



Attachment 1 to Item 2.1.1.

Belmont Park Estate Planning Proposal

Date of meeting: 18 April 2024

Location: Council Chambers or audio-visual link

Time: 12:30pm

A young boy in a grey t-shirt and blue shorts is walking away from the camera through a field of strawberry plants. The plants are arranged in neat rows, and the ground is covered with black plastic mulch. In the background, there is a line of trees and a cloudy sky.

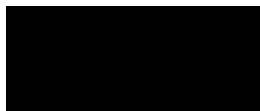
Planning Proposal

Belmont Park Estate

North Richmond

December 2023

Client: Kavanagh Family
Document Type: Planning Proposal
Document Title: Belmont Park Estate – North Richmond
Version: Council Issue – Revision C
Issue Date: 14 December 2023



Prepared By: Michael Rodger | Director

If this document is not signed it is a draft.



© Urbanco Group Pty Ltd | ABN 56 616 790 302 | urbanco.com.au
Suite 3.03 55 Miller Street PYRMONT NSW 2009 | PO Box 546 PYRMONT NSW 2009 | 02 9051 9333

This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Urbanco Group Pty Ltd.

CONTENTS

Executive Summary

1	Introduction	1
	1.1 Purpose of the Planning Proposal	1
	1.2 Project Summary	1
	1.3 Site Context	3
	1.4 Land details.....	3
	1.5 Current LEP Provisions	6
2	Consultation.....	10
3	The Proposal	12
	3.1 Belmont Park Concept Plan.....	12
	3.2 Proposed LEP Amendments	16
	3.3 Delivery and Timing	17
	3.4 Infrastructure Review	17
	3.5 Contributions Framework.....	19
	3.6 Existing Planned Local Infrastructure Upgrades	20
4	Hawkesbury-Nepean Valley Flood Evacuation Modelling (2023)	21
5	Housing Supply & Affordability Analysis.....	22
	5.1 Housing Supply.....	22
	5.2 Housing Affordability.....	24
6	Strategic Merit Test.....	25
	6.1 Strategic Policy Summary.....	27
	6.2 Greater Sydney Region Plan / Western City Plan	28
	6.2.2 Planning Priority W14 Protecting and enhancing bushland and biodiversity	31
	6.2.3 Planning Priority W19 Reducing carbon emissions and managing energy, water and waste efficiently 31	
	6.3 Metropolitan Rural Area.....	32
	6.3.1 Accommodating Local Growth in the MRA.....	32
	6.3.2 Retaining Agricultural, Tourism and Open Space Uses in the MRA	33
	6.3.3 Responding to MRA Values:.....	34
	6.4 Hawkesbury Rural Land Strategy	36
	6.5 Hawkesbury Council Local Strategic Planning Statement	29
	6.6 Hawkesbury Council Local Housing Strategy.....	30
	6.7 2022 Flood Enquiry.....	34
7	Site Specific Merit	35
8	Site Specific Consideration & Investigations	37
	8.1 Preliminary Flood Level Advice INDESCO	38
	8.2 Detailed Evacuation Capability Assessment, Water Technology (Aug 23).....	38
	8.3 Aboriginal Heritage Due Diligence Assessment, AECOM (Aug 23).....	42

8.4	Non-Aboriginal Heritage Constraints, AECOM (Aug 23)	43
8.5	Preliminary Site Investigation (Contamination) JBS&G (Aug 23)	43
8.6	Preliminary Bushfire Constraints Analysis, Ecological Australia (Sept 23)	44
8.7	Preliminary Ecological Assessment, Sclerophyll (Dec 22)	45
8.8	Transport Scoping Report, ARUP (Aug 23).....	45
9	The Planning Proposal	47
9.1	PART 1 – Objectives or Intended Outcomes.....	47
9.2	PART 2 – Explanation of Provisions.....	48
9.3	PART 3 – Justification of strategic and site-specific merit.....	49
9.4	PART 4 – Mapping	77
9.5	PART 5 – Community Consultation	81
9.6	PART 6 – Project Timeline	82
10	Summary	83



FIGURES

Figure 1	Site Context Plan
Figure 2	Subject Site
Figure 3	Current LEP Zoning Plan
Figure 4	Current LEP Lot Size Plan
Figure 5	Current LEP Building Height Plan
Figure 6	Concept Plan
Figure 7	GCC Western City District Plan – North Richmond Inset
Figure 8	Detailed Evacuation Capability Assessment - Flood Evacuation Route
Figure 9	SES Evacuation Routes
Figure 10	Proposed Zoning Plan
Figure 11	Proposed Lot Size Plan
Figure 12	Proposed Building Height Plan

TABLES

Table 1	Dwelling Supply Analysis (Source: Macroplan)
Table 2	Rural Land Strategy Review
Table 3	Hawkesbury Council LHS Housing Supply Review Table
Table 4	Supporting Studies
Table 5	Consistency with Greater Sydney Region Plan
Table 6	Consistency with Western City District Plan
Table 7	Hawkesbury LSPS Priorities Review
Table 8	Indicative Project Timeline

APPENDICIES

Appendix 1	Urban Design Report & Concept Plan
Appendix 2	Housing Diversity Report
Appendix 3	Consistency with Local Planning Directions
Appendix 4	Consistency with SEPPs
Appendix 5	Aboriginal Heritage Due Diligence Assessment
Appendix 6	Non-Aboriginal Heritage Constraints
Appendix 7	Detailed Evacuation Capability Assessment
Appendix 8	Ecological Assessment
Appendix 9	Landscape Character Analysis
Appendix 10	Preliminary Site Investigation
Appendix 11	Recycled Sewer Altogether <i>Letter Of Support</i>
Appendix 12	Residential Needs Assessment
Appendix 13	Servicing Strategy
Appendix 14	Transport Scoping Report
Appendix 15	Preliminary Bushfire Constraints Analysis

EXECUTIVE SUMMARY

This Planning Proposal has been submitted on behalf of the Kavanagh Family, sole owners of the Belmont Park project, a large scale land holding of over 300 acres, located on the western edge of the North Richmond urban area.

The Kavanagh Family are passionate about providing opportunities for local working-class families to afford home ownership. To do so will mean producing housing at approximately ½ the price of currently available new homes in the area. This proposal creates 1200 dwellings of varying types, many of which will enable these local families to achieve their dream of home ownership at an affordable price.

Hawkesbury LGA suffers from a number of housing issues which have been verified by careful analysis of the DPE housing data and observation of actual on ground activity. In summary:

Macroplan Assessed Housing undersupply - > 2,200 dwellings ¹

LHS Non-Deliverable Housing – 3,600 dwellings ²

Affordability Crisis – All new housing product > \$1.1 – \$1.6Mill ³

Housing Diversity Crisis – 87% housing detached homes ⁴

Current housing supply pipeline - does not resolve any of the above issues.

Limited opportunities to resolve such issues in Hawkesbury LGA due to significant development impediments such as flooding.

Belmont Park Estate is uniquely positioned to address much of these issues;

- **Housing Supply** – 1,200 dwellings

- **Housing Diversity** –
 - Medium Density = 520 Dwellings
 - Seniors Housing = 140 dwellings
 - Residential Housing = 540 Dwellings
 - **20% Affordable Housing as part of the project = 240 Dwellings**

- **Housing Affordability** – Belmont Park's deliberately diverse range of housing options creates significantly more affordable housing choices than what can be provided via the LGAs currently projected housing stock.

- **Flood Resilience –**
 - Flood free development footprint
 - Evacuation Assessment, Water Technology (Aug 23);
 - “The site has over 15 hours of warning time for a flood that would require evacuation from the site”.
 - “Development would not adversely impact on existing evacuation capabilities.”
 - “The proposed development will be capable of timely self-evacuation and would not rely on emergency services to assist in the evacuation of occupants.”
 - The site has flood free access to the Colo High School evacuation centre, 15.7km away.

- **Capacity to deliver** - Single ownership, Kavanagh Family with substantial financial capacity. Kavanagh family companies collectively employ over 400 people with the majority situated in Western Sydney. The Kavanaghs are therefore acutely aware of the housing needs of Western Sydney workers and their families. Belmont Park Estate is an opportunity to make a positive contribution to the housing needs of these and others like them and leave a meaningful positive family legacy.

- **Experienced Developer partner** – SEED Projects has extensive experience in the delivery of residential projects of varying scales across Western Sydney.

- **Willingness and Capacity to immediately progress Rezoning and Housing delivery** – The land owners, development partner and project team have the financial capability and project experience to immediately progress and finalise the rezoning of the site and commence delivery works to allow delivery of housing on site by 2028 – addressing a critical looming housing shortage.

- **Enhancing Flora and Fauna Biodiversity** – The project will enhance biodiversity outcomes through the rehabilitation and revegetation of creek lines through the site, providing biodiversity connectivity for the Hawkesbury River to Bushland areas to the west.

- **Environmental Sustainability** – Ensuring that Environmental Sustainability is embedded in the project and future housing is a key principle with the delivery of recycled water, a local green grid energy scheme, community farm and diverse housing envisaged as part of the project.

- **Socially sustainable** - Social Sustainability principles to be implemented include delivery of 20% affordable housing as part of the project, a Community Farm managed by local residents, provision of extensive open space areas and facilities and providing access to the Hawkesbury River foreshore to the broader community.

- **Sensitive Development Footprint** - 50% of the site, over 59 hectares of land has been set aside for open space, riparian corridors, retained agricultural land in the community farm and low scale eco-tourism facilities.

This Planning Proposal has also demonstrated that the proposal has **Strategic Merit and is consistent with the Greater Sydney Region Plan and associated Western City District Plan** Planning Priorities including:

- **Planning Priority W4 Fostering healthy, creative, culturally rich and socially connected communities** - The Concept Plan incorporates **walkable streets and pedestrian connections that provide direct, accessible and safe pedestrian and cycling connections** encouraging physical activity and social connection.

Consistent with the Planning Priority W4 Actions, the proposal also incorporates a **large scale Community Farm which will promote local access to healthy fresh food** and support local fresh food production.

The Belmont Park project also incorporates **diversity of housing types including “The Missing Middle” housing typologies**, which will address housing diversity needs across the LGA and District.

- **Planning Priority W5 Providing housing supply, choice and affordability, with access to jobs, services and public transport** - The site will deliver over **1,200 new dwellings as a direct extension of the existing urban settlement**, to meet local housing demand **addressing the 2,200 dwelling shortfall in the LHS** figures identified by Macroplan.

The Hawkesbury-Nepean Flood Evacuation Model (2023) determined that **potential development in the Windsor and Richmond town centres forecast under the Hawkesbury Local Housing Strategy would increase the average annual people at risk by around 75%**.

As such, there is a **likely shortfall of at least 3,600 due to the LHS identifying increased density and diversity housing in flood prone areas** which the project will assist in addressing.

The project will also **deliver 20% of the total dwellings as Affordable / Community Housing**, providing significant public benefit to the broader community.

Belmont Park’s deliberately diverse range of housing options will facilitate the creation of housing at approximately $\frac{1}{2}$ the price of other new housing options in the area.

Consistent with the objectives of Planning Priority W5 the proposal will specifically deliver Greater housing supply and Housing which is more diverse and affordable.

- **Planning Priority W6 Creating and renewing great places and local centres, and respecting the District’s heritage-** The proposal retains two 1896 farm buildings are proposed to be retained and incorporated into the future development.

The buildings are intended to form part of a medium density housing site, **allowing the buildings to be retained, restored and managed in a landscape setting, as a community facility or refurbished for residential accommodation**, consistent with the intent of the District Plan.

- **Planning Priority W14 Protecting and enhancing bushland and biodiversity** – A sensitive development footprint with 50%, over 59 hectares of land, set aside for open space, riparian corridors, retained agricultural land in the community farm and low scale eco-tourism facilities.

Consistent with the District Plan, the project will enhance biodiversity outcomes through the rehabilitation and revegetation of creek lines through the site, providing biodiversity connectivity for the Hawkesbury River to Bushland areas to the west.

The project will also provide for a long term open space edge along the Hawkesbury River edge, enhancing local Aquatic and riverine biodiversity.

- **Planning Priority W19 Reducing carbon emissions and managing energy, water and waste efficiently - The Belmont Park project incorporates a range of planned innovative water and energy solutions.**

A recycled water plant will enable the reuse of treated water. Recycled water can be treated to a quality suitable for dual reticulation including reuses such as toilet flushing, washing machines and irrigation applications.

Belmont Park intends to **maximise its use of locally generated renewable energy such as roof top solar complimented with various locally located battery back-up systems.** This will allow creation of a localized micro-grid power system throughout the project.

The proposal has been **demonstrated to achieve Strategic Merit and is able to be supported by Council** as an extension of the existing urban settlement to address Local Housing shortfalls as:

- The Belmont Park land holding is not subject to any *Exclusionary Criteria* under the Rural Land Strategy and is **considered appropriate for natural expansion of the North Richmond urban settlement**, noting that the land directly adjoins the existing urban edge.
- The site is **not mapped as Prime Agricultural Land** and support for this proposal will reduce / alleviate existing land use conflict with adjoining sensitive healthcare land use on the eastern property boundary.
- **The proposal will address a local shortfall of at least 3,600 dwellings based on the adopted LHS.**
- **This proposal allows for the delivery of housing in flood free land** in Hawkesbury LGA responding consistent with the Flood Enquiry planning outcomes.
- The proposal is consistent with the broad aims and objectives of the GSRP and Western City District Plan as it will **deliver additional housing supply to meet local housing targets within close proximity of a Centre** providing access to jobs, services and transport.
- Consistent with the objectives of Planning Priority W5 **the proposal will specifically deliver Greater housing supply and Housing which is more diverse and affordable.**
- The proposal is **consistent with the principles of the Metropolitan Rural Area** for the Hawkesbury LGA and the District Plan **which allow for the extension of the existing township in response to local housing demand and needs.**
- **A significant portion of the MRA land will be retained for use as active agricultural and horticultural use, open space facilities and tourism uses** consistent with the principles and intent of the MRA lands.

With Councils support, Belmont Park will deliver significant public benefit through increased housing supply with increased housing diversity on flood free land, providing greater use / benefit of significant infrastructure upgrades and providing opportunity for large scale recreational facilities able to service the broader region. Most notably, the creation of 1200 homes, many of which will be approximately ½ the price of currently new homes in the area. This will enable the dream of many local working-class families to be achieved, home ownership at a reasonable price.

1: Macroplan Belmont Park Estate –Grose Wold Residential Needs Assessment 2023.

2: Refer to Section 6.3 of this report

3: Real estate sales review September 2023.

4: Hawkesbury Council Local Housing Strategy

1 INTRODUCTION

1.1 Purpose of the Planning Proposal

The purpose of this Planning Proposal is to seek support from Hawkesbury Council for the amendment of the Hawkesbury Local Environmental Plan 2012 Camden LEP built form controls to allow the delivery of a gateway entertainment and tourism precinct which incorporates an iconic architecturally designed hotel complex.

The Planning Proposal has been prepared in accordance with the *NSW Department of Planning Local Environmental Plan Making Guideline 2021* and submitted on behalf of the Kavanagh Family, sole owners of the site. The large-scale rural land holding of over 300 acres is located on the western edge of the North Richmond urban area.

The proposal seeks to create 1,200 dwellings of varying types. The deliberately diverse range of housing options will significantly contribute to address the emerging housing affordability crisis within Hawkesbury Council LGA.

To assist Councils assessment, significant progress has been made on many of the ordinarily required supporting studies. Councils feedback on these will greatly aid in the progression to a formal Planning Proposal Application.

The proponent details are as follows:

- The Proponent is the Land Owner – the Kavanagh Family.
- SEED Projects (Matthew Causley) are the development partners in the project.
- Urbanco (Michael Rodger) are the primary consultants.

1.2 Project Summary

The Land

Encompassing 300 Acres of land, in a single ownership, the land holding provides a unique ability to deliver a community encompassing over 1,200 new dwellings with diverse housing choices for Western Sydney families of all ages, family types and levels of affordability. The new community will have access to a local neighbourhood centre for shopping, remote working facilities and leisure activities. Over 1/3 of the site, 100 Acres will be preserved for the creation of a community organic Farm, open space, recreational facilities, and local parklands. The rehabilitated Steading Creek and linking tributaries will form Belmont Parks green spine, linking residents to a 1km stretch of the Hawkesbury River.

The People

The Kavanaghs have a deep connection with Western Sydney families. Kavanagh family companies collectively employ over 400 people with the majority situated in Western Sydney. The Kavanaghs are therefore acutely aware of the housing needs of Western Sydney workers and their families. By producing housing at approximately ½ the price of currently available new homes in the area, Belmont Park Estate is an opportunity for these families to achieve their dream of home ownership.

Belmont Park Estate will be delivered by the Kavanagh Family by leveraging their own substantive financial capacity and the development expertise of SEED Projects, a proven developer with substantial delivery experience. Completing the Project Team are its specialist expert advisors, Urban Co, TRACT, ARUP, Macroplan, Calibre Consulting, Indesco Engineering, JBS&G, AECOM, Ecological Australia, Sclerophyll and Habitat Innovation.

The Vision

Overlooking the Hawkesbury River and Sydney Plains, Belmont Park Estate will be a new benchmark for sustainable residential greenfield development and aims to serve as a new blue print for the creation of new communities across NSW. A core value is to address the emerging housing crises by creating housing choices that attracts people of all ages, family structures and financial standing. In doing so it will have contributed to solving the emerging housing crisis, particularly prevalent in the Hawkesbury LGA.

The vision for the landholding is to deliver a curated modern village nestled in the natural landscape where people of all ages, family types and financial standing will seek out to be a part of. Where residents will form a unique connection with the land, environment and new community. Driven by the Kavanagh family's genuine desire to provide opportunities for local working-class families to afford home ownership.

Designed for Connection.

Connect with the land - The community Farm will create of a local food source with residents as active participants. It will be a learning centre for residents and the wider community for sustainable organic farming practices.

Connect with the environment - Residents will benefit from the creation and use of their own energy and the efficient reuse of waste. Over 50%, 59Ha of open space and green grid links will connect residents around the village and to a 1km stretch of the Hawkesbury River. Rehabilitation of Steading Creek will create a vegetated east-west flora and fauna corridor from the Hawkesbury River to large vegetation areas to the west of the site.

Connect with community – Belmont project will have its own unique identity with a diverse community. The spaces outside of resident's homes are opportunities to make connections to the local community. Residents will meet at the Farm where they regularly contribute to the farm operations. It will be in the well designed safe open spaces, and it will be in the physical infrastructure such as the neighbourhood centre, designed for people to socialise.

A detailed site Concept Plan has been prepared and is submitted with this Planning Proposal. We have provided a detailed summary of the Concept Plan in Section 3.1 below.

1.3 Site Context

The land holding occupies an area of approximately 120 hectares and is situated on the western side of the Hawkesbury River 2.5km south of the North Richmond CBD.

The urban edge of North Richmond township adjoins the northern boundary of the site, being the Redbank residential community. The Richmond CBD is situated only 5km east of the site, providing access to rail and public transport connections.

The land along the northern boundary of the site, between Grose Vale Road and the Hawkesbury River forms part of the current planned urban release area, which extends to the edge of the land holding.

The site has good access to local schools, shops and services, with direct access to North Richmond CBD via Grose Vale Road.

There are a number of educational facilities including primary schools, high schools and the Western Sydney University all situated within 5km of the site. Residents are well catered for in terms of access to educational facilities.

There are a number of significant large scale infrastructure upgrades committed to delivery by the State Government and other agencies / projects in the locality including the North Richmond Bridge and re-alignment of Kurrajong Road, Grose River Road / Gross Vale Road intersection upgrade and a new flood free bridge is also planned to be delivered connecting Gross River Road and Springwood Road.

The site is well located when considering access to existing educational, business, shopping, transport and health services and facilities, with the ability to enhance local recreational facilities as part of the project.

1.4 Land details

The subject site incorporates four allotments located south of Grose Vale Road and encompasses a total area of 119.44 hectares, all within a single land ownership.

The four allotments are described as follows:

- a) 1 Grose River Road (Lot 6 DP 703300)
- b) 35 Grose River Road (Lot 7 DP 703300)
- c) 61 Grose River Road (Lot 14 DP 703300)
- d) 63 Grose River Road (Lot 8 DP 703300)

The northern boundary of the site is primarily bordered by the existing St John of God private health facility, with the site having a small frontage of approximately 50m to Grose Vale Road.

Grose River Road forms the western boundary of the site with the Hawkesbury River forming the eastern boundary.

There are existing rural residential properties along the southern and south-western property boundary.

Access to the site is currently achieved via a vehicle entrance along the northern portion of the Grose River Road frontage.

The upgraded Grose River Road / Grose Vale Road intersection will provide a large round-a-bout, allowing ease of traffic movements to Grose Vale Road.

The site has been primarily cleared in association with historic rural activities undertaken across the site.

The current use of the site is for low scale cattle grazing. Previously the site was used for horse agistment, stabling and training. As a result, there are a range of horse stables, stabling yards and associated infrastructure across the site and an informal training track adjoining the Hawkesbury River.

The site has steeper sloping land along the northern edge areas, which transitions to flat land adjacent to the river.

We have provided a detailed analysis of the existing site conditions and incorporated the site investigations completed to date as part of the Urban Design report provided with this submission.

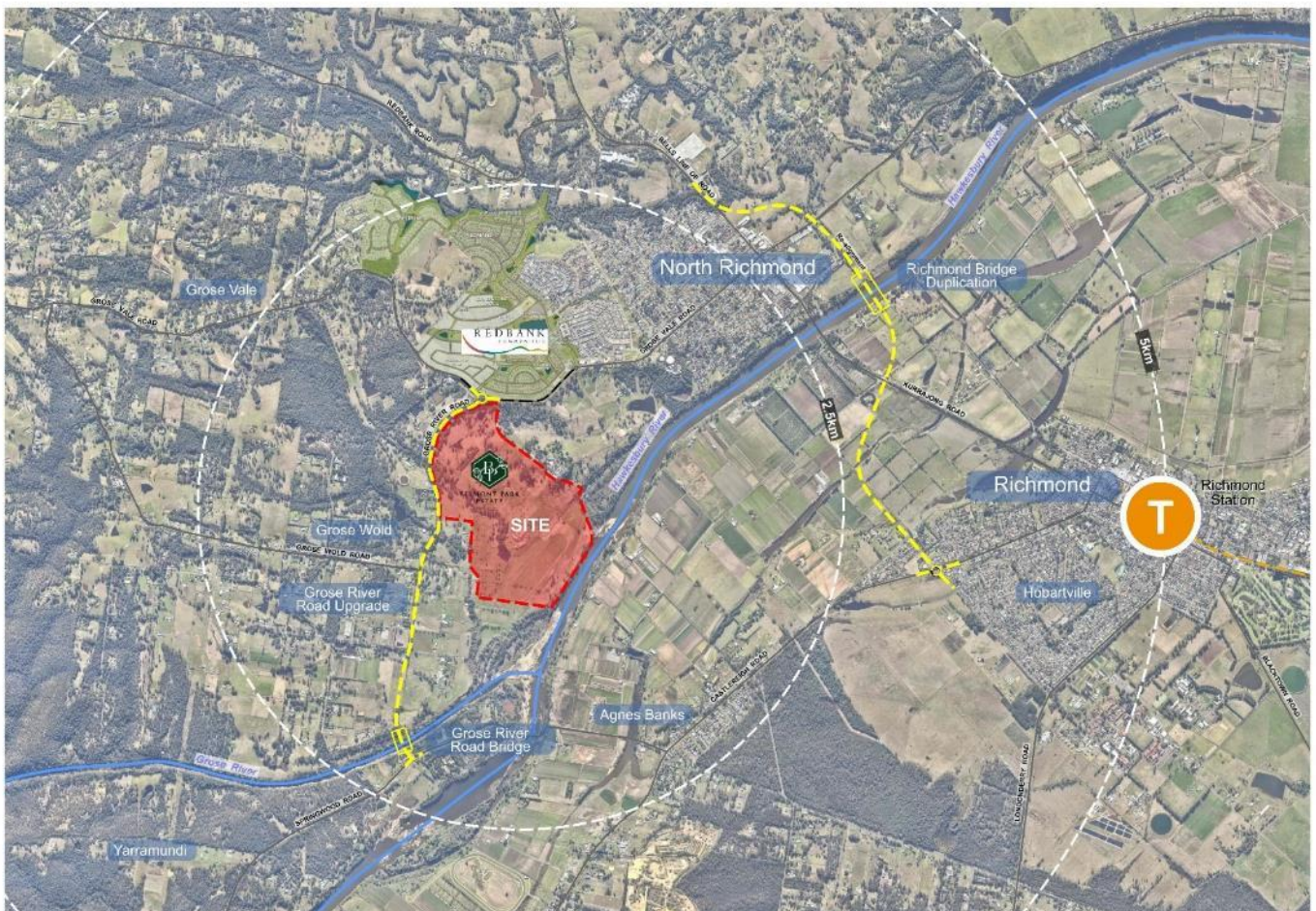


Figure 1 – Site Context Plan

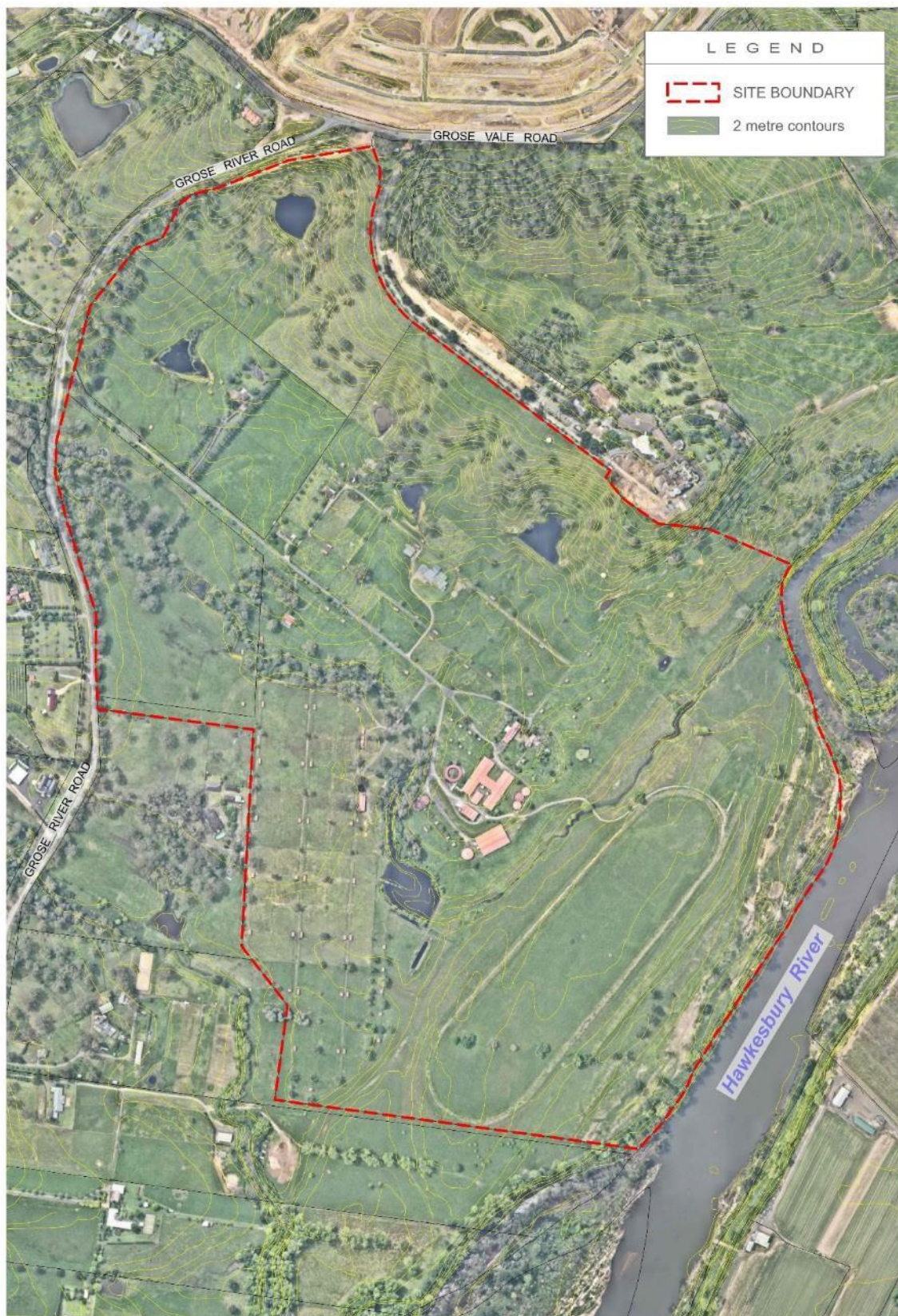


Figure 2 – Subect Site

1.5 Current LEP Provisions

As noted above, the land is located within the Hawkesbury Local Government Area (LGA) and is subject to the provisions of Hawkesbury Local Environmental Plan (LEP) 2012.

The Hawkesbury LEP 2012 adopts the following planning controls applicable to the site:

- Land Use Zoning: RU1 Primary Production
- Minimum Lot Size: 10 hectares
- Maximum Building Height: 10m
- The site is subject to Biodiversity mapping layer over the central creek line which transects the site and some areas of existing vegetation.
- The site is not mapped as having any heritage items or forming part of a heritage conservation area.

The land directly to the north of the site is zoned R2 Low Density Residential and forms part of the Redbank development project currently under delivery.

An operational large scale private hospital (mental health) facility is situated on the landholding directly adjoining the north-eastern property boundary. This site is subject to a heritage listing and mapping under the Hawkesbury LEP 2012.

This Planning Proposal will allow for the delivery of a unique modern residential village encompassing a broad range of housing types and housing diversity, open space areas, creek line rehabilitation and protection, local retail centre, low scale eco-tourism hub and a community farm.

The proposed amendments to the LEP are described in Section 3.2 below.

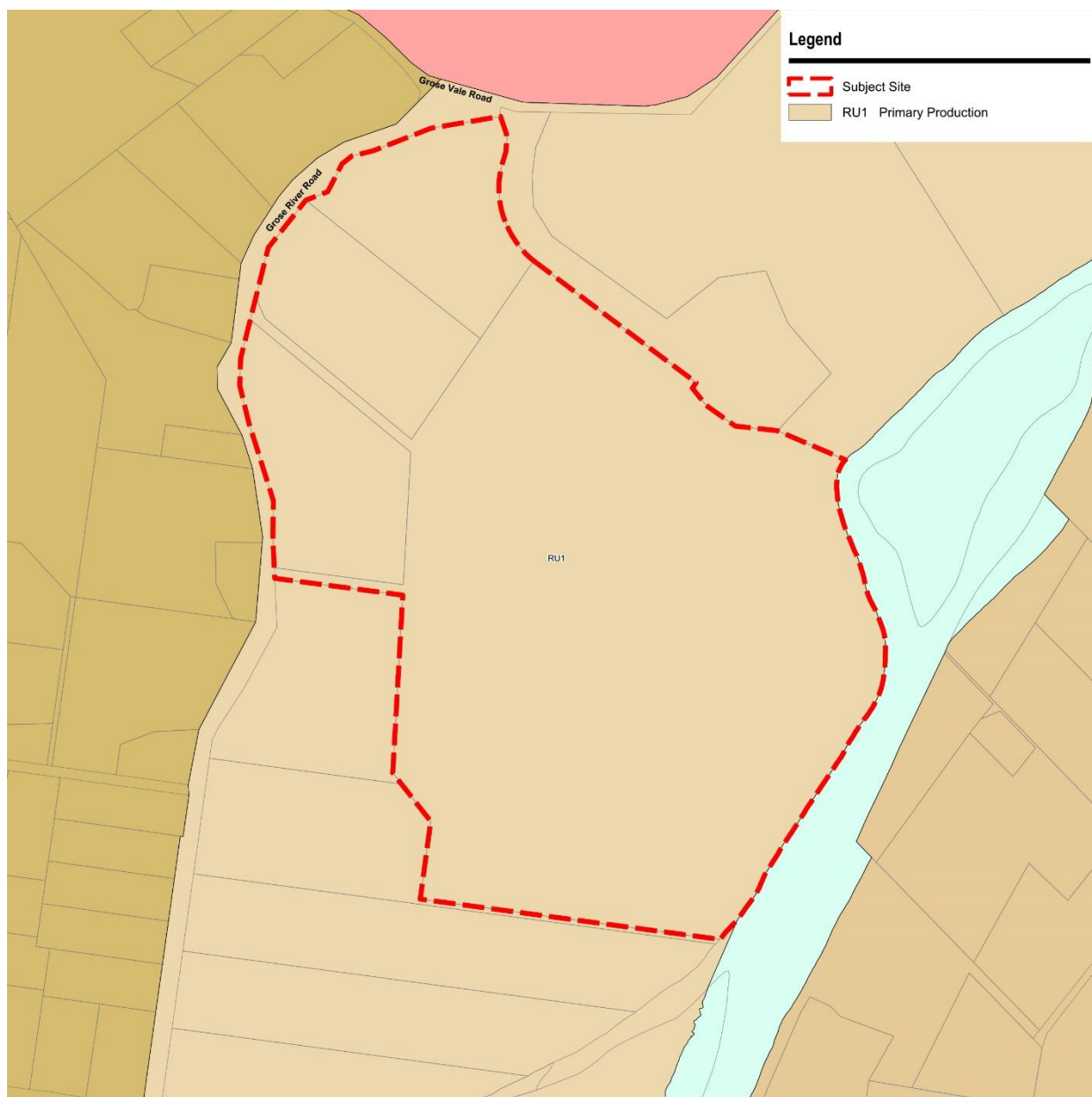


Figure 3 – Current LEP Zoning Plan

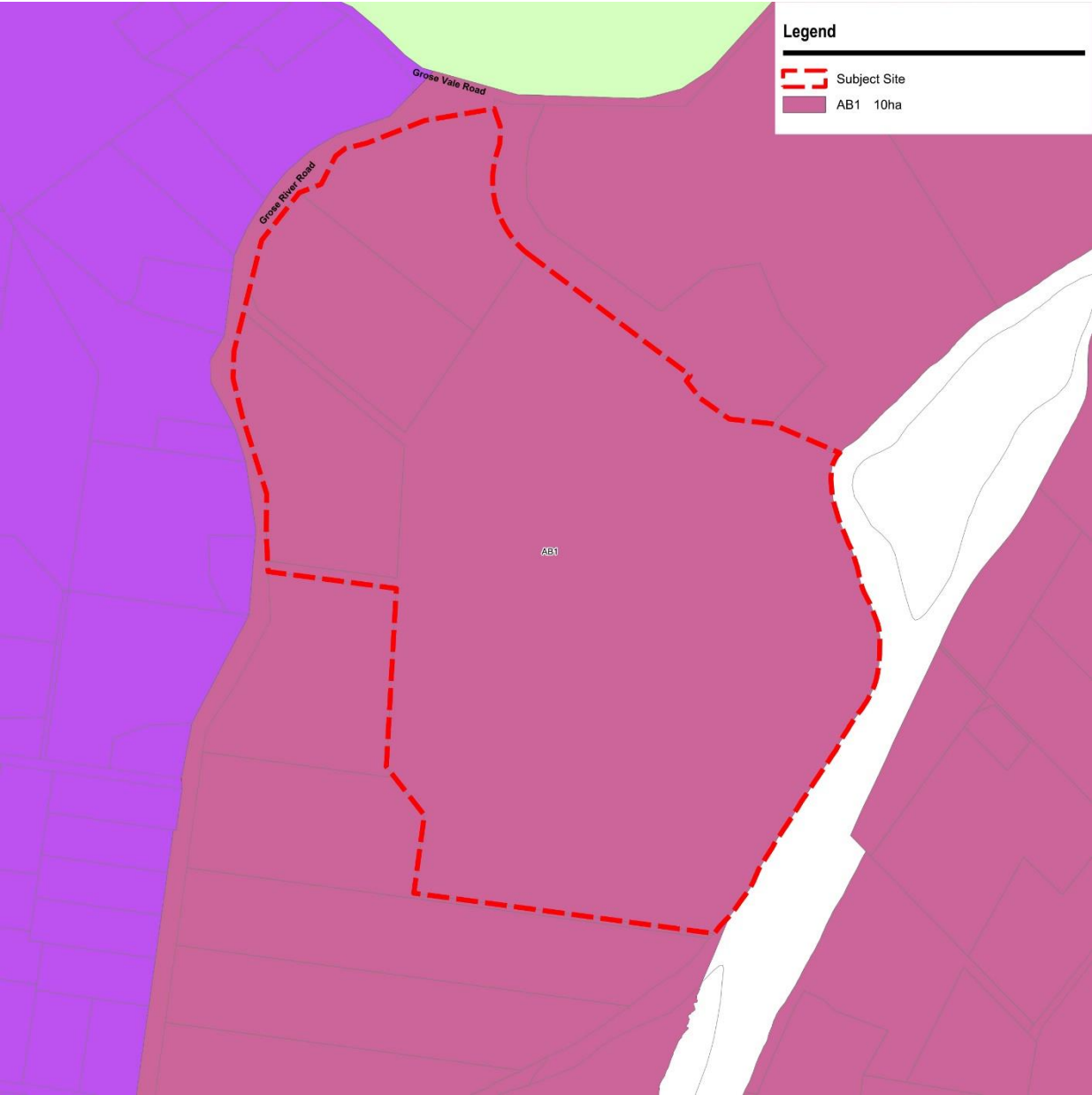


Figure 4 – Current LEP Lot Size Plan

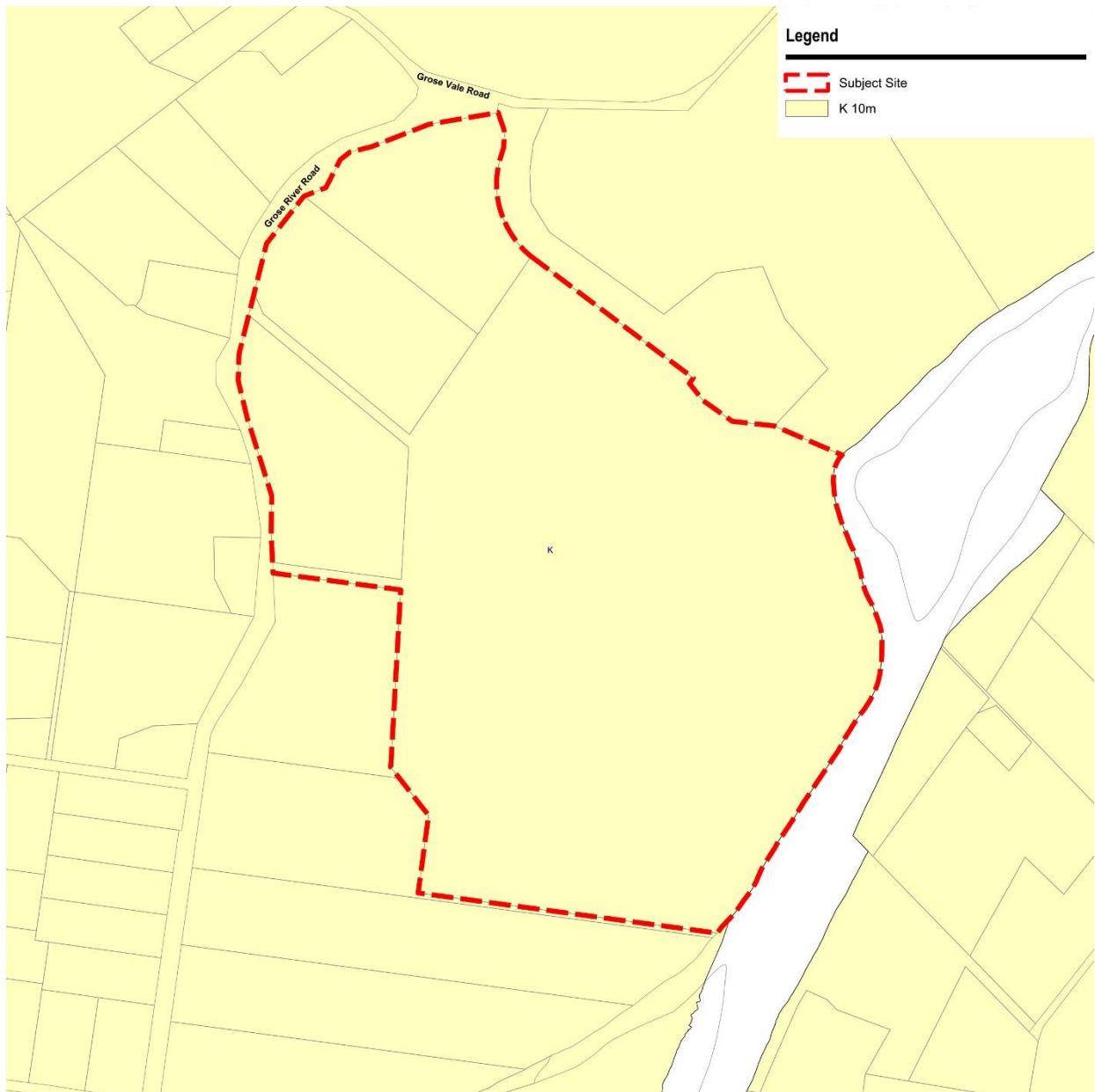


Figure 5 – Current LEP Building Height Plan

2 CONSULTATION

Preliminary joint consultation has been undertaken with Hawkesbury Council, the Department of Planning and the former Greater Cities Commission prior to the submission of this Planning Proposal. Meetings were held with representatives of Hawkesbury Council, the Department of Planning, Land Owners (Kavanagh Family), Development Partner (SEED Projects) and Urbanco in November 2021 and August 2023. The key matters raised in these meetings are outlined below:

Preliminary Meeting November 2021 (Hawkesbury Council and Department of Planning)

- Review flood modelling and evacuation as they relate to the site.
- Review Local Housing Strategy and housing delivery in more detail.
- Need to address “Strategic Merit” of any proposed rezoning.
- Housing affordability and housing diversity are key issues / areas of concern in Hawkesbury LGA – review opportunities to incorporate additional housing diversity.

Pre-lodgement Meeting August 2023 (Hawkesbury Council and Department of Planning)

- Planning Proposal needs to focus on the strategic merit of the proposal, in particular;
 - Address District and Regional Plan
 - Address Metropolitan Rural Area mapping
 - Council Housing Strategy
 - Flood Risk Management incl post flood events and isolation
 - Capacity of Regional Road Network
 - Public Transport
 - Access to Services
- Council noted the subject site does not form any part of Councils current plans for future housing i.e., it is not within Councils Housing Strategy.
- Council is relying on meeting its Department of Planning set Housing Targets via
 - - Vineyard – 2,500 lots (approx. 500 remaining*)
 - - Redbank – 1,400 lots (approx. 500 remaining*)
 - - Jacaranda Rise – 580 lots (580 remaining.)
- *Council noted the uptake at Vineyard is higher than expected. Approx 80% have approvals in place already, Redbank has approximately 500 lots left and Jacaranda Rise is yet to commence.

Pre-lodgement Meeting with Greater Cities Commission Regarding MRA Lands and District Plan Updates September 2023

- Revised District Plans expected to be ready for exhibition End 2023.
- Reviewing urban settlement pattern based on the same principles of the previous plans e.g., efficient / close to jobs / close to services / maintaining social values
- Current District Plans do allow for the MRA area to accommodate local growth. Growth is not prohibited in the MRA.
- District Plan does not allow for large scale new urban released areas in MRA (i.e. South West / North West Growth Centre scale).
- Local Settlement expansion in MRA is consistent with District Plan where it is needed to satisfy local demand as opposed to broader demand.
- Councils LHS can nominate areas for growth in MRA.
- Growth must be balanced against the lands ability to be used for;
 - Farming
 - Tourism
 - Biodiversity
- Growth may be required to keep town and rural uses viable e.g., school and main street
- Some key site matters for consideration / discussed:
 - Flood evacuation and access to services over a long flood period – medical and food.
 - Affordability
 - What other departments had been engaged with e.g., Syd Water and Transport
- Any development needed to be assessed against the criteria of Environmental, Social and Economic outcomes.
- Growth should;
 - Retain cultural values.
 - Retain scenic values.
 - Accommodate local housing growth.
- GCC will work with Council. Suggested that the District Plans would be reviewed first then the Council's LHS.
- GCC requested to receive and be able to provide comment on Scoping Proposal / Planning Proposal.

3 THE PROPOSAL

3.1 Belmont Park Concept Plan

The vision for the site is to deliver a curated modern village nestled in the natural landscape where people of all ages, family types and financial standing will seek out to be a part of. Where residents will form a unique connection with the land, environment and new community.

Overlooking the Hawkesbury River and Sydney Plains, Belmont Park Estate will be a new benchmark for sustainable residential greenfield development and aims to serve as a new blue print for the creation of new communities across NSW.

Belmont Park is designed for connection.

Connect with the land - The community Farm will create of a local food source with residents as active participants. It will be a learning centre for residents and the wider community for sustainable organic farming practices.

Connect with the environment - residents will benefit from the creation and use of their own energy and the efficient reuse of waste. Over 100 Acres of open space and green grid links will connect residents around the village and to a 1km stretch of the Hawkesbury River. Rehabilitation of Steading Creek will create a vegetated east-west flora and fauna corridor from the Hawkesbury River to large vegetation areas to the west of the site.

Connect with community – Belmont project will have its own unique identity with a diverse community. The spaces outside of resident's homes are opportunities to make connections to the local community. Residents will meet at the Farm where they regularly contribute to the farm operations. It will be in the well designed safe open spaces, and it will be in the physical infrastructure such as the neighbourhood centre, designed for people to socialise.

The Concept Plan prepared for the site demonstrates how the Belmont Park Estate can be delivered, responding to key site consideration and urban design elements to create a unique modern residential village.

The Concept Plan creates a series of interconnected neighbourhoods accessed from the central Collector Road system, responding to site topography and key site elements.

The design promotes walkability and accessibility to areas of open space, creek corridors and local facilities to promote healthy and active neighborhoods. In conjunction with Tract, the Concept Plan has been developed to encompass a range of housing options including residential allotments, Low-scale medium density housing (the missing middle), seniors housing and affordable housing opportunities.

Tract have prepared a Housing Diversity Report (Appendix 2) which accompanies this submission and provides further detail on the intended delivery of a diverse range of housing options as part of the project.

The Urban Design Report (Appendix 1) provided with this submission provides a detailed description of the design outcomes embodied in the Concept Plan.

Housing Diversity and Delivery

The community will accommodate 1,200 new homes across a diverse range of housing types and including:

- Seniors Housing = 140 dwellings
- Residential Housing = 540 Dwellings
- Medium Density = 520 Dwellings
- Affordable Housing Sites as part of the project = 240 Dwellings

The Concept Plan has been designed to deliver a wide range of residential allotments with lot sizes ranging from 250m² to 500m² and frontages of 10m to 18m ensuring a wide range of dwelling diversity.

Medium Density housing will comprise a mix of low-rise medium density, cluster housing, villa and terrace style dwellings in community and strata title communities. Seniors housing is likely to incorporate a range of Studio, 1 and 2 bedroom self-contained dwellings.

Affordable / community housing is able to be delivered in association with local housing providers to ensure that dwelling types and designs meet the communities needs.

In conjunction with the TRACT Concept Plan has been designed to deliver a broad range of housing types and ownership models to maximise housing diversity across the project and respond to site considerations.

The Urban Design Report submitted with this proposal provides further detail and commentary on the Urban Design outcomes embodied in the Concept Plan.

Central Hub

A central local hub is the focal point for the future community and will serve as a centre for social connection, creating a beating and dynamic heart with a range of localised retail services, higher density housing and open space connections.

Situated adjacent to the Steading Creek Corridor, and at the confluence of the road network, the Central Hub will be highly accessible in a walkable neighbourhood for all residents. The Central Hub is located within a 5 to 10 minute walk for all residents, with strong east-west at grade connections linking to the planned seniors housing site to the east.

It is envisaged that the Central Hub will be framed by low rise medium density housing, creating an activated and vibrant space. The retail component of the hub has been scaled to accommodate business and facilities to service the new residents and may include a local shops, cafe, restaurant and service based businesses.

The Central Hub has been designed to accommodate a local scale retail offering of approximately 5,000m² of floor space encompassing a small supermarket, specialty shops, café, restaurant and business service premises.

Open Space and Connectivity

The Steading Creek corridor provides a central focus for the community, with road crossings minimised in order to prioritise off-road pedestrian and cycle connections.

Walkability within the community is encouraged through active transport corridors and pedestrian priority streets with ample native tree canopy cover and landscaping, promoting a distinct green-grid connection over the site.

Green space connections have been located and sized to deliver a range of natural, passive and active spaces accommodated creek line pathways, playgrounds, pocket parks and a playing fields across the neighbourhoods. The open space areas include large scale recreational facility providing an activated river edge.

A sustainable community organic arm on the river flats will create a local food source with residents as active participants. It will be a learning centre for residents and the wider community for sustainable organic farming practices.

The proposal incorporates over 59 hectares of land set aside for open space, riparian corridors, retained agricultural land in the community farm and low scale eco-tourism facilities, representing approximately 50% of the site.



Figure 6 – Concept Plan

3.2 Proposed LEP Amendments

As noted above, the land is located within the Hawkesbury Local Government Area (LGA) and is subject to the provisions of Hawkesbury Local Environmental Plan (LEP) 2012.

This Planning Proposal seeks Council support for the delivery of a unique modern residential village, encompassing a broad range of housing types and housing diversity, open space areas, creek line rehabilitation and protection, local retail centre, low impact eco-tourism hub and a community farm.

In this regard, the Planning Proposal likely seeks the following amendments to the Hawkesbury LEP 2012:

- a) Amend the Land Use Zoning to encompass a range of land use zones as follows:
- R2 Low Density Residential zoning for residential housing areas.
 - R1 General Residential zone for the Cluster Housing areas.
 - R5 Large Lot Residential zoning for large lot areas on the edges of the project.
 - E1 Local Centre zoning for the Local Centre – including an allowance to deliver Residential Flat Buildings.
 - RE1 Public Recreation for open space areas
 - C2 Environmental Conservation zone for Riparian Corridor Areas.
 - SP3 Tourist for the tourism hub

We note that the proposal will retain the RU1 Primary Production zoning over the community farm land.

- b) Amend the Minimum Lot Size mapping follows:
- 300m² minimum lot size for the R2 Low Density Residential zoned areas.
 - 200m² minimum lot size for R1 General Residential zoned Cluster Housing areas.
 - 1,200m² minimum lot size for the R5 Large Lot Residential zoned areas.
 - No Minimum lot size for the E1 Local Centre zoned land.
 - Minimum Lot size mapping amendments for RE1 Public Recreation, C2 Environmental Conservation and SP3 Tourist for the tourism hub are subject to discussion with Council.
- c) Amend the Maximum Building Height mapping follows:
- Retain the existing 10m building height for the R2 Low Density Residential and R1 General Residential zoned areas.
 - 12m Maximum Building Height for R5 Large Lot Residential zoned areas (to accommodate split level construction and site topography).
 - 15m Maximum Building Height for the E1 Local Centre and SP3 Tourist zoned land.
 - Retain the existing 10m building height for the RE1 Public Recreation and C2 Environmental land.

- d) Amend the Biodiversity Mapping layer to reflect the detailed site investigations and master planning outcomes.

- e) Remove the land from the *Minimum Lot Size for a Lot Averaging Subdivision* map.

Detailed amendments to the LEP Maps are provided in Section 9 of this report.

3.3 Delivery and Timing

- Housing supply shortage start date – 2028 (Residential Needs Analysis, Macroplan, Aug 23)

- First houses delivered by Belmont Park – 2028*

Based on the Concept Plan prepared, it is expected the first stages of delivery will occur along the main entry road adjacent to Grose River Road. Delivery would likely proceed within the site progressing to the east in the northern portion of the project.

It is expected that the southern portions of the project would be delivered as later stages.

*Based on rezoning occurring in 2026. Concurrent DA applications would be made such that subdivision works could take place shortly after rezoning, making a 2028 housing delivery date entirely achievable.

3.4 Infrastructure Review

Indesco have completed a preliminary Service Strategy (Appendix 13) for the site which reviews existing infrastructure within the locality and capacity to service the proposal.

Critically, Indesco have concluded that the proposed Belmont Park project can be serviced and have provided preliminary infrastructure costings which demonstrate that servicing of the site is feasible from a financial perspective.

As Belmont Park intends to create a sustainable servicing strategy it will take advantage of servicing solutions that generate and store energy locally and efficiently re-use water via its own recycled water treatment plant.

Sewer

Recycled Sewer is the preferred outcome at Belmont Park.

Preliminary modelling concluded that the project will be of a size to be economically feasible. Alltogether Group, a recognised provider of such services have expressed a formal interest in supporting the project (Appendix 11).

Alternatively, INDESCOs investigations revealed that whilst existing Sydney Water infrastructure is limited, Sydney Water have advised that the North Richmond Wastewater Treatment Plant (WWTP) and Richmond WRP are proposed to be upgraded which will include a new pressure main approximately 6.9km long to transfer flows from North Richmond WWTP to Richmond WTP. The upgrades are expected to cater for over 85% increase in demand and are planned to be completed by Q2-Q3 2025.

We also note that Sydney Water have included the site in its DRAFT Richmond Waste Water Services Development Servicing Plan 2023. (<https://www.sydneywatertalk.com.au/infrastructure-contributions>)

Water

Recycled Water is the preferred outcome at Belmont Park.

The establishment of a recycled water plant will enable the reuse of treated water. Recycled water can be treated to a quality suitable for dual reticulation including reuses such as toilet flushing, washing machines and irrigation applications. The irrigation applications could include the farming uses and recreational open spaces.

With respect to existing infrastructure there is an existing DN315mm diameter Polyethylene (PE) Water Main in Grose Vale Road. The water main extends past the intersection of Grose Rover Road and Grose Vale Road, along the northern edge of the site.

There is an existing water reservoir 2km north-east of the site in the North Richmond Waste Water plant property.

Potable water servicing of the site can be achieved through either:

- Connection to the existing water main in Grose Vale Road; or
- Provision of a new main from the reservoir which would provide additional capacity to the surrounding catchment beyond that required by the project.

Electricity

Distributed Energy Resources (DERs) are the preferred outcome at Belmont Park. Belmont Park intends to maximise its use of locally generated renewable energy such as roof top solar complimented with various locally located battery back-up systems.

Alternatively or in addition to the DERs, there are two existing zone substations within the proximity of the site:

- The North Richmond Zone Substation located approximately 3km (approx RL 28m); and
- The East Richmond Zone Substation located approximately 8km (approx. RL 17m) from the site.

Endeavour has advised the development would be supplied from the North Richmond Zone Substation by installing a new 11kV feeder to the site.

An interim supply from the East Richmond zone substation could supply approximately 500 lots, prior to the new feeder being delivered.

Telecommunications

Design It Telco (DIT) were consulted in relation to the proposal and have advised as follows:

- Current NBN and Telstra infrastructure could handle the overall proposed development yield.
- As the development is over 100 lots it will qualify for fibre to premises (FTTP); and
- No back haul charges are expected as the Site is located within 1km of an NBN Co serviced estate (Redbank).

3.5 Contributions Framework

It is anticipated that as part of any rezoning a site-specific Voluntary Planning Agreement would be prepared and entered into by the landowner & developer to address infrastructure delivery and provision associated with the future population.

A detailed Social Infrastructure review would be prepared and submitted with the rezoning proposal.

The Voluntary Planning Agreement would likely address infrastructure including:

- Dedication and delivery of open space areas
- Delivery of local road upgrades where required
- Potential for contribution to the planned Grose Rover Road Bridge
- Offsite social infrastructure as deemed necessary.

3.6 Existing Planned Local Infrastructure Upgrades

Richmond Bridge Duplication - The Australian Government and NSW Government have committed \$500 million for traffic improvements including a new bridge over the Hawkesbury River between Richmond and North Richmond. In a community update issued by Transport for NSW in April 2022 it was reported that a contractor for the design and construction of Stage 1 is expected to be appointed late 2022 and the alignment of Stage 2 is currently being finalised.

Grose River Road and Grose Vale Road Upgrades - Currently underway are significant upgrades to the existing Grose Vale Road and Grose River Roads immediately adjacent to the project. Approximately 1km of road upgrades are being undertaken by the neighbouring developer Redbank Communities, which include a large round-a-bout intersection at Grose River Road.

New Grose River Road Bridge - A new flood free bridge is planned to start construction in early 2024. This will connect Grose River Road and Springwood Road and will ultimately provide a direct connection from the site to Penrith and future Western Sydney Infrastructure Corridors. It would also serve as an alternate route to Richmond town centre and train station.

4 HAWKESBURY-NEPEAN VALLEY FLOOD EVACUATION MODELLING (2023)

In October 2023 the NSW State Government released the Flood Evacuation Modelling (FEM) report for the Hawkesbury-Nepean Valley.

As part of development of the Hawkesbury-Nepean Valley Flood Risk Management Strategy (Flood Strategy), the NSW Government developed a purpose-built flood evacuation model to provide a more detailed understanding of the evacuation road capacity during a flood event.

The FEM simulates the NSW SES evacuation arrangements under a range of assumptions. It provides the NSW Government with a repeatable process to quantify existing and ongoing risk to life associated with the cumulative impact of growth and climate change on road evacuation capacity in the valley.

To ascertain changes in the risk to life over time, three time points were modelled – 2018 (to represent the existing situation), 2026 and 2041.

The modelling considered a range of flood events, from a 1 in 50 chance per year flood up to a 1 in 5000 chance per year flood, with analysis focused on 2 major flood events - 1 in 500 chance per year (worst flood on record), and 1 in 1000 chance per year (more probable with climate change and the flood event which cuts off the last major evacuation route for the flood islands).

The report presents the risk to life using two key metrics - the average annual people unable to evacuate within 12 hours, and the geographical distribution of the average annual people unable to evacuate across the valley, for a specific flood event.

The report notes that floods pose a serious risk to safety in the Hawkesbury-Nepean Valley. *Some locations in the floodplain are more vulnerable than others because they are in low-lying areas which can become surrounded by floodwaters during a flood event. As floodwaters rise, these areas become isolated when low lying roads are cut, creating flood islands. Some of these islands may then become fully submerged as the waters continue to rise, putting many lives at risk.*

Some Urban Centres within the LGA, including Windsor are located on flood islands.

Evacuation often needs to occur at short notice, meaning that large numbers of people may be trying to evacuate via the same major roads, often around the same time. IN some cases, there is not sufficient road capacity to evacuate people before roads are inundated and cut by flood waters.

Based on the modelling, State Government has determined the proposed rezoning and draft plans for Marsden Park North precinct and Riverstone Town Centre will not proceed. The plans for the West Schofields precinct will partially proceed, subject to strict conditions.

As a result, of the approximately 12,700 new homes previously proposed under the three rezonings, only up to 2,300 will now proceed.

The modelling also indicated **that potential development in the Windsor and Richmond town centres forecast under the Hawkesbury Local Housing Strategy would increase the average annual people at risk by around 75%.**

5 HOUSING SUPPLY & AFFORDABILITY ANALYSIS

5.1 Housing Supply

Housing supply in north-west Sydney and the Hawkesbury LGA has been predominantly focussed on existing urban release areas for the last 10 years.

Hawkesbury Council adopted their Local Housing Strategy in 2020 and Local Strategic Planning Statement (LSPS) in 2021. These strategic policies provided an outline of projected housing demand and areas of supply across the LGA.

The Housing Strategy and LSPS indicate a total of 4,500 new dwellings will be delivered in existing urban release areas between 2016 & 2036.

These included the following:

- Vineyard Stage 1 (2,500 dwellings)
- Redbank (1,400 Lots)
- Jacaranda Ponds (580 Lots)

The Department of Planning & Environment have recently released updated dwelling projections for NSW, being the *2022 NSW Common Planning Assumption Projections*. These projections indicate that up to 6,995 new dwellings will be required to be delivered in the Hawkesbury LGA from 2016 to 2041 (*Implied Dwelling Demand 2016-2041*).

Macroplan have undertaken a Residential Needs Analysis, Aug 2023 (Appendix 12) which includes a detailed analysis of projected housing demand versus housing supply.

The key findings of the Macroplan report are:

- There is a housing undersupply of over 2200 dwellings in the Hawkesbury LGA
- There are no developments identified within the LHS that could deliver any of the 2200 dwellings required.
- The 2200 housing undersupply estimate may be understated should dwelling demand (i.e., take up rates) keep apace of new supply, as has been demonstrated since 2017.
- Volume of new supply is projected to begin to diminish from around 2028.

Table 1: Dwelling Supply Analysis (Source: Macroplan)

Table 6.1 Hawkesbury LGA - Net dwelling demand/supply					
Development	Future supply (2021-41)				
	2021-26	2026-31	2031-36	2036-41	Total*
Implied demand (DPE) - increase	802	1,151	1,631	2,340	5,925
- <i>Dwellings p.a.a.</i>	160	230	326	468	296
Demand actual / Macroplan (p.a.) **	1,100	1,375	1,631	1,875	5,981
- <i>Dwellings p.a.a.</i>	220	275	326	375	299
Supply pipeline - increase	1,645	1,550	578	0	3,773
- <i>Dwellings p.a.a.</i>	329	310	116	0	189
Redbank	645	75	0	0	720
Vineyard Stage 1	825	1,225	248	0	2,298
Jacaranda Ponds	0	250	330	0	580
Vermont Estate (Pitt Town)	30	0	0	0	30
Infill developments	145	0	0	0	145
Net demand / supply (5-yrly) - DPE	843	399	-1,053	-2,340	-2,152
Net demand / supply (5-yrly) - Macroplan	545	175	-1,053	-1,875	-2,208
<i>Difference ^</i>	-298	-224	0	465	-56

*Supply 2021-2041
** Macroplan's estimates and projections for demand based upon historical and current demand levels
^ Negative figure demonstrates actual & future potential demand being underestimated
Source: NSW Department of Planning and Environment (DPE) (2022); Cordells (Dec-22); Macroplan

In addition, both the Vineyard Stage 2 and Marsden Park North Precincts have been paused subject to further assessment and consideration of both flooding impacts and the Outer Sydney Orbital alignment. These constraints will significantly reduce expected dwelling projections in these precincts, further exacerbating the undersupply of housing at a District level inclusive of the Hawkesbury LGA.

Furthermore, as demonstrated in Section 6.6 below, there are substantial areas of infill development envisaged under the Hawkesbury LHS in existing flood prone centres / residential areas.

There is a likely shortfall of at least 3,600 dwellings in the Hawkesbury LGA based on the adopted LHS identifying increased density and diversity housing in flood prone areas between 2021 & 2041.

As noted above, the Hawkesbury-Nepean Flood Evacuation Model (2023) determined that potential development in the Windsor and Richmond town centres forecast under the Hawkesbury Local Housing Strategy would increase the average annual people at risk by around 75%.

The Belmont Park project can deliver a significant proportion of the dwelling shortfall in a single land holding, removing the need for Council to resolve the land supply gap in the short term and allowing further time to investigate other areas to accommodate the balance land supply required.

5.2 Housing Affordability

Housing affordability for residents and the delivery of Affordable Housing in the Hawkesbury LGA have become increasingly critical issues over the last decade.

Strategic Planning policies across both State and Local Government identify addressing housing affordability across the Sydney Metropolitan Region as a key planning and social objective.

Recent increases in house prices and a continued lack of affordable housing delivery has further exacerbated these issues.

As outlined in the Macroplan review the median house price in the Hawkesbury LGA increased by 20.6% in the 2022 (*year to August*) and the median unit price increased by 22.8%.

The Hawkesbury Local Housing Strategy states that based on advice from Community Housing providers, a growth of over 7% in affordable dwellings is required to meet projected demand to 2036 with a shortfall of up to 3,000 affordable dwellings by 2036.

Retail and pricing analysis of current and future new housing projects indicates that these estates will not address housing affordability in the region.

Macroplan have identified that due to lack of housing diversity, housing prices within the Hawkesbury LGA are becoming increasingly unaffordable. New house and land packages are typically priced between \$1.1 and \$1.6Mill in the immediate area.

Belmont Park will consist of housing at approximately ½ the price of other new housing options in the area.

The project will also deliver 20% of the total dwellings as Affordable / Community Housing, providing significant public benefit to the broader community.

The type and delivery mechanism of Affordable Housing delivered on site will be refined and determined through consultation with local housing providers, agencies and State & Local Government following rezoning of the land.

It is anticipated that the delivery / provision of Affordable Housing will be encompassed in a Voluntary Planning Agreement as part of any future rezoning.

Affordable Housing delivered on site may include aged care housing, women's refuge housing, housing delivered in partnership with a local community housing provider and the like.

6 STRATEGIC MERIT TEST

The NSW Department of Planning and Environment has established a Strategic Merit Test for consideration when preparing and determining Planning Proposals.

The Strategic Merit Test includes three criteria to be considered in determining whether a proposal has merit to proceed. The proposal is not required to meet all the strategic merit test criteria, rather the proposal is deemed to have strategic merit if it meets one, or more of the criteria.

We have addressed each of the tests below and demonstrate that the proposal achieves Strategic Merit and is able to be supported.

- 1. Give effect to the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, and/or corridor/precinct plans applying to the site. This includes any draft regional, district or corridor/precinct plans released for public comment or a place strategy for a strategic precinct including any draft place strategy;***

Yes, the Planning Proposal is consistent with the Greater Sydney Region Plan and Western Parkland City District Plan.

A detailed response to the relevant Directions and Planning Principles as they relate to this proposal is included below and is also addressed in the Planning Proposal Section (Section 9) of this report.

The Planning Proposal is consistent with the Greater Sydney Region Plan as:

- The proposal will allow for the delivery of housing which allows Hawkesbury Council to meet their dwelling targets and the broader District dwelling targets.
- The proposal will protect and revegetate creek line / riparian corridors providing enhanced biodiversity outcomes and bushland connections.
- The proposal will facilitate a range of land uses which also contribute to the regional economy and provides for local tourism and small scale community agricultural uses.
- The proposal is consistent with the intent and principles of the Metropolitan Rural Area and will allow for delivery of housing as an extension of the existing urban area to satisfy local housing demand.

Key priorities which demonstrate that the Planning Proposal is consistent with the District Plan include:

- *Planning Priority W4 Fostering healthy, creative, culturally rich and socially connected communities*
- *Planning Priority W5 Providing housing supply, choice and affordability, with access to jobs, services and public transport*
- *Planning Priority W6 Creating and renewing great places and local centres, and respecting the District's heritage*
- *Planning Priority W14 Protecting and enhancing bushland and biodiversity*
- *Planning Priority W19 Reducing carbon emissions and managing energy, water and waste efficiently*

2. Demonstrate consistency with the relevant LSPS or strategy that has been endorsed by the Department or required as part of a regional or district plan;

Yes, the Planning Proposal is consistent with the Hawkesbury Local Strategic Planning Statement.

A detailed response to the relevant Planning Priorities as they relate to this proposal is included below and is also addressed in the Planning Proposal Section (Section 9) of this report.

The Planning Proposal is consistent with the LSPS, Housing Strategy and Rural Land Strategy as:

- The site is not considered prime agricultural land and borders the existing urban edge of North Richmond. Support for this proposal is consistent with the LSPS in that it will reduce / alleviate existing land use conflict with rural land directly adjoining a sensitive health land use on the eastern property boundary.
- The proposal will allow for the delivery of housing which allows Hawkesbury Council to meet their dwelling targets and the broader District dwelling targets.
- The proposal is consistent with the housing strategy as it would deliver a diverse range of housing in an area that would be classified as a new urban release area, with development located on flood free land.
- The site is not considered prime agricultural land and borders the existing urban edge of North Richmond. Support for this proposal is consistent with the LSPS in that it will reduce / alleviate existing land use conflict with rural land directly adjoining a sensitive health land use on the eastern property boundary.

3. Respond to a change in circumstances that has not been recognised by the existing planning framework.

Yes, this Planning Proposal responds to changes in circumstances and have not been recognised in the existing planning framework including:

- The Hawkesbury-Nepean Flood Evacuation Model (2023) determined that potential development in the Windsor and Richmond town centres forecast under the Hawkesbury Local Housing Strategy would increase the average annual people at risk by around 75%.

As such there is shortfall of at least 3,600 dwellings in the Hawkesbury LGA based on the adopted LHS identifying increased density and diversity housing in flood prone areas between 2021 & 2041.

- The Macroplan Housing Supply report prepared with this submission determined that there is a housing undersupply of over 2200 dwellings in the Hawkesbury LGA and that there are no developments identified within the LHS that could deliver any of the 2200 dwellings required.
- There is a growing demand and requirement for increased housing diversity across the LGA which is not provided for in the current planning controls and can no longer be delivered in existing flood prone Town centres.

6.1 Strategic Policy Summary

As part of this Planning Proposal, we have provided below a review of the key Strategic Planning Policies relating to the site, Hawkesbury LGA and broader regional context. These have included:

- Hawkesbury Rural Land Strategy
- Hawkesbury Local Strategic Planning Statement
- Hawkesbury Local Housing Strategy
- 2022 Flood Enquiry
- Greater Sydney Region Plan / Western City District Plan
- Metropolitan Rural Area mapping

As outlined in the Department of Planning Proposal template and guidelines, this section of the document provides a short statement to identify whether the proposal aligns with and gives effect to the strategic framework that applies to the proposal site.

We have demonstrated that the proposal is consistent with the settlement expansion criteria established under the Rural Land Strategy and is consistent with the intention of the strategy to allow natural expansion of North Richmond as a Local Town Centre in the centres hierarchy.

We have also provided below an outline of how the project is able to give effect to and enable Hawkesbury Council to address key Strategic Merit and Housing Delivery considerations / targets in the District Plans and Local Planning strategies.

We have also addressed the existing Metropolitan Rural Area mapping over the land holding and surrounding urban areas demonstrating that the MRA mapping is inappropriate. We note that the MRA mapping is currently being reviewed by the Department of Planning (GCC).

The review below has demonstrated that the proposal achieves Strategic Merit and is able to be supported by Council as an extension of the existing urban settlement to address Local Housing shortfalls noting that:

- The Belmont Park land holding is not subject to any *Exclusionary Criteria* under the Rural Land Strategy and can address each of the *Management Criteria*. **As such, the land holding is considered appropriate for natural expansion of the North Richmond settlement under the Rural Land Strategy, noting that the land directly adjoins the existing urban edge.**
- The site is not mapped as Prime Agricultural Land and is therefore able to be considered by Council for residential development. **Support for this proposal is consistent with the LSPS in that it will reduce / alleviate existing land use conflict with rural land directly adjoining a sensitive health land use on the eastern property boundary.**
- **There is a likely shortfall of at least 3,600 dwellings delivered in the Hawkesbury LGA based on the adopted LHS identifying increased density and diversity housing in flood prone areas.**

Given the extent of flooding identified in infill locations, there is a strong basis for the subject site to be considered for residential development as an extension of the existing North Richmond settlement.

- **This proposal allows for the delivery of housing in flood free land** in Hawkesbury LGA responding to housing need in the region and addressing gaps in housing supply, consistent with the Flood Enquiry planning outcomes.
- The proposal is consistent with the broad aims and objectives of the GSRP and Western City District Plan as it will **deliver additional housing supply to meet housing targets within close proximity of a Strategic Centre** providing access to jobs, services and transport close to where people live.
- Consistent with the objectives of Planning Priority W5 **the proposal will specifically deliver Greater housing supply and Housing which is more diverse and affordable.**
- The proposal is **consistent with the principles of the Metropolitan Rural Area** for the Hawkesbury LGA and the District Plan **which allow for the extension of the existing township in response to local housing demand and needs.**
- We note that **a significant portion of the MRA land will be retained for use as active agricultural and horticultural use, open space facilities and tourism uses** consistent with the principles and intent of the MRA lands.

6.2 Greater Sydney Region Plan / Western City Plan

The Greater Sydney Region Plan and associated Western City District Plan were prepared by the Greater Sydney Commission in March 2018.

The plans outline a vision for Greater Sydney as a metropolis of three cities, incorporating the Western Parkland City, the Central River City, and the Eastern Harbour City.

The Western City District Plan incorporates a range of Planning Priorities for the region addressing areas including Infrastructure and Collaboration, Liveability, Productivity, Sustainability, and Implementation.

As demonstrated below, the Planning Proposal is consistent with a range of key Planning Priorities and principles outlined under the Regional Plan.

6.2.1.1 Planning Priority W4 Fostering healthy, creative, culturally rich and socially connected communities

Planning Priority W4 of the District Plan is to deliver and foster Fostering healthy, creative, culturally rich and socially connected communities. The Belmont Park project is consistent with this Planning Priority and associated objectives as follows:

- **Objective 7**

Communities are healthy, resilient and socially connected.

The Concept Plan incorporates walkable streets and pedestrian connections that provide direct, accessible and safe pedestrian and cycling connections from homes to daily needs and recreation facilities, encouraging physical activity and social connection, consistent with the District Plan.

The proposal also delivers connectivity of, and access to, diverse open space and opportunities for recreational physical activity.

Consistent with the Planning Priority W4 Actions, the proposal also incorporates a large scale

Community Farm which will promote local access to healthy fresh food and supporting local fresh food production.

- **Objective 8**

Greater Sydney's communities are culturally rich with diverse neighbourhoods.

The Belmont Park project also incorporates a significant diversity of housing types which will support the different household types and needs across the community.

The project will include medium density and cluster housing, “*The Missing Middle*” housing typologies, which will address housing diversity needs across the LGA and District.

6.2.1.2 Planning Priority W5 Providing housing supply, choice and affordability, with access to jobs, services and public transport

Planning Priority W5 of the District Plan is to ensure that the District Plan facilitates the provision of housing supply, choice and affordability, with access to jobs, services and public transport. The Belmont Park project is consistent with this Planning Priority and associated objectives as follows:

- **Objective 10**

Greater housing supply.

As discussed above, Macroplan have identified that there is a 2,200 dwelling shortfall based on the current LHS dwelling delivery scenario across the LGA.

There is also a likely shortfall of at least 3,600 dwellings based on the adopted LHS identifying increased density and diversity housing in flood prone areas. Refer to Sec 6.3 of this report for further details.

The site will deliver over 1,200 new dwellings as a direct extension of the existing urban settlement, to meet local housing demand, consistent with the objectives of the District Plan.

- **Objective 11**

Housing is more diverse and affordable.

Macroplan have identified that due to lack of diversity, housing prices within the Hawkesbury LGA are becoming increasingly unaffordable. House and land packages in the immediate vicinity are typically priced between \$1.1 to \$1.6million.

Belmont Park's deliberately diverse range of housing options will facilitate the creation of housing at approximately ½ the price of other new housing options in the area. This proposal creates 1200 dwellings of varying types, many of which will enable local working-class families to achieve their dream of home ownership.

The project will also deliver 20% of the total dwellings as Affordable / Community Housing, providing significant public benefit to the broader community.

The community will accommodate 1,200 new homes across a diverse range of housing types and including:

- Seniors Housing = 140 dwellings
- Residential Housing = 540 Dwellings
- Medium Density = 520 Dwellings
- **20% Affordable Housing as part of the project = 240 Dwellings**

In this regard, the proposal is able to deliver 55% of the dwellings as medium density, multi dwelling and seniors housing, significantly contributing to enhancing housing diversity in the LGA.

The GSRP and Western District Plan identify a 20-year housing target of 184,500 new dwellings to be delivered from 2016 to 2036 in the Western City. This equates to an average annual supply of 9,225 dwellings over 20 years.

The housing supply analysis has identified that there is a shortfall in the supply and demand forecast for Hawkesbury Council, which will result in not meeting the housing targets under the GSRP.

The proposal provides for housing as an extension of the existing urban edge of North Richmond to ensure both Hawkesbury Council and Western City District plan housing targets are met.

The proposal is consistent with the broad aims and objectives of the GSRP and Western City District Plan as it will deliver additional housing supply to meet housing targets within close proximity of a Strategic Centre providing access to jobs, services and transport close to where people live.

Consistent with the objectives of Planning Priority W5 the proposal will specifically deliver Greater housing supply and Housing which is more diverse and affordable.

6.2.1.3 Planning Priority W6 Creating and renewing great places and local centres, and respecting the District's heritage

Planning Priority W6 of the District Plan is to create and renew great places and local centres, and respecting the District's heritage. The Belmont Park project is consistent with this Planning Priority and associated objectives as follows:

- **Objective 13**

Environmental heritage is identified, conserved and enhanced.

As discussed in this report, AECOM have prepared a Non-Aboriginal Heritage Constraints report the proposed Belmont Park Estate site.

The report notes that A review of historical sources and a site inspection resulted in two buildings of heritage significance within the Project area. These two buildings constructed in 1896 have been assessed as having local heritage significance owing to their connection with the Belmont Park Estate and the Charley family.

Consistent with the recommendations of the heritage report, the two 1896 farm buildings are proposed to be retained and incorporated into the future development.

The buildings are intended to form part of a medium density housing site, allowing the buildings to be retained, restored and managed in a landscape setting, as a community facility or refurbished for residential accommodation, consistent with the intent of the District Plan.

6.2.2 Planning Priority W14 Protecting and enhancing bushland and biodiversity

Planning Priority W14 of the District Plan aims to protect and enhance bushland and biodiversity across the District. The Belmont Park project is consistent with this Planning Priority and associated objective as follows:

- **Objective 27**

Biodiversity is protected urban bushland and remnant vegetation is enhanced.

The project has adopted a sensitive development footprint with 50%, over 59 hectares of land, set aside for open space, riparian corridors, retained agricultural land in the community farm and low scale eco-tourism facilities.

The project will enhance biodiversity outcomes through the rehabilitation and revegetation of creek lines through the site, providing biodiversity connectivity for the Hawkesbury River to Bushland areas to the west.

The existing creek line is degraded as a result of erosion and long term agricultural and grazing activities on the site. Revegetation of Steading Creek as a Riparian Corridor will significantly enhance biodiversity and vegetation outcomes in the locality.

The project will also provide for a long term open space edge along the Hawkesbury River edge, enhancing local Aquatic and riverine biodiversity.

6.2.3 Planning Priority W19 Reducing carbon emissions and managing energy, water and waste efficiently

Planning Priority W19 of the District Plan is to ensure communities reduce carbon emissions and manage energy, water and waste efficiently. The Belmont Park project is consistent with this Planning Priority and associated objectives as follows:

- **Objective 34**

Energy and water flows are captured, used and re-used.

The Belmont Park project incorporates a range of planned innovative water and energy solutions.

The project is consistent with *Action 82. Support precinct-based initiatives to increase renewable energy generation and energy and water efficiency, especially in Growth Areas, Planned Precincts, Collaboration Areas, State Significant Precincts and Urban Transformation projects.*

Recycled Water is the preferred outcome at Belmont Park.

The establishment of a recycled water plant will enable the reuse of treated water. Recycled water can be treated to a quality suitable for dual reticulation including reuses such as toilet flushing, washing machines and irrigation applications. The irrigation applications could include the farming uses and recreational open spaces.

Distributed Energy Resources (DERs) are the preferred outcome at Belmont Park.

Belmont Park intends to maximise its use of locally generated renewable energy such as roof top solar complimented with various locally located battery back-up systems. This will allow creation of a localized micro-grid power system throughout the project.

6.3 Metropolitan Rural Area

6.3.1 Accommodating Local Growth in the MRA

We note that the GSRP and Western City District Plan indicate that the site forms part of the “*Metropolitan Rural Area*” (MRA) mapping.

As noted in the District Plan, the MRA area *Includes primary production and resource extraction, tourism and recreation assets, towns and villages.*

The Western City District’s rural areas contribute to habitat and biodiversity, support productive agriculture, provide mineral and energy resources, and sustain local rural towns and villages. They are part of the larger Metropolitan Rural Area.

The figure below indicates how the District Plan MRA mapping incorporates all land surrounding the site including existing townships, urban areas, industrial precincts and town centres.

Directly surrounding the site, the adjoining Redbank Urban Release Area, North Richmond residential areas and CBD, Richmond residential areas and CBD and Western Sydney University Campus are all mapped as forming part of the MRA.

Richmond CBD and surrounding residential areas are also predominantly mapped as forming part of the MRA, despite being identified as a Strategic Centre.

This is despite the fact Richmond is identified as a Strategic Centre under the District Plan.

The proposal seeks to deliver local housing as an extension and continuation the existing North Richmond Township and does not seek to establish any new residential release areas or urban development areas under the District Plan.

As advised by the Department of Planning (Greater Cities Commission) during a pre-lodgement meeting in September:

- Current District Plans do allow for the MRA area to accommodate local growth. Growth is not prohibited in the MRA.
- District Plan does not allow for large scale new urban released areas in MRA (i.e. South West / North West Growth Centre scale).
- Local Settlement expansion in MRA is consistent with District Plan where it is needed to satisfy local demand as opposed to broader demand.

Ongoing planning and management of rural towns and villages will need to respond to local demand for growth, the character of the town or village and the surrounding landscape and rural activities. Rural and bushland towns and villages will not play a role in meeting regional or district scale demand for residential growth.

As such, the proposal is able to be supported and is considered consistent with the District Plan as an extension of the existing township in response to local housing demand and needs.

6.3.2 Retaining Agricultural, Tourism and Open Space Uses in the MRA

We note that a significant portion of the MRA land will be retained for use as active agricultural use, open space facilities and tourism uses consistent with the principles and intent of the MRA lands.

We have provided a summary of these uses below.

Community Farm – Agriculture

A large scale Community Farm is intended to be provided in the eastern portion of the land on the higher quality agricultural flood plain land. The Community Farm will accommodate agricultural areas for residents of Belmont Park and allow for the leasing of smaller intensive agricultural plots (1 -2 acres) to local producers.

The Community Farm encompasses over 20 hectares of land providing significant opportunity for local scale agricultural activities.

The Community Farm will be based on similar local and international models including The Ecology Centre in southern California.

As an example, the Ecology Centre is community based farm located on a historic agricultural property that is surrounded by urban land, The Ecology Center is a 28-acre Regenerative Organic Certified farm and education centre.

The Ecology Centre incorporates Cropping Areas, Orchards, Markets Gardens, Seed & Soil Lab, Grain Lab, Kids Farm, Educational Facilities and Farm Infrastructure.

We grow over 200 ingredients - fruits, vegetables, grains, herbs and flowers - directly for the community. The social enterprises generate \$6M in annual revenue which funds our ecosystem and model.

<https://theecologycenter.org/>

Low Impact Eco Tourism

The Concept Plan includes a 5 hectare Tourism area located adjoining the Community Farm area.

It is envisaged the Tourism area will provide opportunities for low impact eco-tourism accommodation and facilities which respond to the natural setting and proximity to the Hawkesbury River.

Accommodation and facilities would incorporate low scale buildings dispersed in the natural setting, consistent with the vision for the MRA lands.

The Tourism area has been deliberately located adjoining the Community Farm to allow for integrated eco-agricultural tourism based opportunities – and provide for true interactive *farm to plate* experiences.

Open Space

The Concept Plan allows for a large scale open space hub and recreational area in the north-eastern portion of the site encompassing around 8.5 hectares.

The open space hub is located along the Hawkesbury River, delivering a long term green edge to the riverbank, enhancing community access to the river edge and maintaining long term views from the eastern side of the river.

The open space hub is able to accommodate double playing fields and cricket / AFL oval, junior / training fields playgrounds areas and associated facilities.

These areas are supplemented by the retention of “Riparian Corridor” lands along the entire interface with the river edge.

6.3.3 Responding to MRA Values:

Environmental

The proposal will retain large areas of agricultural land as part of the Community Farm and also retains significant areas of existing vegetation on site. Environmental benefits of the proposal as they relate to the MRA include:

- Revegetation and rehabilitation of creek lines throughout the site which have been degraded by ongoing agricultural use enhancing flora and fauna corridors and connectivity to the Hawkesbury River.
- Retention of remnant vegetation along the periphery of the site on elevated land in large scale environmental living allotment and green space links will maintain ecological integrity and also maintain long views of vegetation on the site.
- Delivery of a large scale Community Farm on the Hawkesbury River flood plain land allowing for long term economically feasible, socially responsible and tourism related agriculture.
- The Concept Plan retains river edge riparian corridor lands along the full length of the interface with the Hawkesbury River delivering opportunities for long term rivers edge rehabilitation and access for the public.

Social

The proposal will deliver significant social benefits to future residents and the broader community. Social benefits of the proposal as they relate to the MRA include:

- Providing public access to a significant length to the Hawkesbury River corridor which is currently under private ownership. This will allow for Council to investigate the potential to deliver a long term rivers edge walk / public land stretching from the site back to North Richmond.
- The large scale recreation and open space hub will significantly enhance active and passive opens pace facilities and opportunities for local residents. This could also include picnic areas and rivers edge facilities.
- Extensive walking trails through the site and along the rivers edge will greatly enhance opportunities for enhanced health benefits and social interaction.

Economic Values

The proposal will deliver significant economic benefits to future residents and the broader community. Economic benefits of the proposal as they relate to the MRA include:

- The Community Farm will deliver local economic benefits to the community and allow for leasing of small scale agricultural plots for local agriculturalists.
- The tourism hub and operation will deliver employment opportunities for local residents while also delivering economic benefits to local businesses through increasing visitors / tourists to the region.
- The Community Farm will also provide local employment opportunities associated with both the agricultural and educational operations.

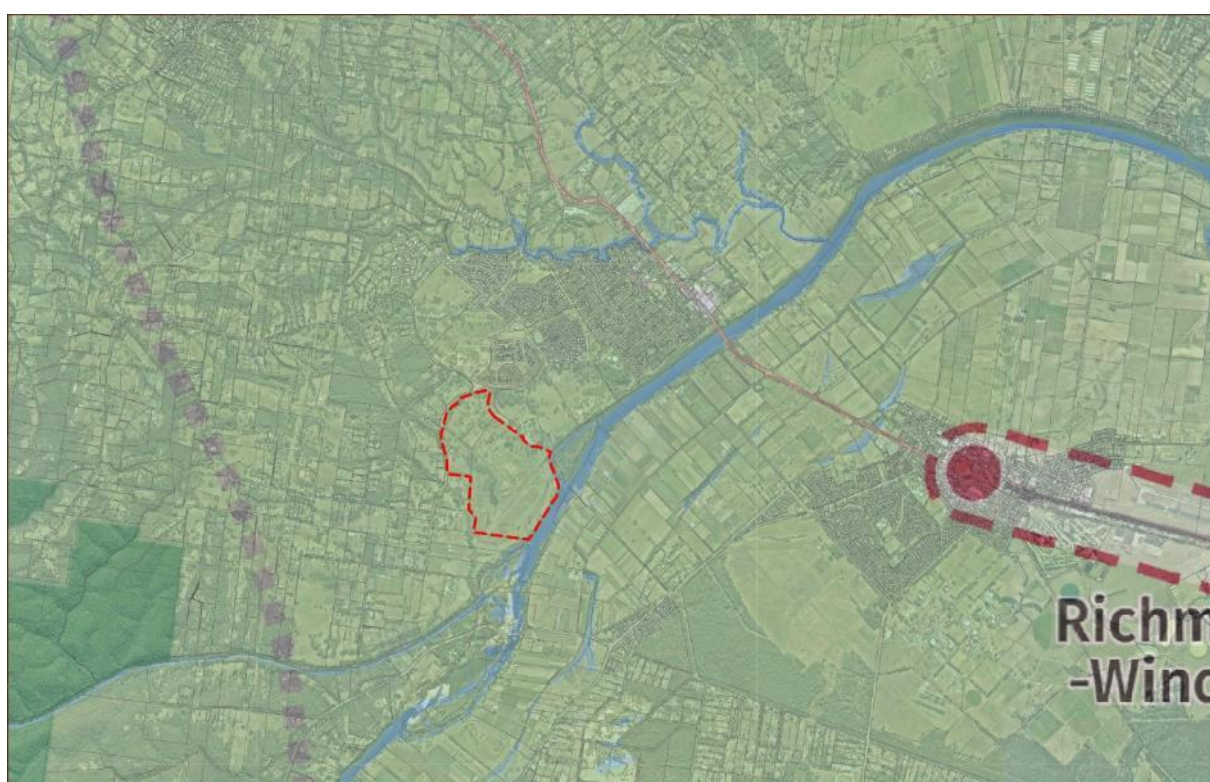


Figure 7 – GCC Western City District Plan – North Richmond Inset

6.4 Hawkesbury Rural Land Strategy

In discussing opportunities for future urban growth, the strategy states that *it may be possible to allow for some 'organic' growth of some of the settlements by providing for a small amount of growth along the lines of the current population growth of the LGA. This would require detailed investigations of each of the settlements in question and should also be done in association with an assessment of the services and facilities available in each settlement.*

The strategy states that *strategic centre and local centre - towns are usually able to grow subject to constraints and the villages and rural centres, don't have the potential to expand their current urban boundaries.*

The Rural Land Strategy specifically lists settlements which are not recommended for expansion, these include:

- Agnes Banks
- Bilpin
- Freemans Reach
- Kurmond
- Kurrajong
- Kurrajong Heights
- McGraths Hill
- Oakville/Maraylya
- Pitt Town
- St Albans

North Richmond is listed as a Local Centre – Town under the strategy and is not excluded from urban expansion under the Rural Land Strategy.

The Rural Land Strategy provides exclusionary and management criteria to be used when assessing the suitability of land for rezoning to accommodate urban housing.

The criteria has been developed to ensure that settlement expansion is sustainable and does not create any adverse social, economic or environmental impacts.

As note in the strategy Exclusionary criteria cover those issues considered to be of such magnitude that it should be used to exclude land from future urban or rural residential development. Management criteria, however, covers issues that can be dealt with on a site by site basis.

We have provided below an assessment of the site in relation to the Exclusion and Management Criteria. This review demonstrates that the Belmont Park land holding is not subject to any *Exclusionary Criteria* and can address each of the *Management Criteria*. **As such, the land holding is considered appropriate for natural expansion of the North Richmond settlement under the Rural Land Strategy, noting that the land directly adjoins the existing urban edge.**

Table 2: Rural Land Strategy Review

Rural Land Strategy – New Urban Development Exclusionary Criteria Assessment	
Exclusion Criteria	Response
Natural Hazards (Bushfire and Flooding)	Detailed site assessment have been completed relating to natural hazards including Bushfire and Flood which have demonstrated the land is

	<p>suitable to accommodate residential housing.</p> <p>Eco Logical Australia (ELA) have reviewed bushfire constraints associated with a rezoning proposal for residential development.</p> <p>This assessment demonstrates that the bushfire risk context allows for the proposed rezoning as it is not exposed to a high bushfire risk.</p> <p>In consideration of flood impacts, the project and associated Concept Plan locates residential development outside land identified as being Flood Prone Land (below the 1:100 year flood level).</p> <p>All residential housing areas are capable of being delivered above the 1:500 year flood level subject to minor earthworks over the land holding.</p> <p>The majority of land to be rezoned is also located above the PMF flood level.</p> <p>Indesco have also provided a review of the proposal under Clause 5.21 of Council's Local Environment Plan (LEP) which specifies controls for Flood Planning.</p> <p>Indesco have advised that the Concept Plan <i>appears conducive to the flood affectation of the Site and thus it is envisaged that compliance with the relevant flood planning controls can be achieved pending further typical investigation that would occur as part of the future planning proposal.</i></p> <p>The land is therefore not excluded from urban settlement expansion under this criteria.</p>
<p>Flood road closures impact</p>	<p>There is flood free road access from the site above the PMF flood event.</p> <p>The Detailed Evacuation Capability Assessment, Water Technology (Aug 23), Appendix 7 concludes that land below the PMF is able to be evacuated to local / regional evacuation centres without aid from emergency services and is not a low or high flood island.</p> <p>The land is therefore not excluded from urban settlement expansion under this criteria.</p>
<p>Prime Agricultural Lands. Prime agricultural lands (classes 1 – 2)</p>	<p>Not applicable to the landholding.</p> <p>The land is mapped as being Class 3 Agricultural land under the Rural Land Strategy.</p> <p>The land is not excluded from urban settlement expansion under this criteria.</p>

<p>Proximity to agricultural development.</p>	<p>The subject land is located directly adjoining a large scale health facility which is a sensitive land use receiver.</p> <p>The land also directly adjoins the existing urban edge of the North Richmond settlement area to the north.</p> <p>Application of the Rural Land Strategy 500m buffer applied from the existing adjacent residential land and health facilities excludes agricultural use of the land.</p>
<p>Utility servicing (water, sewer, electricity and telephone)</p>	<p>Indesco have completed a preliminary Service Strategy for the site which reviews existing infrastructure within the locality and capacity to service the proposal.</p> <p>Indesco have concluded that the proposed Belmont Park project can be serviced and preliminary infrastructure costings demonstrate that servicing of the site is feasible. Refer to Section 3.4 above.</p> <p>The land is therefore not excluded from urban settlement expansion under this criteria.</p>
<p>Road surface. All roads to be accessed should be sealed.</p>	<p>The adjoining roadways (Grose River Road and Grose Vale Road) are fully sealed, with significant local road upgrades currently being completed.</p> <p>The land is therefore not excluded from urban settlement expansion under this criteria.</p>
<p>Community Services and Facilities</p>	<p>A detailed social infrastructure review will be completed as part of any Planning Proposal to ensure appropriate facilities are provided.</p> <p>Social infrastructure provision will be addressed through a site specific VPA. The Local Centre Hub proposed is able to accommodate services including child care, medical, dental and other similar services.</p> <p>The Concept Plan also allows for seniors housing to be delivered onsite.</p> <p>The land is therefore not excluded from urban settlement expansion under this criteria.</p>

<p>Shopping facilities</p>	<p>The land is well located to provide access to the existing North Richmond Town Centre shopping facilities.</p> <p>The Concept Plan also provides for a Local Hub which will incorporate local retail / shopping facilities.</p> <p>The land is therefore not excluded from urban settlement expansion under this criteria.</p>
<p>Slope of land – greater than 20%</p>	<p>Areas of steeper sloping land around the edges of the site have been retained in a green band as part of planned open space connections and large lot areas.</p> <p>Gradients across the site are predominantly less than 20%, allowing for urban development.</p> <p>The land is therefore not excluded from urban settlement expansion under this criteria.</p>
<p>Native Vegetation</p>	<p>A Preliminary Ecological Assessment, Sclerophyll (Dec 22) (Appendix 8) has been undertaken as part of the Planning Proposal and concludes that;</p> <ul style="list-style-type: none"> -No Threatened flora records are known from the subject site or adjoining lands. -Targeted surveys for a small suite of fauna 'species credit species' listed in the BAM Threatened fauna database may be required as part of any future BDAR where a development proposal is captured under the BOS. <p>It should be noted that large areas of native vegetation are retained in a green band along the edges of the site.</p> <p>Support for the proposal would allow full rehabilitation / revegetation of creek lines within the site including restoration of native vegetation.</p> <p>The land is therefore not excluded from urban settlement expansion under this criteria.</p>

Rural Land Strategy – New Urban Development Management Criteria Assessment	
Management Criteria	Response
Domestic Effluent Disposal	<p>Indesco have completed a preliminary Service Strategy for the site which reviews existing infrastructure within the locality and capacity to service the proposal.</p> <p>Refer to Section 3.4 above.</p> <p>The review notes that there is existing sewer infrastructure in the adjoining Redbank Development site to the north. However, there is limited system capacity at present.</p> <p>Sydney Water have advised that the North Richmond Wastewater Treatment Plant (WWTP) and Richmond WRP are proposed to be upgraded which will include a new pressure main approximately 6.9km long to transfer flows from North Richmond WWTP to Richmond WTP. The upgrades are expected to cater for over 85% increase in demand and are planned to be completed by Q2-Q3 2025.</p> <p>Indesco have also advised that the project is also of a scale whereby a private wastewater and recycled water system can be provided. Altogether Group, a supplier of recycled water infrastructure has formally expressed support for such a proposal.</p> <p>The proposal is able to be provided with domestic effluent disposal.</p>
Road Alignment and access	<p>The Concept Plan prepared allows for road connections to Grose Rover Road.</p> <p>These roadways have been located to ensure that adequate sight lines are provided.</p> <p>Intersection treatments will also ensure that any potential impact with other vehicles is minimised.</p> <p>The proposal is able to achieve / deliver appropriate road access.</p>
Traffic Generation	<p>ARUP have completed a Transport Scoping Report, Appendix 14 associated with the proposal.</p> <p>The Transport Scoping Report included a review of the following:</p> <ul style="list-style-type: none"> • An assessment of the existing transport services and provisions near the proposal. • An appreciation of future transport infrastructure upgrades, land use developments and their associated timings

	<p>which may influence or impact the proposal.</p> <ul style="list-style-type: none"> An assessment of likely traffic generation, traffic distribution, road network impacts and likely pinch points/constraints within the Hawkesbury area. <p>The review demonstrates that the traffic generation from the proposal will not have a significant impact on the local or regional road network.</p> <p>We note that the site is located only 10 minutes drive from Richmond Railway Station and would be serviced by existing and future bus routes.</p>
--	---

6.5 Hawkesbury Council Local Strategic Planning Statement

The Hawkesbury Local Strategic Planning Statement (LSPS) was finalised in February 2021 and outlines broad economic, social, and environmental land use needs for the Hawkesbury Local Government Area (LGA) over the next 20 years.

The purpose of the LSPS is described as being to:

- Provide a 20-year land use vision for the Hawkesbury LGA;
- Outline the characteristics which make the Hawkesbury unique;
- Identify Hawkesbury’s shared values to be enhanced or maintained;
- Direct how future growth and change will be managed;
- Updates to guide the Hawkesbury Local Environmental Plan (LEP) and Development Control Plan (DCP);
- Identify further detailed strategic planning for future needs.

The LSPS outlines Local Planning Priority’s for the Hawkesbury LGA under four themes being, Infrastructure and Collaboration, Community, Economy & Productivity and Environment.

The LSPS provides high level broad goals and actions to be implemented by Council including the preparation of a Housing Strategy to meet housing demand and provide enhanced housing diversity on the LGA.

The LSPS also states that in relation to new residential development areas, *it is imperative that Council consider each of the areas for residential development on a case by case basis, ensuring that no prime agricultural land is compromised and no additional land use conflict situation is created.*

The site is not considered prime agricultural land and borders the existing urban edge of North Richmond. Support for this proposal is consistent with the LSPS in that it will reduce / alleviate existing land use conflict with rural land directly adjoining a sensitive health land use on the eastern property boundary.

As outlined below, the proposal can assist Hawkesbury Council in meeting its housing delivery targets and enhance housing diversity as specified under the Housing Strategy.

6.6 Hawkesbury Council Local Housing Strategy

Housing Supply

Section 3.6 of the Hawkesbury Local Housing Strategy notes that around 10,000 additional dwellings will be required within the LGA by 2036.

This is consistent with 2022 DoP projections which estimate 9,739 dwellings are required in the LGA from 2021 to 2041.

A key issue identified in the Housing Strategy are existing flooding and access constraints within Windsor and Richmond which limit increases in population and density.

Council's LHS indicates that up to around 4,500 projected dwellings will be delivered in infill areas. This predates the most recent flooding events in the area that occurred in 2021 / 2022 and changes to the way in which land use planning considers increases in density on flood prone land.

Given the significance of flooding in the areas identified for infill, housing we consider that the potential yield identified in the LHS for areas such as Windsor, South Windsor, Richmond and Hobartville are unlikely to be achieved, particularly having regard to the findings of the Hawkesbury Nepean Flood Study and the updated Ministerial Directions.

For example, the LHS identifies the potential for 1,600 lots in South Windsor and 150 lots in Windsor, all of which are located within the Probable Maximum Flood (PMF) area of the Hawkesbury Nepean Floodplain.

There are known evacuation constraints for these areas with the limited evacuation routes being cut by flood waters before residents are able to be evacuated.

As demonstrated in the table on the following pages, the LHS estimate of over 4,500 infill dwellings in existing flood prone centres / residential areas is likely to only achieve 0-900 dwellings subject to evacuation route capacity.

As noted above, the Hawkesbury-Nepean Flood Evacuation Model (2023) determined that **potential development in the Windsor and Richmond town centres forecast under the Hawkesbury Local Housing Strategy would increase the average annual people at risk by around 75%.**

There is a shortfall of at least 3,600 dwellings delivered in the Hawkesbury LGA based on the adopted LHS identifying increased density and diversity housing in flood prone areas.

In addition, as outlined above, Macroplan have identified that there is an additional 2,200 dwelling shortfall based on the current LHS dwelling delivery scenario.

Given the extent of flooding identified in infill locations, and requirements of the revised section 9.1 Ministerial Direction on flooding, there is a strong basis for potential new areas (such as the subject site) to be further considered for residential development as an extension of existing settlements.

Housing Diversity

The Hawkesbury LHS (and LSPS) identify the lack of housing diversity within the LGA as a key issue for the population both now and over the next 20 years.

Housing within the LGA is predominantly single detached dwelling, with the LHS indicating these

dwellings comprise 85% of the housing across the LGA.

The LHS states that existing centres provide the greatest opportunity to allow for increased housing diversity through delivery of multi dwelling housing and medium density housing.

As noted above, the existing centres referred to in the LHS to accommodate increased housing diversity and medium density housing are highly flood prone, with significant existing constraints in relation to evacuation of residents.

These areas are not considered suitable under current flood planning principles to accommodate significant increases in housing density.

The LHS does also note that increasing the housing diversity delivered in new urban areas will be important to improving housing choice in the LGA.

There is little opportunity to provide housing diversity in new urban areas, outside of the North West Growth Centre – situated on the edge of the LGA.

Proposed new urban areas under LHS comprise single dwelling residential development, and large lot / small acreage housing.

In this regard, the LHS as adopted will result in decreasing housing diversity across the LGA as new urban areas deliver single detached housing typologies and medium density housing is not able to be delivered in town centres.

Belmont Park Housing Supply and Diversity.

The Belmont Park project is able to deliver over 1,200 dwellings with a wide variety of housing types and housing diversity embodied as a key principle in the project.

The project is able to significantly contribute to the projected housing shortfall across the LGA, with housing shortages worsening from 2028 onwards.

The proposal is able to form part of a measured approach to achieving housing targets, which is consistent with the Rural Land Strategy through providing housing as an extension of the existing North Richmond Settlement.

The proposal is able to deliver 55% of the dwellings as medium density, multi dwelling and seniors housing, significantly contributing to enhancing housing diversity in the LGA.

The proposal is consistent with the intent housing strategy as it would deliver a diverse range of housing in an area that would be classified as a new urban release area, with development located on flood free land.

The proposal will allow Hawkesbury Council to meet its required housing delivery targets as outlined in the Housing Strategy.

Table 3: Hawkesbury Council LHS Housing Supply Review Table

LHS Infill Area	Hawkesbury LHS Capacity	Flood Impact - 1:100	Flood Impact - PMF	Capacity based on current Flood Policy
Windsor	150	Significant Inundation Non-flood prone land isolated islands	Complete Inundation.	0
South Windsor	1,600	Significant Inundation Non-flood prone land isolated islands	Complete Inundation.	0
Richmond	720 <i>a) 720 relies on medium density being permissible in R2 low density zone – not yet implemented so current capacity is approx: 560</i>	Existing Residential Areas primarily Flood free. Flood impacts to evacuation routes. Potential isolation of large portion of population	Complete Inundation.	0 – 560 (subject to evacuation plan / capacity)
Hobartville	1,320 <i>b) this assumes redevelopment of every lot for medium density housing – currently only 1,100 dwellings in suburb</i>	Existing Residential Areas primarily Flood free. Flood impacts to evacuation routes. Potential isolation of large portion of population	Complete Inundation.	0 <i>1,320 unlikely as this relies on demolition of dwelling and small scale medium density development on every lot.</i> <i>Note: Table 28 of LHS indicates R3 zoning will be removed and Hobartville rezoned to R2 Low Density</i>
North Richmond	730 <i>c) this assumes redevelopment of every non-developed lot for medium density housing</i> <i>d) 730 relies on LEP being amended to allow medium density in R2 low density zone (current capacity is approx: 680)</i>	Existing Residential Areas Flood free.	50% inundation of residential areas. Flood free evacuation routes available.	0 – 340 (subject to evacuation plan / capacity) <i>680 unlikely as this relies on demolition of dwelling and small scale medium density development On every lot.</i> <i>Assume 50% re-development = 340 dwellings</i>
Total	4,520			0 – 900

6.7 2022 Flood Enquiry

Recent flood events in the Sydney basin have resulted in changes to planning and dwellings approvals on flood free land.

Housing targets for the Hawkesbury and surrounding areas had assumed additional housing in areas no longer appropriate such as local centres which are subject to flood inundation (Windsor / Richmond) and parts of the Northwest Growth Centre (Vineyard Stage 2).

This proposal allows for the delivery of housing in flood free land in Hawkesbury LGA responding to housing need in the region and addressing gaps in housing supply.

Recommendation 20 of the 2022 Flood Enquiry supports this proposal.

20.Recommendation – floodplains as assets

That, to establish the capacity and maximise the economic, social and environmental potential and consequently unlock the value of NSW floodplains, Government adopt the following guiding principles for floodplain management:

- *treat floodplains as an asset, specialising in uses that are productive and minimise risk to life during major weather events. Such uses would include sporting and recreational activities, garden plots and community gardens, agriculture and forestry, renewable energy production, biodiversity offsets, parks and outdoor education activities.*
- *treat development of the floodplain in parallel with development of urban structures (houses, businesses and industry) that are built near to the edge of the floodplain. Examples of connection could include highrise housing developments where apartment owners are granted automatic rights and access to community garden and community recreation facilities.*

Belmont park proposes to establish a Community Farm and, sporting and recreation facilities within currently under utilised grazing lands as envisaged in Recommendation 20 of the 2022 Flood Enquiry.

7 SITE SPECIFIC MERIT

In preparation of this Planning Proposal, extensive site studies and investigations, urban design and housing diversity assessments have been completed to ascertain the Strategic Site Specific Merit of the site to accommodate future residential housing in relation to the

This is consistent with the need to undertake a Site Specific Merit assessment as part of any future Planning Proposal.

As identified in the Strategic Merit review below and site assessment undertaken, the proposal achieves and demonstrates Site Specific Merit as follows:

- The land holding represents a **logical inclusion in relevant strategic plans** as a future residential area, being a direct extension of the existing North Richmond Township.
- The proposal is able to be supported as an extension of the existing North Richmond Township, noting that the District Plan currently nominates and maps existing urban Township and Village areas as forming part of the Metropolitan Rural Area.
- Support for the delivery of housing as proposed **will address identified shortfalls in housing supply** in the LGA in the coming years and off-set anticipated housing in the LHS in flood prone areas which are no longer appropriate to accommodate increased housing densities.
- Belmont Park will consist of **housing at approximately ½ the price of other new housing** options in the Hawkesbury LGA.
- The land is able to accommodate **flood free residential housing** above the 1:100 year flood level (with the majority of dwellings above the 1:500 year flood level). Significant portions of the site are above the PMF flood level.
- Rising **flood free access** is able to be achieved for all planned dwellings below the PMF flood level. Flood Free access is achieved within the site beyond the PMF and there is flood free access to local and regional evacuation centres.
- The **land is able to be serviced** via the establishment of environmentally responsible energy generation and storage systems or direct extension of existing infrastructure adjacent to the site.
- The proposal will retain key areas of flatter rural land along the river edge which is capable of **supporting ongoing agricultural and horticultural use**, encompassing a significant portion of the site, consistent with the principles of Council's Rural Lands Strategy.
- The project will enhance biodiversity outcomes through the **rehabilitation and revegetation of creek lines** through the site, **providing biodiversity connectivity** for the Hawkesbury River to Bushland areas to the west.
- Ensuring that Environmental Sustainability is embedded in the project and future housing is a key principle with the delivery of **recycled water, a local green grid energy scheme, community farm and diverse housing** envisaged as part of the project.
- Social Sustainability principles to be implemented include delivery of **20% affordable housing** as part of the project, a community / coop farm owned and managed by local residents, provision of extensive open space areas and facilities and providing access to the Hawkesbury River foreshore to the broader community.

- The proposal incorporates over **59 hectares of land set aside for open space, riparian corridors, retained agricultural land in the community farm and low scale eco-tourism facilities**, representing approximately 50% of the site.
- The proposed low impact eco style tourism facilities will provide **accommodation opportunities for visitors** to the region and **enhance employment opportunities** for local residents.
- The site is located only **10 minutes drive from Richmond Railway Station**.

The review above has demonstrated that the proposal achieves Site Specific Strategic Merit and is able to be supported by Council as an extension of the existing urban settlement to address Local Housing shortfalls.

We have outlined below how the rezoning of the site is able to be supported and accommodated under existing and revised strategic planning policies and documents.

8 SITE SPECIFIC CONSIDERATION & INVESTIGATIONS

A number of detailed site investigations and supporting studies have been prepared to inform this Planning Proposal.

Supporting studies submitted as part of this package are listed in the Table below.

We have provided a brief summary of each report on the following pages.

Table 4: Supporting Studies

Appendix	Supporting Study	Consultant	Date
Appendix 1	Urban Design Review & Concept Plan	Urbanco	September 2023
Appendix 2	Housing Diversity Report	TRACT	January 2023
Appendix 5	Aboriginal Heritage Due Diligence Assessment	AECOM	August 2023
Appendix 6	Non-Aboriginal Heritage Constraints	AECOM	August 2023
Appendix 7	Detailed Evacuation Capability Assessment	Water Technology	August 2023
Appendix 8	Preliminary Ecological Assessment	Sclerophyll Flora Surveys and Research	December 2022
Appendix 9	Landscape Character Analysis	TRACT	August 2023
Appendix 10	Preliminary Site Investigation	JBS & G	August 2023
Appendix 11	Recycled Sewer Altogether Letter Of Support	Altogether Group	September 2023
Appendix 12	Residential Needs Assessment	MacroPlan	March 2023
Appendix 13	Servicing Strategy	Indesco	June 2022
Appendix 14	Transport Scoping Report	ARUP	August 2023
Appendix 15	Preliminary Bushfire Constraints Analysis	Ecological Australia	September 2023

8.1 Preliminary Flood Level Advice INDESCO

In consideration of flood impacts, the project and associated Concept Plan locates residential development outside land identified as being Flood Prone Land (below the 1:100 year flood level).

Furthermore, development which would be considered Special Flood Consideration land uses, such as Seniors Housing, will be located above the PMF flood level consistent with current flood planning guidelines.

Indesco have completed a preliminary Flood Review for the subject site. As part of the review, Indesco have confirmed current mapped flood levels for the site with Council. Council advised that the applicable design flood levels are as follows:

- 20% AEP = 12.8 – 12.9m AHD
- 5% AEP = 16.3m AHD
- 1% AEP = 18.1 – 18.2m AHD

Further to the above, preliminary flood analysis suggests that the Probable Maximum Flood (PMF) level is approximately 27.1m AHD.

Indesco have also provided a review of the proposal under Clause 5.21 of Council's Local Environment Plan (LEP) which specifies controls for Flood Planning.

Indesco have advised that the Concept Plan *appears conducive to the flood affectation of the Site and thus it is envisaged that compliance with the relevant flood planning controls can be achieved pending further typical investigation that would occur as part of the future planning proposal.*

8.2 Detailed Evacuation Capability Assessment, Water Technology (Aug 23)

A Detailed Evacuation Capability Assessment (ECA) has been prepared for the Belmont Park project by Water Technology to accompany this Planning Proposal submission to Hawkesbury Council.

As noted in the assessment, the development plans include rezoning of land above the extent of the 1% Annual Exceedance Probability (AEP) flood. As such, a risk-based assessment has been undertaken for the proposal, consistent with Considering flooding in land use planning – Guideline July 2021 (NSW Department of Planning, Industry and Environment).

The assessment confirms that internally, the site has roads with rising grade to land above the PMF. Further, the area has rising road access to land above the extent of the Hawkesbury River PMF; this means that the area will not be isolated by rising floodwaters from the river and is not a high or low flood island.

In relation to flood warning, the assessment indicates:

*The Bureau of Meteorology will provide **15 hours of warning for a flood** that would impact the site.*

*In addition to the **15 hours of warning time**, there would be additional time between **floodwaters reaching the lowest levels of the site and floodwaters rising to their peak levels** which would start to impact the developed parts of the site and its roads.*

*Given the above considerations, it is recommended that flood evacuation planning for this site allows for **4.2 hours to evacuate the parts of the site under the extent of the PMF** following an evacuation order being issued. If the entire site evacuates, it would require approximately 6 hours.*

During a flood event, the site would evacuate with North Richmond along the “North Richmond” route along Grose Vale Road. Essential services are available in this immediate area above the extent of flooding.

From Bells Line of Road, site occupants would have the option of traveling west or southwest to the Blue Mountains.

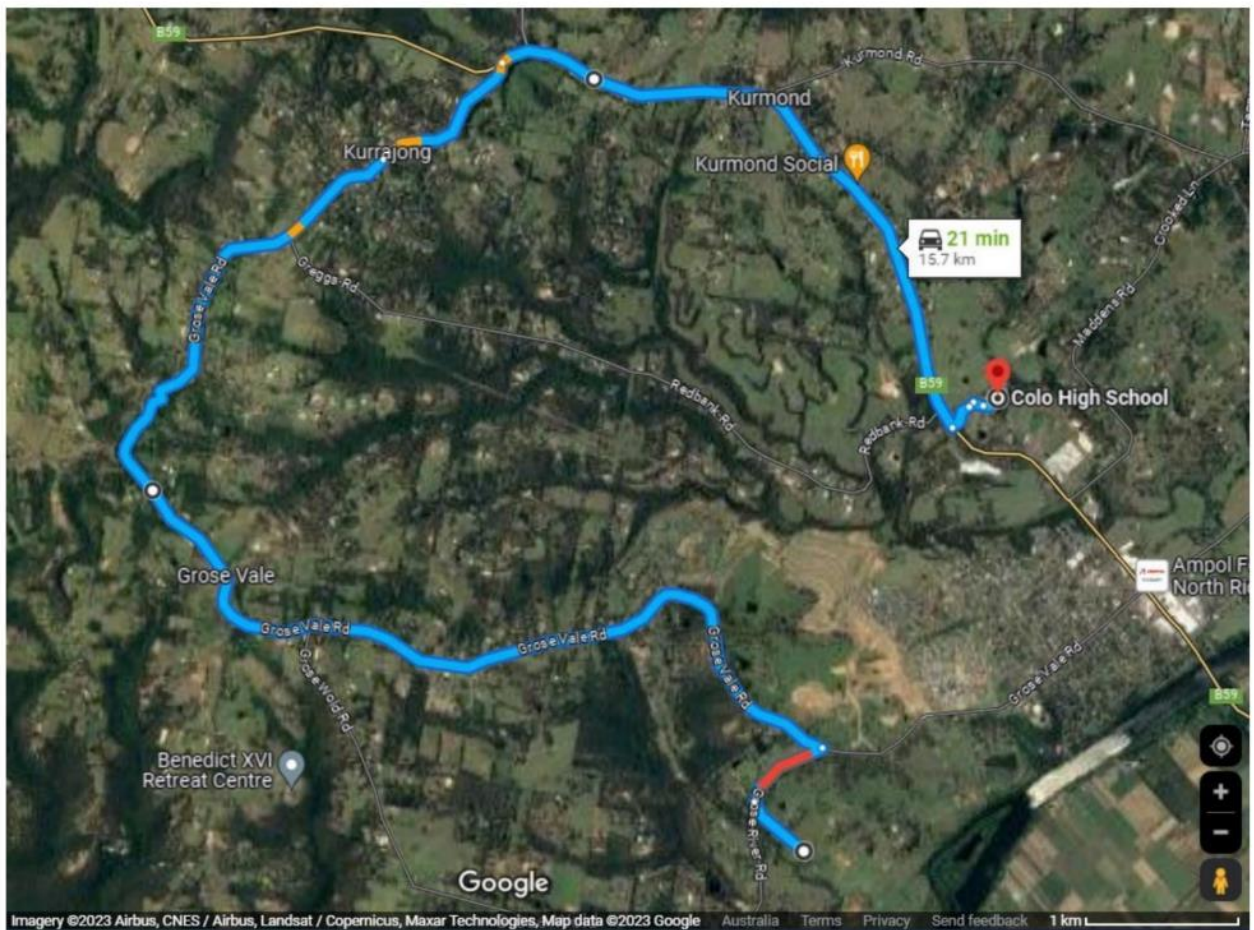


Figure 5-2 Route from the Site to Colo High School Evacuation Centre

Figure 8 – Detailed Evacuation Capability Assessment - Flood Evacuation Route

A local SES nominated Evacuation Centre is Colo High School in north Richmond which is above the extent of the PMF in North Richmond. There is a flood-free route from the site to this evacuation centre via Grose Vale Road and Bells Line of Road.

The assessment concludes that:

- *Based on this assessment, the proposed development will be capable of timely self-evacuation and would not rely on emergency services to assist in the evacuation of occupants.*
- *A Flood Emergency Response Plan can be developed for the site that details the triggers for evacuation and flood emergency response. In addition to Hawkesbury River levels, this can include additional visual triggers for flood emergency response, such as floodwaters reaching a specific point on the site.*
- *There is capacity on the local evacuation routes even accounting for a complete evacuation of North Richmond at the same time as the evacuation of the site. This is based on the unlikely scenario of a complete evacuation of North Richmond and an evacuation of the part of the site under the PMF, requiring approximately 10.7 hours. This is less than the 15 hours of warning time available prior to the level of flooding that would require evacuation from the site. It is noted that even if the entire site evacuates, the time required to evacuate does not exceed the time available, and there is still sufficient capacity on the road. This demonstrates that the proposed development would not adversely impact on existing evacuation capabilities.*

We also note that the St John of God private hospital site, immediately adjacent to Belmont Park has been used for Emergency services accommodation during recent flood events, demonstrating that rezoning of the land does not present a hazard to future residents and the land is appropriate from a flood safety perspective.

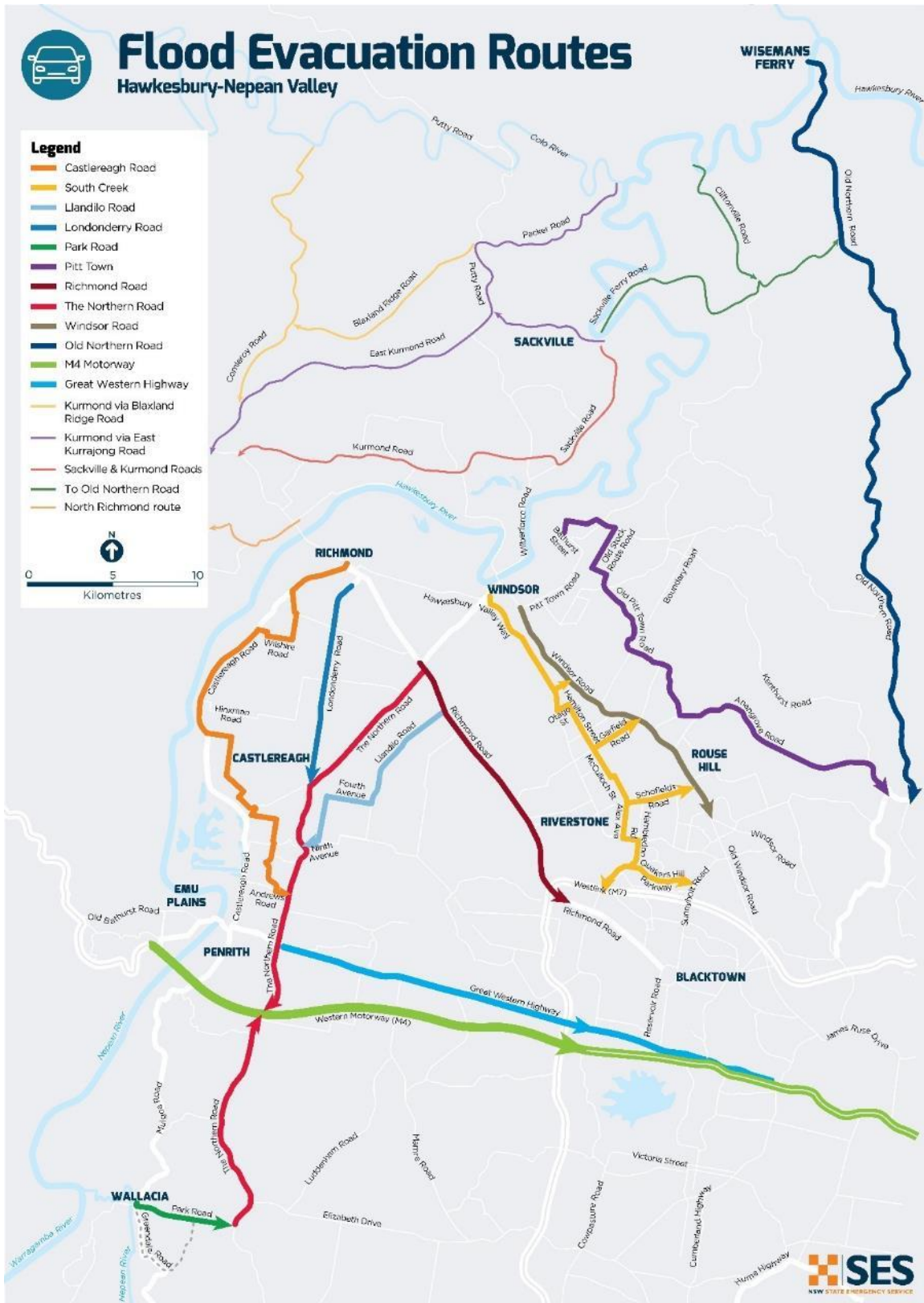


Figure 9 – SES Evacuation Routes

8.3 Aboriginal Heritage Due Diligence Assessment, AECOM (Aug 23)

AECOM has undertaken an Aboriginal Heritage Due Diligence assessment for the proposed Belmont Park Estate site.

The purpose of this assessment was to identify potential impacts to Aboriginal heritage values as a result of the development and to provide appropriate management advice. The report was compiled with reference to *Heritage NSW's Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW, 2010).

As outlined in the report, information regarding the known and potential Aboriginal heritage values of the Project area was obtained from:

- A review of the landscape context of the Project area and surrounds;
- A review of existing Aboriginal Heritage Information Management System (AHIMS) data for land within and surrounding the Project area, obtained from Heritage NSW on 31 August 2022;
- A review of the findings of past Aboriginal heritage investigations within the local area; and
- A visual inspection of the Project area on 20 September 2022 by AECOM Principal Heritage Specialist Geordie Oakes.

The key findings of the due diligence assessment are as follows:

- There are no registered Aboriginal sites within the Project area;
- No Aboriginal objects/sites were identified during the visual inspection component of this assessment; and
- Several areas within the Project area were assessed as archaeologically sensitive. These areas are considered likely to contain Aboriginal objects/sites in subsurface contexts.

Areas identified as having archaeological sensitivity included:

- a) Land along the eastern edge of the site on the river edge, primarily over the existing racecourse training track (outside of the urban development footprint)
- b) A small area in the south-west corner of the site
- c) A small area south & west of the existing stables adjoining Steading Creek
- d) An area centrally located along the southern edge of Steading Creek

Consistent with the recommendations of the Due Diligence, where impacts are proposed within areas of archaeological sensitivity, further investigation would be completed.

This would involve a formal archaeological survey, a program of subsurface testing and a program of Aboriginal community consultation in accordance with Heritage NSW guidelines.

8.4 Non-Aboriginal Heritage Constraints, AECOM (Aug 23)

AECOM have prepared a Non-Aboriginal Heritage Constraints report the proposed Belmont Park Estate site.

The purpose of the report is to identify potential impacts to non-Aboriginal heritage values that may be impacted as a result of the development and to provide appropriate management advice.

The report notes that the Project area, St John of God Hospital and nearby Yobarnie were all part of the Belmont/Belmont Park Estate established in c. 1810 by Alexander Bell.

The Yobarnie farm to the north is listed on the SHR owing to its use in the 1950s as an experimental farm for keyline farming. The adjoining St John of God Hospital is listed on the Hawkesbury Local Environment Plan as an item of local heritage significance as the site of the former Belmont homestead, and the later Belmont Park mansion.

The report notes that A review of historical sources and a site inspection resulted in two buildings of heritage significance within the Project area. These two buildings constructed in 1896 have been assessed as having local heritage significance owing to their connection with the Belmont Park Estate and the Charley family.

Any future subdivision or development of the Project area is unlikely to have a significant impact to historical archaeological and heritage values associated with the property, if adequate and appropriate measures are taken to conserve the two extant 1896 farm buildings.

Consistent with the recommendations of the heritage report, the two 1896 farm buildings are proposed to be retained and incorporated into the future development.

The buildings are intended to form part of a medium density housing site, allowing the buildings to be retained, restored and managed in a landscape setting, as a community facility or refurbished for residential accommodation.

8.5 Preliminary Site Investigation (Contamination) JBS&G (Aug 23)

JBS&G have completed a Preliminary Site Investigation of the subject site to ascertain any areas of potential contamination which may require further detailed investigation.

The investigation was completed following guidelines made and endorsed by NSW Environment Protection Authority (EPA), including the National Environment Protection Council (NEPC) National Environment Protection (Assessment of Site Contamination) Measure 1999 as amended 2013 (ASC NEPM). It included a desktop assessment of available information and a detailed site inspection.

The PSI did not identify any areas of contamination which would render the site inappropriate for future residential development.

The PSI identifies areas recommended for further Targeted Site Investigation (TSI) as part of planning proposal for site rezoning to assess the level and extent of potential contamination associated with identified AECs that are expected to be encountered across the site, including:

- Areas around structures;
- Chemical storage and outdoor stockpiling of materials/wastes;
- Farm dam sediments and surface water; and
- Areas where material may have been imported and placed at the site, typically around structures including animal pens, the horse track in the southern portion of the site and internal access roads; and
- Areas of former cropping activities.

The PSI concludes that

Based on the findings of the PSI undertaken at the site, and subject to the limitations stated in

Section 6, the following conclusions are made:

- *evidence of typically isolated contamination of the site based on past and current site uses was identified; and*
- *the remainder of the site is considered to have a low potential for gross or widespread contamination from historical activities.*

As such, the site is considered appropriate to proceed with a rezoning proposal.

8.6 Preliminary Bushfire Constraints Analysis, Ecological Australia (Sept 23)

Eco Logical Australia (ELA) have reviewed bushfire constraints associated with a rezoning proposal for residential development of the site to rezone the land from RU1 to facilitate residential development and other land uses.

The purpose of the constraints analysis was to assist with the development of the masterplan, through consideration of bushfire constraints and the requirements of Planning for Bushfire Protection (PBP) 2019.

The bushfire assessment provides guidance on vegetation classification and likely Asset Protection Zones based on PBP 2019.

The bushfire assessment also provides guidance on access requirements and road widths to comply with PBP 2019.

This bushfire constraints analysis demonstrates that the bushfire risk context allows for the proposed rezoning as it is not exposed to a high bushfire risk. The analysis states that with consideration of design outcomes, the proposal will be able to achieve the performance criteria and acceptable solutions of PBP.

8.7 Preliminary Ecological Assessment, Sclerophyll (Dec 22)

Sclerophyll Flora Surveys and Research (Sclerophyll) has prepared a Preliminary Ecological Assessment of the site.

The objective of the Preliminary Ecological Assessment was to identify and highlight any significant potential ecological constraints to development through a desktop review supplemented with a preliminary site walkover to produce a draft vegetation map.

As part of the assessment, a 2 day site walkover was undertaken by Sclerophyll to identify and map areas of remnant native vegetation, including woodland patches as well as any areas deemed to be possible derived native grassland (i.e. cleared woodland with at least some intact native groundcover). Farm dams and paddock trees were also inspected.

Remnant native vegetation identified on site located within the Steading Creek corridor included:

- Cumberland Redgum Riverflat Forest
- Cumberland Shale Plains Woodland
- Cumberland Shale Sandstone Ironbark Forest

Remnant native vegetation identified on site located outside the Steading Creek corridor included:

- Cumberland Moist Shale Woodland
- Cumberland Redgum Riverflat Forest
- Cumberland Shale Plains Woodland

The assessment identified a number of threatened fauna species as having the potential to occur within the identified site habitats based on their life cycle requirements and known local occurrences.

The Concept Plan prepared in association with this submission retains large areas native vegetation identified in this review in Riparian Corridors, Open Space and large Environmental Living allotments.

8.8 Transport Scoping Report, ARUP (Aug 23)

ARUP have completed a Transport Scoping Report associated with the proposed development of the site.

The Transport Scoping Report included a review of the following:

- A review of relevant planning policies to identify the priorities that the proposal will need to align with.
- A draft vision and objectives and an assessment of the existing transport services near the proposal.
- An appreciation of future transport infrastructure upgrades, land use developments and their associated timings which may influence or impact the proposal.

- An assessment of likely traffic generation, traffic distribution and road network impacts and likely pinch points/constraints within the Hawkesbury area.
- An overview of access and parking requirements for the development.
- A summary of preliminary transport considerations, opportunities and discussion points to be considered in subsequent stages of planning.

The key preliminary transport considerations identified for the proposal include:

- *The proposed development is expected to be capable of self-evacuation and would not rely on emergency services to assist in the evacuation of occupants. From the site, there is a flood-free evacuation route to extensive areas above the probable maximum flood (PMF) to the west and north-west by travelling north on Grose River Road and Grose Vale Road.*
- *A variety of infrastructure projects are in the planning or construction phases and would benefit the proposal. The New Richmond Bridge and Grose River Bridge are expected to provide additional capacity improvements, including at the Bells Line of Road / Grose Vale Road / Terrace Road intersection. Redbank Communities is also tendering road improvements on Grose River Road to provide greater amenity and safety for road users. The proposal should utilise these future road improvements to provide a safe and amenable environment for road users.*
- *Grose Vale Road (west of Bells Line of Road) is expected to reach capacity with traffic generated by the proposal (up to 1,486 vehicles per hour in each direction). Potential opportunities for additional lane capacity should be considered in subsequent stages of planning. To support road network performance, potential improvements to public and active transport facilities would shift trips to public transport, walking and cycling.*
- *The site is located within driving distance to Richmond Station. Richmond Station is serviced by the T1 Western and T5 Cumberland lines which provide direct connections to Blacktown and Parramatta Station, as well as to the wider Sydney Trains network. These stations are serviced by trains running every half an hour throughout the day in each direction on both weekdays and weekends. The Grose River Bridge would also provide an additional alternative route to Richmond Station via Springwood Road and Castlereagh Road.*

9 THE PLANNING PROPOSAL

9.1 PART 1 – Objectives or Intended Outcomes

The objective of the Planning Proposal is to amend the Hawkesbury Local Environmental Plan (LEP) 2012 to accommodate a master planned urban community encompassing a diversity of housing types and associated local retail facilities, open space and riparian corridors.

The Planning Proposal aims to deliver the following outcomes:

- *Adoption of amended Planning Controls relating to Land Use Zones which reflect the site Concept Plan and allow delivery of the proposed master plan ed community;*
- *Adoption of amended Planning Controls relating to Minimum Lot Sizes which are consistent with the provisions of the adjoining residential land in Calderwood;*
- *Protect riparian corridor areas as environmental land.*

9.2 PART 2 – Explanation of Provisions

The Planning Proposal likely seeks the following amendments to the Hawkesbury LEP 2012:

- a) Amend the Land Use Zoning to encompass a range of land use zones as follows:
- R2 Low Density Residential zoning for residential housing areas.
 - R1 General Residential zone for the Cluster Housing areas.
 - R5 Large Lot Residential zoning for large lot areas on the edges of the project.
 - E1 Local Centre zoning for the Local Centre – including an allowance to deliver Residential Flat Buildings.
 - RE1 Public Recreation for open space areas
 - C2 Environmental Conservation zone for Riparian Corridor Areas.
 - SP3 Tourist for the tourism hub

We note that the proposal will retain the RU1 Primary Production zoning over the community farm land.

- b) Amend the Minimum Lot Size mapping follows:
- 300m² minimum lot size for the R2 Low Density Residential zoned areas.
 - 200m² minimum lot size for R1 General Residential zoned Cluster Housing areas.
 - 1,200m² minimum lot size for the R5 Large Lot Residential zoned areas.
 - No Minimum lot size for the E1 Local Centre zoned land.
 - Minimum Lot size mapping amendments for RE1 Public Recreation, C2 Environmental Conservation and SP3 Tourist for the tourism hub are subject to discussion with Council.
- c) Amend the Maximum Building Height mapping follows:
- Retain the existing 10m building height for the R2 Low Density Residential and R1 General Residential zoned areas.
 - 12m Maximum Building Height for R5 Large Lot Residential zoned areas (to accommodate split level construction and site topography).
 - 15m Maximum Building Height for the E1 Local Centre and SP3 Tourist zoned land.
 - Retain the existing 10m building height for the RE1 Public Recreation and C2 Environmental land.
- d) Amend the Biodiversity Mapping layer to reflect the detailed site investigations and master planning outcomes.
- e) Remove the land from the *Minimum Lot Size for a Lot Averaging Subdivision* map.

9.3 PART 3 – Justification of strategic and site-specific merit

Section A— Need for the Planning Proposal

Q1. Is the planning proposal a result of an endorsed LSPS, strategic study or report?

Hawkesbury Council adopted their Local Housing Strategy in 2020 and Local Strategic Planning Statement (LSPS) in 2021. These strategic policies provided an outline of projected housing demand and areas of supply across the LGA.

The Housing Strategy and LSPS indicate a total of 4,500 new dwellings will be delivered in existing urban release areas between 2016 & 2036.

The Department of Planning & Environment have recently released updated dwelling projections for NSW, being the *2022 NSW Common Planning Assumption Projections*. These projections indicate that up to 6,995 new dwellings will be required to be delivered in the Hawkesbury LGA from 2016 to 2041 (*Implied Dwelling Demand 2016-2041*).

Macroplan have undertaken a Residential Needs Analysis, Aug 2023 (Appendix 12) which includes a detailed analysis of projected housing demand versus housing supply.

The key findings of the Macroplan report are:

- There is a housing undersupply of over 2200 dwellings in the Hawkesbury LGA
- There are no developments identified within the LHS that could deliver any of the 2200 dwellings required.
- The 2200 housing undersupply estimate may be understated should dwelling demand (i.e., take up rates) keep apace of new supply, as has been demonstrated since 2017.
- Volume of new supply is projected to begin to diminish from around 2028.

In addition, in October 2023 the NSW State Government released the Flood Evacuation Modelling report for the Hawkesbury-Nepean Valley.

Based on the modelling, State Government has determined the proposed rezoning and draft plans for Marsden Park North precinct and Riverstone Town Centre will not proceed. The plans for the West Schofields precinct will partially proceed, subject to strict conditions.

As a result, of the approximately 12,700 new homes previously proposed under the three rezonings, only up to 2,300 will now proceed.

The modelling also indicated that potential development in the Windsor and Richmond town centres forecast under the Hawkesbury Local Housing Strategy would increase the average annual people at risk by around 75% and were not appropriate to proceed.

In this regard, there is now a significant shortfall in the capability of existing zoned land to deliver the required number of new dwellings under the Hawkesbury LSPS / Housing Strategy and adopted Regional Plan.

Support for this Planning Proposal will assist Council in achieving the new dwelling targets and housing diversity principles prescribed in the Hawkesbury LSPS, Housing Strategy and Regional Plan.

Q2. Is the Planning Proposal the best way of achieving the objectives or intended outcomes, or is there a better way?

The Hawkesbury Local Environmental Plan Plannig is the principle Planning Instrument which applies to the land and incorporates provisions relating to land use zoning, lot size and building height and the like.

As the provisions are contained in the LEP, a Planning Proposal is required to amend the planning provision and land use zones.

Section B — Relationship to Strategic Planning Framework

Q3. Will the planning proposal give effect to the objectives and actions of the applicable regional or district plan or strategy (including any exhibited draft plans or strategies)?

a) Greater Sydney Region Plan

The Greater Sydney Region Plan and associated Western City District Plan were prepared by the Greater Sydney Commission in March 2018.

The plans outline a vision for Greater Sydney as a metropolis of three cities, incorporating the Western Parkland City, the Central River City, and the Eastern Harbour City.

We have further provided consideration of the GSRP directions and objectives in Table 13.

This Planning Proposal is consistent and gives effect to the GSRP by:

- Providing new urban growth and housing supply in an LGA which requires additional zoned land to meet local housing targets and housing diversity outcomes.
- Optimising existing and proposed infrastructure within the locality and facilitating new social and servicing infrastructure to support new housing and the livability of residents.
- Rezoning land as a direct extension of the existing North Richmond Urban Area.

Table 5: Consistency with Greater Sydney Region Plan

GSRP Directions and Objectives	Comment on consistency with GSRP
Infrastructure and Collaboration	
<p>Objective 1 Infrastructure supports the three cities</p> <p>Strategy 1.1 Prioritise infrastructure investments to support the vision of A Metropolis of Three Cities.</p> <p>Strategy 1.2 Sequence growth across the three cities to promote north-south and east-west connections.</p>	<p>The infrastructure and servicing report submitted with this proposal demonstrates that the land is able to be serviced through augmentation and extension of existing services.</p>

GSRP Directions and Objectives	Comment on consistency with GSRP
<p>Objective 2 Infrastructure aligns with forecast growth –growth infrastructure compact</p> <p>Strategy 2.1 Align forecast growth with infrastructure.</p> <p>Strategy 2.2 Sequence infrastructure provision across Greater Sydney using a place-based approach</p>	
<p>Objective 3 Infrastructure adapts to meet future needs</p> <p>Strategy 3.1 Consider the adaptability of infrastructure and its potential shared use when preparing infrastructure strategies and plans.</p>	<p>There are a number of existing major infrastructure projects in the locality including the planned North Richmond River crossing bridge and Grose Rover Road extension & Bridge Crossing.</p> <p>Support for and delivery of the Belmont Park project will ensure efficiency and cost effectiveness of new infrastructure is maximized.</p>
<p>Objective 4 Infrastructure use is optimised</p> <p>Strategy 4.1 Maximise the utility of existing infrastructure assets and consider strategies to influence behaviour changes, to reduce the demand for new infrastructure, including supporting the development of adaptive and flexible regulations to allow decentralised utilities.</p>	
<p>Objective 5 Benefits of growth realised by collaboration of governments, community and business</p>	<p>The site is not within an identified collaboration area.</p>
Liveability	
<p>Objective 6 Services and infrastructure meet communities' changing needs</p> <p>Strategy 6.1 Deliver social infrastructure that reflects the needs of the community now and in the future.</p> <p>Strategy 6.2 Optimise the use of available public land for social infrastructure.</p>	<p>The Concept Plan prepared and submitted with this proposal demonstrates that the rezoning will incorporate a range of community facilities, local retail centre and significant areas of open space to meet the needs of the future community and provide broader public benefit for the wider community.</p>

GSRP Directions and Objectives	Comment on consistency with GSRP
<p>Objective 7 Communities are healthy, resilient and socially connected</p>	<p>The Planning Proposal will deliver a sports field facility, a number of local parks and extensive pedestrian / cycle connections along Riparian Corridors.</p> <p>There is also an opportunity to deliver a potential 'river walk'. A pedestrian connection between Belmont Park and North Richmond Town Centre via the Hawkesbury River</p>
<p>Strategy 7.1 Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities.</p>	<p>These spaces and connections will form important meeting places for the community to engage in range of active and passive activities to socially connect with other members of the community and encourage healthy, active lifestyles.</p>
<p>Objective 8 Greater Sydney's communities are culturally rich with diverse neighbourhoods</p>	<p>The proposal seeks to deliver a broad diversity of housing options which will allow for and encourage a range of housing and family compositions.</p> <p>The diversity in housing will facilitate a diverse band culturally rich neighbourhood.</p>
<p>Objective 9 Greater Sydney celebrates the arts and supports creative industries and innovation</p> <p>Strategy 9.1 Facilitate opportunities for creative and artistic expression and participation, wherever feasible with a minimum regulatory burden</p>	<p>Smaller-scale opportunities for integration of creativity and innovation in the delivery of social infrastructure can be accommodated in the planned retail centre and as part of the tourism development.</p>
<p>Objective 10 Greater housing supply</p>	<p>Macroplan have identified that there is a 2,200 dwelling shortfall based on the current LHS dwelling delivery scenario across the LGA.</p> <p>There is also a shortfall of at least 3,600 dwellings based on the adopted LHS identifying increased density and diversity housing in flood prone areas. Refer to Sec 6.3 of this report for further details.</p> <p>The site will deliver over 1,200 new dwellings as a direct extension of the existing urban settlement, to meet local housing demand.</p>

GSRP Directions and Objectives	Comment on consistency with GSRP
<p>Objective 11 Housing is more diverse and affordable</p>	<p>Belmont Park’s deliberately diverse range of housing options will facilitate the creation of housing at approximately ½ the price of other new housing options in the area. This proposal creates 1200 dwellings of varying types, many of which will enable local working-class families to achieve their dream of home ownership.</p> <p>The project will also deliver 20% of the total dwellings as Affordable / Community Housing, providing significant public benefit to the broader community.</p> <p>The community will accommodate 1,200 new homes across a diverse range of housing types and including:</p> <ul style="list-style-type: none"> • Seniors Housing = 140 dwellings • Residential Housing = 540 Dwellings • Medium Density = 520 Dwellings • 20% Affordable Housing as part of the project = 240 Dwellings <p>In this regard, the proposal is able to deliver 55% of the dwellings as medium density, multi dwelling and seniors housing, significantly contributing to enhancing housing diversity in the LGA.</p>
<p>Objective 12 Great places that bring people together Strategy 12.1 Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places.</p>	<p>The Concept Plan incorporates walkable streets and pedestrian connections that provide direct, accessible and safe pedestrian and cycling connections encouraging physical activity and social connection.</p> <p>Consistent with the Planning Priority W4 Actions, the proposal also incorporates a large scale Community Farm which will promote local access to healthy fresh food and support local fresh food production.</p> <p>The Belmont Park project also incorporates diversity of housing types including “<i>The Missing Middle</i>” housing typologies, which will address housing diversity needs across the LGA and District.</p>

GSRP Directions and Objectives	Comment on consistency with GSRP
<p>Strategy 12.2</p> <p>In Collaboration Areas, Planned Precincts and planning for centres:</p> <ul style="list-style-type: none"> investigate opportunities for precinct-based provision of adaptable car parking and infrastructure in lieu of private provision of car parking ensure parking availability takes into account the level of access by public transport consider the capacity for places to change and evolve, and accommodate diverse activities over time incorporate facilities to encourage the use of car sharing, electric and hybrid vehicles including charging stations. 	<p>The site is not part of a Collaboration Area or Planned Precinct.</p>
<p>Objective 13</p> <p>Environmental heritage is identified, conserved and enhanced</p> <p>Strategy 13.1</p> <p>Identify, conserve and enhance environmental heritage</p>	<p>Environmental heritage has been assessed for the site and no significant features of items of environmental heritage exist within the site.</p>
<p>Productivity</p>	
<p>Objective 14</p> <p>A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities</p> <p>Strategy 14.1</p> <p>Integrate land use and transport plans to deliver the 30-minute city.</p> <p>Strategy 14.2</p> <p>Investigate, plan and protect future transport and infrastructure corridors.</p>	<p>The site is well connected to existing and planned public transport and active transport networks,. These transport connections provide walkable and access to shopping, health and recreation facilities and services within 30 minutes.</p> <p>The site is also located only 10 minutes drive from Richmond Railway Station and would be serviced by existing and future bus routes.</p>
<p>Objective 15</p> <p>The Eastern, GOP and Western Economic Corridors are better connected and more competitive</p>	<p>The site is not within these economic corridors.</p>
<p>Objective 16</p> <p>Freight and logistics network is competitive and efficient</p>	<p>Not relevant to the Planning Proposal.</p>
<p>Objective 17</p> <p>Regional connectivity is enhanced</p>	<p>Not relevant to the Planning Proposal.</p>

GSRP Directions and Objectives	Comment on consistency with GSRP
<p>Objective 18 Harbour CBD is stronger and more competitive</p>	Not relevant to the Planning Proposal.
<p>Objective 19 Greater Parramatta is stronger and better connected</p>	Not relevant to the Planning Proposal.
<p>Objective 20 Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City</p>	Not relevant to the Planning Proposal.
<p>Objective 21 Internationally competitive health, education, research and innovation precincts</p>	Not relevant to the Planning Proposal.
<p>Objective 22 Investment and business activity in centres</p> <p>Strategy 22.1 Provide access to jobs, goods and services in centres</p>	The proposal is consistent with the broad aims and objectives of the GSRP and Western City District Plan as it will deliver additional housing supply to meet housing targets within close proximity of a Strategic Centre providing access to jobs, services and transport close to where people live.
<p>Objective 23 Industrial and urban services land is planned, retained and managed</p>	Not relevant to the Planning Proposal.
<p>Objective 24 Economic sectors are targeted for success</p> <p>Strategy 24.1 Consider the barriers to the growth of internationally competitive trade sectors including engaging with industry and assessing regulatory barriers.</p> <p>Strategy 24.2 Consider issues when preparing plans for tourism and visitation.</p> <p>Strategy 24.3 Protect and support agricultural production and mineral resources (in particular construction materials) by preventing inappropriately dispersed urban activities in rural areas.</p> <p>Strategy 24.4 Provide a regulatory environment that enables economic opportunities created by changing technologies.</p>	Not relevant to the Planning Proposal.

GSRP Directions and Objectives	Comment on consistency with GSRP
Sustainability	
<p>Objective 25 The coast and waterways are protected and healthier</p>	<p>Riparian Corridors and the Hawkesbury River frontage will be protected and revegetated under this proposal, providing enhanced ecological and biodiversity outcomes.</p>
<p>Objective 26 A cool and green parkland city in the South Creek corridor</p>	<p>Not applicable to this proposal. The land is not located within the South Creek catchment area.</p>
<p>Objective 27 Biodiversity is protected, urban bushland and remnant vegetation is enhanced</p> <p>Strategy 27.1 Protect and enhance biodiversity.</p>	<p>Riparian Corridors are proposed to be zoned as environmental land and revegetated under this Plannig Proposal.</p> <p>The existing farm creek lines are significantly degraded as a result of ongoing agricultural use.</p> <p>Support for the proposal will significantly enhance biodiversity outcomes.</p> <p>The proposal also includes large lot environmental living allotments around the outer edges to allow retention of existing remnant vegetation where appropriate.</p>
<p>Objective 28 Scenic and cultural landscapes are protected</p> <p>Strategy 28.1 Identify and protect scenic and cultural landscapes.</p> <p>Strategy 28.2 Enhance and protect views of scenic and cultural landscapes from the public realm.</p>	<p>The site does not contain significant features of scenic and cultural importance.</p> <p>A Landscape Character and Visual Analysis has also been prepared in association with the proposal and is submitted as part of the submission.</p>
<p>Objective 29 Environmental, social and economic values in rural areas are protected and enhanced</p> <p>Strategy 29.1 Maintain or enhance the values of the Metropolitan Rural Area using place-based planning to deliver targeted environmental, social and economic outcomes.</p> <p>Strategy 29.2 Limit urban development to within the Urban Area, except for the investigation areas at Horsley Park, Orchard Hills, and east of The Northern Road, Luddenham.</p>	<p>Section 7.6 of this report addresses the MRA in detail.</p> <p>The proposal seeks to deliver local housing as an extension and continuation the existing North Richmond Township and does not seek to establish any new residential release areas or urban development areas under the District Plan.</p> <p>As advised by the Department of Planning (Greater Cities Commission) during a pre-lodgement meeting in September:</p> <ul style="list-style-type: none"> • Current District Plans do allow for the MRA area to accommodate local growth. Growth is not prohibited in the MRA. • District Plan does not allow for large scale

GSRP Directions and Objectives	Comment on consistency with GSRP
	<p>new urban released areas in MRA (i.e. South West / North West Growth Centre scale).</p> <ul style="list-style-type: none"> Local Settlement expansion in MRA is consistent with District Plan where it is needed to satisfy local demand as opposed to broader demand. <p><i>Ongoing planning and management of rural towns and villages will need to respond to local demand for growth, the character of the town or village and the surrounding landscape and rural activities. Rural and bushland towns and villages will not play a role in meeting regional or district scale demand for residential growth.</i></p> <p>A such, the proposal is able to be supported and is considered consistent with the District Plan as an extension of the existing township in response to local housing demand and needs.</p>
<p>Objective 30 Urban tree canopy cover is increased</p> <p>Strategy 30.1 Expand urban tree canopy in the public realm.</p>	<p>The land has been primarily cleared in association with agricultural uses.</p> <p>A significant portion of the site is identified for open space, riparian protection area and drainage.</p> <p>Plantings in these areas will expand the urban tree canopy and will be further enhanced with street tree plantings and trees within residential properties.</p>
<p>Objective 31 Public open space is accessible, protected and enhanced</p> <p>Strategy 31.1 Maximise the use of existing open space and protect, enhance and expand public open space</p>	<p>The site does not incorporate any areas of existing public open space.</p> <p>Notwithstanding, a sensitive development footprint has been adopted with 50%, over 59 hectares of land, set aside for open space, riparian corridors, retained agricultural land in the community farm and low scale eco-tourism facilities.</p> <p>The proposal incorporate a range of large and small scale active and passive open space areas to meet future demand and enhance open space for the broader community.</p>

GSRP Directions and Objectives	Comment on consistency with GSRP
<p>Objective 32</p> <p>The Green Grid links parks, open spaces, bushland and walking and cycling paths</p> <p>Strategy 32.1</p> <p>Progressively refine the detailed design and delivery of:</p> <ul style="list-style-type: none"> • Greater Sydney Green Grid priority corridors • opportunities for connections that form the long-term vision of the network • walking and cycling links for transport as well as leisure and recreational trips. 	<p>Over 50%, 59Ha of open space and green grid links will connect residents around the village and to a 1km stretch of the Hawkesbury River. Rehabilitation of Steading Creek will create a vegetated east-west flora and fauna corridor from the Hawkesbury River to large vegetation areas to the west of the site.</p>
<p>Objective 33</p> <p>A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change</p> <p>Strategy 33.1</p> <p>Support initiatives that contribute to the aspirational objective of achieving net-zero emissions by 2050 especially through the establishment of low-carbon precincts in Planned Precincts, Growth Areas and Collaboration Areas.</p>	<p>Broader State and local government planning policy initiatives on net-zero for the SWGA and Western Sydney District can be implemented.</p>
<p>Objective 34</p> <p>Energy and water flows are captured, used and re-used</p>	<p>The Belmont Park project incorporates a range of planned innovative water and energy solutions.</p> <p>Recycled Water is the preferred outcome at Belmont Park.</p> <p>The establishment of a recycled water plant will enable the reuse of treated water. Recycled water can be treated to a quality suitable for dual reticulation including reuses such as toilet flushing, washing machines and irrigation applications. The irrigation applications could include the farming uses and recreational open spaces.</p> <p>Distributed Energy Resources (DERs) are the preferred outcome at Belmont Park.</p> <p>Belmont Park intends to maximise its use of locally generated renewable energy such as roof top solar complimented with various locally located battery back-up systems. This will allow creation of a localized micro-grid power system throughout the project.</p>

GSRP Directions and Objectives	Comment on consistency with GSRP
<p>Objective 35 More waste is re-used and recycled to support the development of a circular economy</p>	<p>Broader State and local government planning policy initiatives on circular economy for the SWGA and Western Sydney District can be implemented.</p>
<p>Objective 36 People and places adapt to climate change and future shocks and stresses</p> <p>Strategy 36.1 Support initiatives that respond to the impacts of climate change.</p>	<p>Broader State and local government planning policy initiatives on climate change for the SWGA and Western Sydney District can be implemented.</p>
<p>Objective 37 Exposure to natural and urban hazards is reduced</p>	<p>The proposal and associated supporting studies have demonstrated that the land is suitable to be rezoned for residential use, with the residential land situated above the 1:100year flood line, and primary above the 1:500 year flood line.</p> <p>A Flood Evacuation Plan has been prepared which has demonstrated that land below the PMF flood level is able to be evacuated to local evacuation centres and there is no impact on emergency services.</p>
<p>Objective 38 Heatwaves and extreme heat are managed</p> <p>Strategy 38.1 Mitigate the urban heat island effect and reduce vulnerability to extreme heat.</p>	<p>The project has adopted a sensitive development footprint with 50%, over 59 hectares of land, set aside for open space, riparian corridors, retained agricultural land in the community farm and low scale eco-tourism facilities.</p> <p>These spaces will assist in mitigating the urban heat island effect and provide easy access to cool spaces for residents throughout the community.</p>

b) Western City District Plan

The Greater Sydney Region Plan and associated Western City District Plan were prepared by the Greater Sydney Commission in March 2018.

The Western City District Plan incorporates a range of Planning Priorities for the region addressing areas including Infrastructure and Collaboration, Liveability, Productivity, Sustainability, and Implementation.

As demonstrated in Section 7.5 of this report above, the Planning Proposal is consistent with a range of key Planning Priorities and principles outlined under the Regional Plan.

We have further provided consideration of the District Plan directions and objectives in Table 14 below.

Table 6: Consistency with Western City District Plan

WCDP Planning Priorities	Comment on consistency with WCDP
Infrastructure and Collaboration	
<p>Planning Priority W1 Planning for a city supported by infrastructure</p> <p>Relevant Action(s) 4. Sequence infrastructure provision using a place-based approach.</p>	<p>The infrastructure and servicing report submitted with this proposal demonstrates that the land is able to be serviced through augmentation and extension of existing services.</p> <p>There are a number of existing major infrastructure projects in the locality including the planned North Richmond River crossing bridge and Grose Rover Road extension & Bridge Crossing.</p>
<p>Planning Priority W2 Working through collaboration</p> <p>Relevant Action(s) 8. Coordinate land use and infrastructure for the Western City District.</p>	<p>Support for and delivery of the Belmont Park project will ensure efficiency and cost effectiveness of new infrastructure is maximized.</p> <p>Recycled Water and locally generated electricity are also potentially able to be delivered on site.</p>
Liveability	
<p>Planning Priority W3 Providing services and social infrastructure to meet people's changing needs</p> <p>Relevant Action(s) 9. Deliver social infrastructure that reflects the needs of the community now and in the future.</p>	<p>A detailed Community Infrastructure and Services Review will be prepared in discussion with Council. As the Planning Proposal progresses.</p> <p>It is anticipated that any required community facility will be delivered as part of the retail centre or as a standalone community facility within one of the open space areas.</p>

WCDP Planning Priorities	Comment on consistency with WCDP
<p>Planning Priority W4</p> <p>Fostering healthy, creative, culturally rich and socially connected communities</p> <p>Relevant Action(s)</p> <p>11. Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities by:</p> <ul style="list-style-type: none"> a. providing walkable places at a human scale with active street life b. prioritising opportunities for people to walk, cycle and use public transport c. co-locating schools, health, aged care, sporting and cultural facilities d. promoting local access to healthy fresh food and supporting local fresh food production. <p>16. Strengthen social connections within and between communities through better understanding of the nature of social networks and supporting infrastructure in local places.</p>	<p>The Concept Plan incorporates walkable streets and pedestrian connections that provide direct, accessible and safe pedestrian and cycling connections encouraging physical activity and social connection.</p> <p>Consistent with the Planning Priority W4 Actions, the proposal also incorporates a large scale Community Farm which will promote local access to healthy fresh food and support local fresh food production.</p> <p>The Belmont Park project also incorporates diversity of housing types including “<i>The Missing Middle</i>” housing typologies, which will address housing diversity needs across the LGA and District.</p>
<p>Planning Priority W5</p> <p>Providing housing supply, choice and affordability, with access to jobs, services and public transport</p>	<p>Macroplan have identified that there is a 2,200 dwelling shortfall based on the current LHS dwelling delivery scenario across the LGA.</p> <p>There is also a shortfall of at least 3,600 dwellings based on the adopted LHS identifying increased density and diversity housing in flood prone areas. Refer to Sec 6.3 of this report for further details.</p> <p>The site will deliver over 1,200 new dwellings as a direct extension of the existing urban settlement, to meet local housing demand.</p> <p>Belmont Park’s deliberately diverse range of housing options will facilitate the creation of housing at approximately ½ the price of other new housing options in the area. This proposal creates 1200 dwellings of varying types, many of which will enable local working-class families to achieve their dream of home ownership.</p> <p>The project will also deliver 20% of the total dwellings as Affordable / Community Housing, providing significant public benefit to the broader community.</p>

The community will accommodate 1,200 new homes across a diverse range of housing types and including:

- Seniors Housing = 140 dwellings
- Residential Housing = 540 Dwellings
- Medium Density = 520 Dwellings
- **20% Affordable Housing as part of the project = 240 Dwellings**

In this regard, the proposal is able to deliver 55% of the dwellings as medium density, multi dwelling and seniors housing, significantly contributing to enhancing housing diversity in the LGA.

Planning Priority W6

Creating and renewing great places and local centres, and respecting the District's heritage

Relevant Action(s)

19. Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places by:

- a. prioritising a people-friendly public realm and open spaces as a central organising design principle
- b. recognising and balancing the dual function of streets as places for people and movement
- c. providing fine grain urban form, diverse land use mix, high amenity and walkability, in and within a 10-minute walk of centres
- d. integrating social infrastructure to support social connections and provide a community hub
- e. recognising and celebrating the character of a place and its people.

The proposal retains two 1896 farm buildings are proposed to be retained and incorporated into the future development.

The buildings are intended to form part of a medium density housing site, allowing the buildings to be retained, restored and managed in a landscape setting, as a community facility or refurbished for residential accommodation, consistent with the intent of the District Plan.

WCDP Planning Priorities	Comment on consistency with WCDP
Productivity	
<p>Planning Priority W7 Establishing the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City</p> <p>Relevant Action(s) 25. Investigate, plan and protect future transport and infrastructure corridors.</p>	<p>The site is well connected to existing and planned public transport and active transport networks.</p> <p>ARUP have also completed a Transport Scoping Study which demonstrates that the traffic generation from the proposal will not have a significant impact on the local or regional road network.</p> <p>Any required local road upgrades will be delivered under a VPA arrangement.</p>
<p>Planning Priority W8 Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis</p>	<p>Not relevant to the Planning Proposal.</p>
<p>Planning Priority W9 Growing and strengthening the metropolitan cluster</p>	<p>Not relevant to the Planning Proposal.</p>
<p>Planning Priority W10 Maximising freight and logistics opportunities and planning and managing industrial and urban services land</p>	<p>Not relevant to the Planning Proposal.</p>
<p>Planning Priority W11 Growing investment, business opportunities and jobs in strategic centres</p>	<p>Not relevant to the Planning Proposal.</p>
Sustainability	
<p>Planning Priority W12 Protecting and improving the health and enjoyment of the District's waterways</p> <p>Relevant Action(s) 67. Protect environmentally sensitive areas of waterways. 68. Enhance sustainability and liveability by improving and managing access to waterways and foreshores for recreation, tourism, cultural events and water-based transport.</p>	<p>The project will enhance biodiversity outcomes through the rehabilitation and revegetation of creek lines through the site, providing biodiversity connectivity for the Hawkesbury River to Bushland areas to the west.</p> <p>The existing creek line is degraded as a result of erosion and long term agricultural and grazing activities on the site. Revegetation of Steading Creek as a Riparian Corridor will significantly enhance biodiversity and vegetation outcomes in the locality.</p> <p>The project will also provide for a long term open space edge along the Hawkesbury River edge, enhancing local Aquatic and riverine biodiversity.</p>

WCDP Planning Priorities	Comment on consistency with WCDP
<p>Planning Priority W13 Creating a Parkland City urban structure and identity, with South Creek as a defining spatial element</p>	<p>Not applicable to the proposal as it is not located within the South Creek Catchment.</p>
<p>Planning Priority W14 Protecting and enhancing bushland and biodiversity</p> <p>Relevant Action(s)</p> <p>72. Protect and enhance biodiversity by:</p> <ul style="list-style-type: none"> a. supporting landscape-scale biodiversity conservation and the restoration of bushland corridors b. managing urban bushland and remnant vegetation as green infrastructure c. managing urban development and urban bushland to reduce edge-effect impacts. 	<p>The project has adopted a sensitive development footprint with 50%, over 59 hectares of land, set aside for open space, riparian corridors, retained agricultural land in the community farm and low scale eco-tourism facilities.</p> <p>Remnant vegetation will be retained where possible in areas of open space and creek corridor.</p> <p>The proposal will deliver local bushland corridor links from bushland areas to the west through the Hawkesbury River.</p>
<p>Planning Priority W15 Increasing urban tree canopy cover and delivering Green Grid Connections</p> <p>Relevant Action(s)</p> <p>74. Progressively refine the detailed design and delivery of:</p> <ul style="list-style-type: none"> a. Greater Sydney Green Grid priority corridors and projects important to the District b. opportunities for connections that form the long-term vision of the network c. walking and cycling links for transport as well as leisure and recreational trips. 	<p>The Concept Plan and associated Urban Design Report provides for a green and blue grid framework that connects riparian protection areas, local parks and play fields, and drainage areas. The green spaces within the site will form important green connections within the site and connecting to the Hawkesbury River.</p>
<p>Planning Priority W16 Protecting and enhancing scenic and cultural landscapes</p>	<p>The site does not contain significant features of scenic and cultural importance.</p> <p>A Landscape Character and Visual Analysis has also been prepared in association with the proposal and is submitted as part of the submission.</p>
<p>Planning Priority W17 Better managing rural areas</p>	<p>The proposal retains a large area of Rural Land as a Community Farm along the edge of the Hawkesbury River.</p> <p>The Community Farm will accommodate agricultural areas for residents of Belmont Park and allow for the leasing of smaller intensive agricultural plots (1 -2 acres) to local producers.</p>

WCDP Planning Priorities	Comment on consistency with WCDP
<p>Planning Priority W18 Delivering high quality open space</p> <p>Relevant Action(s)</p> <p>80. Maximise the use of existing open space and protect, enhance and expand public open space by:</p> <ul style="list-style-type: none"> a. providing opportunities to expand a network of diverse, accessible, high quality open spaces that respond to the needs and values of communities as populations grow b. investigating opportunities to provide new open space so that all residential areas are within 400 metres of open space and all high density residential areas (over 60 dwellings per hectare) are within 200 metres of open space c. requiring large urban renewal initiatives to demonstrate how the quantity of, or access to, high quality and diverse local open space is maintained or improved d. planning new neighbourhoods with a sufficient quantity and quality of new open space e. delivering shared and co-located sports and recreational facilities including shared school grounds and repurposed golf courses f. delivering or complementing the Greater Sydney Green Grid g. providing walking and cycling links for transport as well as leisure and recreational trips. 	<p>The Community Farm encompasses over 20 hectares of land providing significant opportunity for local scale agricultural activities.</p> <p>A significant area within the site is identified for open space, riparian protection area and drainage.</p> <p>The Planning Proposal will expand the offer for open space and recreation facilities in the locality.</p> <p>The open spaces areas incorporate a range of active and recreation facilities to suit all members of the community to promote social interaction and inclusiveness.</p> <p>A number of pocket parks are proposed, which will incorporate a range of playspaces, kick-a-bout areas and informal activity spaces for local residents.</p> <p>Pocket parks have been located to ensure all residents live within 400m walking distance of an open space area.</p> <p>The cleared flat land along the river edge provides an ideal opportunity to deliver playing fields and associated facilities.</p> <p>There is also an opportunity to deliver a potential 'river walk' providing a safe and convenient pedestrian connection between Belmont Park and North Richmond Town Centre via the Hawkesbury River</p>
<p>Planning Priority W19 Reducing carbon emissions and managing energy, water and waste efficiently</p>	<p>The Belmont Park project incorporates a range of planned innovative water and energy solutions.</p> <p>Recycled Water is the preferred outcome at Belmont Park.</p> <p>The establishment of a recycled water plant will enable the reuse of treated water. Recycled water can be treated to a quality suitable for dual reticulation including reuses such as toilet flushing, washing machines and irrigation applications. The irrigation applications could include the farming uses and recreational open spaces.</p> <p>Distributed Energy Resources (DERs) are the</p>

WCDP Planning Priorities	Comment on consistency with WCDP
--------------------------	----------------------------------

preferred outcome at Belmont Park.

Belmont Park intends to maximise its use of locally generated renewable energy such as roof top solar complimented with various locally located battery back-up systems and delivery of a localized micro-grid power system throughout the project.

Planning Priority W20

Adapting to the impacts of urban and natural hazards and climate change

Relevant Action(s)

88. Avoid locating new urban development in areas exposed to natural and urban hazards and consider options to limit the intensification of development in existing urban areas most exposed to hazards.

89. Mitigate the urban heat island effect and reduce vulnerability to extreme heat.

In consideration of flood impacts, the project and associated Concept Plan locates residential development outside land identified as being Flood Prone Land (below the 1:100 year flood level).

All residential housing areas are capable of being delivered above the 1:500 year flood level subject to minor earthworks over the land holding.

The majority of land to be rezoned is also located above the PMF flood level.

Indesco have also provided a review of the proposal under Clause 5.21 of Council's Local Environment Plan (LEP) which specifies controls for Flood Planning.

Indesco have advised that the Concept Plan appears conducive to the flood affectation of the Site and thus it is envisaged that compliance with the relevant flood planning controls can be achieved pending further typical investigation that would occur as part of the future planning proposal.

There is flood free road access from the site above the PMF flood event.

The Detailed Evacuation Capability Assessment, Water Technology (Aug 23), Appendix 7 concludes that land below the PMF is able to be evacuated to local / regional evacuation centres without aid from emergency services and is not a low or high flood island.

We also note that the St John of God private hospital site, immediately adjacent to Belmont Park has been used for Emergency services accommodation during recent flood events, demonstrating that rezoning of the land does not present a hazard to future residents.

Q4. Is the planning proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GSC, or another endorsed local strategy or strategic plan?

The Planning Proposal will give effect to Hawkesbury Council’s Local Strategic Planning Statement as outlined in Table 7 below.

Table 7: Hawkesbury Local Strategic Planning Statement Priorities Review

LSPS Priority	Comment on consistency with LSPS Priority
Infrastructure	
<p>Planning Priority 1</p> <p>Ensure infrastructure aligns with current needs and future growth</p>	<p>The infrastructure and servicing report submitted with this proposal demonstrates that the land is able to be serviced through augmentation and extension of existing services.</p> <p>There are a number of existing major infrastructure projects in the locality including the planned North Richmond River crossing bridge and Grose Rover Road extension & Bridge Crossing.</p> <p>Support for and delivery of the Belmont Park project will ensure efficiency and cost effectiveness of new infrastructure is maximized.</p>
<p>Planning Priority I2</p> <p>Form partnerships with stakeholders and agencies.</p>	<p>This Local Priority does not influence the Planning Proposal.</p> <p>This Planning Priority relates to Council establishing partnerships with State Agencies and the like to deliver infrastructure.</p>
Community	
<p>Planning Priority 3</p> <p>Provide a diversity of housing types to meet the needs of the changing population.</p>	<p>Belmont Park’s deliberately diverse range of housing options will facilitate the creation of housing at approximately ½ the price of other new housing options in the area. This proposal creates 1200 dwellings of varying types, many of which will enable local working-class families to achieve their dream of home ownership.</p> <p>The project will also deliver 20% of the total dwellings as Affordable / Community Housing, providing significant public benefit to the broader community.</p> <p>The community will accommodate 1,200 new homes across a diverse range of housing types and including:</p> <ul style="list-style-type: none"> • Seniors Housing = 140 dwellings • Residential Housing = 540 Dwellings • Medium Density = 520 Dwellings • 20% Affordable Housing as part of the project = 240 Dwellings <p>The proposal is able to deliver 55% of the dwellings as medium density, multi dwelling and seniors housing, significantly contributing to enhancing housing diversity in the LGA.</p>

LSPS Priority	Comment on consistency with LSPS Priority
<p>Planning Priority 4</p> <p>Protect and promote Aboriginal and European heritage and its transition into innovative, creative and adaptive re-uses.</p>	<p>The proposal retains two 1896 farm buildings are proposed to be retained and incorporated into the future development.</p> <p>The buildings are intended to form part of a medium density housing site, allowing the buildings to be retained, restored and managed in a landscape setting, as a community facility or refurbished for residential accommodation, consistent with the intent of the District Plan.</p> <p>AECOM completed an Aboriginal Heritage Due Diligence assessment for the proposed Belmont Park Estate site.</p> <p>The key findings of the due diligence assessment are as follows:</p> <ul style="list-style-type: none"> • There are no registered Aboriginal sites within the Project area; • No Aboriginal objects/sites were identified during the visual inspection component of this assessment; and • Several areas within the Project area were assessed as archaeologically sensitive. These areas are considered likely to contain Aboriginal objects/sites in subsurface contexts. <p>Consistent with the recommendations of the Due Diligence, where impacts are proposed within areas of archaeological sensitivity, further investigation would be completed.</p> <p>This would involve a formal archaeological survey, a program of subsurface testing and a program of Aboriginal community consultation in accordance with Heritage NSW guidelines.</p>
<p>Planning Priority 5</p> <p>Managing rural lands.</p>	<p>The proposal retains a large area of Rural Land as a Community Farm along the edge of the Hawkesbury River.</p> <p>The Community Farm will accommodate agricultural areas for residents of Belmont Park and allow for the leasing of smaller intensive agricultural plots (1 -2 acres) to local producers.</p> <p>The Community Farm encompasses over 20 hectares of land providing significant opportunity for local scale agricultural activities.</p>
<p>Planning Priority 6</p> <p>Manage, enhance and celebrate the distinctive heritage character of our towns, villages and naturally landscaped environment.</p>	<p>The proposal respects the heritage and character of existing town and villages while delivering a new community with associated facilities.</p>

LSPS Priority	Comment on consistency with LSPS Priority
Productivity	
<p>Planning Priority 7</p> <p>Promote and support all sectors of industry and businesses in the Hawkesbury to meet current and future demands and trends.</p>	<p>The proposal will deliver additional housing supply to meet housing targets within close proximity of a Strategic Centre providing access to jobs, services and transport close to where people live.</p> <p>The proposal also includes the delivery of a local retail centre, tourism operation and community farm which will generate a wide range of employment and business opportunities for future residents.</p>
<p>Planning Priority 8</p> <p>Explore opportunities at the Western Sydney University, Richmond RAAF Base and other industries to create value chain at the Western Sydney Airport.</p>	<p>This Local Priority does not influence the Planning Proposal.</p>
<p>Planning Priority 9</p> <p>Encourage the economic self-determination of the Aboriginal community through their land holdings and culture.</p>	<p>This Local Priority does not influence the Planning Proposal as the site does not incorporate any Aboriginal Land.</p>
Sustainability	
<p>Planning Priority 10</p> <p>An aware and resilient city that can adapt to natural hazards of flood, bushfire and climate change.</p>	<p>In consideration of flood impacts, the project and associated Concept Plan locates residential development outside land identified as being Flood Prone Land (below the 1:100 year flood level).</p> <p>All residential housing areas are capable of being delivered above the 1:500 year flood level subject to minor earthworks over the land holding.</p> <p>The majority of land to be rezoned is also located above the PMF flood level.</p> <p>Indesco have also provided a review of the proposal under Clause 5.21 of Council's Local Environment Plan (LEP) which specifies controls for Flood Planning.</p> <p>Indesco have advised that the Concept Plan appears conducive to the flood affectation of the Site and thus it is envisaged that compliance with the relevant flood planning controls can be achieved pending further typical investigation that would occur as part of the future planning proposal.</p>

LSPS Priority	Comment on consistency with LSPS Priority
	<p>Eco Logical Australia (ELA) have reviewed bushfire constraints associated with a rezoning proposal for residential development of the site to rezone the land from RU1 to facilitate residential development and other land uses.</p> <p>This bushfire constraints analysis demonstrates that the bushfire risk context allows for the proposed rezoning as it is not exposed to a high bushfire risk. The analysis states that with consideration of design outcomes, the proposal will be able to achieve the performance criteria and acceptable solutions of PBP.</p>
<p>Planning Priority 11 Protect our rivers, creeks and areas of high biodiversity and environmental values.</p>	<p>The project will enhance biodiversity outcomes through the rehabilitation and revegetation of creek lines through the site, providing biodiversity connectivity for the Hawkesbury River to Bushland areas to the west.</p> <p>The existing creek line is degraded as a result of erosion and long term agricultural and grazing activities on the site. Revegetation of Steading Creek as a Riparian Corridor will significantly enhance biodiversity and vegetation outcomes in the locality.</p> <p>The project will also provide for a long term open space edge along the Hawkesbury River edge, enhancing local Aquatic and riverine biodiversity.</p>
<p>Planning Priority 12 Champion, educate and support a transition to renewable energy and reduced waste.</p>	<p>The Belmont Park project incorporates a range of planned innovative water and energy solutions.</p> <p>Recycled Water is the preferred outcome at Belmont Park.</p> <p>The establishment of a recycled water plant will enable the reuse of treated water. Recycled water can be treated to a quality suitable for dual reticulation including reuses such as toilet flushing, washing machines and irrigation applications. The irrigation applications could include the farming uses and recreational open spaces.</p> <p>Distributed Energy Resources (DERs) are the preferred outcome at Belmont Park.</p> <p>Belmont Park intends to maximise its use of locally generated renewable energy such as roof top solar complimented with various locally located battery back-up systems. This will allow creation of a localized micro-grid power system throughout the project.</p>

Q5. Is the planning proposal consistent with any other applicable State and regional studies or strategies?

There are no other specific State or Regional Planning Studies / Strategies which apply to the site or Planning Proposal.

Q6. Is the Planning Proposal consistent with applicable state environmental planning policies?

The NSW Government has gazetted a range of State Environmental Planning Policies (SEPPs) and Sydney Regional Environmental Plans (SREPs or Deemed SEPPs) which guide land use and planning outcomes across the State and Sydney Metropolitan Region.

We have provided a detailed review of the Planning Proposal and its intended outcomes and objectives against all relevant SEPPs in Appendix 2.

This review has demonstrated that the proposal is consistent with all relevant and applicable state environmental planning policies.

The Planning Proposal is not considered to be inconsistent with any adopted State Environmental Planning Policies.

Q7. Is the planning proposal consistent with applicable Ministerial Directions (Section 9.1)?

The Minister for Planning and Environment has issued Local Planning Directions that must be considered in the preparation of Planning Proposals. The directions cover a range of categories and land use considerations including:

- Employment and resources
- Environment and heritage
- Housing, infrastructure and urban development
- Hazard and risk
- Regional planning
- Local plan making

A detailed review of the proposal against each Local Planning Direction is provided in Appendix 3. This review demonstrates that the Planning Proposal is wholly consistent with all applicable Local Planning Directions.

Section C — Environmental, Social and Economic Impact

Q8. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected because of the proposal?

Sclerophyll Flora Surveys and Research (Sclerophyll) has prepared a Preliminary Ecological Assessment of the site.

The objective of the Preliminary Ecological Assessment was to identify and highlight any significant potential ecological constraints to development through a desktop review supplemented with a preliminary site walkover to produce a draft vegetation map.

As part of the assessment, a 2 day site walkover was undertaken by Sclerophyll to identify and map areas of remnant native vegetation, including woodland patches as well as any areas deemed to be possible derived native grassland (i.e. cleared woodland with at least some intact native groundcover). Farm dams and paddock trees were also inspected.

Remnant native vegetation identified on site located within the Steading Creek corridor included:

- Cumberland Redgum Riverflat Forest
- Cumberland Shale Plains Woodland
- Cumberland Shale Sandstone Ironbark Forest

Remnant native vegetation identified on site located outside the Steading Creek corridor included:

- Cumberland Moist Shale Woodland
- Cumberland Redgum Riverflat Forest
- Cumberland Shale Plains Woodland

The assessment identified a number of threatened fauna species as having the potential to occur within the identified site habitats based on their life cycle requirements and known local occurrences.

The Concept Plan prepared in association with this submission retains large areas native vegetation identified in this review in Riparian Corridors, Open Space and large Environmental Living allotments.

A detailed assessment of any biodiversity off-set requirements will be completed following Gateway Determination as part of the Planning Proposal process.

Q9. Are there any other likely environmental effects of the planning proposal and how are they proposed to be managed?

The Planning Proposal and associated supporting studies includes a comprehensive assessment of potential environmental effects with site-specific technical assessments for Aboriginal cultural heritage, acoustics, biodiversity, bushfire, heritage, land contamination, riparian areas, salinity, and water cycle management including flooding.

There are no likely environmental effects on Aboriginal cultural heritage, biodiversity and heritage. All other potential environmental effects in relation to bushfire, land contamination, salinity and water cycle management have been adequately addressed to allow the progression of the Planning Proposal.

Further detailed investigations are able to be completed post Gateway Determination as required.

Q10. Has the planning proposal adequately addressed any social and economic effects?

The Planning Proposal will have a positive social and economic effects through the delivery of housing diversity, creation of employment opportunities and delivery of open space facilities.

There is a clear and identified lack of housing diversity within the Hawkesbury LGA. This creates poor social and housing outcomes.

The Belmont Park project is able to deliver over 1,200 dwellings with a wide variety of housing types and housing diversity embodied as a key principle in the project.

The proposal is able to deliver 55% of the dwellings as medium density, multi dwelling and seniors housing, significantly contributing to enhancing housing diversity in the LGA, with 20% of the project to be delivered as Affordable Housing.

This will significantly enhance social outcomes in the LGA by providing greater housing diversity for a broad range of users and significantly enhancing Affordable Housing opportunities.

The proposal will deliver significant economic benefits to future residents and the broader community including:

- The Community Farm will deliver local economic benefits to the community and allow for leasing of small scale agricultural plots for local agriculturalists.
- The tourism hub and operation will deliver employment opportunities for local residents while also delivering economic benefits to local businesses through increasing visitors / tourists to the region.
- The Community Farm will also provide for local employment opportunities associated with both the agricultural and educational operations.

Section D — Infrastructure (Local, State and Commonwealth)

Q11. Is there adequate public infrastructure for the planning proposal?

a) Road Capacity

ARUP have completed a Transport Scoping Report, Appendix 14 associated with the proposal.

The Transport Scoping Report included a review of the following:

- An assessment of the existing transport services and provisions near the proposal.
- An appreciation of future transport infrastructure upgrades, land use developments and their associated timings which may influence or impact the proposal.
- An assessment of likely traffic generation, traffic distribution, road network impacts and likely pinch points/constraints within the Hawkesbury area.

The review demonstrates that the traffic generation from the proposal will not have a significant impact on the local or regional road network.

We note that the site is located only 10 minutes drive from Richmond Railway Station and would be serviced by existing and future bus routes.

There are also a number of planned road upgrades already being completed in the locality which will benefit the proposal including”:

- **Richmond Bridge Duplication** - The Australian Government and NSW Government have committed \$500 million for traffic improvements including a new bridge over the Hawkesbury River between Richmond and North Richmond. In a community update issued by Transport for NSW in April 2022 it was reported that a contractor for the design and construction of Stage 1 is expected to be appointed late 2022 and the alignment of Stage 2 is currently being finalised.
- **Grose River Road and Grose Vale Road Upgrades** - Currently underway are significant upgrades to the existing Grose Vale Road and Grose River Roads immediately adjacent to the project. Approximately 1km of road upgrades are being undertaken by the neighbouring developer Redbank Communities, which include a large round-a-bout intersection at Grose River Road.
- **New Grose River Road Bridge** - A new flood free bridge is planned to start construction in early 2024. This will connect Grose River Road and Springwood Road and will ultimately provide a direct connection from the site to Penrith and future Western Sydney Infrastructure Corridors. It would also serve as an alternate route to Richmond town centre and train station.

b) Servicing

As discussed above, Indesco have completed a preliminary Service Strategy (Appendix 13) for the site which reviews existing infrastructure within the locality and capacity to service the proposal.

Indesco have concluded that the proposed Belmont Park project can be serviced, and that servicing of the site is feasible from a financial perspective.

As Belmont Park intends to create a sustainable servicing strategy it will take advantage of servicing solutions that generate and store energy locally and efficiently re-use water via its own recycled water treatment plant.

Sewer

Recycled Sewer is the preferred outcome at Belmont Park.

Preliminary modelling concluded that the project will be of a size to be economically feasible. Alltogether Group, a recognised provider of such services have expressed a formal interest in supporting the project (Appendix 11).

Alternatively, INDESCO's investigations revealed that whilst existing Sydney Water infrastructure is limited, Sydney Water have advised that the North Richmond Wastewater Treatment Plant (WWTP) and Richmond WRP are proposed to be upgraded. The upgrades are expected to cater for over 85% increase in demand and are planned to be completed by Q2-Q3 2025.

Water

Recycled Water is the preferred outcome at Belmont Park.

The establishment of a recycled water plant will enable the reuse of treated water. Recycled water can be treated to a quality suitable for dual reticulation including reuses such as toilet flushing, washing machines and irrigation applications. The irrigation applications could include the farming uses and recreational open spaces.

With respect to existing infrastructure there is an existing DN315mm diameter Polyethylene (PE) Water Main in Grose Vale Road. The water main extends past the intersection of Grose Rover Road and Grose Vale Road, along the northern edge of the site.

There is an existing water reservoir 2km north-east of the site in the North Richmond Waste Water plant property.

Potable water servicing of the site can be achieved through either:

- Connection to the existing water main in Grose Vale Road; or
- Provision of a new main from the reservoir which would provide additional capacity to the surrounding catchment beyond that required by the project.

Electricity

Distributed Energy Resources (DERs) are the preferred outcome at Belmont Park.

Belmont Park intends to maximise its use of locally generated renewable energy such as roof top solar complimented with various locally located battery back-up systems.

Alternatively or in addition to the DERs, there are two existing zone substations within the proximity of the site:

- The North Richmond Zone Substation located approximately 3km (approx RL 28m); and
- The East Richmond Zone Substation located approximately 8km (approx. RL 17m) from the site.

Endeavour has advised the development would be supplied from the North Richmond Zone Substation by installing a new 11kV feeder to the site.

An interim supply from the East Richmond zone substation could supply approximately 500 lots, prior to the new feeder being delivered.

Telecommunications

Design It Telco (DIT) were consulted in relation to the proposal and have advised as follows:

- Current NBN and Telstra infrastructure could handle the overall proposed development yield.
- As the development is over 100 lots it will qualify for fibre to premises (FTTP); and
- No back haul charges are expected as the Site is located within 1km of an NBN Co serviced estate (Redbank).

Section E — State and Commonwealth Interests

Q12. What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?

Any State and Commonwealth public authorities to be consulted as part of the Gateway Determination will be detailed in the post-exhibition version of the Planning Proposal.

9.4 PART 4 – Mapping

The Planning Proposal likely seeks the following amendments to the Hawkesbury LEP 2012:

- a) Amend the Land Use Zoning to encompass a range of land use zones as follows:
 - R2 Low Density Residential zoning for residential housing areas.
 - R1 General Residential zone for the Cluster Housing areas.
 - R5 Large Lot Residential zoning for large lot areas on the edges of the project.
 - E1 Local Centre zoning for the Local Centre – including an allowance to deliver Residential Flat Buildings.
 - RE1 Public Recreation for open space areas
 - C2 Environmental Conservation zone for Riparian Corridor Areas.
 - SP3 Tourist for the tourism hub

The proposal will retain the RU1 Primary Production zoning over the community farm land.

- b) Amend the Minimum Lot Size mapping follows:
 - 300m² minimum lot size for the R2 Low Density Residential zoned areas.
 - 200m² minimum lot size for R1 General Residential zoned Cluster Housing areas.
 - 1,200m² minimum lot size for the R5 Large Lot Residential zoned areas.
 - No Minimum lot size for the E1 Local Centre zoned land.
 - Minimum Lot size mapping amendments for RE1 Public Recreation, C2 Environmental Conservation and SP3 Tourist for the tourism hub are subject to discussion with Council.
- c) Amend the Maximum Building Height mapping follows:
 - Retain the existing 10m building height for the R2 Low Density Residential and R1 General Residential zoned areas.
 - 12m Maximum Building Height for R5 Large Lot Residential zoned areas (to accommodate split level construction and site topography).
 - 15m Maximum Building Height for the E1 Local Centre and SP3 Tourist zoned land.
 - Retain the existing 10m building height for the RE1 Public Recreation and C2 Environmental land.
- d) Amend the Biodiversity Mapping layer to reflect the detailed site investigations and master planning outcomes.
- e) Remove the land from the *Minimum Lot Size for a Lot Averaging Subdivision* map.

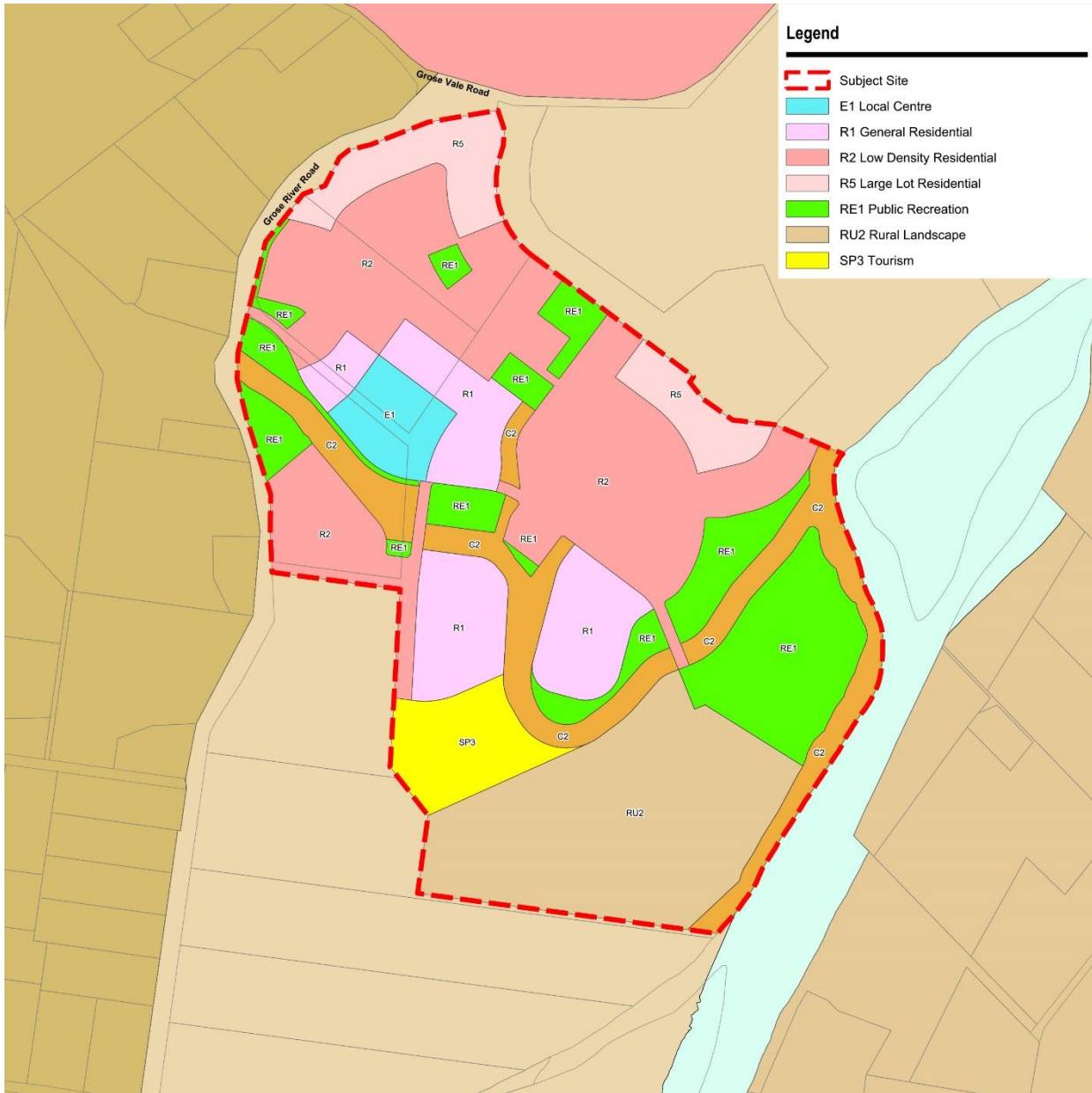


Figure 10 – Proposed Zoning Plan

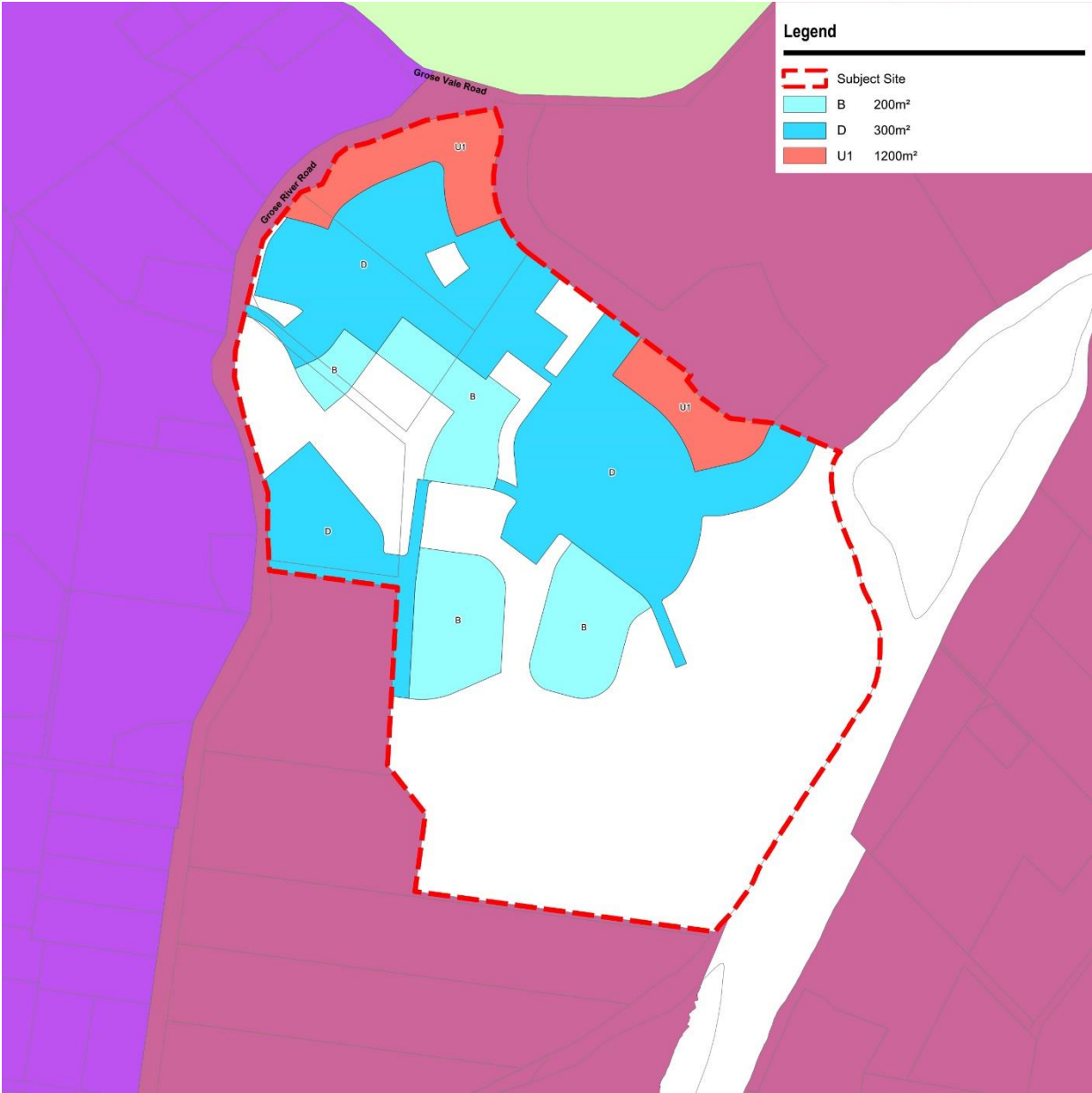


Figure 11 – Proposed Lot Size Plan

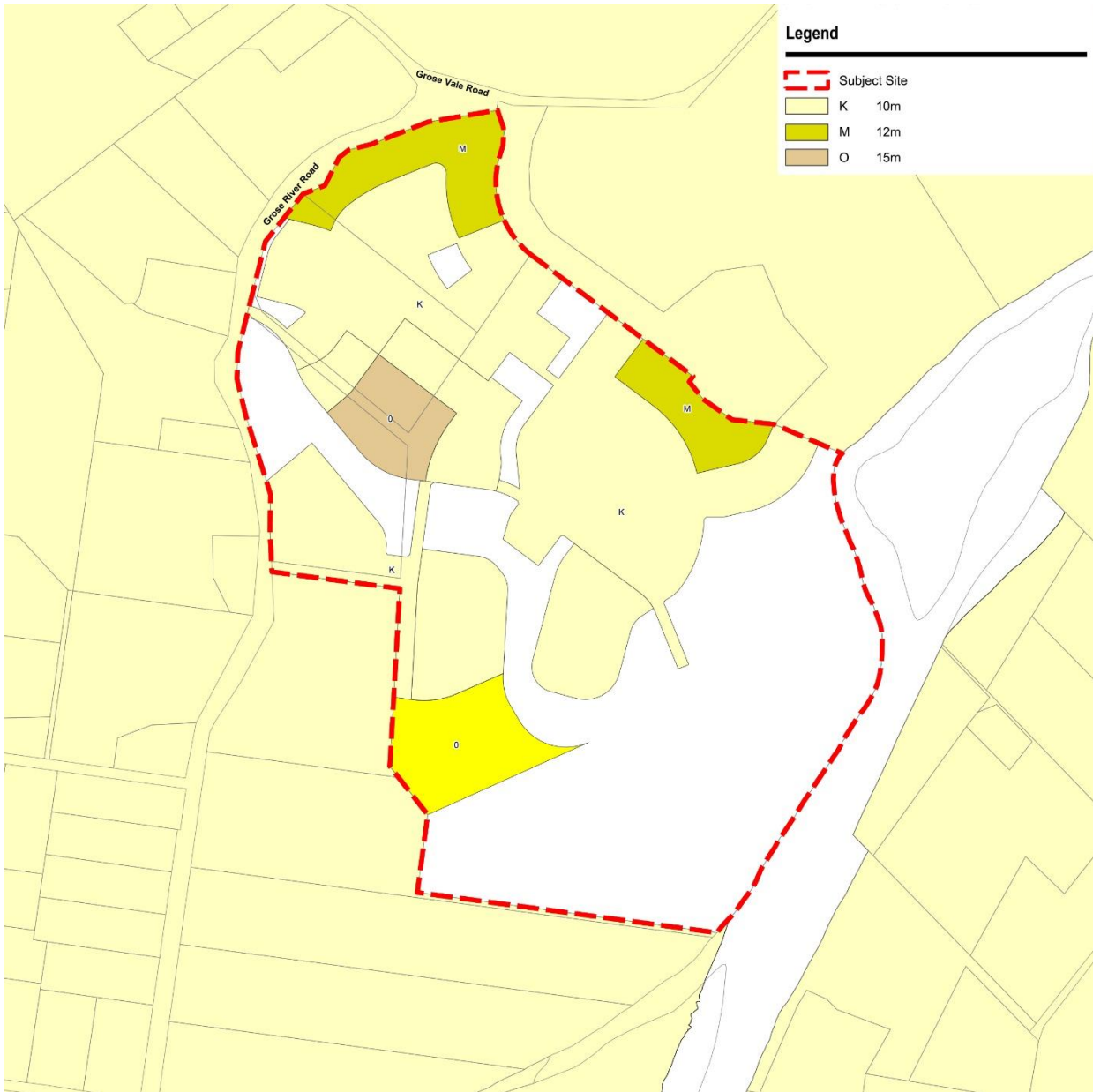


Figure 12 – Proposed Building Height Plan

9.5 PART 5 – Community Consultation

Community consultation is to be undertaken in accordance with the DPIE *Local Environmental Plan Making Guideline December 2021*. It is note that the Planning Proposal would be categorised as 'complex', and the maximum public exhibition period is 30 working days.

9.6 PART 6 – Project Timeline

An indicative project timeline for the Planning Proposal is outlined in **Table 20**.

Table 8: Indicative Project Timeline

Stage	Timeframe and/or date
Consideration by council	December 2023 to September 2024
Council decision	September 2024
Gateway Determination	November 2024
Pre-exhibition and completion of any Gateway Determination Reports	November 2024 to February 2025
Public E	March 2025
Consideration of submissions and Post-exhibition Review	April to June 2025
Final Council Decision	July 2025
Submission to Department of Planning and Environment	August 2025
Gazettal of LEP amendment	October 2025

10 SUMMARY

This Planning Proposal has been submitted on behalf of the Kavanagh Family, sole owners of the Belmont Park project, a large scale land holding of over 300 acres, located on the western edge of the North Richmond urban area.

The Kavanagh Family are passionate about providing opportunities for local working-class families to afford home ownership. To do so will mean producing housing at approximately ½ the price of currently available new homes in the area. This proposal creates 1200 dwellings of varying types, many of which will enable these local families to achieve their dream of home ownership at an affordable price.

This Planning Proposal and associated supporting studies have demonstrated that:

- The Hawkesbury LGA has an assessed undersupply of housing 2,200 dwellings, with supply shortages commencing in 2028, MacroPlan.
- There are approximately 3,600 dwellings in the Local Housing Strategy which are not able to be delivered due to Flood Evacuation Modelling.
- There is a current and growing issue in the Hawkesbury LGA in relation to Housing Diversity, with 87% of housing being housing detached homes.
- This has resulted in a housing diversity and affordability crisis with all new housing product in the LGA now costing \$1.1 – \$1.6Mill or more.

In response to this Housing Affordability and Diversity Crisis, Belmont Park Estate is uniquely positioned to address these issues as:

- The Proponent is able to immediately commence planning and delivery of over 1200 dwellings, significantly contributing to Housing Supply.
- The Proponent has committed to delivering 20% of the dwellings as affordable housing as part of the project, being 240 new Affordable Dwellings
- Belmont Park's deliberately diverse range of housing options creates significantly more affordable housing choices than what can be provided via the LGAs currently projected housing stock.
- The project provides for significant Housing Diversity incorporating:
 - Medium Density Housing = 520 Dwellings
 - Seniors Housing = 140 dwellings
 - Residential Housing = 540 Dwellings

A detailed review of the Strategic Flood Planning Policies in place in the Hawkesbury, has identified that the proposal can be supported as:

- The site achieves Flood Resilience through adopting a Flood free development footprint.
- The proposal delivers housing on flood free land, with a significant portion of the site also above the PMF Flood Level.
- The landholding achieves flood free access from the site in a PMF event.

- A Detailed Evacuation Assessment demonstrates that:
 - “The site has over 15 hours of warning time for a flood that would require evacuation from the site”.
 - “The development would not adversely impact on existing evacuation capabilities.”
 - “The proposed development will be capable of timely self-evacuation and would not rely on emergency services to assist in the evacuation of occupants.”
 - The site has flood free access to the Colo High School evacuation centre, 15.7km away.

This Planning Proposal has also demonstrated that the proposal has **Strategic Merit and is consistent with the Greater Sydney Region Plan and associated Western City District Plan** Planning Priorities including:

- **Planning Priority W4 Fostering healthy, creative, culturally rich and socially connected communities** - The Concept Plan incorporates **walkable streets and pedestrian connections that provide direct, accessible and safe pedestrian and cycling connections** encouraging physical activity and social connection.

Consistent with the Planning Priority W4 Actions, the proposal also incorporates a **large scale Community Farm which will promote local access to healthy fresh food** and support local fresh food production.

The Belmont Park project also incorporates **diversity of housing types including “The Missing Middle” housing typologies**, which will address housing diversity needs across the LGA and District.

- **Planning Priority W5 Providing housing supply, choice and affordability, with access to jobs, services and public transport** - The site will deliver over **1,200 new dwellings as a direct extension of the existing urban settlement**, to meet local housing demand **addressing the 2,200 dwelling shortfall in the LHS** figures identified by Macroplan.

There is also a **likely shortfall of at least 3,600 due to the LHS identifying increased density and diversity housing in flood prone areas** which the project will assist in addressing.

The Hawkesbury-Nepean Flood Evacuation Model (2023) determined that **potential development in the Windsor and Richmond town centres forecast under the Hawkesbury Local Housing Strategy would increase the average annual people at risk by around 75%**.

The project will also **deliver 20% of the total dwellings as Affordable / Community Housing**, providing significant public benefit to the broader community.

Belmont Park’s deliberately diverse range of housing options will facilitate the creation of housing at approximately ½ the price of other new housing options in the area.

Consistent with the objectives of Planning Priority W5 the proposal will specifically deliver Greater housing supply and Housing which is more diverse and affordable.

- **Planning Priority W6 Creating and renewing great places and local centres, and respecting the District's heritage-** The proposal retains two 1896 farm buildings are proposed to be retained and incorporated into the future development.

The buildings are intended to form part of a medium density housing site, **allowing the buildings to be retained, restored and managed in a landscape setting, as a community facility or refurbished for residential accommodation**, consistent with the intent of the District Plan.
- **Planning Priority W14 Protecting and enhancing bushland and biodiversity –** A sensitive development footprint with 50%, over 59 hectares of land, set aside for open space, riparian corridors, retained agricultural land in the community farm and low scale eco-tourism facilities.

Consistent with the District Plan, the project will enhance biodiversity outcomes through the rehabilitation and revegetation of creek lines through the site, providing biodiversity connectivity for the Hawkesbury River to Bushland areas to the west.

The project will also provide for a long term open space edge along the Hawkesbury River edge, enhancing local Aquatic and riverine biodiversity.
- **Planning Priority W19 Reducing carbon emissions and managing energy, water and waste efficiently - The Belmont Park project incorporates a range of planned innovative water and energy solutions.**

A recycled water plant will enable the reuse of treated water. Recycled water can be treated to a quality suitable for dual reticulation including reuses such as toilet flushing, washing machines and irrigation applications.

Belmont Park intends to **maximise its use of locally generated renewable energy such as roof top solar complimented with various locally located battery back-up systems.** This will allow creation of a localized micro-grid power system throughout the project.

The proposal is also demonstrated to have Strategic Planning Merit and Site Specific Merit and is able supported as:

- Under the Rural Land Strategy, North Richmond is identified as a Local Town Centre where new urban development can be accommodated through an extension of the existing township.
- The extension of the existing urban settlement over the site is consistent with the assessment criteria outlined in the Rural Land Strategy.
- The proposal can assist in meeting a projected Local Housing Strategy shortfall of 3,600 homes across the LGA.
- The proposal can make a significant contribution to enhancing housing diversity within North Richmond and the broader LGA.
- The existing District Plan and associated MRA mapping incorporate urban areas and Town Centres and industrial land across the Hawkesbury LGA with no distinction between rural, semi-rural or non-rural land.

- The Department of Planning have advised that the extension of existing settlement in the MRA area to address local housing demands is consistent with the District Plan.
- The proposal is consistent with the broad aims and objectives of the GSRP and Western City District Plan as it will deliver additional housing supply to meet housing targets as an extension of an existing township with access to jobs, services and transport close to where people live.
- The proposal is consistent with the objectives of Planning Priority W5 the proposal will specifically deliver greater housing supply and housing which is more diverse and affordable.
- The proposal is consistent with the principles of the Metropolitan Rural Area for the Hawkesbury LGA and the District Plan which allow for the extension of the existing township in response to local housing demand and needs.
- We note that a significant portion of the MRA land will be retained for use as active agricultural use, open space facilities and tourism uses consistent with the principles and intent of the MRA lands.
- In consideration of flood impacts, the project and associated Concept Plan locates residential development outside land identified as being Flood Prone Land (below the 1:100 year flood level).
- Development which would be considered Special Flood Consideration land uses, such as Seniors Housing, will be located above the PMF flood level consistent with current flood planning guidelines.

With Councils support, Belmont Park will deliver significant public benefit through increased housing supply with increased housing diversity on flood free land, providing greater use / benefit of significant infrastructure upgrades and providing opportunity for large scale recreational facilities able to service the broader region. Most notably, the creation of 1200 homes, many of which will be approximately ½ the price of currently new homes in the area. This will enable the dream of many local working-class families to be achieved, home ownership at a reasonable price.

We look forward to continuing our engagement with Hawkesbury Council in relation to this key project as we move to the next phase of preparing a detailed Planning Proposal.

APPENDIX 1

Urban Design Report & Concept Plan

APPENDIX 2

Housing Diversity Report - Tract

APPENDIX 3

Consistency with Local Planning Directions

S.9.1 Direction	Is the Direction Applicable?	Comment on Consistency
Focus area 1: Planning Systems		
1.1 Implementation of Regional Plans	Yes, Applicable	Yes, the proposal will provide for housing delivery required in the implementation of the Regional Plan.
1.2 Development of Aboriginal Land Council land	Not Applicable	No rezoning of Aboriginal Land Council land is proposed.
1.3 Approval and Referral Requirements	Yes, Applicable	The proposal is consistent as it would not propose any additional clauses relating to approval processes and referral requirements.
1.4 Site Specific Provisions	To be Confirmed	To be addressed as part of a detailed Planning Proposal.
Focus area 1: Planning Systems – Place-based		
1.5 Parramatta Road Corridor Urban Transformation Strategy	Not applicable	The land is not located within the Parramatta Road corridor.
1.6 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	Not applicable	The land is not located within North West Priority Growth Area.
1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	Not applicable	The land is not located within the Greater Parramatta Priority Growth Area.
1.8 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	Not applicable	The land is not located within the Wilton Priority Growth Area.
1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor	Not applicable	The land is not located within the Glenfield to Macarthur Corridor.
1.10 Implementation of Western Sydney Aerotropolis	Not applicable	The land is not located within the Western Sydney Aerotropolis LUIP Area.
1.11 Implementation of Bayside West Precinct Plan	Not applicable	The land is not located within the Bayside West Precinct Plan area.

S.9.1 Direction	Is the Direction Applicable?	Comment on Consistency
1.12 Implementation of Planning Principles for Cookes Cove Precinct	Not applicable	The land is not located within the Cookes Cove Precinct area.
1.13 Implementation of St Leonards and Crows Nest 2036 Plan.	Not applicable	The land is not located within the Crows Nest 2036 Plan Area.
1.14 Implementation of Greater Macarthur 2040	Not applicable	The land is not located within the Macarthur 2040 Area.
1.15 Implementation of Pyrmont Peninsula Place Strategy	Not applicable	The land is not located within the Pyrmont Peninsula.
1.16 North West Rail Link Corridor Strategy	Not Applicable	The site is not located within the listed Local Government Areas.
1.17 Implementation of the Bays West Place Strategy	Not Applicable	The land is not located within the Bays West Strategy area.
1.18 Implementation of the Macquarie Park Innovation Precinct	Not Applicable	The land is not located within the Macquarie Park Innovation Precinct.
1.19 Implementation of the Westmead Place Strategy	Not Applicable	The land is not located within the Westmead Place Strategy area.
1.20 Implementation of the Camellia-Rosehill Place Strategy	Not Applicable	The land is not located within the Camellia-Rosehill Place Strategy area.
1.21 Implementation of South West Growth Area Structure Plan	Not Applicable	The land is not located within the South West Growth Area.
1.22 Implementation of the Cherrybrook Station Place Strategy	Not Applicable	The land is not located within the Cherrybrook Station Place Strategy area.
Focus area 2: Design and Place		
No Directions		
Focus area 3: Biodiversity and Conservation		
3.1 Environment Protection Zones	Not Applicable	The proposal does not seek any amendments to the existing environmental protection zoned land or planning provisions.
3.2 Heritage Conservation	Yes, Applicable	The proposal would be consistent with this direction as the proposal will retain the existing LEP heritage provisions which facilitate conservation of heritage items and areas.

S.9.1 Direction	Is the Direction Applicable?	Comment on Consistency
3.3. Sydney Drinking Water Catchments	Not Applicable	The land is not located within a Local Government Area which forms part of the Sydney drinking water catchment.
3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs	Not Applicable	The subject land is not situated within a listed Local Government Area.
3.5 Recreation Vehicle Areas	Not Applicable.	The proposal does not seek to enable land to be developed for a recreation vehicle area.
3.6 Strategic Conservation Planning	Not Applicable.	The land is not identified as avoided land or a strategic conservation area.
3.7 Public Bushland	Not Applicable.	The land does not contain any areas of Public Bushland.
3.8 Willandra Lakes Region	Not Applicable.	The land is not located within the Willandra Lakes region.
3.9 Sydney Harbour Foreshores and Waterways Area	Not Applicable.	The land is not located within the Sydney Harbour Foreshore or waterways area.
3.10 Water Catchment Protection	Not Applicable.	The land is not located within regulated catchment area.
Focus area 4: Resilience and Hazards		
4.1 Flooding	Yes, Applicable	<p>The proposal is able to demonstrate consistency with this Direction as land within the Flood Planning Area will be retained as rural or recreational zoned land.</p> <p>Furthermore, development which would be considered Special Flood Consideration land uses, such as Seniors Housing, will be located above the PMF flood level consistent with current flood planning guidelines.</p> <p>This will be addressed in any detailed Planning Proposal and associated flood report.</p>
4.2 Coastal Protection	Not Applicable	The subject land is not located within an identified coastal zone under the Coastal Management Act.
4.3 Planning for Bushfire Protection	Yes Applicable	<p>The proposal is able to demonstrate consistency with Planning for Bushfire Protection 2019 requirements.</p> <p>A preliminary bushfire review has been completed by Eco Logical.</p> <p>A supplementary bushfire report would be submitted with any details Planning Proposal package.</p>

S.9.1 Direction	Is the Direction Applicable?	Comment on Consistency
4.4 Remediation of Contaminated Land	Not Applicable	A Preliminary Site Investigation has been prepared. The proposal will be able to demonstrate consistency with this Direction as part of a detailed Planning Proposal package.
4.5 Acid Sulfate Soils	Yes, Applicable	The land is mapped as containing Class 5 acid sulfate soils. A Geotechnical Report will be provided as part of any detailed Planning Proposal package addressing consistency with this direction.
4.6 Mine Subsidence and Unstable Land	Not Applicable	The subject land is not identified as being situated within a Mine Subsidence District.
Focus area 5: Transport and Infrastructure		
5.1 Integrating Land Use and Transport	Not Applicable.	The Planning Proposal would not seek to amend land currently zoned for residential, business, industrial, village or tourist purposes
5.2 Reserving Land for Public Purposes	Yes, Applicable	The proposal is consistent with this direction as it does not alter or reduce any existing zonings for reservations of land for public purpose.
5.3 Development Near Regulated Airports and Defence Airfields	Yes Applicable	The land is situated over 6km west of the Richmond RAAF base. The proposal is considered to be consistent with this Direction. The proposal does not seek to alter any land use provisions or zoning in proximity to the airport. Formal referral of the Planning Proposal post Gateway Determination will ensure consistency with this Direction.
5.4 Shooting Ranges	Not Applicable.	No shooting ranges are located or proposed on the subject site.
Focus area 6: Housing		
6.1 Residential Zones	Yes Applicable	The proposal seeks to deliver a wide range of housing types and diversity consistent with this Direction. The proposal will broaden the choice of building types available in the locality and make more efficient use of existing infrastructure and services.
6.2 Caravan Parks and Manufactured Home Estates	Yes Applicable.	The Planning Proposal is consistent with this direction as it does not seek to amend any provisions relating to caravan parks or manufactured homes.

S.9.1 Direction	Is the Direction Applicable?	Comment on Consistency
Focus area 7: Industry and Employment		
7.1 Business and Industrial Zones	Not Applicable.	The proposal would not affect land within an existing or proposed business or industrial zone.
7.2 Reduction in non-hosted short term rental accomdoation period	Not Applicable	No amendments to short term rental accommodation provisions proposed.
7.3 Commercial and Retail Development along the Pacific Highway, North Coast	Not Applicable	The land is not within the identified commercial and retail development area.
Focus area 8: Resources and Energy		
8.1 Mining, Petroleum Production and Extractive Industries	Not Applicable	The proposal will not amend any land use provisions relating to natural resources and does not affect any identified resources.
Focus area 9: Primary Production		
9.1 Rural Zones	Yes, Applicable	Consistency with this Direction will be addressed in detail as part of any Planning Proposal package.
9.2 Rural Lands	Yes, Applicable	The site has historically been used as an equine facility, rather than agricultural production. A detailed agricultural assessment can be provided as part of any Planning Proposal package addressing this Direction.
9.3 Oyster Aquaculture	Not Applicable	The proposal will not have an impact on any identified aquaculture areas.
9.4 Farmland of State and Regional Significance on the NSW Far North Coast	Not Applicable	The land is not within the identified area of State or Regional Significance Farmland.

APPENDIX 4

Consistency with Applicable SEPPs

SEPP	Comment on consistency with SEPP
State Environmental Planning Policy (Biodiversity and Conservation) 2021	
Chapter 3 Koala habitat protection 2020	<p>The subject land has not been identified as core or potential Koala Habitat under the SEPP.</p> <p>Notwithstanding, consistent with Clause 3.14 Preparation of local environmental studies an environmental study is able to be prepared for the site if required by the Minister prior to rezoning.</p>
Chapter 4 Koala habitat protection 2021	<p>The subject land has not been identified as containing Koala Habitat under the SEPP.</p> <p>The SEPP primarily relates to the preparation of koala management plans if required, prior to the approval of any development applications.</p> <p>If required, a Koala Management Plan will be prepared prior to any Development Applications being determined in accordance with the SEPP.</p>
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	
All Chapters	<p>This SEPP relates to the construction of residential dwellings.</p> <p>The SEPP will continue to apply to any residential dwellings constructed on the land.</p>
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	
All Chapters	<p>The exempt and complying provisions will continue to apply to the site.</p>
State Environmental Planning Policy (Housing) 2021	
Chapter 2 Affordable housing	<p>This chapter provides development assessment criteria for Affordable Housing projects.</p> <p>The provisions of this chapter will continue to apply to the land to facilitate delivery of affordable housing.</p> <p>We note that the project seeks to deliver approximately 120 Affordable Housing dwellings in partnership with local housing providers.</p>
Chapter 3 Diverse housing	<p>This chapter provides development assessment criteria for a range of housing diversity outcomes including secondary dwellings, group homes and the like.</p>

SEPP	Comment on consistency with SEPP
	The provisions of this chapter will continue to apply to the land to facilitate delivery of affordable housing.
Part 5 Housing for seniors and people with a disability	<p>Part 5 provides specific development assessment criteria for a projects which seek to deliver housing for seniors and people with a disability.</p> <p>The provisions of this Part will continue to apply to the land to facilitate delivery of affordable housing.</p> <p>We note that the project seeks to deliver a seniors housing development as part of the Belmont Park Estate.</p>
State Environmental Planning Policy (Precincts—Western Parkland City) 2021	
Chapter 2 State significant precincts	Not applicable to this Planning Proposal as the site is not located within or identified as a State Significant Precinct.
Chapter 3 Sydney region growth centres	Not applicable to this Planning Proposal as the site is not located within the Sydney Region Growth Centre.
Chapter 4 Western Sydney Aerotropolis	Not applicable to this Planning Proposal as the site is not located within the Western Sydney Aerotropolis.
Chapter 5 Penrith Lakes Scheme	Not applicable to this Planning Proposal as the site is not located within the Penrith Lakes Scheme land area.
Chapter 6 St Marys	Not applicable to this Planning Proposal as the site is not located within the St Marys Precinct.
Chapter 7 Western Sydney Parklands	Not applicable to this Planning Proposal as the site does not incorporate any land within the Western Sydney Parklands.
State Environmental Planning Policy (Primary Production) 2021	
All Chapters	<p>This SEPP provides guidance and development controls for a range of agricultural development and primary production.</p> <p>The rezoning of the land for residential purposes would result in the SEPP no longer applying to that portion of the land.</p> <p>The SEPP will remain applicable for any land retaining a rural zoning.</p>

SEPP	Comment on consistency with SEPP
State Environmental Planning Policy (Resilience and Hazards) 2021	
Chapter 2 Coastal management	Not applicable to this Planning Proposal as the site is not located within a Coastal Management Area.
Chapter 3 Hazardous and offensive development	Not applicable to this Planning Proposal as the project does not incorporate any hazardous or offensive development.
Chapter 4 Remediation of land	A Preliminary Site Investigation has been prepared. The proposal will be able to demonstrate compliance with this SEPP as part of a detailed Planning Proposal package and subsequent Development Applications.
State Environmental Planning Policy (Transport and Infrastructure) 2021	
Chapter 2 Infrastructure	The subject site does not incorporate any identified infrastructure projects. Future DAs within the site that meet the criteria for traffic generating development to be referred to TfNSW if required.

Deemed SEPPs	Comment
Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	Not applicable as the subject site is not situated within the Sydney Harbour Catchment.
Sydney Regional Environmental Plan No 20—Hawkesbury-Nepean River (No 2—1997)	This Deemed SEPP is applicable to the project. The legislation provides assessment criteria to manage water quality for Development Applications. Detailed stormwater and water quality management reports and assessments will be prepared in association with any future Development Applications which demonstrate compliance with water quality targets.

List of Appendices and Supporting Studies

Appendix	Supporting Study	Consultant	Date
Appendix 1	Urban Design Review & Concept Plan	Urbanco	September 2023
Appendix 2	Housing Diversity Report	TRACT	January 2023
Appendix 3	Consistency with Local Planning Directions	Urbanco	
Appendix 4	Consistency with SEPPs	Urbanco	
Appendix 5	Aboriginal Heritage Due Diligence Assessment	AECOM	August 2023
Appendix 6	Non-Aboriginal Heritage Constraints	AECOM	August 2023
Appendix 7	Detailed Evacuation Capability Assessment	Water Technology	August 2023
Appendix 8	Ecological Assessment	Sclerophyll Flora Surveys and Research	December 2022
Appendix 9	Landscape Character Analysis	TRACT	August 2023
Appendix 10	Preliminary Site Investigation	JBS & G	August 2023
Appendix 11	Recycled Sewer Altogether Letter Of Support	Altogether Group	September 2023
Appendix 12	Residential Needs Assessment	MacroPlan	March 2023
Appendix 13	Servicing Strategy Final	Indesco	June 2022
Appendix 14	Transport Scoping Report	ARUP	August 2023
Appendix 15	Preliminary Bushfire Constraints Analysis	Ecological Australia	September 2023

APPENDIX 5

Aboriginal Heritage Due Diligence Assessment

APPENDIX 6

Non-Aboriginal Heritage Constraints

APPENDIX 7

Detailed Evacuation Capability Assessment

APPENDIX 8

Ecological Assessment

APPENDIX 9

Landscape Character Analysis

APPENDIX 10
Preliminary Site Investigation

APPENDIX 11

Recycled Sewer Altogether Letter Of Support

APPENDIX 12

Residential Needs Assessment

APPENDIX 13
Servicing Strategy Final

APPENDIX 14
Transport Scoping Report

APPENDIX 15

Preliminary Bushfire Analysis

urbanco