

14 September 2021

Luke.Joseph@campbelltown.nsw.gov.au

Attn: Luke Joseph
Campbelltown City Council
PO Box 57
Campbelltown NSW 2560

Dear Luke,

RE: DA-389/2017/DA-RA – Raith, 74 Fern Ave, Bradbury – Deferred Commencement Conditions

Further to our discussions yesterday post the public meeting. I have outlined my opinion below on the deferred commencement conditions as directed by the Panel yesterday.

1. *An updated Conservation Works Schedule shall be provided for Council's approval prior to the issue of an operational development consent, to reflect the changes to the condition of the property since the preparation of the original Conservation Works Schedule.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

2. *A fencing plan for the site shall be submitted to Council for the written approval of Council's Executive Manager Urban Centres that is sensitive to the site's heritage values and complies with the requirements of the Campbelltown Sustainable City Development Control Plan 2015.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

3. *An arborist report shall be submitted to Council for the written approval of Council's Executive Manager Urban Centres that demonstrates compliance with the provisions of the Campbelltown Sustainable City Development Control Plan 2015.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

4. *A subdivision plan for the development shall be prepared by a Registered Surveyor and submitted to Council for the written approval of Council's Executive Manager Urban Centres. The subdivision plan shall indicate that all dwellings and the Raith House building shall be part of the Community Title Scheme.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

5. *The non-cyclical works relating to the planning/design of landscaping, trees, gardens and weeding identified in the Conservation Works Schedule shall be undertaken, and the landscape plan for the development shall be updated to reflect the outcome of these works.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

6. *A heritage interpretation that enhances the 'sense of place' shall be designed and integrated into the all of the site's communal open space areas. The designs shall be submitted to Council for the written approval of Council's Executive Manager Urban Centres.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

7. *A Waste Management Plan for the development prepared by an experienced waste management professional shall be prepared for the written approval of Council's Domestic Waste Service Coordinator. If the Waste Management Plan requires amendments to the plans, then these amended plans shall be submitted to Council for the written approval of Council's Executive Manager Urban Centres.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

8. *The location of pits titled Pit 1 and Pit 27698 in the DRAINS model shall be marked on the stormwater plans drawn by United Consulting Engineers Issue E dated 26/04/21.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

9. *The connection details of the new stormwater pipeline in Fern avenue connecting into the existing stormwater pipe shall be provided. The connection and alignment of the proposed pipe shall make an efficient hydraulic connection to the existing network and shall avoid unnecessarily crossing the Fern Avenue carriageway.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

10. *The drainage network connecting to the On-site detention (OSD) shall be included in the modelling and demonstration is required that the on-site detention system is functioning as proposed.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

11. *The roughness coefficient adopted for grassed area in the catchment parameters shall be in accordance with the value range recommended by DRAINS.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

12. *The overland flow paths on Fern Avenue shall be modelled as a road section.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

13. *The downstream pipeline shall not be smaller than the upstream pipe sizes within the site and outside the site in the public way.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

14. *The sub-catchment title “Existing” shall be modelled applied to Pit 5, rather than flows applied as a base flow to the pit.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

15. *Council does not consider Rainwater tanks as water quality treatment devices, and in this regard the MUSIC model shall be redesigned without rainwater tanks.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

16. *The MUSIC modelling using Liverpool City Council’s MUSIC Link shall be changed to comply with Campbelltown City Council’s “Draft MUSIC Modelling Guide”.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

17. *The proposed stormwater quality devices shall meet Campbelltown City Council’s water quality targets. The Spel Filter does not meet Council’s specified targets.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

18. *The percentage of pervious and impervious areas used in the DRAINS and MUSIC models shall be consistent.*

Comment

It is my opinion this condition can be shifted to Prior to the Issue of a Construction Certificate.

19. *The traffic report shall be amended to incorporate the requirements below:*

- a. *The recommended standard arrival departure splits 15/85 AM and 60/40 PM shall be adopted.*
- b. *The trip distribution at intersection AM peak 90/10 (N/S) and PM peak 10/90 (N/S) shall be adopted.*
- c. *The extent of the modelled road network for the SIDRA analysis shall include the road intersections at Appin Road/Oxley Street/The Parkway/Narellan Road and Appin Road/St Johns Road.*

Comment

It is our opinion that this condition should be deleted.

Following on from yesterday’s conversation, I have spoken to Donald Lee from Varga Traffic Planning Pty Ltd and we provide the following comments in support of why the condition should be deleted.

- If the suggested above rates were to be applied, this results in a *net difference* of 2 vph during the morning peak period, with a more evenly distributed IN/OUT movements for the afternoon peak period, which would likely be diluted within the local road network as a result of the existing schools and Bradbury Shopping Village located to the east of the site.
- The above recommended trip distribution *does not* take into account the vehicle trips that would visit the nearby local schools as well as the Bradbury Shopping Village located to the east of the site. In essence, the RMS Guidelines (*Guide to Traffic Generating Developments, Section 3*) indicate that as a guide, about 25% of trips are *internal* to the subdivision, involving local shopping, schools, and local social visits within the local road network. Given the location of the shops and schools

located east of the site, the recommended trip distribution would not accurately depict the *actual* likely trip distribution of the site.

- We also note that the development has now been significantly reduced from originally 132 residential dwellings to 72 residential dwellings.
- Regardless of this split, it is clear that the proposed development will not have any unacceptable traffic implications in terms of road network capacity and with

I also note that some of these conditions are worded to require Council's Executive Manager Urban Centres approval prior to satisfaction of the specific condition, this could be cleaned up if you saw the need. If you have any questions please do not hesitate to contact me on 0438 398 079.

Yours sincerely,



JEREMY SWAN
DIRECTOR | THE PLANNING HUB