents and adequate street parking is also available for visitors.

5.4.3 Public transport

The area is well-served by public transport with a regional bus network that provides adequate bus services to the Riverwood area, including buses stopping frequently along Belmore Road and one service operating through the site. Buses run every 10-15 minutes during peak travel times and connect the site with Bankstown and Hurstville strategic centres and other centres including Campsie, Lugarno and Mortdale. The site is also within walking distance of Riverwood Railway Station, which provides frequent services between 5 and 10 minutes during peak periods, 10 and 15 minutes during off-peak periods and 10 and 20 minutes for weekend services to the Sydney central business district. The department considers the site is well serviced by public transport and recommends that a travel access guide is provided to all future residents.

5.4. Development Contributions

The proposal is seeking approval to construct 150 social housing dwellings to replace the 176 social housing units that were previously located on the site. Council's Canterbury City Section 94 Contributions Plan 2005 (Section 94 Plan) allows a credit to be applied for existing development. The previous dwellings on the site comprised 66 medium/large dwellings and 106 small dwellings. Phase 1 proposes to develop 31 medium dwellings and 119 small dwellings. Therefore, development results in a credit that would offset the entire development sought within Phase 1.

The concept plan approval required that any Voluntary Planning Agreement (VPA) developed for the site be executed prior to or with the first subsequent application for private development or payment of development contributions in accordance with council's Section 94 Plan. As this proposal is seeking approval for social housing only, and is offset by the credit applied to the previous dwellings on the site, the VPA is not required for this stage to proceed. The department notes that in relation to future stages, the proponent and council are finalising the VPA arrangements. Accordingly, no development contributions or VPA are required for Stage 1.

5.5. Draft Conditions

In order to ensure that the environmental impacts of the proposed development can be adequately managed, a number of conditions have been recommended for the project approval. Comments on the draft conditions from the proponent and council were sought and where relevant, have been incorporated into the final version of the conditions.

6. CONCLUSION

The department has reviewed the environmental assessment and duly considered advice from public authorities in accordance with section 75(2) of the EP&A Act. All the relevant environmental issues associated with the proposal have been assessed. The key issues included built form and urban design, environmental and residential amenity including solar access, transport and traffic impacts and development contributions.

The project is consistent with the concept plan and would deliver affordable housing, whilst also facilitating redevelopment and renewal of a social housing estate. The consolidation of the social housing will allow for the orderly and economic development of the remainder of the site for private housing and support social diversity. The site is suitable for the project given the high level of access to infrastructure and services. The proposal is consistent with the strategic objectives for the area, being consistent with the NSW 2021, Metropolitan Plan for Sydney 2036 and the draft South Subregional Strategy, and would provide significant public benefits to the broader community through urban renewal of the Riverwood area.

The proponent has adequately addressed the Director General's Environmental Assessment Requirements and satisfactorily mitigated the potential environmental impacts associated with the proposal. The recommended conditions and implementation of the measures detailed in the proponent's EA and appendices, PPR and appendices and Statement of Commitments seek to maintain the amenity of the local area, and adequately mitigate the environmental impacts of the proposal.

The department considers the site is suitable for the proposed development and that the application is in the public interest. Consequently, the department recommends that the project be approved, subject to conditions.

7. RECOMMENDATION

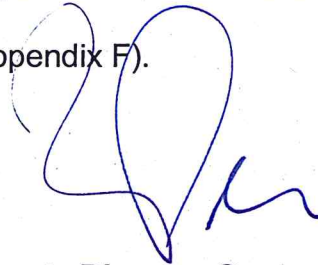
It is recommended that the Planning Assessment Commission, by virtue of the special delegation issued by the Minister for Planning and Infrastructure:

- a) **Consider** the findings and recommendations of this report;
- b) **Approve** the Major Project Application (MP 10_0181), subject to conditions, under section 75J(1) of the EP&A Act, having considered all relevant matters in accordance with (a) above; and
- c) **Sign** the attached Instrument of Approval (Appendix F).



**Executive Director
Major Projects Assessment**

10.11.11



**Deputy Director-General
Development Assessment &
Systems Performance**

15/11/11