

PLANNING ASSESSMENT REPORT

Subdivision of Stage 7 – to create 209 lots comprising of 201 Torrens title residential lots, 4 residue lots, 2 lots for future development, 1 lot comprising an existing senior housing development and 1 lot for dedication as a public road and associated civil, landscape and ancillary site works including the removal of 516 trees.

Community Strategic Plan

Objective	Strategy
4 Outcome Four: A Successful City	4.3 – Responsibly manage growth and development, with respect for the environment, heritage and character of our city

Applicant

This development application is lodged pursuant to Part 4 of the Environmental Planning and Assessment Act 1979 ("the EP&A Act") and is a Crown development application. The applicant is the NSW Land and Housing Corporation ("LAHC"). LAHC is a public authority for the purposes of the Environmental Planning and Assessment Act 1979.

Referral Criteria

The consent authority for the subject development application is the *South Western City Regional Planning Panel*, as the development has a capital investment value of over \$5 million as outlined in Schedule 7 of the State Environmental Planning Policy (State and Regional Development) 2011.

"Schedule 7 Regionally Significant Development

4 Crown development over \$5 million

Development carried out by or on behalf of the Crown (within the meaning of Division 4.6 of the Act) that has a capital investment value of more than \$5 million."

Executive Summary

- Redevelopment of the Airds/Bradbury public housing estate is being undertaken by NSW Land and Housing Corporation in accordance with the Airds/Bradbury Urban Renewal Concept Plan granted by the Minister for Planning and Infrastructure on 24 August 2012.
- The development application proposes subdivision to create 209 lots comprising of 201 Torrens title residential lots, 4 residue lots, 2 lots for future development, 1 lot comprising an existing senior housing development and 1 lot for dedication as a public road and associated civil, landscape and ancillary site works including the removal of 516 trees. The development is identified as Stage 7 (7A and 7B) of the Airds/Bradbury public housing estate in accordance with the Airds/Bradbury Urban Renewal Concept Plan.
- Stage 7 of the Airds/Bradbury Urban Renewal Concept Plan is generally bounded by Riverside Drive, Greengate Road and Briar Road Public School to the west, the Georges River Parkway Reserve and the rear of some properties fronting Kelburn Place, Olbury Place, and Cavan Place to the east, the under-construction Stage 4 to the north, and the future Stage 8 to the south. The area of land affected by Stage 7 works is approximately 14.25 hectares.
- Owners consent has been provided from Planning Ministerial Corporation for works occurring in SP2 zoned land (Lot 1034 DP250130), 28 April 2023 and Transport for NSW dated 13 April 2023.
- The development application was notified and publicly exhibited. No submissions were received in response.
- The proposal is generally in accordance with the terms and intent of the Airds/Bradbury Urban Renewal Concept Plan, and associated Claymore Urban Renewal Development Control Guidelines.
- Concurrence to the proposed conditions of consent was not received from the Applicant.
- It is recommended to the Planning Panel that the application be approved, subject to the recommended conditions of consent detailed in Attachment 1.

Officer's Recommendation

That development application 535/2021/DA-SW for subdivision to create 209 lots comprising of 201 Torrens title residential lots, 4 residue lots, 2 lots for future development, 1 lot comprising an existing senior housing development and 1 lot for dedication as a public road and associated civil, landscape and ancillary site works including the removal of 516 trees, identified as Stage 7, be approved, subject to the recommended conditions of consent in Attachment 1.

Overview

Council has received a development application to create 209 lots comprising of 201 Torrens title residential lots, 4 residue lots, 2 lots for future development, 1 lot comprising an existing senior housing development and 1 lot for dedication as a public road and associated civil, landscape and ancillary site works including the removal of 516 trees, identified as Stages 7A & 7B in accordance with the Airds/Bradbury Urban Renewal Concept Plan.

DA Number	535/2021/DA-SW
Panel Reference No.	PPSSWC-146
Property Description	Various Lots comprising Woolwash Road, Teeswater Place, Lot 68 Southdown Place, Lot 57 Greengate Road, Georges River Parkway Reserve, Briar Road, Lot 65 Mamre Crescent, Merino Reserve, Douro Place, Wallinga Place, Katella Place, Samuel Place, Riverside Drive, Romney Way, Southdown Place, Amarina Early Learning Centre, 26 Southdown Place, AIRDS.
Applicant	NSW Land & Housing Corporation
Owner	NSW Land & Housing Corporation
Owners Consent	Owners consent obtained from Planning Ministerial Corporation for works occurring in Lot 1034 DP250130, dated 28 April 2023 and Transport for NSW for SP2 zoned land dated 13 April 2023.
Date of Lodgement	18 March 2021 as amended 14 September 2021, Flora and Fauna Assessment (dated December 2020), amended plan package October 2021, Arboriculture Impact Assessment (September 2022), updated plan package 23 November 2022, updated Arborist Assessment November 2022, amended drawing package 02 February 2023, Tree Retention Plan 04 April 2023, updated FFA & Ecological Assessment 14 June 2023, updated DRAINS & MUSIC model dated 14 June 2023.
Cost of Works	\$13,914,412
Notification/Exhibition	11 March 2021 to the 02 April 2021. The exhibition was in line with the statutory requirements and the Council's notification policies.
Number of Submissions	No submissions were received in response to the proposal.
Regional Panel Kick Off Briefing	Monday 10 May 2021
Regional Panel Status Update Briefing	Monday 24 April 2023

List of all Relevant Section 4.15 matters of the Environmental Planning and Assessment Act, 1979	<ul style="list-style-type: none"> • SEPP (Transport and Infrastructure) 2021 • SEPP (Resilience and Hazards) 2021 • SEPP (Biodiversity and Conservation) 2021 • Campbelltown Local Environmental Plan 2015 • Campbelltown (Sustainable City) Development Control Plan 2015 • Campbelltown (Sustainable City) Development Control Plan 2015 – Volume 2: Site Specific DCPs: Part 9 – Urban Renewal Areas Airds Claymore • Campbelltown Local Strategic Planning Statement
Concurrence	Not received
Recommendations	Approval subject to conditions

1.0 Site History

The Airds Bradbury Urban Renewal Project (ABURP) comprises the long term urban rejuvenation of the Airds Bradbury public housing estate in the Campbelltown Local Government Area (LGA).

The ABURP is the subject of a Concept Plan approval issued by the Minister for Planning (the Minister) pursuant to Part 3A (transitional arrangements) of the EP&A Act.

Director General Requirements were issued for the project on 10 December 2010 and Campbelltown City Council was delegated the authority to undertake the environmental assessment of the Concept Plan. The environmental assessment was undertaken between June 2011 and December 2011; culminating in a Council resolution to support the project at the Council meeting of 13 December 2011 and further updated on 3 July 2012.

A Concept Plan approval was subsequently issued by the Minister on 24 August 2012, followed by a Section 75R (3A) Order on 24 May 2013 which amended the zoning of the project land to be consistent with the approved Concept Approval.

The Concept Approval was amended on 22 October 2013 in relation to development contributions, to reference the letter of offer to Council to provide greater certainty regarding the nature of contributions and timing of the delivery of the contributions. The modification also sought to amend the timing for execution of the contributions agreement to Stage 3 of the development.

At the time of the Concept Plan approval, the Airds Bradbury estate comprised approximately 1,542 dwellings, built during the 1970s and early 1980s. Of these, 94 per cent are in public ownership, with only 91 dwellings privately owned.

The ABURP sought to rejuvenate the locality through a revised street layout, improved parks, public areas, new and upgraded community facilities and importantly, a more diverse socio-economic resident population.

Under the Concept Plan, townhouse areas will be demolished and redeveloped, whilst existing cottages will be selectively upgraded.

In summary, the Concept Plan comprises:

- An increase of approximately 562 dwellings;
- Retention of approximately 880 existing dwellings on separate lots;
- A more diverse social mix with 70 per cent private housing and 30 per cent public housing;
- Formalisation and reinvigoration of the Airds Town Centre;
- New and upgraded urban infrastructure including pathways, lighting, open space, community facilities, drainage and new interconnecting public roads;
- A Staging Plan;
- A utilities and infrastructure Delivery Plan;
- Airds-Bradbury Development Control Guidelines; and
- A street tree and landscaping strategy.

The former Sydney South West Planning Panel (SSWPP) and Sydney Western City Planning Panel (SWCPP) have issued consents for Stages 1, 2, 4 and 6 of the ABURP in November 2013, April 2014, September 2019 and February 2019 respectively.

Consent has been granted under Council delegation for Stage 3 of the ABURP on 11 December 2017 (DA No. 2678/2016/DA-SW).

1.1. History/Background

A summary of determinations issued by the SWCPP and/or by Council under delegated authority is summarised below:

Stage 1 - 1610/2012/DA-SW

Subdivision creating 184 residential allotments and one open space lot including associated works was approved by SWCPP on 6 November 2013.

Construction of Stage 1 is complete with new titles registered and sold.

Stage 2 - 2978/2013/DA-SW

Subdivision to create 132 allotments, two open space lots, one lot for existing seniors housing development and associated works was approved by the SWCPP on 3 April 2014.

Construction of Stage 2 is complete with new titles registered and sold.

Stage 3 - 2678/2016/DA-SW

Development application for Stage 3, including subdivision of land to create 54 residential lots, 3 super lots and construction of associated road works, landscaping and civil works was approved under Council delegation on 11 December 2017.

Construction of Stage 3 is complete with new titles registered and sold.

Kevin Wheatley Playing Fields Civil Works - 3742/2016/DA-CW

A development application for the establishment of new playing fields including earthworks, retaining walls, fencing, lighting installation and landscaping at Kevin Wheatley VC Reserve.

Conditions of consent imposed under development consent 2678/2016/DA-SW required the stormwater strategy to be resolved for the site prior to the issue of a Construction Certificate which result in further amendments to the playing fields application to accommodate the required design outcomes to manage stormwater across the precinct.

Earthworks have commenced.

3742/2016/DA-CW/A

An application for modification was lodged and subsequently approved under the delegated authority of Council, which comprised of the amendment of Condition 1 – Approved Development and Condition 6 – Retaining Wall and included:

- Modification to the grade of the playing fields from approximately 2 per cent to 1 per cent, to account for the approved synthetic playing field surface, and;
- An increase in retaining wall height adjoining Creigan Road, to account for the change in grade of the playing field surface.

Deane Park, Briar Road - 1644/2017/DA-S

A development application for subdivision into 7 residue allotments was approved by Council under delegated authority on 7 September 2017. This consent related to the existing lots which formed part of this application.

The paper subdivision has been completed.

Stage 4 - 497/2017/DA-SW

A development application for the subdivision of land to create 159 Torrens titled residential lots, one lot containing an existing community facility, 7 residue lots, roads and associated civil and landscape works being Stage 4 of the ABURP was approved by the SWCPP in September 2019.

The proposed subdivision works have commenced.

Stage 6 - 2138/2017/DA-SW

A development application for subdivision into 144 residential allotments and associated civil works for Stage 6 of the ABURP was approved by the SWCPP in February 2019.

Construction of Stage 6 is complete with new titles registered and sold.

Campbellfield Avenue construction and subdivision - 3740/2016/DA-CW

A development application for the construction of a road extension to Campbellfield Avenue between St Johns Road to Riverside Drive including earthworks, boundary adjustments for 16 residential lots, demolition of houses, landscaping and installation of associated services at Campbellfield Avenue, Creigan Road and St Johns Road, Bradbury and Riverside Drive, Airds at Riverside Inn, 48 Riverside Drive, Deane Park, Briar Road, Airds, 3-9 & 15 Summers Place, 11-13 & 22-24 Karingal Place, 174 -178 St Johns Road, 6-8 Docharty Street, 7-9 Karingal Place, 47-49 Creigan Road, 1-9 Croft Place, Bradbury.

The application was approved under delegated authority on 19 December 2019 and construction works have commenced.

Campbellfield Avenue Modification - 3740/2016/DA-CW/A

Modification of development consent (3740/2016/DA-CW) for the Airds/Bradbury Renewal Project, construction of a road extension Campbellfield Avenue to Riverside Drive including earthworks, boundary adjustments for 16 residential lots, demolition of houses, landscaping and installation of associated services at Campbellfield Avenue, Creigan Road and St Johns Road, Bradbury and Riverside Drive, Airds and comprised the provision of an additional roundabout, introduction of a landscape median and associated street and landscape improvement works and including the removal of an additional 44 trees.

The application was approved under delegated authority on 10 June 2022 and construction works have commenced.

Airds Pond Bulk Earthworks - 2854/2020/DA-CW

A development application for early works to the Airds Pond comprising of bulk earthworks and including excavation, cut and fill, construction of retaining structures, dewatering of the dam and the removal of 28 trees was approved by Council under delegated authority, 28 February 2022 subject to conditions.

Earthworks have commenced.

Airds Pond Embellishment Works - 774/2021/DA-CW

A development application for the construction of a new access road, landscape and open space infrastructure embellishment works to the new pond and surrounding parklands was approved by the SWCPP, 11 May 2022, subject to conditions.

2842/2019/DA-SW and 2842/2019/DA-SW/A (Tasma/Argo)

Development application was submitted to Campbelltown City Council on 9 September 2019, seeking development consent for the creation of 10 residential lots, 2 boundary adjustments and one super lot and stormwater drainage work.



The application was approved subject to conditions on 6 May 2021 and modification A was approved 10 March 2022.

The current development application incorporates the subdivision of the 'super lot' (as identified above) into 6 separate Torrens titled allotments.

Stage 9 - 16/2021/DA-SW

A development application for the subdivision of 54 lots comprising of 52 Torrens title residential allotments, one lot consisting of an existing multi dwelling development, one lot being for a public park, associated road and stormwater drainage works, landscape works and ancillary site works including the removal of 103 trees was approved by Council under delegated authority, 10 June 2022 subject to conditions.

A contractor has been engaged and civil works have commenced.

988/2020/DA-SW known as 'Riley Park subdivision'

A development application for the consolidation of existing allotments, subdivision to create 20 Torrens title residential allotments, associated landscaping, stormwater and drainage works, including the removal of thirty nine (39) trees and ancillary site works was approved by Council under delegated authority, 26 August 2022, subject to conditions.

2794/2022/DA-C known as 'Amarina Learning Centre'

A development application involving proposed interim works to the existing Community Centre and Child Care Centre comprising of the construction of a new shared access driveway and reconfiguration of external areas including the removal of eight (8) trees, was approved under delegated authority of Council 18 November 2022 subject to conditions.

Airds Cottages Site 01 - 77/20201/DA-SW

A development application involving subdivision and comprising the reconfiguration of four (4) lots to deliver a new connector road and three (3) residential torrens title lots including associated street tree landscaping, stormwater, drainage works, ancillary site works and

including the removal of three (3) trees was approved by Council under delegated authority, 17 April 2023, subject to conditions.

Airds Cottages Site 02 – 67/2021/DA-SW

A development application involving the re-subdivision of seven (7) torrens title residential lots into twelve (12) residential allotments including road reserve and associated landscaping, stormwater, drainage, ancillary site works and the removal of nine (9) trees was approved by Council under delegated authority, 17 March 2023 subject to conditions.

Airds Cottages Site 03 – 75/2021/DA-SW

A development application involving the reconfiguration of ten (10) lots and the existing road reserve, to deliver a new connector road, fourteen (14) new residential torrens title lots including associated landscaping, stormwater, drainage, ancillary site works and including the removal of twenty (20) trees was approved by Council under delegated authority subject to conditions.

2635/2021/DA-SL (Seniors Living, Stage 9/Creigan Road)

A development application involving the construction of a part two and part three storey seniors living development comprising 31 independent living units and 31 parking spaces including provision of communal gardens, landscaping, site services, stormwater infrastructure, site remediation works and associated site works was approved by the Sydney Western City Planning Panel 14 March 2022, subject to conditions.

3142/2022/DA-SL (Seniors Living, Stage 4)

A development application involving the construction of a part two and part three storey seniors living development comprising 31 independent living units and 21 off street parking spaces including the provision of eight accessible spaces and including communal gardens, landscaping, site services, storm water infrastructure and associated ancillary site works was approved by the Sydney Western City Planning Panel, 26 April 2023, subject to conditions.

2.0 Owners Consent

Transport for NSW

Concurrence was requested of Transport for NSW (TfNSW) in accordance with Clause 2.118 of the State Environmental Planning Policy (Transport and Infrastructure) 2021 (TI SEPP).

Transport for NSW provided owners consent 13 April 2023 advising as follows:

"TfNSW has reviewed the relevant documents including:

- Statement of Environmental Effects (SEE) – Airds Renewal Area Stage 7*
- Appendix 2 – Civil Engineering Drawings*
- Appendix 6 – Water Cycle Management Report Stage 7*

It is noted that the application seeks approval to deliver stormwater civil works within the SP2 Infrastructure corridor and therefore requires the concurrence of TfNSW pursuant to Clause 2.118 of the TI SEPP, as follows:

Consent for development for any of the following purposes on land reserved for the purposes of a classified road (but before the land is declared to be a classified road) may be granted only with the concurrence of TfNSW—

- a) subdivision that results in the creation of an additional lot with dwelling entitlements,
- b) development with a capital investment value greater than \$185,000,
- c) development for the purpose of dwellings that are, or any other building that is, to be held under strata title.

TfNSW has also reviewed the proposed development (in relation to impacts on the infrastructure corridor) against the following heads of consideration pursuant to C.2.118 (3) of the TISEPP and grants concurrence to the proposed development.”

Planning Ministerial Corporation

The Planning Ministerial Corporation provided its consent dated 28 April 2023, as owner of the lands (lot 1034 in DP250130) to the carrying out of stormwater upgrade works associated with the DA for Stage 7 Airds. The works involve replacing the existing drainage pipes with new pipes and rebuild the existing headwall to suit new pipe as detailed.

3.0 The Site and Locality

The subject site is located within the Airds-Bradbury Urban Renewal area.

Stage 7 is generally bounded by Riverside Drive, Greengate Road and Briar Road Public School to the west, the Georges River Parkway Reserve and the rear of some properties fronting Kelburn Place, Olbury Place, and Cavan Place to the east, the under-construction Stage 4 to the north, and the future Stage 8 to the south.

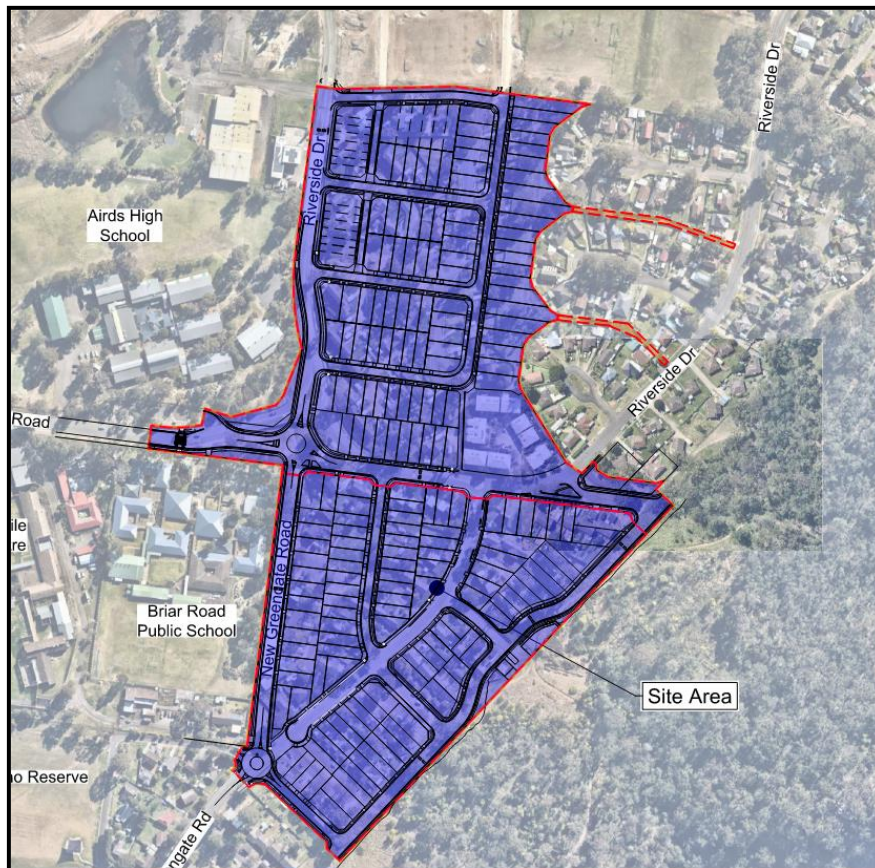


Figure 1: Stage 7 Site Works

The subject site is surrounded by existing residential development and the Georges River National Park.

The properties are not listed as an item of Environmental Heritage and are not located within an identified heritage conservation area.

3.1 Airds Bradbury Concept Plan

The proposed subdivision and road extension falls within the area of the concept plan.

An excerpt of the concept plan showing the area affected by the proposed subdivision is provided below:



Figure 2 - Excerpt from Concept Plan

Koala Linkage Corridor

The Airds Infrastructure Services Delivery Plan (ISDP) identifies a strategic koala linkage corridor to assist in the safe movement of koalas from the Georges River Reserve to the Smiths Creek reserve. The northern portion of the Stage 7 site falls within the identified corridor.

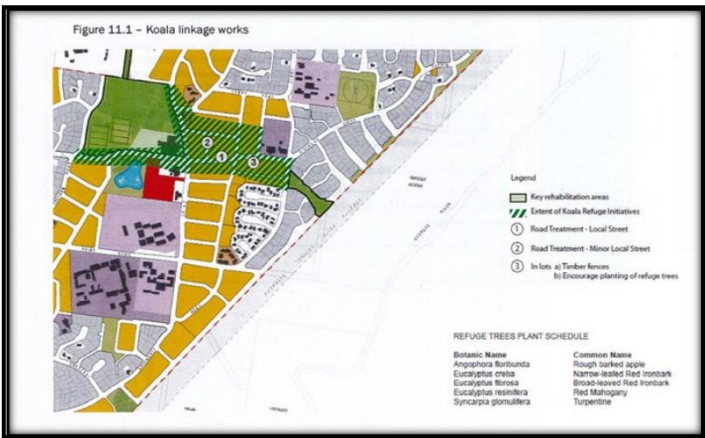


Figure 3 - Koala Linkage Works Airds ISDP

The landscape plan packages proposes the inclusion of Koala Feed trees to the perimeter of the site to re-establish the koala linkage corridor at its interface with Stage 4.

It is anticipated that appropriate conditions will be incorporated within the Notice of Determination to ensure the re-establishment of the corridor in line with the Plan.

4.0 Site Constraints Table

Site Constraints	Applicable to this site
Bushfire Prone Land	Applicable
Flood Affected	Not Applicable
Overland flow affected	Applicable
Mine Subsidence	Not Applicable
Noise Affected Property	Not Applicable
Aboriginal Sensitivity Zone	Applicable
Koala Habitat	Applicable
Jemena Gas Line	Not Applicable
Transgrid Electrical Easement	Not Applicable
Easements	Not Applicable
Tree Removal	Applicable
Biodiversity Impacts	Applicable
Heritage Item	Not Applicable

5.0 Sydney Western City Planning Panel

5.1 Kick Off Briefing

A Kick Off Briefing was held with the Panel Chair on Monday 10 May 2021.

The key issues discussed during the meeting were noted as follows:

1. *This note addresses both Stages 7 and 8 of the long term urban rejuvenation of the Airds Bradbury public housing estate in the Campbelltown Local Government Area (LGA) by NSW Land and Housing Corporation, and the Panel is keen to expedite its determination (subject to ensuring a rigorous assessment).*
2. *Compliance and general consistency with the approved Concept Plan for the Airds Bradbury Urban Renewal Project (ABURP) as amended is important and to be addressed in the assessment report.*

The Panel is eager to see progress towards delivery of the improved parks, public areas, together with new and upgraded community facilities which are planned to be delivered as part of the staged implementation of the Concept Plan. Briefing as to progress in that regard within the staging of the development would be appreciated.

4. 3. *The Project, via the Concept Plan, was endorsed by the Department of Planning, Industry and Environment (DPIE) (formerly the Department of Planning), attention to the applicable transitional arrangements applying to the current DA is required. The Panel awaits advice as to the timing and outcome of the request made to the Department under clause 34A(3) of the Biodiversity Conservation (Savings and Transitional) Regulation 2017 (NSW) for exemption of the assessment of the DA from the provisions of the BC Act by letter dated 13 November 2020. This includes confirmation on whether there remain any residual*

biodiversity impact matters such as extent of tree removal compared to that anticipated by the Concept Plan, that must otherwise be addressed arising from that certification outcome. The assessment staff have provided a generally favourable assessment to date against the numerical and design standards within Council's (Sustainable City) Development Control Plan 2015 (SCDCP 2015), but noting that building envelope plans have been requested for sites less than 300 m² in area. The allotment mix seems sufficiently and appropriately varied and planned in relation to road frontages, size and layout.

5. The Panel is informed that in addition to Clause 34A certification, issues of stormwater management are delaying determination of the DA. Once the Council is satisfied that those stormwater issues can be resolved, consideration of a deferred commencement condition on the subject might be appropriate.
6. The Panel is advised that at the time of briefing GTAs from RFS are also outstanding. Once received, the Panel would like to ensure they are reviewed for consistency and any implications, including any limitation to on street parking (if any)."

5.2 Status Update Briefing

A status update briefing was held with the Panel Chair on Monday 24 April 2023.

The key issues discussed during the meeting were noted as follows:

PANEL MEETING

- The Council provided the Panel with an update on the assessment of the DA.
- Council indicated that most of the assessment issues had now been satisfactorily addressed by the Applicant but that it could not complete its assessment of the DA because it was still waiting for the Applicant to provide an updated flora and fauna assessment of the impacts of the DA.
- The Panel indicated that it was concerned that the DA had been under assessment for nearly 800 days and that there was still no clear date for the determination of the DA.
- The Panel sought to get a better understanding of the significance of the outstanding flora and fauna issues but was told the Applicant was seeking legal advice on matter.
- Given the Applicant was not at the meeting, the Panel decided to send a representative to the regular meeting between Council and the Applicant.

FURTHER MEETING

- On 27 April 2023, a representative of the Panel attended a meeting online with Council and the Applicant.
- The Applicant advised that it had now obtained its legal advice, which confirmed that most of flora and fauna impacts of the DA were considered and addressed in the approved Part 3A
- Concept Plan for the redevelopment of the Airds Estate and that it would now submit its updated flora and fauna assessment to Council as quickly as possible.
- The Applicant also advised that it is in the process of obtaining land owner's consent for a small block of land in the DA area.
- Council indicated it would complete its assessment of the DA as soon as it received the outstanding information from the Applicant, and that while it may be possible to do this for the Panel's meeting in June it was more likely to be completed for the July meeting.

6.0 Overview of Proposal

The proposed works comprising Stage 7 of the Concept Plan are described as follows:

- Staged subdivision comprising 209 lots;
- 201 residential lots for dwellings;
- 2 lots for future residential development for approximately 16 dwellings;
- 1 lot for the existing seniors housing development on Riverside Drive;
- 1 lot for future road dedication; and
- 4 residual lots.

Comprising of the following:

- Stage 7 is proposed to be developed in stages as identified on the proposed plan of subdivision as Stages 7A and Stage 7B.
- Stage 7A – 99 lots comprising 94 residential lots; Lot 7197 residual lot (Stage 7B); 2 lots for future development; 1 lot comprising the existing seniors housing development on Riverside Drive, and 1 lot for dedication as a public road;
- Stage 7B – 110 lots comprising 107 residential lots and 3 residual lots;
- Associated subdivision works including the construction of roads and roadworks, associated drainage, site regrading and retaining works, utility services including services relocation and landscaping;
- Minor associated works such as the removal of redundant services, sedimentation control;
- Closure of walkways;
- Removal of underpass to Briar Road;
- Tree removal;
- Excavation works associated with road grading and site benching.

The following Torrens title residential allotment sizes are proposed as a component of the subdivision:

Lot Size (m2)	Stage 7A
300 - 399	74
400 - 499	17
500 +	9
Total	94

Lot Size (m2)	Stage 7B
200 - 299	10
300 - 399	62
400 - 499	20
500 +	9
Total	107



Figure 4 – Proposed Lot Layout

The mix of residential allotment sizes provides choice in the development of future housing form. All allotments have been provided with a street frontage.

Urban Design Strategy

The proposed subdivision layout is based on the Urban Design Strategy prepared by e8urban which has refined the approved concept plan according to best practice urban design principles.

The strategy retains the approved street network, block pattern and key dimensions of street reserves of the approved concept plan and promotes a quality residential sub-division development with a mix of housing typologies located on local streets. The strategy aims to rectify the poor social and urban outcomes as a result of the Radburn planning model. It creates a clear definition of public and private spaces, ensures all homes have a clear street address, improves street legibility, connects public open space and creates a high quality public domain with good pedestrian links and opportunities for cycle connections.

Highlighted features of the strategy are noted as follows:

1. Medium density lots close to the town centre;
2. New round-a-bout at Briar Road and Riverside Drive;
3. Pedestrian connection to Riverside Drive;
4. New lots to resolve poor 'back-fence' condition to private lots;
5. New street to address Georges River Reserve;
6. New round-a-bout at Greengate Road.



Figure 5 - Excerpt of Highlighted Features

Proposed Allotments

Proposed Lot	Frontage	Depth	Size
7101	10m	50.865m	563sqm
7102	10m	40.62m	457.4sqm
7103	10m	34.46m	368.8sqm
7104	10m	34.44m	344.4sqm
7105	10.53m	34.435m	366.5sqm
7106	12.5m	35.63m	432.2sqm
7107	12.5m	35.63m	499.2sqm
7108	12.5m	45.815m	657.8sqm
7109	12.5m	49.895m	714sqm
7110	12.5m	37.385m	545.5sqm
7111	10m	34.41m	354.2sqm
7112	10m	34.405m	344.1sqm
7113	10m	34.4m	344sqm
7114	10m	34.4m	344sqm
7115	10	34.395m	365.7sqm
7116	12.5m	40.075m	579sqm
7117	12.5m	52.565m	735.6sqm
7118	12.5m	43.05m	616.4sqm
7119	12.5m	36.37m	482.6sqm
7120	12.5m	36.365m	454.6sqm
7121	12.5m	36.36m	454.5sqm
7122	14.085m	36.36m	528sqm
7123	13.455m	30m	397.5sqm
7124	12.5m	30m	375sqm
7125	10m	30m	300sqm
7126	10m	30m	300sqm

7127	12.5m	30m	375sqm
7128	9.485m (splay corner)	30m	400.1sqm
7129	10m	31.83m	314.8sqm
7130	10m	31.515m	315.6sqm
7131	10m	31.595m	316.3sqm
7132	10m	31.675m	317.1sqm
7133	10m	31.75m	317.9sqm
7134	9.765m (splay corner)	31.83m	435.6sqm
7135	10.03 (splay corner)	31.44m	428.7sqm
7136	10m	31.425m	314.3sqm
7137	10m	31.415m	314.2sqm
7138	10m	31.4m	314.1sqm
7139	10m	31.385m	313.9sqm
7140	10m	31.37m	313.8sqm
7141	8.53m (splay corner)	29.6m	359.5sqm
7142	12.5m	29.6m	370sqm
7143	12.92m	29.6m	382.5sqm
7144	12.5m	29.6m	370sqm
7145	8.47m (splay corner)	29.6m	364.5sqm
7146	10m	31.55m	315.4sqm
7147	10m	31.535m	315.3sqm
7148	10m	31.525m	315.2sqm
7149	10m	31.51m	315sqm
7150	10m	31.495m	314.9sqm
7151	9.45m (splay corner)	27.46m	419.9sqm
7152	16.035m	31.46m	487.2sqm
7153	15m	31.46m	471.9sqm
7154	12.5m	31.46m	393.3sqm
7155	10m	31.46m	314.6sqm
7156	10m	31.46m	314.6sqm
7157	10m	31.46m	314.6sqm
7158	10m	31.46m	314.6sqm
7159	10m	31.46m	314.6sqm
7160	8.5m (splay corner)	30m	367sqm
7161	12.5m	30m	375sqm
7162	12.92m	30m	387.6sqm
7163	12.5m	30m	375sqm
7164	8.5m (splay corner)	30m	367sqm
7165	10m	31.46m	314.6sqm
7166	10m	31.46m	314.6sqm
7167	10m	31.46m	314.6sqm
7168	10m	31.46m	314.6sqm
7169	10m	31.46m	314.6sqm
7170	12.5m	31.46m	393.3sqm
7171	10m	31.46m	314.6sqm
7172	8.83m (splay corner)	31.46m	421.2sqm
7173	8.9m (splay corner)	30.935m	408.8sqm
7174	12.5m	30.935m	386.7sqm
7175	12.5m	30.935m	386.7sqm
7176	10m	30.935m	309.4sqm
7177	10m	30.935m	309.4sqm

7178	10m	30.935m	309.4sqm
7179	10m	30.935m	309.4sqm
7180	10m	30.935m	309.4sqm
7181	10m	30.935m	309.4sqm
7182	10m	30.935m	309.4sqm
7183	9.03m (splay corner)	30.935m	383.2sqm
7184	10.845m	33m	403.9sqm
7185	10m	34.71m	347.5sqm
7186	10m	34.805m	348.2sqm
7187	10m	34.803m	348.5sqm
7188	10m	34.865m	348.9sqm
7189	10m	34.9m	349.2sqm
7190	10m	34.925m	349.5sqm
7191	10m	34.965m	349.8sqm
7192	10m	35m	350.1sqm
7193	16.39m	35.035m	343.4sqm
7194	17.88 (corner)	30.935m	631.7sqm
7195	96m	66.055m	4966sqm
7196	Riverside Drive road reserve 1010sqm		
7197	Residue Lot		1.476ha
7198	Residue Lot 1928sqm		
7199	Residue Lot		6291sqm
7201	11.44m	30.965m	458.6sqm
7202	12.5m	30.8m	386.1sqm
7203	12.5m	30.5m	384.2sqm
7204	12.5m	30.3m	382.4sqm
7205	12.5m	30.3m	380.5sqm
7206	10m	30.2m	303sqm
7207	11.26m	42.7m	713.2sqm
7208	18.5m	32.09m	562.7sqm
7209	32.5m	45.01m	731.4sqm
7210	10m	43.3m	433.4sqm
7211	10m	43.34m	433.4sqm
7212	10m	41.5m	427.5sqm
7213	10m	36.4m	391.5sqm
7214	10m	31.4m	337.8sqm
7215	10m	28.6m	298.5sqm
7216	10m	27.92m	281.3sqm
7217	7.735 (splay corner)	24.72m	342.1sqm
7218	7.93m (splay corner)	26.185m	316.2sqm
7219	10.67m	26.185m	322.7sqm
7220	12.51m	29.925m	446.3sqm
7221	12.35m	35.52m	534.2sqm
7222	12.355m	42.485m	774sqm
7223	9.5 (splay corner)	26.21m – 30.21m	402.3sqm
7224	10m	31.13m	311.6sqm
7225	12.5m	31.22m	389.6sqm
7226	8.73m (splay corner)	31.105m	378.1m
7227	10.085m	33.435m	339.6qm
7228	10.195m	31.455m	324.4sqm
7229	10.35m	28.78m	301.7sqm

7230	15.975m	23.375m – 28.78m	393.2sqm
7231	45.26m	Irregular shape	502.7sqm
7232	Corner lot	30.135m	441.7sqm
7233	10m	30.135m	302sqm
7234	10m	30.21m	302.1sqm
7235	10m	30.21m	302.1sqm
7236	10m	30.21m	302.1sqm
7237	10m	30.21m	302.1sqm
7238	10m	30.21m	302.1sqm
7239	10m	30.21m	302.1sqm
7240	10m	30.21m	302.1sqm
7241	10m	30.21sqm	302.1sqm
7242	10m	30.21sqm	302.1sqm
7243	13.5m (splay corner)	26.8m – 30.815m	533.1sqm
7244	12.5m	30.835m	385.3sqm
7245	11.885m	26.095m	469.1sqm
7246	15m	30.04m	450.8sqm
7247	10m	30.02m	300.3sqm
7248	10m	30m	300.1sqm
7249	10m	29.98m	299.9sqm
7250	10m	29.965m	299.7sqm
7251	10m	29.945m	299.5sqm
7252	10m	29.925m	299.4sqm
7253	10m	29.91m	299.2sqm
7254	9.435m	29.89m	299sqm
7255	10m	30.55m	301.2sqm
7256	12.765m	33.14m	396sqm
7257	10m	33.14m	348.2sqm
7258	10m	36.75m	383.1sqm
7259	41.65m	28.44m	472.3sqm
7260	14.73m	31.99m	374sqm
7261	18.695m	12.81m – 29.82m	376.9sqm
7262	corner	29.82m	441.6sqm
7263	12.5m	29.9m	375.4sqm
7264	12.5m	30.045m	375.7sqm
7265	12.5m	30.065m	375.8sqm
7266	12.5m	30.065m	375.8sqm
7267	15m	30.065m	451sqm
7268	12.5m	30.065m	375.8sqm
7269	12.5m	30.065m	375.8sqm
7270	12.5m	30.065m	375.8sqm
7271	12.5m	30.065m	375.8sqm
7272	12.5m	30.065m	375.8sqm
7273	12.5m	30.065m	375.8sqm
7274	12.5m	30.065m	375.8sqm
7275	11.89m (splay corner)	24.74m	299.3sqm
7276	10m	26.45m	265.7sqm
7277	14.85m (splay corner)	26.63m	326.8sqm
7278	12.6m	18.4m – 24.5m	316.1sqm
7279	14.18m	24.5m – 30m	347.7sqm
7280	13.67m (splay corner)	30.015m – 31m	567.5sqm

7281	13.92m	30.075m	408.5sqm
7282	12.56m	31.085m	397.8sqm
7283	7.12	30.04m – 31.085m	305.2sqm
7284	10.05m	29.55m – 30.04m	297.5sqm
7285	12.51m	24.74m – 24.55m	307.1sqm
7286	14.46m (splay corner)	24.145m – 31.635m	422.2sqm
7287	14.23m (splay corner)	34.4m – 39.35m	548.5sqm
7288	10m	39.35m	393.5sqm
7289	10m	39.35m	393.5sqm
7290	10m	39.35m	393.5sqm
7291	10m	39.35m	393.5sqm
7292	10m	39.35m	393.5sqm
7293	10m	39.35m	393.5sqm
7294	10m	39.35m	393.5sqm
7295	15.005m	39.3m	575.2sqm
7296	10.14m (splay corner)	35.14m – 39.34m	553.6sqm
7297	10m	29.99m	301sqm
7298	10m	30.2m	303.1sqm
7299	10m	30.42m	305.3sqm
7300	16.47m (splay corner)	18.095m – 30.64m	349.3m
7301	10m	34.74m	339.9sqm
7302	10.045m	34.625m	370.5sqm
7303	10.045m	37.5sqm	370sqm
7304	10.045m	36.4sqm	358sqm
7305	10.045m	35.21m	346.1sqm
7306	10.045m	34.015m	334.2sqm
7307	10.045m	32.82m	322.3sqm
7308	Residue Lot - Stage 8		5919sqm
Lot 1 Samuel Place			392.6sqm
Lot 2 Samuel Place			147.6sqm

It is noted, that no existing dwellings are to be retained as a component of the Stage 7 works.

Bushfire Prone Land - NSW Rural Fire Service

The Stage 7 area of works is identified as comprising bushfire prone land. The affected land is concentrated in the south-east portion of the site, being between Riverside Drive Road and the Georges River Parkway Reserve.

A bushfire protection assessment has been undertaken for the proposed Stage 7 development by Travers Bushfire and Ecology. The report noted as follows:

"The south eastern edge of the development is subject to bushfire risk from surrounding bushland. In recognition of this risk, Travers bushfire & ecology propose the following combination of bushfire measures:

- *Use of an alternative solution to determine minimum APZ and bushfire attack level (BAL) setbacks in accordance with Method 2 of AS3959 Construction of Buildings in Bushfire Prone Areas using the NSW Rural Fire Service Comprehensive Vegetation Fuel Loads (March, 2019).*
- *Provision of access in accordance with the acceptable solutions outlined in PBP 2019.*

- *Use of an alternative solution for one (1) turning head. The turning head has been designed to allow for a three (3) point turn to be undertaken by a Category 1 fire tanker in compliance with the performance criteria.*
- *Water, electricity and gas supply in compliance with the acceptable solutions outlined in PBP 2019."*

The development is categorised by the NSW Rural Fire Service (RFS) as being a residential subdivision and this requires the RFS to issue a bushfire safety authority (BSA) in accordance with Planning for Bush Fire Protection 2019 (PBP 2019).

NSW Rural Fire Service provided their General Terms of Approval 08 July 2021.
(Attachment 3)

Bulk Earthworks

Earthworks are proposed to make the land suitable for future residential development. Excavation earthworks will require 24,108 cubic metres of cut material and 32,326 cubic metres of fill material. This will result in an excess of 8,218 cubic metres of fill to be brought to the Stage 7 site. Excavated material will be re-used as fill. Suitable material will be reused on the site as fill, and unsuitable materials will be removed.

Re-grading works will be undertaken to modify and enhance overland flow paths and to adjust development platforms. It is anticipated that there will be some transfer of excavated material between stages requiring short term stockpiling. Temporary sediment basins will be constructed and maintained during construction in accordance with relevant guidelines.

Geotechnical Investigation

A Geotechnical Investigation Report for Stages 7 and 8 Airs was prepared by Geotechnique Pty Ltd, in support of the proposal and noted as follows:

*"It is our assessment that the geotechnical conditions across the site for Stages 7 and 8 of Airs Bradbury Renewal Project **are suitable** for proposed residential subdivision provided constraints imposed by reactivity, dispersibility and salinity of soils are addressed during site preparation and construction of buildings and other structures.*

Therefore, this geotechnical investigation report provides recommendations on earthworks, including appropriate methods for cut and fill operations, saline soil management plan and design of batter slopes, retaining structures, floor slabs and footings of residential dwellings and road pavement."

Site Contamination

In the support of the application a site specific Detailed Site investigation report for Stages 7A, 7B & 8 was provided, and undertaken by JBS&G, dated 29 March 2023.

The findings and recommendations of the assessment were as follows:

- *Fill or disturbed topsoil materials were observed at all bar one location with inclusions of gravels, brick, plastic, sandstone and glass observed at some locations, with fill depths confirmed between 0.1 and 0.2 m bgs at 8 of 48 locations and otherwise present to the maximum investigation depth of between 0.3 and 0.4 m bgs;*

- *All contaminant concentrations of soils samples analysed within investigation locations conducted (heavy metals, TRH, BTEX, PAHs, PCBs, OCPs and asbestos) were all below the LOR and/or the adopted site criteria;*
- *Asbestos impact associated with fly-tipped suspected non-friable ACM sheeting in the eastern bushland area of Stage 8 (within the site), detectable ACM in soil at a concentration below the adopted criteria in sample S7B-02 0-0.35 and detectable Asbestos Fines (AF)/Friable Asbestos (FA) at a concentration below the adopted criteria in sample S7A-03- 0-0.35 was identified;*
- *Fly-tipping of house-hold goods was observed on vacant lots and road verges associated with surrounding residential land use in Stages 7A, 7B and 8;*
- *Fly-tipping associated with dumping waste was observed within the eastern bushland areas of the site, particularly within Stage 8; and*
- *Given the dense vegetation in the east of the site there is the potential for more fly-tipped ACM and other waste to be present.*

The following recommendations were concluded:

- *Further investigations works are required within inaccessible areas and building footprints following demolition of site structures (including residences demolished since the 2020 sampling event) and prior to development-related earthworks and civil works to identify potential impact for inclusion in the remedial action plan (RAP) and remediation/management. The further works shall include intrusive investigation using an excavator to allow for comprehensive inspected for asbestos in fill and to verify the depth of fill and natural soils throughout the site;*
- *An RAP be prepared consistent with other stages of the Airds Bradbury Renewal Project, to remediate impacts associated with asbestos such as the ACM sheeting and associated surface soil impact identified in the eastern bushland area of Stage 8. The RAP shall also incorporate any other impacts identified in the further investigation works recommended; and*
- *Standard development controls including an Unexpected Finds Protocol will need to be implemented to address any potential unexpected contamination encountered during civil works."*

The report noted that based on review of site history, background information, previous reports and based on the results completed in the assessment there is no contamination risk which would prevent the site from being made suitable for the proposed redevelopment. The report went on to say that further to this, soil analytical concentrations from this assessment and from previous works (JBS&G 2009) were all within the human health and ecological land use criteria adopted.

However, it was noted, that visible non-friable ACM was identified at one location on the ground surface and minor ACM and AF/FA within soils was detected at two locations albeit below the adopted criteria. Visible ACM on the surface could pose a potential health risk if the ACM were to be damaged and respirable fibres become airborne. As such, it was acknowledged and given the limitations in the investigation approach, impact associated with asbestos is considered likely to be encountered during development works and will require to be managed. Whilst the contamination risk is considered low based on results of this assessment and based on review of previous uses, further investigation is recommended within inaccessible areas and following demolition of existing dwellings to identify any potential impact, particularly in relation to asbestos.

Aboriginal Cultural Heritage

Extent Heritage Advisors prepared an addendum Aboriginal Cultural and Heritage Assessment in support of the proposed works.

A site inspection of the subject area was undertaken. The subject area has been subject to high and extreme levels of ground disturbance arising from the urban development of the suburb of Airds, and installation of associated infrastructure and services. No Aboriginal objects or areas of archaeological potential were identified during the field investigation. As such, Stage 7 of the Airds Bradbury Renewal Project is considered unlikely to have an impact on any Aboriginal objects, deposits or cultural values.

Extent Heritage recommended as follows:

"There is low risk of harm to Aboriginal objects, sites or cultural values through the proposed development. Works may proceed with caution. No further Aboriginal heritage assessment or community consultation is required for Stage 7 of the Airds Bradbury Renewal Project.

In the event that unexpected Aboriginal objects, sites or places (or potential Aboriginal objects, sites or places) are discovered during construction, all works in the vicinity of the find should cease and the proponent should determine the subsequent course of action in consultation with a heritage professional, relevant Registered Aboriginal Parties and/or Heritage NSW as appropriate.

If human skeletal material less than one hundred years old is discovered, the Coroners Act 2009 (NSW) requires that all works should cease and the NSW Police and the NSW Coroner's Office should be contacted. Traditional Aboriginal burials (older than one hundred years) are protected under the National Parks and Wildlife Act 1974 (NSW) and should not be disturbed. Interpreting the age and nature of skeletal remains is a specialist field, and an appropriately skilled archaeologist or physical anthropologist should be contacted to inspect the find and recommend an appropriate course of action.

Should the skeletal material prove to be archaeological Aboriginal remains, notification to Heritage NSW and the Local Aboriginal Land Council is required. Notification should also be made to the Commonwealth Minister for the Environment, under the provisions of the Aboriginal and Torres Strait Islander Heritage Protection Act 1984."

Historic Heritage

The site does not comprise any individually listed items of local heritage significance as listed by Schedule 1 of the Campbelltown Local Environmental Plan 2015.

Waste Management

Adequate space has been allocated on the verge for each housing lot to accommodate garbage bins at the kerb-side.

Construction Management

The proposed development has the potential for noise and dust emissions during construction. It is anticipated that conditions will be imposed to ensure construction activity will take place in accordance with accepted criteria for construction activity.

Construction will be managed to minimise disturbance to neighboring properties. Construction techniques would seek to avoid the generation of waste and to achieve a reduction in building waste to landfill by reusing and recycling construction material waste where possible.

A Construction Management Plan would be required prior to the commencement of construction works. This is to include construction traffic management and construction noise and vibration management measures as conditioned in Attachment 1.

Clause 34A Certification

The Project was approved under former NSW biodiversity legislation, which has since been replaced by the NSW Biodiversity Conservation Act 2016 (BC Act). An application was made by LAHC for certification of the development under Clause 34A of the Biodiversity Conservation (Savings and Transitional) Regulation 2017. Certification under Clause 34A allows for recognition of past offsetting agreements for Part 3A concept plan approvals under the NSW Environmental Planning and Assessment Act 1979 and does not require further biodiversity assessment or approval under Part 7 of the BC Act.

Clause 34 A certification was approved for the Airds/Bradbury Urban Renewal Project Area in December 2021. As such, no further biodiversity matters are required to be assessed unless the proposed works extend beyond the Clause 34A certification boundary, or the impacts are increased because of the proposed works causing further biodiversity impacts.

Flora and Fauna/Ecological Assessment

A Flora and Fauna Impact Assessment for Stages 7 and 8, has been undertaken by Travers Bushfire and Ecology.

The assessment noted the direct ecological impacts as a result of the Stages 7 and 8 subdivision including:

- *Loss or impact of 0.89 ha Cumberland Plain Woodland (CPW) PCT849 Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin) that is largely comprised of sparse scattered trees but no native understorey*
- *Loss or impact of 1.26 ha of PCT 1790 - Sydney Hinterland Grey Gum Ridgeline*
- *Forest along the eastern portion of the subject site.*
- *Loss of Koala foraging habitat and potential bushfire refuge.*
- *Reduction in foraging habitat for several threatened fauna species that may on occasion utilise the site.*
- *Loss of 21 habitat trees containing 30 hollows of various sizes.*

The impacts of the proposal have been considered in the original site concept plan which enacted an approved biodiversity offset program to ensure that impacts upon Cumberland Plain Woodland, Shale-Sandstone Transition Forest were offset under the NSW Biobanking scheme prior to the enactment of the Biodiversity Conservation Act 2016.

The Assessment concluded as follows:

"In accordance with Section 5A of the EP&A Act 1979, the 7 part test of significance concluded that the proposed subdivision of Stages 7 & 8, will not have a significant impact on any threatened species, populations or EECs. This is given the conservation of significant portions of the affected EECs within the greater Airds Bradbury Urban Project Renewal area and the provision of the approved biodiversity offsets for the impacted communities.

It is concluded that the proposed works for the Airds Bradbury Urban Renewal Project, Stages 7 & 8 has been granted a Clause 34 Certification and any significant impact on any threatened species, populations or EECs or their habitats given that the impacts have already been considered and approved as part of the Airds Bradbury Urban Renewal Project Masterplan Approval with approved biodiversity offsetting prior to the enactment of the Biodiversity Conservation Act (BC Act).

In addition, the impact on individual threatened fauna species is also considered not significant given the affected remnant patches of vegetation are very small, scattered, of lower quality, do not appear to contain threatened species of significance, are not part of a significant habitat corridor, do not form part of core habitat areas and provide, at best, transitory foraging habitat for Koalas. Therefore, a Species Impact Statement is not required for the proposed development."

Arboricultural Assessment

An Arboricultural Impact Assessment was prepared by Arborsaw dated November 2022. A summary of the report is provided as follows:

"567 trees within and adjacent to the proposed development area were inspected and are now subject to this report. This document and data has been prepared in accordance with Australian Standard 4970: 2009 Protection of trees on development sites. The site trees subject to this report have been tagged and located on the site plan by the project surveyor. The complete data table is listed in the appendix. Certain trees were not physically tagged due to access restrictions on the days of assessment.

The 567 trees are comprised of:

- 83 A Retention Value Trees*
- 155 B Retention Value Trees*
- 283 C Retention Value Trees*
- 46 R (Remove) Trees*

Numerous tree species identified in this report form part of Cumberland Plain Woodland (CPW) which is mapped within site. CPW is listed as a Critically Endangered Ecological Community (CEEC) under both the state, (BC Act) and the commonwealth (EPBC Act) legislation.

This proposal includes a Subdivision to create new residential lots, roads, landscaping, storm water, sewer and vehicle crossing works. Lot layout, building envelopes and service locations have been adjusted in order to retain as many trees as possible while ensuring the viability of the project was upheld. When reasonably possible, design change and sensitive construction measures have been incorporated into the works to ensure the viability of trees for retention is not compromised by the proposed works. The primary conflicts between the proposal and tree retention included bulk earthworks resulting in major soil level changes within TPZ's and proposed road locations conflicting with trees.

If the current proposed layout and construction is to proceed, then 516 Trees require removal to facilitate the project.

The 516 Tree Removals include; 71x A, 131 x B, 268 x C and 46 x R Retention Value Trees. Tree removals include 38 exempt trees and 190 CPW species.

51 trees can be retained if the tree protection measures in the report are adhered to. The 51 Trees nominated for retention include; 12 x A, 24 x B and 15 x C Retention Value Trees. Impacts to individual trees are detailed on a per tree basis in the data sheet. In order to ensure the 51 trees nominated for retention remain viable during and post construction, tree protection measures including; the engagement of a project arborist, Arborist supervision, trunk protection, tree protection fencing, tree protection signage, mulching, a restriction of activities within Tree Protection Zones (TPZ's) and compliance reporting must be incorporated into the project.

398 Street trees are proposed to be planted in the Stage 7 development. Further Replanting for this site has been calculated and planned for within the biodiversity assessments, recommendations and approvals detailed within the Certification under cl 34A of the Biodiversity Conservation (Savings and Transitional) Regulation 2017 (NSW)."

Water Cycle Management

A Water Cycle Management report supported the application as prepared by Mott McDonald.

The results concluded as follows:

"100 year ARI overland flow paths are in accordance with Council's Engineering Design Guidelines section 4.7 regarding Major Minor Philosophy and allows for pipework through pathways and residential lots to achieve an increased 100 year ARI flow".

The DRAINS modelling indicates some surcharge in the existing stormwater infrastructure located between Cavan Place and the to-be-retained roundabout at the north Greengate Road tying into Riverside Drive. The flows generally flow into the site where within the site the stormwater system is proposed in accordance with Campbelltown City Council's Engineering Design for Development guideline.

With regards to detention the SMEC report titled Water Quality Review Airs Precinct (2020) considers the catchment area draining to 'The Pond' located directly to the west. The pond is evaluated to provide a storage volume of 6,375cum above the permanent water level and can be considered for detention of the upstream catchments. The pond is further proposed to be re-shaped and redeveloped including utilisation for detention and as a water quality measure.

In considering the Stage 7 catchment flowing to the south-east and discharging at the end of what is currently Katella Place, the proposed works includes extensive upgrade of the existing stormwater network to the point of discharge in line with Council's preferred option that downstream stormwater systems be upgraded to take the increased flows."

Bio retention system – Filterra

Bio-retention is a planted filtration system where water can temporarily pond and permeate through the ground allowing pollutants to be removed through natural processes. Bio-retention systems are planted with nutrient removing plants which provide an effective means of extracting dissolved nitrates and phosphates.

The bio-retention proposed is a high-flow type system such as the proprietary Filterra system produced by Ocean Protect (or approved equivalent).

- Filter area = 390 m²
- Extended detention depth = 0.15 m;
- Filter depth = 0.53 m; and
- Saturated hydraulic conductivity = 3550 mm/hr.-

The system utilises physical, chemical and biological mechanisms of a soil, plant and microbe complex to remove pollutants typically found in urban stormwater runoff. Stormwater flows through a specially designed filter media mixture where pollutants are immobilized, decomposed, volatilized and incorporated into the biomass of the Filterra® system's micro/macro fauna and flora. Stormwater runoff flows through into an underdrain pipe at the bottom of the system where the treated water is discharged. Higher flows are designed to bypass the Filterra® to a downstream structure.

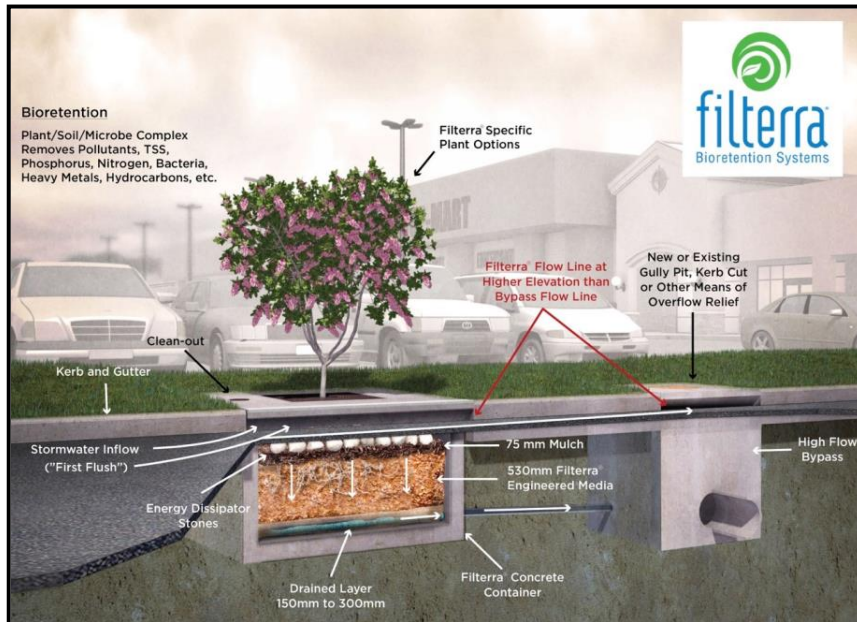


Figure 6 –Filterra Bio Retention System

Gross Pollutant Trap (GPT) Model Parameters

For primary treatment of the stormwater runoff within station areas where the use of green infrastructure treatment is limited, a Gross Pollutant Trap (GPT) is to be provided.

The Ocean Protect Cascade OceanSave GPT is proposed and is a pollution control device specifically designed to remove gross pollutants and coarse sediments in residential and commercial developments.

Roads

The street network has been planned to integrate with allotment boundaries and enable co-ordinated provision of driveway crossings, parking bays and tree planting within the public streets. Space has also been considered for garbage and recycling receptacles.

Proposed vehicular access arrangements for the subdivision includes:

- a new four way round about intersection of Briar Road and Riverside Drive with provision for pedestrian crossing;
- an improved connection from the roundabout east to Greengate Drive;
- an extension of Riverside Drive to the south from the new roundabout to Greengate Road at the intersection of Greengate Road and Burrundulla Crescent;
- a new roundabout at the intersection of Greengate Road and Burrundulla Crescent;
- the termination of the northern section of Greengate Road in the form of a cul de sac;

- new local streets.

It is noted that all residential lots will have direct vehicular access to either a local or minor road.

Closure of Walkways

The proposed subdivision incorporates the closure of two (2) existing walkways from Riverside Drive to the former linear Brindley Park at the rear of properties fronting Kelburn Place, Olbury Place and Cavan Place. It is noted that these walkways (Kelburn Walk, Olbury Walk and Cavan Walk) terminate at the boundary of the Stage 7 subdivision and will become redundant.

These walkways will be closed with the intention being to subdivide the lots comprising Kelburn Walk and Olbury Walk and incorporating the lanes into adjoining residential lots. All existing utilities along the laneways will be relocated/removed/made redundant. The process will be managed by Landcom under a separate approval process. It is also noted that Cavan Walk is to be incorporated into the existing senior housing being lot 7195 of the proposed Stage 7 subdivision.

Existing Underpass Briar Road

The existing underpass to Briar Road between Airs High School and Briar Road public school will be removed and adjustments made to footpaths with pedestrian and cycle movements along the street network enhancing community safety and surveillance. The existing raised pedestrian crossing on Briar Road will also be relocated to the west.

Utility Services

Utilities such as water, electricity, gas and NBN, are available.

Street Tree Landscape Master Plan

A street tree landscape master plan was provided as a component of the proposal prepared by Distinctive.

The landscape design incorporates the following features:-

- New street planting;
- Concrete footpaths/shareways; and
- New turf shrubs and groundcover.

Street trees will include a number of koala use tree species.

- tree planting to all streets to provide shade, local distinctiveness, seasonal variation and habitat opportunities when mature.

The public domain treatment strategy continues the streetscape as established.

Report

7.0 Strategic Context

7.1 Greater Sydney Regional Plan

The Greater Sydney Region Plan (GSRP), is built on a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. In the transformation of Greater Sydney, the needs of a growing and changing population have been broken into three metropolis cities:

- Western Parkland City
- Central River City
- Eastern Harbour City

The GSRP identifies the need for an additional 725,000 dwellings across Greater Sydney between 2016-2036. Approximately 25 per cent of this growth will come from the Western Parkland City, which the Campbelltown LGA is a part.

The proposal is consistent with the GSRP in that it seeks to deliver some 180 residential allotments that will help contribute to the GSRP's projected needs by 2036.

7.2 Western City District Plan

The Western City District Plan (the District Plan) sets out more detail with respect to the anticipated growth in housing and employment in the Western City over the next 20 years.

The District Plan identifies future growth of an additional 184,500 dwellings to be provided in land release areas and urban renewal of existing areas close to existing centres.

The re-development of Airds/Bradbury will assist in achieving the revised 2021 – 2026 housing target range of 7,100 – 8,250 dwellings for Campbelltown as future subdivision and dwelling house applications are lodged.

7.3 Greater Macarthur 2040 (Draft) An interim Plan for the Greater Macarthur Growth Area

Greater Macarthur 2040 is a draft land use and infrastructure implementation plan that, when finalised, will guide precinct planning within the Growth Area. The Plan is supported by strategies for major items of State and local infrastructure and includes an updated structure plan for the land release areas of South Campbelltown.

The Growth Area within the Campbelltown Local Government Area (LGA) would provide for approximately 39,000 dwellings in the land release precincts. Approximately 19,000 of these new dwellings is expected to be delivered in new land releases within the Campbelltown LGA, including Menangle Park.

The proposal is consistent with the draft Plan and the overall Concept Plan approval.

7.4 Local Strategic Planning Statement

On 31 March 2020 the Campbelltown Local Strategic Planning Statement (LSPS) came into force when it was published on the NSW Department of Planning, Industry and Environment's e-planning portal.

The LSPS responds to a number of key strategic documents produced by the Federal and NSW State Governments, as well as by Council, to provide a 20 year land use vision for the Campbelltown LGA. The LSPS delivers four key themes, which are consistent with the Council's Community Strategic Plan. The themes that are most relevant to the proposed development are:

1. A vibrant, liveable city, and
2. A respected and protected natural environment.

The planning priorities, within these themes, that are applicable to the proposed development are:

- Planning Priority 2 - Creating high quality, diverse housing
- Planning Priority 6 - Respecting and protecting our natural assets

The application is consistent with the above strategic directions as the proposal would continue to facilitate the redevelopment of the Airds public housing estate, which would significantly improve the existing public infrastructure.

7.5 Campbelltown 2017-2027 Community Strategic Plan

Campbelltown 2027 is the Community Strategic Plan (CSP) for the City of Campbelltown. Campbelltown 2027 addresses four key strategic outcomes that Council and other stakeholders will work to achieve over the next 10 years:

- Outcome 1: A vibrant, liveable city
- Outcome 2: A respected and protected natural environment
- Outcome 3: A thriving, attractive city
- Outcome 4: A successful city

The key outcome most relevant to the proposed development is Outcome 1: A vibrant liveable city.

The strategy most relevant to this application is:

- 1.8 - Enable a range of housing choices to support different lifestyles
- 2.3.1 - Ensure all people in Campbelltown have access to safe, secure, and affordable housing.

The proposed development would facilitate the renewal of aging social housing to revitalise and provide a new supply of social housing in a more inclusive and safe environment.

The proposal is in accordance with Council's Strategic vision.

8. Planning Provisions

The development has been assessed in accordance with the heads of consideration under Section 4.15 of the EP&A 1979, and having regard to those matters, the following have been identified for further consideration.

8.1 Determination of Crown Development Applications

Pursuant to Clause 4.33 of the Environmental Planning and Assessment Act 1979, a consent authority must not impose a condition on its consent to a Crown development application, except with the approval of the applicant.

The draft conditions of consent were provided to Landcom for review. Concurrence to the proposed conditions was not obtained.

8.2 State Environmental Planning Policy (Transport and Infrastructure) 2021

Clause 2.119 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* sets out provisions relating to the impacts of road noise or vibration on non-road development. The proposed land use is not identified in Clause 2.119.

Clause 2.121 of the SEPP sets out provisions relating to traffic generating development. It is noted, that referral to Transport for NSW is not required, as the proposal is not traffic-generating development. The proposed development does not trigger the threshold for traffic generating development as the subdivision is less than 200 allotments and the connection to the site is not within 90m of a connection with a classified road.

A Traffic Impact Assessment prepared by Positive Traffic Engineering & Planning supported the proposal and concluded as follows:

"This report has reviewed the potential traffic impacts proposed sub division within the Airds / Bradbury Renewal Project known as Stage 7A and 7B. The findings of this assessment are presented below:

1. *The traffic impacts of the development would be minimal with future traffic flows on surrounding roads within acceptable limits.*
2. *Intersections surrounding the development would continue to operate at levels of service to that which currently occurs following full development of the Airds / Bradbury precincts.*
3. *The proposed design of the internal roads complies with the minimum requirements of the AECOM report and are considered satisfactory.*
4. *The closure of Greengate Road near Burrundulla Crescent would have negligible impact on both available routes of travel, future traffic conditions and public transport accessibility compared to that which was assumed in the original AECOM report.*
5. *The proposed eastern boundary road through Stages 7B and the future Stage 8 would provide a further opportunity for both vehicle and bus travel as an alternative to Greengate Road following its closure.*
6. *The closure of Greengate Road should not occur until the Riverside Drive extension between Briar Road and Greengate Road is fully completed and operational.*

Overall the potential traffic impacts of the proposed residential sub division are considered acceptable."

The assessment was considered by Council's Traffic Engineer who did not raise concern subject to inclusion of conditions as incorporated within the recommended conditions. This includes a condition requiring a Construction Management Plan prior to works commencing.

8.3 State Environmental Planning Policy (Resilience and Hazards) 2021 - Chapter 4 Remediation of Land

Clause 4.1 Object of this Chapter:

- (1) The object of this Policy is to provide for a State-wide planning approach to the remediation of contaminated land.
- (2) In particular, this Policy aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment:
 - a. by specifying when consent is required, and when it is not required, for a remediation work, and
 - b. by specifying certain considerations that are relevant in rezoning land and in determining development applications in general and development applications for consent to carry out a remediation work in particular, and
 - c. by requiring that remediation work meet certain standards and notification requirements.

The SEPP introduces state-wide planning controls for the remediation of contaminated land. The policy states that land must not be developed if it is unsuitable for a proposed use because it is contaminated. If the land is unsuitable, remediation must take place before the land is developed.

The Environmental Consultants noted, that based on review of site history, background information, previous reports and based on the results completed in the assessment there is no contamination risk which would prevent the site from being made suitable for the proposed redevelopment. In addition, the report also concluded, that, soil analytical concentrations from this assessment and from previous investigatory works (JBS&G 2009) were all within the human health and ecological land use criteria adopted.

8.4 State Environmental Planning Policy (Biodiversity and Conservation) 2021 Chapter 11 Georges River Catchment

The proposal falls within the Georges River Catchment and thus this policy applies. The general aims and objectives of this plan are as follows:

Clause 11.4 Aims and Objectives

- a. *to maintain and improve the water quality and river flows of the Georges River and its tributaries and ensure that development is managed in a manner that is in keeping with the national, State, regional and local significance of the Catchment,*
- b. *to protect and enhance the environmental quality of the Catchment for the benefit of all users through the management and use of the resources in the Catchment in an ecologically sustainable manner,*

- c. *to ensure consistency with local environmental plans and also in the delivery of the principles of ecologically sustainable development in the assessment of development within the Catchment where there is potential to impact adversely on groundwater and on the water quality and river flows within the Georges River or its tributaries,*
- d. *to establish a consistent and coordinated approach to environmental planning and assessment for land along the Georges River and its tributaries and to promote integrated catchment management policies and programs in the planning and management of the Catchment,*
- e. *to provide a mechanism that assists in achieving the water quality objectives and river flow objectives agreed under the Water Reform Package.*

The proposal does not conflict with any of the relevant provisions and is therefore considered to be acceptable.

8.5 State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 3 Koala Habitat Protection 2020

Clause 3.1 Aims of this Chapter

This Chapter aims to encourage the proper conservation and management of areas of natural vegetation that provide habitat for koalas to ensure a permanent free-living population over their present range and reverse the current trend of koala population decline—

- a. *by requiring the preparation of plans of management before development consent can be granted in relation to areas of core koala habitat, and*
- b. *by encouraging the identification of areas of core koala habitat, and*
- c. *by encouraging the inclusion of areas of core koala habitat in environment protection zones.*

The Ecological Assessment as prepared by Travers Bushfire & Ecology (dated May 2023) noted as follows;

Mitigation and compensation for impacts on Koala's

A Koala activity assessment has been completed and despite the records of koala throughout the local area the residential subdivision area (consisting of the existing urban lots and open space) has low activity and consequently is Potential Koala Habitat. The most recent observations include a foraging male Koala in Greengate Reserve in 2020. Green Gate reserve is one of the onsite conservation areas and is not affected by the proposal. This habitat is being conserved and re-generated.

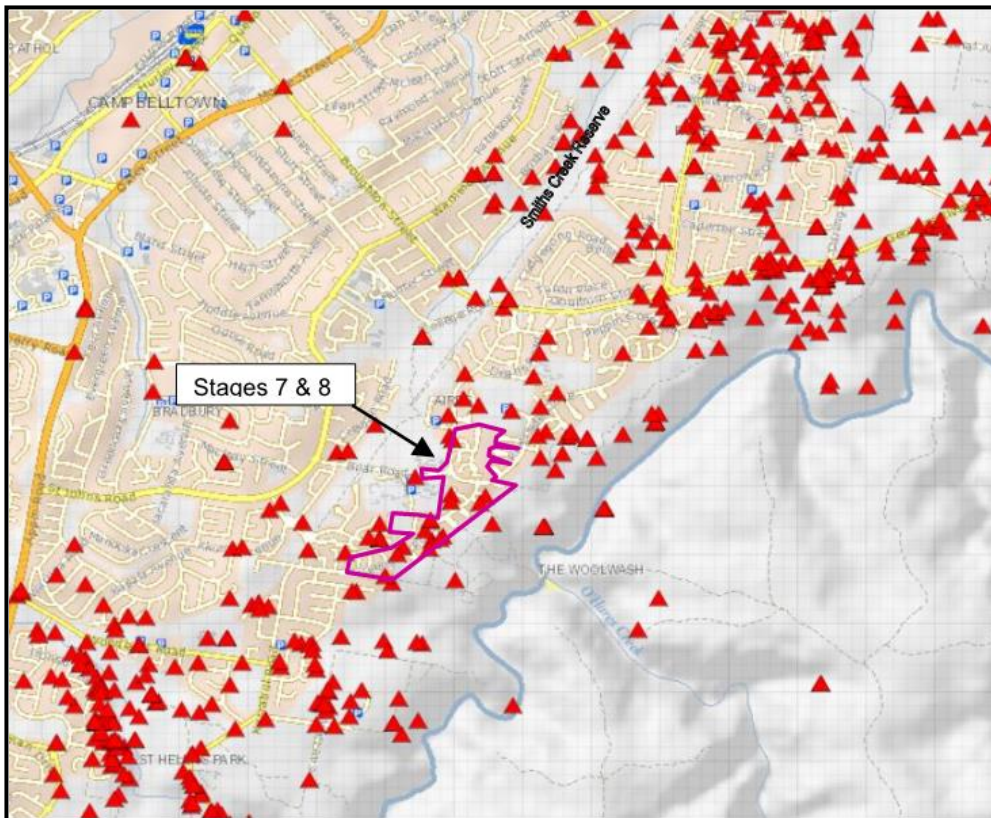


Figure 9 – Historical Koala Records, Bionet

Habitat Hayes 2011 recommended:

- Future detailed design of each stage within the concept plan would include details to maintain the accessibility of treed areas providing potential bushfire refuge for Koalas and would incorporate measures to increase protection of Koalas from Vehicle collisions and dog attacks.
- Consultation with Dr Close is also recommended but reference to the current Campbelltown Comprehensive Plan of Management Koala protection measures could apply as mentioned above.

It is noted that at the time of approval the Campbelltown Comprehensive Plan of Management was in draft and considered essentially a guidance to mitigating impacts on Koalas. Consequently stages 7 & 8 should consider the Koala Protection measures but is not bound by any specific revegetation offsets or compensatory payments for the loss of the trees. Consequently, mitigation measures are proposed below to minimise impacts on Koala in general.

The proposed works for Stage 7 of the Airds Bradbury Urban Renewal Project are unlikely to result in a significant impact on any threatened species, populations of EECs or their habitats given the impacts have already been considered as part of the concept plan process.

The application is consistent with the biodiversity offset strategy for the renewal project and the supporting bushland management plan as adopted with the concept plan approval.

8.6 Airds Bradbury Development Control Guidelines

The Concept Plan Approval MP10_0186 states:-

"As delegate of the Minister for Planning and Infrastructure under delegation executed on 14 September 2011 and effective 1 October 2011, I determine:

- a) to approve the concept plan referred to in Schedule 1, subject to the terms of approval and modifications in Schedule 3,
- b) under section 75P(1)(b) of the Environmental Planning and Assessment Act 1979 (EP&A Act), development the subject of the Concept Plan, except the demolition works as set out in Schedule 6, that is no longer a project to which Part 3A applies by operation of Schedule 6A to the EP&A Act and that is:
 - i. (i) by operation of an environmental planning instrument (EPI), permissible with development consent is subject to Part 4 of the EP&A Act,
 - ii. (ii) by operation of an EPI, permissible without development consent is subject to Part 5 of the EP&A Act, and
 - iii. (iii) that is specified in an EPI as exempt development is subject to section 76 of the EP&A Act;
- c) under section 75P(2)(c) of the EP&A Act:
 - i. (i) where development is subject to Part 4 of the EP&A Act (other than complying development), that development is subject to the further environmental assessment requirements specified in Schedule 4 of this approval, and
 - ii. (ii) where development is subject to Part 5 of the EP&A Act, that development is subject to the further environmental assessment requirements specified in Schedule 4 of this approval."

The terms of approval of the Concept Plan Approval MP10_0186 and the general consistency of the Stage 7 DA is assessed in the following table.

Criteria	Requirement	Consistency
Schedule 3		
Part A – Terms of Approval	1. Approval of Airds- Bradbury concept plan:	The proposed development is consistent with the masterplan, infrastructure delivery plan, Airds-Bradbury Development Control Guidelines and street layout.
	2. The Proponent shall carry out the Concept Plan generally in accordance with approved documentation.	The proposed development is generally consistent with the ABURP approval.
	3. Inconsistency between plans and documentation	The plans are generally consistent with the ABURP Approval.
	4. Limits on approval	Further approval has been obtained for the construction of the ABURP.
Part B – Modifications to the concept plan	1. Building Setbacks	Not applicable.
	2. Fencing Strategy	Not applicable.
	3. Traffic and transport	The proposal does not include access to Georges River Road.

	5. Landscaping	A street tree landscape plan has been submitted with the proposal, it is envisaged that approximately 398 street trees are to be planted.
	6. Open Space	Not applicable
	7. Biodiversity Offset Package	The applicant has stated a biodiversity offset package was approved on 4 July 2014. As previously approved
Schedule 4 Further Environmental Assessment Required	1. General Requirements	The proposal maintains consistency with the masterplan with regard to the provision of open space and road access.
	2. Built Form and Urban Design	The proposal is consistent with the ABURP.
	3. Traffic and transport	The applicant has submitted a traffic and transport assessment, which was reviewed by Council's Engineer.
	4. Development contributions	A VPA was executed for the Airds-Bradbury Renewal Plan.
	5. Bushfire hazard	Applicable
	6. Biodiversity offset package	As previously approved
	9. Bushland Management	An updated Bushland Management Plan 2023, prepared by Travers Bushfire & Ecology was submitted noting: <i>'The nominated bushland conservation areas are part of the Biodiversity Offset Strategy and represent the on-site conservation areas. External offset sites have been provided at St Helens Park and Gilead to offset the loss of Shale-Sandstone Transition Forest (SSTF) and Cumberland Plain Woodland (CPW) respectively.</i> <i>It is the intention that the six (6) bushland conservation areas be handed over to Council in good condition so as to allow minimal maintenance effort to be applied in perpetuity."</i>
	10. Heritage	Not Applicable
	12. Site filling and disposal	Cut and fill is considered to be appropriate for the proposed development.
	13. Utilities	Infrastructure servicing has been conditioned.
	14. Contamination	As previously addressed.
	15. Flooding	Not Applicable
	16. Water Quality and Riparian Corridors	Water Cycle Management Report submitted in support of application.

It is considered that the proposed subdivision and associated works are consistent with the nominated terms of the Concept Plan.

8.7 Campbelltown Local Environmental Plan 2015

The Campbelltown Local Environment Plan 2015 establishes the area's development objectives and land zoning.

The site is zoned **R2 Low Density Residential** in accordance with the provisions of the LEP, consent must not be granted for any type of development within this zone unless it is consistent with one or more of the zone objectives, and the use is permissible within the zone

The zone provisions for **R2 Low Density Residential** are:

- To provide for the housing needs of the community within a low density residential environment.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.
- To enable development for purposes other than residential only if that development is compatible with the character of the living area and is of a domestic scale.
- To minimise overshadowing and ensure a desired level of solar access to all properties.
- To facilitate diverse and sustainable means of access and movement.

The proposed subdivision is considered to contribute to the future residential development of the area. The re-subdivision works will add to the housing diversity of the locality. The proposed works are compatible with the character of the area and low residential scale.

The proposal is consistent with the objectives of the R2 Low Density Residential zone.

The proceeding table highlights compliance with the relevant development standards of the Campbelltown Local Environment Plan 2015.

Clause	Requirement	Proposed	Compliance
2.6(1) – Subdivision consent requirements	Land to which this Plan applies may be subdivided, but only with development consent.	Subdivision to create 209 lots comprising of 201 Torrens title residential lots, 4 residue lots, 2 lots for future development, 1 lot comprising an existing senior housing development and 1 lot for dedication as a public road and associated civil, landscape and ancillary site works including the removal of 516 trees.	Complies
4.1(3) – Minimum Subdivision Lot Size	The size of any lot resulting from a subdivision of land to which this clause applies is not to be less than the minimum size	The proposed lot sizes range from 265sqm to 774sqm. Reduced lot size permissible under the	Whilst the development includes creation of lots less than 500sqm, clause 3B(2)(f) of Schedule

	<p>shown on the Lot Size Map in relation to that land. I = 500sqm.</p>	<p><i>Airds Bradbury Urban Renewal Development Control Guidelines</i> and <i>Claymore Urban Renewal Development Control Guidelines</i>.</p> <p>Assessment against these policies provided below.</p>	<p>2 of the Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017 states that the provisions of any environmental planning instrument do not affect to the extent to which they are inconsistent with the terms of the Concept Plan. Therefore, the minimum lot size guidelines within the Concept Plan prevail over any inconsistency with the CLEP 2015.</p>
7.1 Earthworks	<p>(1) The objective of this clause is to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.</p> <p>(2) Development consent is required for earthworks unless—</p> <p>(a) the earthworks are exempt development under this Plan or another applicable environmental planning instrument, or</p> <p>(b) the earthworks are ancillary to development that is permitted without consent under this Plan or to development for</p>	<p>The proposal includes earthworks to facilitate the construction of a road and associated infrastructure works.</p> <p>The proposed earthworks are considered to satisfy the considerations of Clause 7.1 of the CLEP 2015.</p>	<p>Complies</p>

	which development consent has been given.		
7.10 – Essential Services	Development consent must not be granted to development unless the consent authority is satisfied that any of the following services that are essential for the proposed development are available or that adequate arrangements have been made to make them available when required: (a) the supply of water, (b) the supply of electricity, (c) the disposal and management of sewage, (d) stormwater drainage or on-site conservation, (e) suitable road and vehicular access, (f) telecommunication services, (g) the supply of natural gas.	The civil works proposed include the provision of utility services to the site.	Complies

8.8 Campbelltown (Sustainable City) Development Control Plan 2015

The purpose of Campbelltown (Sustainable City) Development Control Plan 2015 (SCDCP 2015) is to provide more detailed provisions to supplement the Campbelltown Local Environmental Plan 2015 (CLEP 2015).

Pursuant to Clause 4.15(1)(a)(iii) Council is required to consider the relevant provisions of the applicable development control plan of the Campbelltown Local Government Area (LGA), being SCDCP 2015.

The following details the assessment of the proposal in accordance with the relevant requirements of the Campbelltown (Sustainable City) Development Control Plan 2015.

Part 2 – Requirements Applying to All Types of Development

The general provisions of Part 2 of the Plan apply to all types of development.

Compliance with the relevant provisions of Part 2 of the Plan is discussed as follows:

Campbelltown (Sustainable City) Development Control Plan			
Control	Requirement	Proposed	Complies

Campbelltown (Sustainable City) Development Control Plan			
Control	Requirement	Proposed	Complies
2.5 Landscaping			
2.5 d) ii) Landscape Concept Plan	A landscape concept plan is required to be submitted with a development application for residential subdivision.	A Street Tree landscape plan has been submitted as a component of the proposal.	Complies
2.5 e) Design Requirements	The Landscape Concept Plan shall illustrate mature height, spread of species, trees to be removed/ retained and shall be prepared by a suitably qualified person.	All of the aforementioned information is demonstrated on the submitted street tree landscape masterplan.	Complies
2.5 f) Design Requirements	Landscaping shall maximise the use of locally indigenous and other drought tolerant native plants and avoid the use of invasive species.	<p>The landscaping design incorporates the following features:-</p> <ul style="list-style-type: none"> • New street planting; • Concrete footpaths/shareways; and • New turf shrubs and groundcover. <p>Street trees include a number of koala use tree species.</p>	Complies
2.7 Erosion and Sediment Control			
2.7 a) Design Requirements	An Erosion and Sediment Control Plan (ESCP) shall be prepared and submitted with a development application proposing construction and/or activities involving the disturbance of the land surface.	ESCP submitted. Recommended condition of consent for implementation prior to the commencement of any works.	Complies
2.8 Cut, Fill and Floor Levels			
2.8.1 a) Cut and Fill	A Cut and Fill Management Plan (CFMP) shall be submitted with a development application where the development incorporates cut and/or fill operations.	CFMP has been submitted with the plan package. As shown on the Cut-Fill and Soil & Water Management Plan, the Stage 7 works requires 34,150 cubic metres of cut and 28,610 cubic metres of fill.	Complies

Campbelltown (Sustainable City) Development Control Plan			
Control	Requirement	Proposed	Complies
2.10 Water Cycle Management			
2.10.3 a) Stormwater Drainage	A stormwater Drainage Concept Plan shall be prepared by a suitably qualified person, and submitted with all development applications, involving construction (except for internal alterations/fitouts), demonstrating to Council how the stormwater will be collected and discharged from the site.	Stormwater Drainage Concept Plan submitted.	Complies
2.10.3 b) Stormwater Drainage	<p>The stormwater concept plan shall include the following information as a minimum:</p> <p>i) locations, layouts and sizes of stormwater pipes and pits;</p> <p>ii) minimum grades and capacity of stormwater pipes; and</p> <p>iii) existing and proposed easements, site contours and overland flow path/s.</p>	Submitted and is considered to be satisfactory.	Complies
2.15 Waste Management			
2.15.1 a) Waste Management Plan	A detailed 'Waste Management Plan' (WMP) shall accompany development applications for certain types of development/land uses.	Submitted, and is considered satisfactory.	Complies

Part 3 – Low and Medium Density Residential Development and Ancillary Residential Structures

The proposal was further assessed under the relevant controls outlined in Part 3 of the SCDCP 2015 with regard to requirements for residential development.

Control	Requirement	Proposed	Compliance
3.8.1(a)	Subdivision shall have appropriate regard to orientation, slope, aspect and solar access.	The subdivision pattern appropriately responds to the site constraints and is in accordance with the concept plan as approved.	Complies
3.8.1(b)	Subdivision design shall comply with the requirements specified in Council's Engineering Design Guide for Development	The proposal was reviewed by Council's Engineer and appropriate conditions of consent have been recommended.	Complies
3.8.1(c)	Where relevant, roads shall be designed to provide satisfactory level of services for the evacuation of occupants in the event of emergency.	The proposal was reviewed by Council's Engineer and appropriate conditions of consent have been recommended.	Capable of compliance
3.8.1(f)	All allotments within a subdivision that are located adjacent to the intersection of local public roads (existing or proposed) shall provide a splay in accordance with Council's Engineering Design Guide for Development to ensure adequate sight distances and maintain footpath widths.	Corner splays are provided to corner lots.	Capable of Compliance
3.8.1(g)	Residential subdivision shall be designed to address the public domain.	The allotments are designed to address the public domain.	Complies

8.9 Campbelltown (Sustainable City) Development Control Plan 2015 – Volume 2: Site Specific DCPs: Part 9 – Urban Renewal Areas Airds Claymore

The proposed development has been assessed having regard to the relevant numerical and design standards within Council's (Sustainable City) Development Control Plan 2015 (SCDCP 2015).

The following table sets out the proposal's compliance with the applicable provisions and numerical standards of the Plan:

Campbelltown (Sustainable City) Development Control Plan			
Control	Requirement	Proposed	Complies
8. Neighbourhood Subdivision			

Campbelltown (Sustainable City) Development Control Plan			
Control	Requirement	Proposed	Complies
8.3.1 Design Requirements	All neighbourhood subdivisions shall be generally consistent with the Concept Plan approval for Claymore and Airds Bradbury and generally as shown in Figures 1 and 2 regarding the location of open space areas, public roads and proposed residential development.	The proposed subdivision is considered generally consistent with the concept plans for the Airds area.	Complies

Campbelltown (Sustainable City) Development Control Plan			
Control	Requirement	Proposed	Complies
8.3.2 Design Requirements	<p>No further subdivision of allotments following the neighbourhood subdivision, shall be permitted unless:</p> <p>a) the allotment is located in an area identified in Figures 3 and 4 as future development lots or seniors living; or</p> <p>b) The land is located in an area identified in Figure 3 as existing residential areas and the subdivision is a re-subdivision of existing lots in the ownership of NSW Land and Housing Corporation; or</p> <p>c) The land is located on any of the following streets within the Claymore Urban Renewal Area (Figure 4) and the subdivision is a re-subdivision of existing lots in the ownership of NSW Land and Housing Corporation:</p> <p>i. Carter Place;</p> <p>ii. Drysdale Street;</p> <p>iii. Crozier Street, Blake Place and Auld Place;</p> <p>iv. Boyd Street;</p> <p>v. Fairweather Place;</p> <p>vi. Gould Road; or</p> <p>d) The size of any lot resulting from a subdivision of land is not to be less than the minimum size allowed for that land under CLEP 2015.</p> <p>e) The subdivision is a strata subdivision or community title subdivision.</p>	<p>The subject site is located in an area identified as an existing residential area and the subdivision is a re-subdivision of existing lots in the ownership of NSW Land and Housing Corporation.</p> <p>This requirement negates point d) as minimum lot size less than that permissible under the Campbelltown Local Environment Plan 2015 is permissible per this DCP.</p>	Complies

Campbelltown (Sustainable City) Development Control Plan			
Control	Requirement	Proposed	Complies
8.4 Neighbourhood Subdivision - Allotment Size and Design			
8.4.1 Allotment size and Design	Design of residential allotments shall have regard for the impact of orientation, slope, and aspect to facilitate solar access to future dwelling development.	The proposed lots have been designed to provide an improvement for future residential development.	Complies
8.4.2 Allotment size and Design	All proposed allotments shall have a street frontage.	All of the proposed lots have access to a street frontage.	Complies
8.4.3 Allotment size and Design	Battle-axe lots shall only be permitted where a street frontage cannot otherwise be provided because of existing conditions including the size and shape of a residual parcel.	Not Applicable as no battle axe allotments are proposed.	Not Applicable
8.4.4 Allotment size and Design	All allotments intended for dwellings will have a minimum site area of 200m ² with a minimum width measured at the building line of 6 metres.	The minimum proposed lot is 265sqm with a minimum width of 7.12m	Complies
8.4.5 Allotment size and Design	Any allotment with a width to the street frontage of less than 9 metres is to have the garage located to the rear of the property accessed from a rear lane or accessway.	Not applicable to the subject application as all allotments proposed have a street frontage of greater than 9 metres.	Not Applicable
8.4.6 Allotment size and Design	Allotments are to have a minimum depth of 25 metres.	Generally all lots have a minimum depth of 25m, 24.7m (corner lots) is provided.	Complies

Campbelltown (Sustainable City) Development Control Plan			
Control	Requirement	Proposed	Complies
8.5 Subdivision Approval Process for Housing on Smaller Lots			
8.5.2 Subdivision Approval Process for Housing on Smaller Lots	<p>For lots less than 300m² and equal to or greater than 225m² in area, and with a width equal to or greater than 9m:</p> <p>a. Dwelling plans are required as part of future development application or complying development certificate application;</p> <p>b. A Building Envelope Plan is to accompany the development application for subdivision;</p> <p>c. Dwelling design restriction to be registered on title via a S88B instrument to reflect the Building Envelope Plan;</p> <p>d. Subdivision can be completed (plan registered) prior to dwelling construction.</p>	Applicable.	To be conditioned accordingly

The proposed development is generally in accordance with the requirements of Council's Sustainable City Development Control Plan 2015.

8.10 Development Contributions

Council's Development Contributions Officer reviewed the proposal and noted as follows:

"This development, being Stage 7 of the Airds Bradbury Renewal Project is subject to development contributions in accordance with the executed VPA between LAHC and Council.

No further contributions are required.

Please insert the standard condition referencing the need to comply with requirements of the VPA."

The above comment is noted and is to be conditioned accordingly.

9. Planning Assessment

9.1 EP&A Act 4.15 (1)(b) – Likely Impacts

Section 4.15 (1)(b) of the EP&A Act requires that the consent authority must consider the development's potential impacts on the natural and built environment, as well as, potential social and economic impacts of the development.

The key matters for consideration when considering the potential impacts on the natural and built environment are as follows:

- Stormwater Impacts
- Bushfire Risk Management
- Ecological
- Development Staging
- Construction Impacts
- Social and Economic impacts

Stormwater Impacts

The Stage 7 DA is located within an established urban area, measures are proposed to manage stormwater quality and quantity during construction and operation. This includes improvements in stormwater treatment and management on the site. The site will be fully serviced and existing services upgraded or replaced as required.

Council's Development Engineer reviewed the stormwater assessment including the Water Management Cycle report and supports the development subject to recommended conditions of development consent.

Bushfire Risk Management

The south eastern edge of the development is subject to bushfire risk from surrounding bushland. The submitted report prepared by, Travers bushfire & ecology, proposes the following combination of bushfire measures:

- Use of an alternative solution to determine minimum APZ and bushfire attack level (BAL) setbacks in accordance with Method 2 of AS3959 Construction of Buildings in Bushfire Prone Areas using the NSW Rural Fire Service Comprehensive Vegetation Fuel Loads (March, 2019).
- Provision of access in accordance with the acceptable solutions outlined in PBP 2019.
- Use of an alternative solution for one (1) turning head. The turning head has been designed to allow for a three (3) point turn to be undertaken by a Category 1 fire tanker in compliance with the performance criteria.
- Water, electricity and gas supply in compliance with the acceptable solutions outlined in PBP 2019.
- Future dwelling construction in compliance with the appropriate construction sections of AS3959-2018, and PBP 2019.

The development is categorised by the NSW Rural Fire Service (RFS) as being a residential subdivision and required a bushfire safety authority (BSA) to be issued in accordance with Planning for Bush Fire Protection 2019 (PBP 2019). NSW Rural Fire Service provided their General Terms of Approval 08 July 2021.

Bushfire management measures proposed as part of the Stage 7 DA are consistent with the bushfire management measures outlined in the Concept Plan and are in accordance with Planning for Bushfire Protection 2006 in its updated form being Planning for Bush Fire Protection 2019.

Ecological

The impacts of the Stage 7 DA on existing flora and fauna were addressed in the accompanying Flora and Fauna Impact Assessment prepared by Travers Bushfire & Ecology.

The Assessment identified the following ecological communities present within the subject site:

"Ecological survey and assessment has been undertaken in accordance with relevant legislation including the Environmental Planning and Assessment Act 1979, the Threatened Species Conservation Act 1995, the Environment Protection and Biodiversity Conservation Act 1999 and the Fisheries Management Act 1994.

*In respect of matters required to be considered under the Environmental Planning and Assessment Act 1979 and relating to the species / provisions of the Threatened Species Conservation Act 1995, one (1) threatened fauna species, Koala (*Phascolarctos cinereus*) no threatened flora species, and one (1) critically endangered ecological community, Cumberland Plain Woodland were recorded within the subject site.*

*Koala (*Phascolarctos cinereus*) has also been previously recorded within the subject site and Cumberland Plain Land Snail (*Meridolum corneovirens*), Greater Broad-nosed Bat (*Scoteanax rueppellii*), Little Bentwing-bat (*Miniopterus australis*) and Grey-headed Flying-fox (*Pteropus poliocephalus*) have previously been recorded in the broader Airds Bradbury Urban Renewal Project study area.*

In accordance with Section 5A of the Environmental Planning and Assessment Act 1979, the 7-part test of significance concluded that the proposed subdivision of Stages 7 & 8, will not have a significant impact on any threatened species, populations or threatened ecological communities. Travers bushfire & ecology reiterates that as an approved Biodiversity Offset has been provided, under the Threatened species Conservation Act 1995, entry into the Biodiversity Offset Scheme (BOS) is not required. "

The proposed re-development of stage 7 of the Airds Bradbury Urban Renewal Project has been certified under Clause 34A of the Biodiversity Conservation Act 2016 (BC Act). The BC Act outlines transitional arrangements provided by Clause 34A, Biodiversity Conservation Savings & Transition Regulation (S&T Regulation). These provisions acknowledge past offsetting agreements secured as part of a concept plan approval or a relevant planning arrangement.

The impacts of the proposal have been considered in the original site concept plan which enacted an approved biodiversity offset program to ensure that impacts upon Cumberland Plain Woodland, Shale-Sandstone Transition Forest were offset under the NSW Biobanking scheme prior to the enactment of the Biodiversity Conservation Act 2016.

Development Staging

Stage 7 will be developed in stages as identified on the proposed plans of subdivision as Stage 7A and Stage 7B. It is also noted that the proposed works will be further staged with subdivision works certificates and subdivision certificates (as required) issued progressively and plans of subdivision progressively registered. It is noted that the land comprising the existing community centre and child care centre will not be developed until alternative arrangements are in place for these community facilities.

Construction Impacts

The applicant has committed to the preparation of a Construction Management Plan (CMP) for Stage 7, prior to construction commencing. A condition of development consent has been recommended for a CMP to be prepared prior to the commencement of any works in line with the applicant's commitment.

The proposal includes several erosion and sediment control measures that will seek to alleviate any nuisance to any residents as well as the surrounding road network.

Social and Economic Impacts

The proposed subdivision will facilitate future residential development of the land to provide for the housing needs of the community, which will in effect provide tangible social and economic benefits.

Socially, the proposal will deliver vacant residential allotments that will facilitate an increase of housing supply and help to improve housing choice and affordability within the locality. The proposed development will also facilitate an active and passive recreation area that will promote social interactions and passive surveillance.

Economically, the proposal will be beneficial to the overall local economy with workers being employed during the construction phase of the development and future residents spending in the local economy once the allotments comprise dwelling houses.

Referrals

External

NSW Rural Fire Service

General Terms of Approval, issued under Division 4.8 of the Environmental Planning & Assessment Act 1979, have been included in the recommended conditions of consent.

Internal

Development Engineer

Council's Development engineer reviewed the proposal and raised no objections subject to the inclusion of conditions as provided.

Environment (Contamination & Acoustic)

Council's Environment Officer reviewed the submitted Contamination report and noted that no objections were raised subject to validation of the soils.

Condition is to be imposed within Notice of Determination.

Environment (Flora & Fauna)

Council's Environment Officer reviewed the submitted reports and conditions were provided including 2 x Vegetation Management Plan conditions. The Officer provided the following explanation with regard to the imposition of the conditions:

""There is no disagreement from Council that by virtue of the original concept plan approval for the Airds Bradbury Renewal Project, that Stage 7 forms a part of the approved Biodiversity Offset Package (BOP).

However, its application is limited with regards to areas of Commonwealth listed critically endangered ecological communities (CEEC) comprising both Cumberland Plain Woodland (CPW) & Shale Sandstone Transition Forest (SSTF) (for moderate – high condition vegetation only) in association with the Federal approval (EPBC 2011/6169) granted for the project (as shown in Figure 1 of the Bushland Management Plan (BMP)). It is important to note here that no areas of CEEC as identified in the BMP were found to occur within Stage 7.

In accordance with the Clause 34A that has been issued for the project, Councils assessment of the subject development application is required to be undertaken in accordance with the NSW Threatened Species Conservation Act, 1995 (instead of Part 7 of the NSW Biodiversity Act, 2016 (BC Act)).

The Flora and Fauna Assessment (FFA) (Travers Bushfire & Ecology, 2023) and Arboricultural Impact Assessment (AIA) (Arborsaw, 2022) for Stage 7 have identified new areas of CEEC comprising CPW that meet the TSC Act listing criteria as defined in the NSW Scientific Committee determination (refer Figure 4 of the FFA). These areas are described as 'new' areas of CPW as they are additional to those areas identified in the BOP as per Figure 1 of the BMP.

As part of Councils assessment requirements under the TSC Act for CEECs, Ministers and Public Authorities (Council) must not make decisions that are inconsistent with a recovery plan. Accordingly, Councils determination decision for CPW is required to be consistent with the approved NSW Cumberland Plain Recovery Plan, 2011 (the Recovery Plan) (otherwise notification to the Director General is required as per Part 4, Division 2 of the TSC Act).

The Recovery Plan (Principle 4) requires that 'where impacts to CPW cannot be avoided, that they should be offset using appropriate means'.

In line with the above, those additional areas of CEEC identified for Stage 7 include 1.18 ha of CPW (Travers Bushfire & Ecology, 2023), consisting of 223 CPW trees (Arborsaw, 2022); with a total impact of 0.89 ha of CPW and associated loss of 190 CPW trees.

Thus, in accordance with Councils assessment requirements under the TSC Act requiring that the determination not be inconsistent with the NSW Recovery Plan – the conditions have been formulated for this purpose."

Noting the above advice, conditions have been included within the recommended draft conditions of consent.

9.2 EP&A Act 4.15 (1)(c) – Suitability of the Site

Section 4.15 (1)(c) of the EP&A Act requires the consent authority to consider the suitability of the site when determining a development application.

The proposed dimensions, areas and orientation of the allotments are considered adequate to facilitate the siting, design and construction of future residential development.

The subdivision will also contribute positively to the desired future character of the locality by enabling the construction of future dwellings within the residential zone.

The site is therefore considered suitable for the proposed development.

10.0 Public Participation

Section 4.15 (1)(d) of the EP&A Act requires the consent authority to consider any submissions made in relation to a development proposal.

The application was publicly notified and exhibited from the 20 April 2021 to the 21 May 2021. The exhibition was in line with the statutory requirements and the Council's notification policies.

No public submissions were received.

11.0 Conclusion

Stage 7 of the Airds/Bradbury Urban Renewal Concept Plan proposes a 209 lot subdivision, comprising 201 Torrens title residential lots, 4 residue lots, 2 lots for future development, 1 lot comprising an existing senior housing development and 1 lot for dedication as a public road. The development also includes associated civil, landscape and ancillary site works as well as the removal of 516 trees within the Airds/Bradbury public housing estate.

The continued redevelopment of the Airds/Bradbury public housing estate is anticipated to have positive social and economic impacts for the immediate locality and the wider community due to the provision of improved housing in a renewed urban environment.

Overall, having regard to the matters for consideration under Section 4.15 of the Environmental Planning and Assessment Act 1979, and the relevant matters discussed within this report, the development is recommended for approval, subject to the recommended conditions of consent.

Attachment 2 – Record of Briefing



BRIEFING DETAILS

BRIEFING DATE / TIME	Monday, 10 May 2021, 11:18am and 12:15pm
LOCATION	Teleconference

BRIEFING MATTER(S)

PPSSWC-146 – Campbelltown – 535/2021/DA-SW – Woolwash Road, Airds – Subdivision of Stage 7 to create 214 lots comprising of 207 torrens title residential lots, 3 residue lots, 2 lots for future development, 1 lot containing an existing senior housing and 1 lot for dedication as a public road and associated civil, landscape and ancillary site works

PANEL MEMBERS

IN ATTENDANCE	Justin Doyle (Chair), Nicole Gurran, Sandra Hutton, George Griess and Darcy Lound
APOLOGIES	None
DECLARATIONS OF INTEREST	Louise Camenzuli: A Partner of my firm has just been awarded some work from LAHC

OTHER ATTENDEES

COUNCIL ASSESSMENT STAFF	Alex Long and Belinda Borg
OTHER	Melissa Felipe and George Dojas – Panel Secretariat

KEY ISSUES DISCUSSED

1. This note addresses both Stages 7 and 8 of the long term urban rejuvenation of the Airds Bradbury public housing estate in the Campbelltown Local Government Area (LGA) by NSW Land and Housing Corporation, and the Panel is keen to expedite its determination (subject to ensuring a rigorous assessment).
2. Compliance and general consistency with the approved Concept Plan for the Airds Bradbury Urban Renewal Project (ABURP) as amended is important and to be addressed in the assessment report. The Panel is eager to see progress towards delivery of the improved parks, public areas, together with new and upgraded community facilities which are planned to be delivered as part of the staged implementation of the Concept Plan. Briefing as to progress in that regard within the staging of the development would be appreciated.
3. The Project, via the Concept Plan, was endorsed by the Department of Planning, Industry and Environment (DPIE) (formerly the Department of Planning), attention to the applicable transitional arrangements applying to the current DA is required. The Panel awaits advice as to the timing and outcome of the request made to the Department under clause 34A(3) of the Biodiversity Conservation (Savings and Transitional) Regulation 2017 (NSW) for exemption of the assessment of the DA from the provisions of the BC Act by letter dated 13 November 2020. This includes confirmation on whether there remain any residual biodiversity impact matters such as extent of

tree removal compared to that anticipated by the Concept Plan, that must otherwise be addressed arising from that certification outcome. The assessment staff have provided a generally favourable assessment to date against the numerical and design standards within Council's (Sustainable City) Development Control Plan 2015 (SCDCP 2015), but noting that building envelope plans have been requested for sites less than 300 m² in area. The allotment mix seems sufficiently and appropriately varied and planned in relation to road frontages, size and layout.

5. The Panel is informed that in addition to Clause 34A certification, issues of stormwater management are delaying determination of the DA. Once the Council is satisfied that those stormwater issues can be resolved, consideration of a deferred commencement condition on the subject might be appropriate.

6. The Panel is advised that at the time of briefing GTAs from RFS are also outstanding. Once received, the Panel would like to ensure they are reviewed for consistency and any implications, including any limitation to on street parking (if any).

Planning Panels Secretariat

4PSQ, 12 Darcy Street, Parramatta NSW 2150 | Locked Bag 5022, Parramatta NSW 2124 | T 02 8217 2060 |

Attachment 3 – NSW RFS GTA's



NSW RURAL FIRE SERVICE



Campbelltown City Council
PO Box 57
CAMPBELLTOWN NSW 2560

Your reference: 535/2021/DA-SW-CNRforRFS
(CNR-21697)
Our reference: DA20210504001794-Original-1
8 July 2021

Attention: Alexandra Long

Dear Sir/Madam,

**Development Application
S.100b– Subdivision Woolwash Rd Airds and other locations**

I refer to your correspondence dated 4 May 2021 seeking general terms of approval for the above Development Application.

The New South Wales Rural Fire Service (NSW RFS) has considered the information submitted. General Terms of Approval, under Division 4.8 of the *Environmental Planning and Assessment Act 1979*, and a Bush Fire Safety Authority, under section 100B of the *Rural Fires Act 1997*, are now issued subject to the following conditions:

Asset Protection Zones

The intent of measures is to provide sufficient space and maintain reduced fuel loads so as to ensure radiant heat levels of buildings are below critical limits and to prevent direct flame contact with a building. To achieve this, the following conditions shall apply:

1. At the issue of a subdivision certificate, and in perpetuity to ensure ongoing protection from the impact of bush fires, the entire road reserve of the proposed road along the south-eastern edge of the site must be managed as an inner protection area (IPA) in accordance with the requirements of Appendix 4 of *Planning for Bush Fire Protection 2019*. Note that this applies to the area outside the proposed road carriageway in the vicinity of the existing sewage pumping station.

When establishing and maintaining an IPA the following requirements apply:

- tree canopy cover should be less than 15% at maturity;

Postal address
NSW Rural Fire Service
Planning and Environment Services
Locked Bag 17
GRANVILLE NSW 2141

T 1300 NSW RFS
F (02) 8741 5433
E records@rfs.nsw.gov.au
www.rfs.nsw.gov.au

- trees at maturity should not touch or overhang any building;
- lower limbs should be removed up to a height of 2m above the ground;
- tree canopies should be separated by 2 to 5m;
- preference should be given to smooth barked and evergreen trees;
- large discontinuities or gaps in vegetation should be provided to slow down or break the progress of fire towards buildings;
- shrubs should not be located under trees;
- shrubs should not form more than 10% ground cover;
- clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation.
- grass should be kept mown (as a guide grass should be kept to no more than 100mm in height); and
- leaves and vegetation debris should be removed.

2. At the issue of a subdivision certificate, suitably worded instruments created pursuant to section 88 of the *Conveyancing Act 1919* must be placed on proposed lots numbers 7207 to 7215, 7278 to 7280 and 7287 to 7296, which requires the provision of asset protection zones (APZ) and prohibits the construction of buildings other than class 10b structures within the APZ. The APZ and building restriction shall be as per **Schedule 1 - Subdivision BAL plan** of the Bushfire Protection Assessment report prepared by Travers bushfire & ecology, dated November 2020, ref: 18EPM02B, and extend for a distance of 29m north-west from the south-eastern edge of the road reserve of the proposed new road. The name of authority empowered to release, vary or modify the instrument shall be Campbelltown Council.

When establishing and maintaining an APZ the following requirements apply:

- tree canopy cover should be less than 15% at maturity;
 - trees at maturity should not touch or overhang any building;
 - lower limbs should be removed up to a height of 2m above the ground;
 - tree canopies should be separated by 2 to 5m;
 - preference should be given to smooth barked and evergreen trees;
- large discontinuities or gaps in vegetation should be provided to slow down or break the progress of fire towards buildings;
- shrubs should not be located under trees;
 - shrubs should not form more than 10% ground cover;
 - clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation.

- grass should be kept mown (as a guide grass should be kept to no more than 100mm in height); and
- leaves and vegetation debris should be removed.

Access

The intent of measures is to provide safe operational access to structures and water supply for emergency services, while residents are seeking to evacuate from an area. To achieve this, the following conditions shall apply:

3. Perimeter roads must comply with the general requirements of Table 5.3b of *Planning for Bush Fire Protection 2019* and the following:

- are two-way sealed roads;
- minimum 8m carriageway width kerb to kerb;
- parking is provided outside of the carriageway width;
- hydrants are located clear of parking areas;
- are through roads, and these are linked to the internal road system at an interval of no greater than 500m;
- curves of roads have a minimum inner radius of 6m;
- the maximum grade road is 15 degrees and average grade of not more than 10 degrees;
- the road crossfall does not exceed 3 degrees; and
- a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches, is provided.

4. Non-perimeter roads must comply with the general requirements of Table 5.3b of *Planning for Bush Fire Protection 2019* and the following:

- minimum 5.5m carriageway width kerb to kerb;
- parking is provided outside of the carriageway width;
- hydrants are located clear of parking areas;
- roads are through roads, and these are linked to the internal road system at an interval of no greater than 500m;
- curves of roads have a minimum inner radius of 6m;
- the road crossfall does not exceed 3 degrees; and

- a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches, is provided.

5. The turning head to the proposed cul-de-sac is to have either a minimum 12 metre radius turning circle or turning heads compliant with Appendix A3.3. Vehicle turning head requirements of *Planning for Bush Fire Protection 2019*.

Services

The intent of measures is to provide adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building. To achieve this, the following conditions shall apply:

6. The provision of water, electricity and gas must comply with the following in accordance with Table 5.3c of *Planning for Bush Fire Protection 2019*:

- reticulated water is to be provided to the development;
- fire hydrant, spacing, design and sizing complies with the relevant clauses of Australian Standard AS 2419.1:2005;
- new hydrants are not located within any road carriageway;
- reticulated water supply to urban subdivisions uses a ring main system for areas with perimeter roads;
- fire hydrant flows and pressures comply with the relevant clauses of AS 2419.1:2005;
- all above-ground water service pipes are metal, including and up to any taps.

For any queries regarding this correspondence, please contact 1300 NSW RFS.

Yours sincerely,



Nika Fomin
Manager
Planning & Environment Services (East)

BUSH FIRE SAFETY AUTHORITY

Subdivision

Woolwash Rd Airds

RFS Reference: DA20210504001794-Original-1

Your Reference: 535/2021/DA-SW-CNRforRFS (CNR-21697)

This Bush Fire Safety Authority is issued on behalf of the Commissioner of the NSW Rural Fire Service under s100b of the *Rural Fires Act 1997* subject to the attached General Terms of Approval.

This authority confirms that, subject to the General Terms of Approval being met, the proposed development will meet the NSW Rural Fire Service requirements for Bush Fire Safety under s100b of the *Rural Fires Act 1997*.

Nika Fomin

Manager

Planning and Environment Services

Thursday 8 July 2021