

# Addendum to PLANNING PROPOSAL

montgomery planning  
solutions



## Bells Lane Kurmond

Lot 31 DP 7565 (457 Bells Line of Road)

Lot 38 DP 7565 (79 Bells Lane)

Lot 12 DP 711049 (95 Bells Lane)

Lot 50 DP 7565 (100 Bells Lane)

The purpose of this addendum is to address the newly released Draft *Western City District Plan*, which was released by the Greater Sydney Commission in October 2017.



November 2017

This Addendum was prepared by Robert Montgomery, Principal, Montgomery Planning Solutions, for the purpose of addressing the draft Western City District Plan, and in support of our application to NSW Planning & Environment for a rezoning review.



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## Background

- A planning proposal was submitted to Hawkesbury City Council in January 2015.
- An application for rezoning review was submitted to NSW Planning & Environment in September 2017, as the Council had not dealt with the proposal.
- The objective of the planning proposal is to allow the land to be subdivided into large residential lots, which are sufficient in size to support sustainable housing within a rural village setting.
- The intended outcome is to facilitate future development applications to subdivide the land into a maximum of 18 lots, with a minimum size of 4,000m<sup>2</sup>.
- In October 2017, the draft *Western City District Plan* was released for comment by the Greater Sydney Commission.
- The purpose of this addendum is review and comment on the matters contained within the draft *Western City District Plan*, as are relevant to the planning proposal.
- It is concluded that the planning proposal is consistent with the draft *Western City District Plan*.

## Introduction

The Western City District comprises the local government areas (LGA) of Blue Mountains, Camden, Campbelltown, Fairfield, Hawkesbury, Liverpool, Penrith and Wollondilly. Significant urban growth is targeted for Greater Penrith, Badgerys Creek Airport, Liverpool and Campbelltown – Macarthur.

The Hawkesbury LGA contains the strategic centre of Richmond – Windsor, an aerospace cluster around the Richmond RAAF Base at Clarendon and a University of Western Sydney Campus.

The opportunity for urban growth in particular, new housing and increased densities, is very limited by the constraints imposed by Hawkesbury River flood events and the capacity of the local and regional road system for resident evacuation in times of flood. Indeed, a number of planning proposals for small residential projects around the Richmond - Windsor centre have been recently rejected by the Gateway due to flooding and evacuation constraints.<sup>1</sup>

This major constraint is recognised by the draft *Western City District Plan* in the fact that no significant growth is planned within the Hawkesbury LGA. Previous regional and local strategies have also recognised that minimal residential growth will occur with the LGA.

The subject land is located at Kurmond, some 5 kilometres to the north-west of the Hawkesbury River (North Richmond bridge) off Bells Line of Road. The land is not constrained by flooding or evacuation capacity, and the proposal represents a small increase in the number of dwellings within the rural village of Kurmond.

In 2011 Hawkesbury City Council prepared a Residential Land Strategy, largely in response to dwelling targets suggested by the then Northwest Draft Subregional Strategy. This

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<sup>1</sup> PP\_2016\_HAWKE\_005\_00 Decision: 15/16, PP\_2015\_HAWKE\_003\_00 Decision: 5/5/15, PP\_2015\_HAWKE\_012\_00 Decisi

Strategy, inter alia, provided a number of criteria for rural village expansion, which would allow minor growth while not significantly changing the character of the villages. This Planning Proposal was prepared in response to the Hawkesbury Residential Strategy.

It is fair to say that the Hawkesbury LGA is not a major contributor to the growth in housing and jobs. However, minor planning proposals such as this provide additional choice and variety of housing available locally within the LGA.

## Review of draft *Western City District Plan*

The following table lists the Planning Priorities and Actions with relevant commentary in relation to the planning proposal.

Planning Priority W1	
Planning for a city supported by infrastructure	
Actions	Comment
1. Prioritise infrastructure investments to support the vision of a metropolis of three cities	<p>This planning proposal will provide the opportunity for some 14 additional dwellings. This minor growth will assist in better utilising existing infrastructure, in terms of roads, schools and community facilities.</p> <p>It has been demonstrated that the land is suited for the on-site treatment of wastewater with relevant environmental safeguards to minimise impact. The existing water supply has capacity for additional dwellings and if necessary can be supplemented by roof water collection as is common on large lot residential properties in the area.</p> <p>There is no negative impact in relation to the provision of infrastructure.</p>
2. Sequence growth across the three cities to promote the north-south and east-west connections	
3. Align forecast growth with infrastructure	
4. Sequence infrastructure provision using a place-based approach	
5. Consider the adaptability of infrastructure and its potential for shared use	
6. Maximise the utility of existing infrastructure assets and consider strategies to influence behavior changes, to reduce the demand for new infrastructure, including supporting the development of adaptive and flexible regulations to allow decentralized utilities.	
Planning Priority W2	
Working through collaboration	
7. Identify, prioritise and deliver Collaboration Areas	This Action is not relevant to the planning proposal.

Planning Priority W3	
Providing services and social infrastructure to meet people’s changing needs	
8. Deliver social infrastructure to reflect the needs of the community now and in the future	This planning proposal essentially represents minor infill development. It is considered that existing social infrastructure will become more viable to retain with minor increases across various age groups.
9. Optimise the use of available public land for social infrastructure	
Planning Priority W4	
Fostering healthy, creative, culturally rich and socially connected communities	
10. Deliver inclusive places for people of all ages and abilities that support healthy, resilient and socially connected communities by:  a. Providing walkable places with active street life and a human scale  b. Co-locating schools, social, health, sporting, cultural and shared facilities.	The planning proposal will facilitate a small number of large lot residential properties located within a rural village setting.  Existing facilities will be better utilised by the marginal increase in population.
11. Consider cultural diversity in strategic planning and engagement.	Not applicable to this proposal, as it proposes to facilitate housing in a rural setting to meet local demand
12. Strengthen the economic self-determination of Aboriginal communities by engagement and consultation with Local Aboriginal Land Councils to better understand and support their economic aspirations as they relate to land use planning.	This is a matter for Council and government agencies. This proposal will facilitate housing for a specific sector of the community,
13. Facilitate opportunities for creative and artistic expression and participation, wherever feasible with a minimum regulatory burden, including:  a. Creative arts and cultural enterprises and facilities  b. Creative interim and temporary uses  c. Appropriate development of the night time economy.	The proposal is for minor infill development around a rural village only. Notwithstanding, marginal increases in population in proximity to the villages will facilitate this action.

<p>14. Strengthen social connections within and between communities through better understanding of the nature of social networks and supporting infrastructure in local places.</p>	<p>As stated above, the proposal is for minor infill development.</p>
<p><b>Planning Priority W5</b></p> <p><b>Providing housing supply, choice and affordability, with access to jobs and services</b></p>	
<p>15. Prepare local or district housing strategies that address the following:</p> <ol style="list-style-type: none"> <li>The delivery of five-year housing supply targets for each local government area</li> <li>The delivery of 6-10-year (when agreed) housing supply targets for each local government area</li> <li>Capacity to contribute to the longer term 20-year strategic housing target for the District</li> <li>housing strategy requirements outlined in objective 10 of the draft Greater Sydney Region Plan that include: <ol style="list-style-type: none"> <li>creating capacity for more housing in the right locations</li> <li>supporting planning and delivery of priority growth areas and precincts as relevant to each local government area</li> <li>supporting investigation of opportunities for alignment with investment in regional and district infrastructure</li> <li>supporting the role of centres</li> </ol> </li> </ol>	<p>This planning proposal was prepared in response to the Hawkesbury Residential Land Strategy, published in 2011.</p> <p>Part of the Strategy was to facilitate additional large lot residential development around existing rural villages. The Strategy provides a number of detailed sustainability criteria by which planning proposals such as this would be assessed. Pages 24 and 25 of the planning proposal submission provides a table of compliance.</p> <p>This type of minor increase in potential dwellings around the existing villages is sound planning practice and has the following benefits:</p> <ul style="list-style-type: none"> <li>providing increased availability and choice of housing within the LGA;</li> <li>facilitating the entry of younger families to the housing market within the rural villages;</li> <li>providing clear guidance and criteria for location and performance of new housing;</li> <li>the rural village character is not substantially changed by large lot residential;</li> <li>existing infrastructure, which is underutilised due to declining dwelling occupancy rates and an ageing population. Is more fully utilised and becomes more sustainable</li> <li>existing commercial and medical services located within rural</li> </ul>



	<p>villages are bolstered by the minor increase in dwelling numbers, and are more likely to remain viable.</p> <p>It is considered that this part of the Strategy is essential to the long-term survival of the rural villages and the services they provide.</p>
16. Prepare Affordable Rental Housing Target Schemes	Not applicable to this planning proposal
<b>Planning Priority W6</b> <b>Creating and renewing great places and local centres, and respecting the District's heritage</b>	
<p>17. Deliver great places by:</p> <ul style="list-style-type: none"> <li>a. Prioritising a people friendly public realm and open spaces as a central organising design principle</li> <li>b. Recognising and balancing the dual function of streets as places for people and movement</li> <li>c. Providing fine grain urban form, high amenity and walkability</li> <li>d. Integrating social infrastructure to support social connections and provide a community hub</li> <li>e. Encouraging contemporary interpretation of heritage where possible</li> <li>f. Using a place-based and collaborative approach throughout planning, design, development and management.</li> </ul>	<p>This planning proposal represents minor infill development on the edge of a rural village. The directions in this Planning Priority are aimed at creating new urban communities, and are therefore not relevant to this proposal.</p>
<p>18. Conserve and enhance environmental heritage by:</p> <ul style="list-style-type: none"> <li>a. Engaging with the community early in the planning process to understand Aboriginal, European and natural heritage values</li> <li>b. Conserving and interpreting Aboriginal, European and natural heritage to foster distinctive local places.</li> </ul>	<p>The land does not include any identified items of heritage. The subsequent development application will be required to undertake a higher level of analysis/ review.</p>



<p>19. Use place-based planning to support the role of centres as a focus for connected neighbourhoods.</p>	<p>This direction is clearly aimed at urban development. However, there is some relevance for rural villages. This planning proposal supports the role of Kurmond Village in servicing the surrounding rural and rural residential properties.</p> <p>The adopted Hawkesbury Residential Land Strategy advocates the need to bolster the rural villages with additional population. By doing so, the Council is also sending a clear message that development of rural land in inappropriate locations will not be supported.</p>
<p><b>Planning Priority W7</b></p> <p>Establishing the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City</p>	
<p>20. Integrate land use and transport plans to deliver the 30-minute city.</p>	<p>The subject land is within a rural village setting. Although public transport (bus) operates through Kurmond. The level of service will never match the objective for urban communities. However, marginal increase in population in this area is likely to assist in keeping existing services viable.</p>
<p>21. Investigate, plan and protect future transport and infrastructure corridors.</p>	
<p>22. Support innovative approaches to the operation of business, educational and institutional establishments to improve performance of the transport network.</p>	
<p>23. Manage the interfaces of industrial areas, trade gateways and intermodal facilities by:</p> <p><i>(detail not included as not relevant to the proposal)</i></p>	
<p>24. Optimise the efficiency and effectiveness of the freight handling and logistics network by:</p> <p><i>(detail not included as not relevant to the proposal)</i></p>	
<p>25. Investigate and plan for the land use implications of potential long-term transport connections.</p>	

26. Plan for urban development, new centres and employment uses that are integrated with, and optimise opportunities of, the public value and use of the potential north-south train link	
27. Protect transport corridors as appropriate, including the Western Sydney Freight Line and the outer Sydney Orbital.	
28. Create landscaped boulevards along new and major transport corridor upgrades as appropriate to the existing environment.	
29. Prioritise the planning and delivery of east-west and north-south roads to facilitate access to the strategic centres (including Badgally Road transport corridor to Campbelltown, Spring Farm Parkway and the Horsely Drive) and improve walking and safe cycling connections nearby.	
<b>Planning Priority W8</b> <b>Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis</b>	
Actions 30-36 not detailed here as they are not relevant to the proposal	Not relevant
<b>Planning Priority W9</b> <b>Growing and strengthening the metropolitan city cluster</b>	
Actions 37-45 not detailed here as they are not relevant to the proposal	Not relevant
<b>Planning Priority W10</b> <b>Maximising freight and logistics opportunities and planning and managing industrial and urban services land</b>	
Actions 46 -50 not detailed here as they are not relevant to the proposal	Not relevant
<b>Planning Priority W11</b> <b>Growing investment, business opportunities and jobs in strategic centres</b>	
Actions 51 -60 not detailed here as they are not relevant to the proposal	These actions are not relevant to this planning proposal. Notwithstanding, the

	proposal will assist in maintaining the economic viability of the Kurmond village.
<p>61. Strengthen Richmond-Windsor through approaches that:</p> <ul style="list-style-type: none"> <li>a. support complementary land uses around the agglomeration of education and defence uses in Richmond</li> <li>b. support master planning processes for Richmond and Windsor that encourage new lifestyle and entertainment uses, employment opportunities, activate streets and places, grow the tourism economy and respect and enhance the significant heritage value and assets</li> <li>c. facilitate the attraction of office/commercial floor space and provide opportunities to allow commercial and retail activities to innovate, including smart work hubs.</li> </ul>	While not entirely relevant, incremental increases in dwellings within the LGA will assist in supporting the existing centres.
<p>62. Strengthen St Marys through approaches that:</p> <p>Not relevant to proposal</p>	Not relevant
<p><b>Planning Priority W12</b></p> <p><b>Protecting and improving the health and enjoyment of the District's waterways</b></p>	
63. Protect environmentally sensitive waterways.	<p>Three of the subject properties contain very minor watercourses. The preliminary concept for each property contains a larger rural residential lot which contains the watercourse and associated riparian vegetation. The larger lot on each property is designed to ensure that future building envelope, bushfire asset protection zone and effluent disposal area will achieve required separation distances and will not create interference with the vegetation corridor.</p> <p>In addition, a vegetation management plan will be implemented for these future lots through positive covenants ensuring</p>
64. Enhance sustainability and liveability by improving and managing access to waterways and foreshores for recreation, tourism, cultural events and water-based transport.	
65. Improve the health of catchments and waterways through a risk-based approach to managing the cumulative impact of development including coordinated monitoring of outcomes.	

	ongoing protection of the waterway and riparian corridor.
66. Reinstate more natural conditions in highly modified urban waterways	Future vegetation management plans will be implemented through the development application and subdivision processes to enhance and protect the riparian corridors within the land.
<b>Planning Priority W13</b> <b>Creating a Parkland City urban structure and identity, with South Creek as a defining spatial element</b>	
67. Implement the South Creek Corridor Plan and use the design principles for South Creek to deliver a cool and green Western Parkland City.	The Planning proposal is not within the South Creek Corridor Plan.
<b>Planning Priority W14</b> <b>Protecting and enhancing bushland and biodiversity</b>	
68. Protect and enhance biodiversity by: <ul style="list-style-type: none"> <li>a. supporting landscape-scale biodiversity conservation and the restoration of bushland corridors</li> <li>b. managing urban bushland and remnant vegetation as green infrastructure.</li> </ul>	<p>As a consequence of animal grazing over many years, the land is largely cleared pasture. Bushland remnants remain along the minor watercourses with scattered trees along fence lines.</p> <p>The preliminary concepts provide for protection and enhancement of the riparian bushland, by creating larger rural residential lots in these locations. The larger lot on each property is designed to ensure that future building envelope, bushfire asset protection zone and effluent disposal area will achieve required separation distances and will not create interference with the vegetation corridor.</p> <p>In addition, a vegetation management plan will be implemented for these future lots through positive covenants ensuring ongoing protection of the waterway and riparian corridor.</p>

Planning Priority W15	
Increasing urban tree canopy cover and delivering Green Grid connections	
69. Expand the tree canopy in the public realm.	<p>There is no public land proposed as a consequence of this proposal. The land is not identified as a Green Grid opportunity.</p> <p>This Priority is not relevant to the proposal</p>
70. Progressively refine the detailed design and delivery of:	
a. Greater Sydney Green Grid opportunities	
b. connections that form the long-term vision of the network.	
71. Create Greater Sydney Green Grid connections to the Western Sydney Parklands	
Planning Priority W16	
Protecting and enhancing scenic and cultural landscapes	
72. Identify and protect scenic and cultural landscapes, specifically the Scenic Hills and the escarpments of the Blue Mountains.	<p>The land is located on the lower foot slopes to part of the Blue Mountains eastern escarpment. There are numerous minor ridgelines within the locality, including Bells Line of Road and local roads.</p> <p>Future development resulting from these planning proposals will be largely lower than the existing minor ridgelines and will not impact on distant views to the eastern escarpment.</p> <p>The proposal represents minor sustainable development which satisfies all criteria of the Hawkesbury Residential Strategy for rural village expansion.</p>
73. Enhance and protect views of scenic and cultural landscapes from the public realm.	

<b>Planning Priority W17</b>	
<b>Better managing rural areas</b>	
74. Maintain or enhance the values of the Metropolitan Rural Areas using place-based planning to deliver targeted environmental, social and economic outcomes, including rural residential development.	Not relevant to proposal.
75. Limit urban development to within the Urban Area, except for the investigation areas at Horsely Park, Orchard Hills, and east of The Northern Road, Luddenham	
<b>Planning Priority W18</b>	
<b>Delivering high quality open space</b>	
76. Refers to existing open space areas.  Details not included as not relevant to this proposal.	Not relevant to the proposal.
<b>Planning Priority W19</b>	
<b>Reducing carbon emissions and managing energy. Water and waste efficiency.</b>	
77 – 82. Refers to Priority Growth Areas and other identified projects.  Details not included as not relevant to this proposal.	Not relevant to the proposal.
<b>Planning Priority W20</b>	
<b>Adapting to the impacts of urban and natural hazards and climate change</b>	
83. Support initiatives that respond to the impacts of climate change.	The proposal is for rural residential development within a rural village setting.  The land is not flood affected and residents in this locality are not reliant on flood prone roads near the Hawkesbury River and surrounding lowlands.
84. Mitigate the urban heat island effect and reduce vulnerability to extreme heat.	
85. Respond to the direction for managing flood risk in the Hawkesbury-Nepean Valley as set out in <i>Resilient Valley, Resilient Communities – Hawkesbury Nepean Valley Flood Risk Management Strategy</i> .	

## Conclusion

This Planning Proposal was prepared in response to the Hawkesbury Residential Strategy, which was adopted by Council in 2011. The Strategy encourages landowners to submit planning proposals such as this for sustainable rural village expansion.

The Planning proposal will facilitate minor growth and economic support to the Kurmond village, while not significantly changing the character of the locality.

Having reviewed the Priorities and Directions contained within the draft *Western City District Plan*, it is considered that this planning proposal is consistent with the draft Plan and satisfies all of the relevant requirements.