



## Office of Water

9 September 2011

Campbelltown City Council  
PO Box 57  
CAMPELLTOWN NSW 2560

Attention: Adam Coburn

c: Janne Grose  
t: 02 4729 8262  
f: 02 4729 8141  
e: Janne.Grose@water.nsw.gov.au

Our ref : ER21555  
Your ref: MP10\_0186

Dear Sir

**MP10\_0186 – Airds Bradbury Urban Renewal Concept Plan, Campbelltown**

Thank you for your letter of 10 June 2011 seeking comment from the NSW Office of Water (NOW) on the Environmental Assessment (EA) for the above Concept Plan proposal.

It is understood that Council is acting on behalf of the Minister for Planning and Infrastructure for assessment of this proposal.

NOW's key issues are outlined in **Attachment A**.

**Contact Details**

Should you have any queries in relation to this matter please contact Janne Grose on telephone (02) 4729 8262.

Yours sincerely

**Mark Mignanelli**  
Manager Major Projects, Mines and Assessment

cc Megan Fu, Department of Planning and Infrastructure

## NSW Office of Water Comments

### Airds Bradbury Urban Renewal Concept Plan, Campbelltown

---

#### Riparian Corridors

This office (and its previous departments) over a period of years has provided comment on the Airds Bradbury urban renewal project in respect of Smiths Creek and its riparian corridor and the establishment of a vegetated biological linkage to link Smiths Creek riparian corridor to the Georges River. It is recommended this linkage is achieved through maximising the retention of existing native vegetation and the planting and rehabilitation of local native species at the site.

From the plans provided in the EA and accompanying reports it is difficult to determine what is proposed for Smiths Creek and the associated riparian corridor. That is, plans are inconsistent in the location of the creek. For example, Figure 24 in the EA shows the creek to be in a different location to the Hughes Trueman Figure 2 in the Final Additional Flora and Fauna Studies report. Therefore, it is difficult to determine the riparian area proposed to be provided in relation to the location of development such as the new residential areas, playing fields, roads, GPTs etc.

Further it is not clear what minimum riparian width is proposed to be established on either side of Smiths Creek. Section 4.7.1 of the EA refers to the retention of a 20 m wide riparian vegetation corridor along Smiths Creek. The former department (DIPNR) previously negotiated an average 30 m wide riparian corridor (or to the extent of remnant native vegetation adjoining the creek) along either side of Smiths Creek to be protected and enhanced up to the existing dam. This comprised an average 20 metre wide core riparian zone (CRZ) plus an average 10 metre wide vegetated buffer either side of the creek. It would appear the Concept Plan is proposing to locate development such as new residential areas and playing fields in remnant native vegetation adjoining the riparian land. It is recommended the Concept Plan protects the remnant native vegetation adjoining the riparian land. In this regard CRZs and vegetated buffers should be consistent with NOW's Guidelines for Controlled Activities (2010/2011).

Section 3.15 of the EA indicates stormwater detention is proposed in the Smiths Creek corridor. Stormwater is proposed to be detained upstream of the Georges River Road with the construction of a low wall to detain the 1 in 100 year flow. NOW is concerned by this proposal and requests further details be provided. That is, it may be that the proposal is inconsistent with NOW's Guidelines for Controlled Activities (2010/2011) which recommends retention structures are built off-line. If a detention structure is unavoidable, it must be demonstrated that this has no impact on connectivity or hydrology of the site in low-medium flows.

Section 4.10 of the EA indicates provision has been made to place the high voltage transmission lines underground along the Smiths Creek bypass corridor. NOW recommends the placement of high voltage lines underground avoids disturbing remnant vegetation or the route underbores areas with existing native vegetation.

#### APZ

Section 4.8 of the EA refers to the provision of an Asset Protection Zone (APZ) and indicates the APZ width along Smiths Creek bushland will range in width depending on



the width and the continuity of the corridor. It is recommended any APZ requirements are located outside the riparian land along Smiths Creek and the remnant native vegetation which adjoins the riparian area.

### Groundwater

Section 6.3 of the Preliminary Geotechnical Investigation notes groundwater conditions were only briefly examined in this investigation and that a single level basement is proposed in the town centre. If it is anticipated that the below ground works (excavations) are likely to intercept groundwater it is strongly advised a groundwater assessment is undertaken as part of the Project Application stage of development as the results may impact on the overall development.

It should be noted that all proposed groundwater works including bores for the purpose of investigation, extraction, dewatering, testing or monitoring must be identified and approval obtained from NOW prior to their installation.

On 1 July 2011, the Water Sharing Plan (WSP) for *the Greater Metropolitan Region Groundwater Sources* which covers the project area commenced. Upon commencement of the WSP, the licensing provisions of the *Water Management Act 2000* (WMA 2000) also came into effect in the plan area. Information on the WSP can be found at the following link: [http://www.water.nsw.gov.au/Water-management/Water-sharing-plans/plans\\_commenced/default.aspx](http://www.water.nsw.gov.au/Water-management/Water-sharing-plans/plans_commenced/default.aspx).

### Groundwater Dependent Ecosystems

An assessment needs to be undertaken at the local scale of any Groundwater Dependent Ecosystems (GDEs) in the surrounding area and identify any potential impacts on GDEs as a result of the proposal. This assessment needs to be provided as part of the Project Application stage.

**End Attachment A  
9 September 2011**

20 September 2011

Mr Adam Coburn  
Senior Development Assessment Planner  
PO Box 57  
Campbelltown NSW 2560

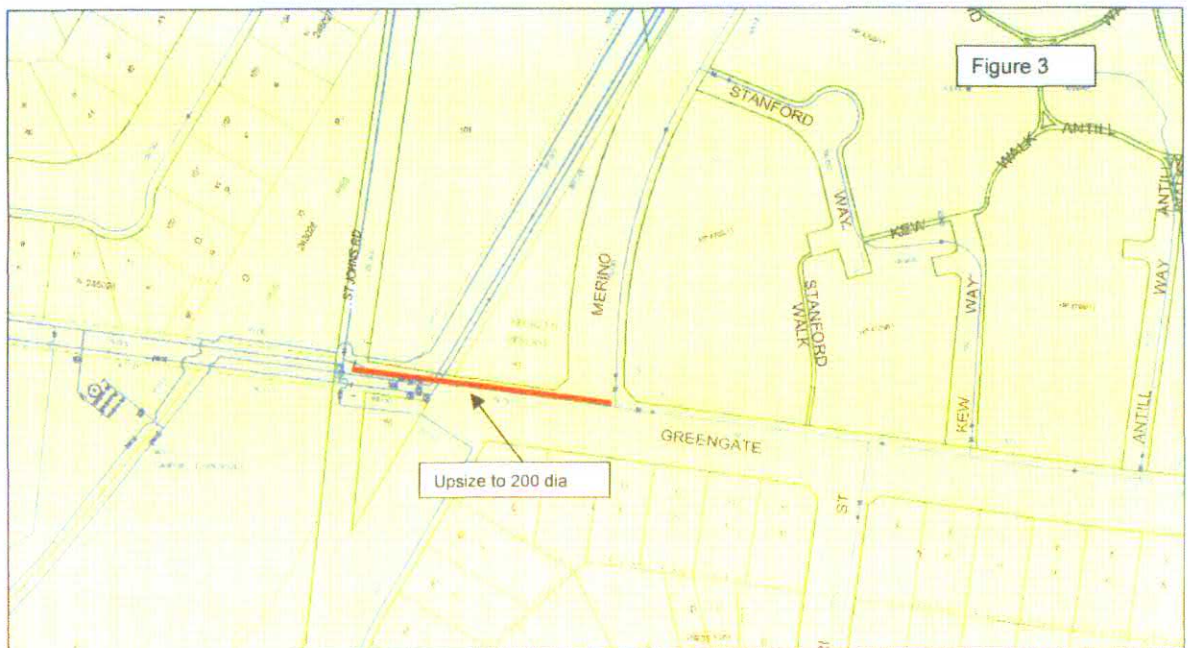
**Re: MP 10\_0186 Airds Bradbury Urban Renewal**

Dear Mr Coburn,

Sydney Water understands that Campbelltown Council has closed the exhibition period of the Airds Bradbury Urban Renewal project and that the proponent is currently reviewing submissions. Although Sydney Water's comments did not make the deadline of the close of the exhibition, we would like to inform Council of the impact of the development on Sydney Water's assets.

**Water**

The proposed redevelopment of the existing Airds and Bradbury housing estates is to be serviced via a 200mm drinking water main which is to be laid in Greengate Road as shown on the figure below. Preliminary investigation indicates that the 150mm main can either be upsized to a 200mm main or a new 200mm main can be laid parallel, depending on detailed design. Sydney Water will review this when the developer applies for a Section 73 Certificate.







Sydney Water has other assets that are affected by the redevelopment project including:

- a) Two main sewers within the area – one of which crosses the Smith Creek By-Pass Corridor and both of which travel close to and parallel to the Corridor for part of their length;
- b) Sewer rising mains from the three Sewage Pumping Stations in operation;
- c) Various water and sewer reticulation mains.

These assets will also need to be taken into account ahead of the redevelopment.

Sydney Water is in discussion with Landcom to ensure Sydney Water's assets are not compromised.

### **Sydney Water Servicing**

Sydney Water will further assess the impact of the development when the proponent applies for a Section 73 Certificate. This assessment will enable Sydney Water to specify any works required as a result of the development and to assess if amplification and/or changes to the system are applicable. The proponent must fund any adjustments needed to Sydney Water infrastructure as a result of any development.

The proponent should engage a Water Servicing Coordinator to get a Section 73 Certificate and manage the servicing aspects of the development. The Water Servicing Coordinator will ensure submitted infrastructure designs are sized and configured according to the Water Supply Code of Australia (Sydney Water Edition WSA 03-2002) and the Sewerage Code of Australia (Sydney Water Edition WSA 02-2002). Details are available from Sydney Water's website at [www.sydneywater.com.au](http://www.sydneywater.com.au).

### **Sydney Water e-planning**

Sydney Water has created a new email address for planning authorities to use to submit statutory or strategic planning documents for review. This email address is [urbangrowth@sydneywater.com.au](mailto:urbangrowth@sydneywater.com.au). The use of this email will help Sydney Water provide advice on planning projects faster, in line with current planning reforms. It will also reduce the amount of printed material being produced. This email should be used for:

- Section 62 consultations under the Environmental Planning and Assessment Act 1979
- consultations where Sydney Water is an adjoining land owner to a proposed development
- consultations and referrals required under any Environmental Planning Instrument
- draft LEPs, SEPPs or other planning controls, such as DCPs
- any proposed development or rezoning that will be impacted by the operation of a Sydney Water Wastewater Treatment Plant
- any proposed planning reforms or other general planning or development inquiries

If you require any further information, please contact David Demer of the Urban Growth Branch on 02 8849 5241 or e-mail [david.demer@sydneywater.com.au](mailto:david.demer@sydneywater.com.au)

Yours sincerely,



Kate Wild

Manager, Urban Growth Strategy and Planning





An accredited Water Servicing Coordinator/Designer will need to ensure that the submitted design is sized and configured according to the Water Supply Code of Australia (Sydney Water Edition WSA 03-2002). Evidence of Code compliance should be attached with the design.

#### Wastewater

The proposed redevelopment area is presently serviced by three separate sewer pumping stations: SPS 402, SPS 403 and SPS 404, and the remaining area by gravity.

Preliminary investigation indicates that the trunk system has adequate capacity to service the proposed redevelopment.

The developer will be required to provide an overall concept-servicing scheme for the ultimate development, at their expense. This will include but not be limited to:

- Scheme plan showing sub-catchments and proposed connection to the existing Sydney Water wastewater system
- Proposed mains to be disused and removed
- Flow schedule and/or wastewater modelling may be required subject to a review of the concept scheme plan.
- The servicing scheme plan will be assessed to define any additional works necessary to service the proposed development i.e. local amplifications or alternate connection points.

An accredited Hydraulic Designer will be engaged by the developer to ensure that the proposed wastewater infrastructure for this development will be sized and configured according to the Sewerage Code of Australia (Sydney Water Edition WSA 02-2002). Evidence of Code compliance should be attached with the design.

#### Asset Protection

The developers have conducted investigations to establish the feasibility of a road to be constructed over three of Sydney Water's watermains. Sydney Water's primary concern is that the three mains in question are major links supplying a series of ten water reservoirs servicing the whole of the Macarthur area. Any lengthy interruption to this supply, either during or after the redevelopment, will have a major impact on the district.



Your Reference:  
Our Reference:  
Contact:  
Telephone:



**SRDAC**

**SYDNEY  
REGIONAL  
DEVELOPMENT  
ADVISORY  
COMMITTEE**

The General Manager  
Campbelltown City Council  
PO Box 57  
CAMPBELLTOWN NSW 2560

JUL14'11 08:00:56 RCVD

Attention: Adam Coburn

**PROPOSED AIRDS BRADBURY RENEWAL PROJECT (1007/2011/DA-MP)**

Dear Sir/Madam,

I refer to Council's correspondence dated 15 June 2011 and traffic models dated 29 June 2011 with regard to the abovementioned development application, which was referred to the Roads and Traffic Authority (RTA) for comment in accordance with Part 3A of the *Environmental Planning and Assessment Act 1979*.

I wish to advise that the Sydney Regional Development Advisory Committee (SRDAC) discussed the proposed development at its meeting held on 29 June 2011 and provides the following comments:

1. The proposal should be referred to the Department of Planning & Infrastructure (DP&I) given the proximity of the two transport corridors in this location, as shown by green colour on the attached plan, that they have a vested interest upon.
2. Council should ensure that the applicant is aware of the potential for future road traffic noise to impact on residential development on the subject site. In this regard, the applicant, not the RTA, is responsible for providing noise attenuation measures in accordance with the Department of Environment, Climate Change and Water Authority's Environmental Criteria for Road Traffic Noise.
3. The proposed development will generate additional pedestrian and cyclist movements in the vicinity of the site. The pedestrian and cyclist facilities should be provided to Council's satisfaction.
4. It is strongly recommended that Department of Transport and the State Transit Authority be consulted to determine if additional bus services can be provided or rerouted to this development to achieve a reasonable mode shift to public transport.
5. It is strongly recommended that the developer provide any sustainable initiatives and measures which will reduce car dependency and the increased use of sustainable modes of travel including the use of buses, bicycles and walking.

Page 1 of 2


Roads and Traffic Authority  
ABN 64 480 155 255

Civic Centre Queen Street Campbelltown PO Box 57 Campbelltown NSW 2560 DX5114  
Telephone 02 4645 4000 Facsimile 02 4645 4111 TTY 02 4645 4615

Email [council@campbelltown.nsw.gov.au](mailto:council@campbelltown.nsw.gov.au) Web [www.campbelltown.nsw.gov.au](http://www.campbelltown.nsw.gov.au)


ABN 31 459 914 087



- 
6. The proposed traffic control devices, local road network within the vicinity of Airds Bradbury Urban renewal area and cycle network in the submitted Transport & Accessibility Study should be referred to Council's Local Traffic Committee Meeting for consideration.
7. All internal roads shall be designed and constructed in accordance with Council's requirements.
8. All works/regulatory signposting associated with the proposed development are to be at no cost to the RTA.

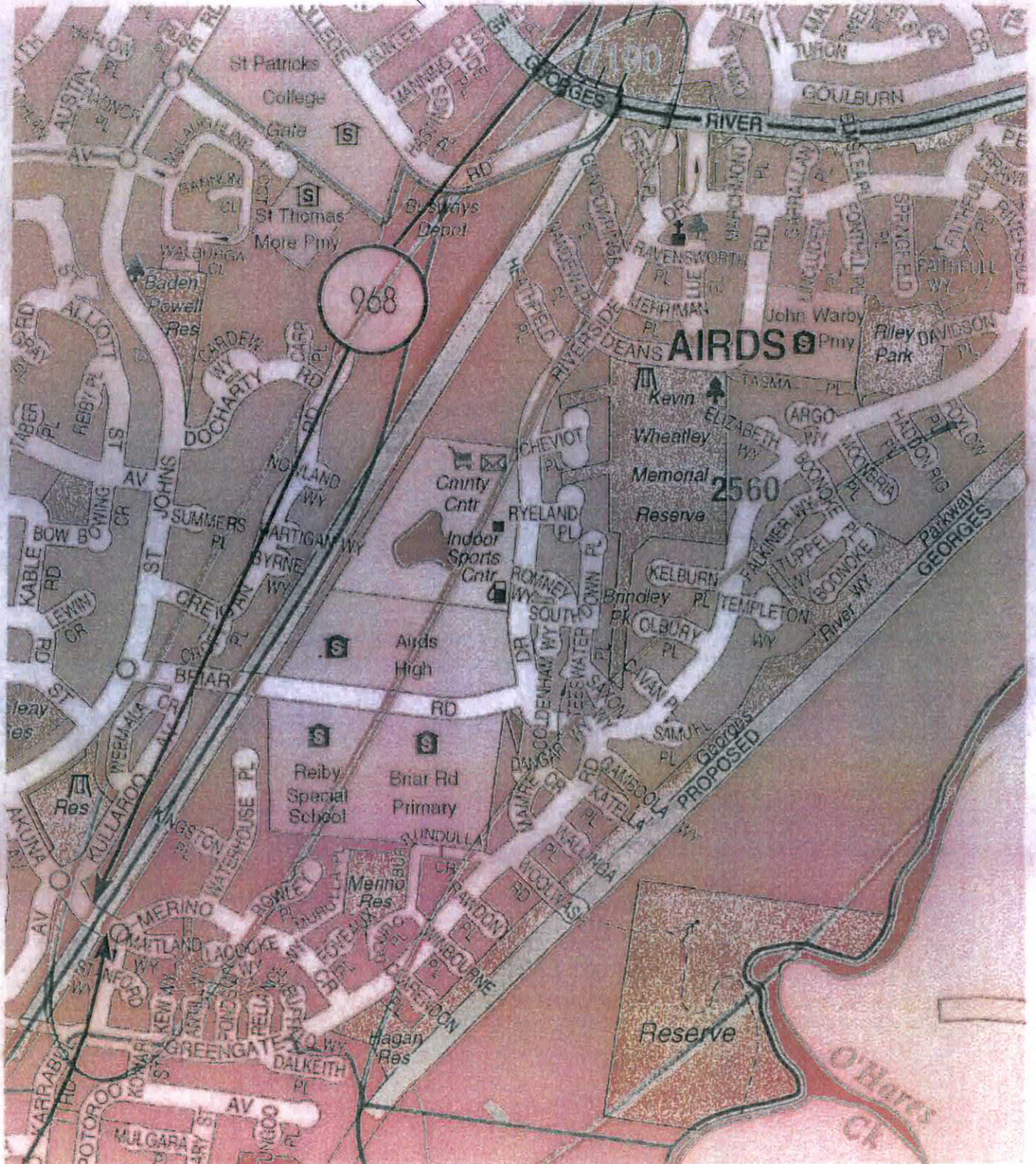
Further enquiries on this matter can be directed to the nominated Land Use & Transport Planner, Stella Qu on phone 8849 2520 or facsimile (02) 8849 2918.

Yours faithfully



Chris Goudanas  
Chairman, Sydney Regional Development Advisory Committee  
12 July 2011





PIMS

Copyright © NSW. For DM only PART IMAGE: lga\_campbelltown.nsw.gov.au DATE: 30-JUN-2011

Civic Centre Queen Street Campbelltown PO Box 57 Campbelltown NSW 2560 DX5114

Telephone 02 4645 4000 Facsimile 02 4645 4111 TTY 02 4645 4615

Email [council@campbelltown.nsw.gov.au](mailto:council@campbelltown.nsw.gov.au) Web [www.campbelltown.nsw.gov.au](http://www.campbelltown.nsw.gov.au)

ABN 31 459 914 087



AUG24/11 08:29:09 ECM

All communications to be addressed to:

Headquarters  
NSW Rural Fire Service  
Locked Mail Bag 17  
GRANVILLE NSW 2142

Headquarters  
NSW Rural Fire Service  
15 Carter Street  
Lidcombe NSW 2141

Telephone: (02) 8741 5555

Facsimile: (02) 8741 5550

e-mail: [development.assessment@rfs.nsw.gov.au](mailto:development.assessment@rfs.nsw.gov.au)



The General Manager  
Campbelltown City Council  
GPO Box 57  
Campbelltown NSW 2560

Your Ref: 1007/2011/DA-MP  
S11/0012  
Our Ref: DA11062078384

Attention: Adam Coburn

17 August 2011

Dear Mr Coburn

**Re: Airds Bradbury Renewal Project (1007/2011/DA-MP)**

I refer to your correspondence dated 10 June 2011 seeking the NSW Rural Fire Service comments regarding bush fire protection for the above development in accordance with section 75H of the *Environmental Planning and Assessment Act 1979*.

Based on the above the NSW Rural Fire Service provides the following advice regarding bush fire protection measures for the proposed development.

1. Asset protection zones in accordance with *Planning for Bush Fire Protection 2006* would be required for new dwellings, schools etc that are impacted by the Campbelltown Bush Fire Prone Land Map.
2. Public roads are to comply with section 4.1.3 of *Planning for Bush Fire Protection 2006*.
3. Water, electricity and gas are to comply with sections 4.1.3 and 4.2.7 of *Planning for Bush Fire Protection 2006*.
4. Construction of future dwellings in accordance with Appendix 3 of *Planning for Bush Fire Protection 2006* and AS3959 – *Construction of Buildings in Bush Fire Prone Areas 2009*.
5. Landscaping and property maintenance within the site is to comply with the principles of Appendix 5 of *Planning for Bush Fire Protection 2006*.



For any enquiries regarding this correspondence please contact Doug Stevens on 8741 5175.

Yours sincerely

*Mark Hawkins*

**Mark Hawkins**  
**A/Team Leader**  
**Development Assessment**

The RFS has made getting additional information easier. For general information on *Planning for Bush Fire Protection 2006*, visit the RFS web page at [www.rfs.nsw.gov.au](http://www.rfs.nsw.gov.au) and search under *Planning for Bush Fire Protection 2006*.





# Transport

AUG02/11 08:17:13 RCUD

Mr Adam Coburn  
Senior Development Assessment Planner  
Campbelltown City Council  
PO Box 57  
CAMPBELLTOWN NSW 2560

Dear Mr Coburn,

**PUBLIC EXHIBITION – AIRDS BRADBURY  
RENEWAL PROJECT (1007/2011/DA-MP)**

I refer to your letter dated 10 June 2011 seeking advice regarding the above Major Project. The Department of Transport (DoT) appreciates the opportunity to provide input to this proposal.

The Department has reviewed the Environmental Assessment Report for the above site, together with the Transport and Accessibility Study. The measures outlined to encourage mode shift to public and active transport in the planning proposal are broadly supported. The following comments are provided for Council's consideration:

- It is necessary that the proposal nominate a public and active transport mode shift target to guide in prioritising measures and ensure consistency with NSW Government policy.
- The proposal needs to establish how the measures outlined in the transport study will be implemented. The final Statement of Commitments should include the implementation of the package of measures identified in the Transport and Accessibility Study.
- There is opportunity for the inclusion of other measures such as a Green Travel Coordinator to facilitate increased public and active transport patronage.
- Bicycle parking should be provided, particularly for multi-dwelling units, as part of the development proposal.
- The proposed changes to the local road network in improving connectivity to adjoining area are supported. However, the proposed indicative bus network appear to maintain the same circuitous network which is portrayed in the transport study as a disincentive to public transport use. The east-west links through the site require improvement. Further discussion with the Department of Transport is recommended to address these issues. The appropriate Departmental contact for this matter is John Broady, Senior Service Planner, Network Development and Service Improvement who may be contacted on 8202 3645 or via email at [john.broaday@transport.nsw.gov.au](mailto:john.broaday@transport.nsw.gov.au).

18 Lee Street Chippendale NSW 2008  
PO Box K659 Haymarket NSW 1240  
T 8202 2200 F 8202 2209 [www.transport.nsw.gov.au](http://www.transport.nsw.gov.au)  
ABN 11 370 995 518



- The noted absence of direct bus services from the site to major employment areas (e.g. Liverpool, Camden and Bankstown) need to consider current insufficient number of people to justify a direct bus service. Also, it maybe faster to connect to trains for travel to Liverpool and Bankstown. The study cites only 5% of journey-to-work trips to Camden.

Should you have any questions regarding this matter, please contact me on (02) 8202 2356 or [james.li@transport.nsw.gov.au](mailto:james.li@transport.nsw.gov.au).

Yours sincerely



27/7/11

James Li  
**A/Principal Manager – Statutory Planning  
Centre for Transport Planning**

CD11/07660





## Office of Environment & Heritage

Our reference: DOC11/28085  
Your reference: 1007/2011/DA-MP  
Contact: Marnie Stewart 9995 6861

Mr Adam Coburn  
Campbelltown City Council  
PO Box 57  
CAMPBELLTOWN NSW 2560

Dear Mr Coburn

I refer to your letter received by the Office of Environment and Heritage (OEH) on 10 June 2011 requesting comments on the Concept Plan for the Airds Bradbury Renewal Project MP 10\_0186 in the Campbelltown local government area.

It is understood that Council on behalf of the Department of Planning and Infrastructure (DoP&I) is undertaking the assessment of the Concept Plan, however the Concept Plan will be determined by the Minister for Planning (or delegate) under Part 3A of the *Environmental Planning and Assessment Act, 1979*. As Council is aware, OEH previously provided comments on the draft Ecological Assessment for the proposal on 29 March 2011, in which a number of concerns were raised with the adequacy of the report. OEH also advised that the report did not address the Director-General's Requirements issued on 10 December 2010.

OEH has reviewed the relevant documentation and provides detailed comments on the proposal in Attachment 1 with regard to the adequacy of the Ecological Assessment, particularly the evaluation of impacts, measures to avoid or mitigate impacts and proposed measures to offset impacts. Matters requiring clarification or further information have been identified including the feasibility of retaining the vegetation along Smiths Creek Corridor. While voluntary, OEH also strongly recommends the use of the BioBanking Assessment Methodology to calculate the biodiversity impacts of the development and its offsetting requirements.

In regard to Aboriginal Cultural heritage, the Assessment of Aboriginal Heritage states that an Aboriginal Heritage Impact Permit (AHIP) will not be required but 'signoff' from OEH on the Aboriginal Heritage Management Plan (AHMP) should be sought. It should be noted that under Part 3A of the *Environmental Planning and Assessment Act, 1979*, 'signoff' from OEH on the AHMP is not required. Furthermore, OEH does not agree to provide a 'signoff' role and should not be prescribed such a role in any condition of approval.

OEH trusts that the attached comments will assist Council assess the Concept Plan and to weigh up the social, economic and environmental components of the proposal.

The Department of Environment, Climate Change and Water is now known as the Office of Environment and Heritage, Department of Premier and Cabinet

PO Box 668 Parramatta NSW 2124  
Level 7, 79 George St Parramatta NSW 2150  
Tel: (02) 9995 5000 Fax: (02) 9995 6900  
ABN 30 841 387 271  
[www.environment.nsw.gov.au](http://www.environment.nsw.gov.au)



OEH is also able to meet to further discuss the proposal. If you have any queries or would like to arrange a meeting, please contact Marnie Stewart, Conservation Planning Officer on 9995 6861.

Yours sincerely

*G Howard 22/7/11*

**GISELLE HOWARD**  
Director Metropolitan  
Environment Protection and Regulation  
Office of Environment and Heritage  
Department of Premier and Cabinet

Encl.



## Attachment 1 - OEH comments on the Airds Bradbury Renewal Project Concept Plan

### Biodiversity

#### 1. Impacts on Critically Endangered / Endangered Ecological Communities

The vegetation of the Cumberland Plain has been substantially cleared and modified and consequently Cumberland Plain Woodland (CPW) is listed as a critically endangered ecological community (CEEC) under the *Threatened Species Conservation Act 1995* (TSC Act) and *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Shale Sandstone Transition Forest (SSTF) is listed as an endangered ecological community (EEC) under the TSC Act and EPBC Act.

In the Airds/Bradbury estate, CPW and SSTF is known to provide habitat for a number of threatened species listed under the TSC Act and EPBC Act including, but not necessarily limited to, Cumberland Plain Land Snail (*Meridolum corneovirens*), Koala (*Phascolarctos cinereus*), Sydney Plains Greenhood (*Pterostylis saxicola*) and a variety of threatened microchiropteran bat species.

##### 1.1 Evaluation of impacts

The Ecological Assessment (EA) (Hayes, January 2011) originally stated that at least 0.58 hectares of CPW and 2.94 hectares of SSTF would be lost through the rejuvenation of the Airds/Bradbury estate. The Concept Plan and Ecological Assessment (April 2011) has now revised the level of impact on EECs and their habitats to include the loss of 1.21 hectares of CPW and 4.41 hectares of SSTF.

It is unclear from the Concept Plan whether any further loss and/or modification of CPW and SSTF is likely through bush fire protection measures, utility provision such as for sewage, electricity, gas or water, off-road pedestrian paths and cycleways, and/or landscaping. To satisfy Step 3 of the draft *Guideline for Threatened Species Assessment* (DEC & DPI, 2005), the EA should clarify whether any further loss and/or modification of CPW and SSTF is likely, and if so, provide detail on the magnitude, extent and significance of any further impacts of the proposal on EECs and their habitats.

##### 1.2 Measures to Avoid or Mitigate Impacts

The Concept Plan now identifies the location of the proposed impact on EECs and their habitats within Airds/Bradbury to include the Smiths Creek Corridor. CPW and SSTF along the Smiths Creek Corridor is identified as 'core habitat' by the *Conservation Significance Assessment of the Native Vegetation of the Cumberland Plain* (DECCW, 2002), meaning that this vegetation remnant forms part of a viable conservation network across the landscape. CPW and SSTF surrounding this 'core habitat' provides a range of support values, including increasing remnant size, buffering from edge effects, and providing corridor connections. In the Smiths Creek Corridor, CPW and SSTF as identified in the *Terrestrial Vertebrate Fauna of the Greater Southern Sydney Region* (DECC, 2007), connects the habitat of four Koala colonies at Wedderburn, Avon – Nepean, south Nattai and Glenbrook around the rim of the Cumberland Plain (known as the 'Cumberland Koala Linkage'). Loss of CPW and SSTF along the Smiths Creek Corridor will result in the loss of ecological functions and habitat resources, including but not necessarily limited to, the loss of mature hollow-bearing trees, removal of feed trees, as well as a depletion in structural and species diversity.

The Cumberland Plain Recovery Plan (DECCW, 2010) identifies further loss and fragmentation of habitat as the principal threat to the biodiversity of the Cumberland Plain. Additional threats, including weed invasion, high frequency fire, recreational impacts, mowing and sedimentation, may be contributed to by the rejuvenation of the Airds/Bradbury public housing estate. The Ecological Assessment (Hayes, 2011) states that the rejuvenation of the Airds/Bradbury could result in a significant impact on CPW and SSTF.



In light of the above, OEH sought clarification on measures to avoid or mitigate impacts associated with the proposal on EECs and their habitats in correspondence dated 29 March 2011. OEH also sought clarification on the feasibility of retaining CPW and SSTF along the Smiths Creek Corridor. To date this information has not been canvassed in the EA.

To satisfy Step 4 of the draft *Guideline for Threatened Species Assessment*, the EA should identify and describe all measures to avoid or mitigate impacts associated with the proposal on EECs and their habitats, including but not necessarily limited to, the feasibility of:

- siting new roads in a previously cleared areas,
- alternate lot arrangements, such as re-adjustments to precinct boundaries, reduced lot yield or higher lot densities,
- wholly containing bush fire protection measures (APZs) within lot boundaries,
- locating utilities such as for sewage, electricity, gas or water in cleared areas or road easements,
- siting off-road pedestrian paths and cycleways in cleared areas or road easements,
- retaining all CPW and SSTF along the Smiths Creek Corridor, and
- managing retained CPW and SSTF to reflect environmental conservation objectives rather than open space and/or recreational objectives.

Once all measures to avoid or mitigate impacts associated with the proposal have been identified and described, the EA should contain justification of the preferred options, including the identification and evaluation of alternatives, where impacts cannot be avoided or mitigated.

### 1.3 Measures to Offset Impacts

Offsetting should only proceed if an appropriate legal mechanism or instrument is used to secure the required actions. In the absence of any mechanism or instrument in the EA to ensure conservation of the offset area in perpetuity, OEH is unable to support the proposal.

#### • *Deficiencies in Proposed Compensatory Measures*

To compensate for the loss of CPW, the Proponent intends to compensate for the loss of CPW through the retention and management of 3 hectares of CPW in the vicinity of the Airds shopping centre and 0.19 hectares of CPW in the vicinity of the juvenile justice centre. While OEH strongly supports the retention of CPW remnants, retention in the absence of legal security and a commitment towards resourcing ongoing bushland management is not sufficient to offset against the loss of CPW.

To compensate for the loss of SSTF, the Proponent intends to revegetate areas within the Airds/Bradbury estate with representative species. While OEH supports revegetation in principle, reconstruction of ecological communities involves high risks and uncertain biodiversity outcomes and is less preferable than other management strategies, such as the retention of existing SSTF remnants. Should SSTF be adequately reproduced following the rejuvenation project, the return of SSTF to its current state, extent and species composition is likely to be a medium to long-term outcome, well beyond the expected life of the project itself. The development of hollow-bearing trees, feed trees, as well as structural and species diversity to support species such as the Koala (*Phascolarctos cinereus*) and threatened microchiropteran fauna species is likely to take even longer to occur. In light of the above, reconstruction of ecological communities is not sufficient to offset against the loss of SSTF.

#### • *Directing Conservation Outcomes towards Priority Conservation Lands*

The Cumberland Plain Recovery Plan (DECCW, 2010) identifies public authorities that are responsible for implementing recovery actions. Public authorities that endorsed the actions in Cumberland Plain Recovery Plan are listed as responsible for their implementation under 'responsibility.'



Action 1.5 of the Cumberland Plain Recovery Plan states 'in circumstances where impacts on the threatened biodiversity listed in Table 1 are unavoidable, as part of any consent, approval or license that is issued, ensure that offset measures are undertaken within the priority conservation lands where practicable.' The Concept Plan identifies the Smiths Creek Corridor as land currently owned by the Department of Planning and Infrastructure. The Department of Planning and Infrastructure is listed as a responsible party for its implementation of Action 1.5. Therefore, any impact to CPW and SSTF along the Smiths Creek Corridor should be offset by measures within the 'priority conservation lands.'

## 2. Recommended Amendments

### 2.1 Biodiversity Offset Package

In order to compensate for the impact of the rejuvenation of the Airds/Bradbury estate, any residual impact must be compensated by the development of a suitable biodiversity offset package. In correspondence dated 29 March 2011, OEH sought information from the Proponent on measures to offset against the loss of biodiversity. To date this information has not been addressed in the EA.

OEH's offsetting principles should be used to guide appropriate offsetting (available at <http://www.environment.nsw.gov.au/biocertification/offsets.htm>). While voluntary, OEH also strongly recommends the use of the offsetting tool in the BioBanking Assessment Methodology (BBAM) to describe, quantify and categorise the biodiversity values and impacts of a proposal and to identify the offsetting required. The BBAM is an assessment tool that allows the impacts of a proposal and its offsetting requirements to be calculated in a consistent and transparent way.

To address the above issue, OEH recommends the following Statement of Commitment or condition of approval:

#### Biodiversity Offset Package

- The Proponent shall develop and submit for the approval of the Director-General, a Biodiversity Offset Package (the Offset) to compensate for the loss of threatened species, populations, endangered ecological communities (EEC) and their habitats. The Offset shall include, but not limited to the following:
  1. The Offset shall be developed in accordance with the *Principles for the Use of Biodiversity Offsets in NSW* (DECCW, 2009).
  2. The Offset shall be developed in consultation with OEH.
  3. The Offset shall be directed towards priority conservation lands identified in the *Cumberland Plain Recovery Plan* (DECCW, 2010).
  4. Identify the offsetting that would be required to meet the 'improve or maintain' standard.
  5. Identify the conservation mechanisms to be used to ensure the long term protection and management of the offset sites.
  6. Include an appropriate Management Plan (such as vegetation or habitat) that has been developed as a key amelioration measure to ensure any proposed compensatory offsets, retained habitat enhancement features within the development footprint and/or impact mitigation measures (including proposed rehabilitation and/or monitoring programs) are appropriately managed and funded.

The three preferred mechanisms for securing biodiversity offsets are:

- The establishment of biobanking sites with biobanking agreements under the *Threatened Species Conservation Act 1995*.
- The retirement of biobanking credits (where appropriate credits are available).
- The dedication of land under the *National Parks and Wildlife Act 1974*, where this option is agreed to by OEH.

### 2.2 Management and Restoration of Retained Bushland



OEH considers that opportunities exist as part of rejuvenation of Airds/Bradbury to implement programs to increase biodiversity values for threatened species, populations and EECs and their habitats. In correspondence dated 29 March 2011, OEH requested that the Proponent detail what measures will be put in place to manage and restore retained CPW and SSTF areas. To date this information has not been addressed in the EA.

To address the above issue, OEH recommends the following Statement of Commitment or condition of approval:

#### Landscape Rehabilitation Management Plan

- The Proponent shall prepare and implement a Landscape Rehabilitation Management Plan (LRMP) for the Airds/Bradbury area, to the satisfaction of the Director-General prior to the commencement of construction. The LRMP shall include, but not limited to the following:
  1. The LRMP shall be prepared in consultation with a fully qualified ecologist prior to the commencement of any construction works.
  2. The LRMP shall be consistent with best practice standards for bushland management and restoration contained in the *Cumberland Plain Recovery Plan* (DECCW, 2010) and *Recovering Bushland on the Cumberland Plain: Best Practice Guidelines for the Management and Restoration of Bushland* (DEC, 2005).
  3. The LRMP shall define the rehabilitation objectives and goals for the area, clearly set out the proposed actions required, monitoring regimes, as well as performance indicators to report on the implementation of rehabilitation.
  4. The LRMP shall include an accompanying work or action plan which includes specific restoration actions, site preparation, rehabilitation techniques to be used, as well as care and maintenance following rehabilitation.
  5. The LRMP shall address the management weed and pest animal species, weed eradication methods, protocols for the use of herbicides, as well as methods to treat and re-use weed infested topsoil.

### Aboriginal Cultural Heritage

#### 1. Consultation Process

OEH is satisfied that the consultation process has been completed in accordance with the Part 3A *Draft Guidelines for Aboriginal Heritage Impact Assessment and Community Consultation 2005*.

#### 2. Archaeological Assessment

In relation to land use impacts pertinent to the subject area, the assessment suggests that the majority of the subject area has been significantly impacted by historical and more recent land use practises. The soils of the subject area have been classified as poor which has precluded intensive agricultural uses which has enabled the preservation of some natural woodland pockets within the subject area, in these areas there is a higher probability of undisturbed archaeological sites. OEH supports this assessment.

This assessment divides the subject area into four separate disturbance levels, extreme, high, moderate and low. The implications of the levels of disturbance relate directly to the potential preservation of Aboriginal archaeological deposits. The low and moderate disturbed zones are likely to retain intact soil horizon which may hold archaeological deposits, depending on soil integrity. OEH agrees with this assessment and classification of disturbance levels.

#### 3. Registered sites

There are two registered sites within the site:

- AHIMS Site # 52-2-2150 Scarred Tree (Airds 01); and



- AHIMS Site # 52-2-2151 Open Artefacts Scatter (Airds 02)

There were 16 registered sites within 1km of the subject area, 3 open artefact scatters, 2 modified trees and 11 potential archaeological deposits (PADS). The assessment concludes that evidence of Aboriginal occupation may exist within the subject area however it is predicted to be scant and consist of low density artefact scatters, with the possibility for individual stone artefact finds to occur. There is also a very low possibility for scarred trees of Aboriginal origin to be present. OEH agrees with the general archaeological assessment of the subject area.

#### 4. Archaeological Site Survey

The Aboriginal site survey and assessment meets current OEH requirements.

#### 5. Significance Assessment

The assessment of significance concludes that there are only three portions of the subject site that may contain significant archaeological deposits and these areas have been given a high scientific significance classification. The majority of the subject area is already highly disturbed and therefore has low to no archaeological significance. OEH supports this assessment of significance.

There are two locations of potential conflict between high sensitivity areas and likely development impacts:

1. an area at the south of the remnant bushland where there are proposed playing fields. This is also the location of AHIMS Site # 52-2-2151 Open Artefact Scatter (Airds 02), and
2. in an area in the northeast of the bushland where there are proposed houses.

These two locations will require further negotiations between Aboriginal community groups and Landcom; and an application of the strategic management approach to landscapes of archaeological sensitivity. OEH supports this assessment.

#### 6. Proposed Conservation

The Concept Plan places the majority of the land that is assigned moderate to high sensitivity within parkland. AHIMS Site # 52-2-2150 Scarred Tree (Airds 01) is located within parkland and thus can be avoided and conserved. AHIMS Site # 52-2-2151 Open Artefact Scatter (Airds 02) is located within an area proposed to accommodate playing fields, and thus conservation options for this site, based on the Concept Plan appear more limited.

#### 7. Proposed Impacts to Heritage Site

The Concept Plan indicates that portions of Zones 1 and 2 (high and moderate sensitivity) will be impacted by playing fields and residential development. The larger majority of Zone 1 will be preserved within parklands. Impact to AHIMS Site # 52-2-2151 Open Artefact Scatter (Airds 02) from placement of the proposed playing fields will occur unless the playing fields could be moved from their current location.

Landcom have indicated that it could move the playing fields from their proposed location. The following options were discussed as options to reduce impacts to Aboriginal sites arising from the Concept Plan:

- Changes could be made to the current design placement of playing fields away from zones of archaeological density including AHIMS Site # 52-2-2151 Open Artefact Scatter (Airds 02). This would be OEH's preferred conservation option,
- Protection by introducing soil and turf. This measure would need to be carefully managed as to avoid impacts to the existing upper surfaces of the known Aboriginal site. OEH does not support this option as "burial" is still considered to be "harming" of an Aboriginal site and therefore not a reductive measure, and



- Archaeological salvage of surface sites and sensitive areas is proposed as a mitigation measure against the loss of the site because of development impacts. It is argued that this would provide a representative sample of archaeological evidence of the area. OEH would see this as a last resort mitigation measure.

## 8. Potential Effects from Proposed Impacts

Portions of Zones 1 and 2 with moderate and high archaeological sensitivity will be affected by various aspects of the proposed Concept Plan. The consultant argues that if it is not possible to avoid impacts on these zones including AHIMS Site # 52-2-2151 Open Artefacts Scatter (Airds 02), a salvage operation over Zones 1 and 2 would be preferable. OEH supports the option of salvage as a last resort.

## 9. Cumulative Impact to Aboriginal Sites

The original housing development at Airds has resulted in the removal of the majority of evidence relating to Aboriginal occupation of the area, outside of open areas. As such, open areas within the subject area are the only likely sites that will contain residual evidence of Aboriginal occupation. The cumulative impact on Aboriginal heritage within the region is considerable. The consultant argues that when considering the wider level of regional impact to Aboriginal sites, the relative absence of evidence of Aboriginal occupation in Airds, the small area of high archaeological sensitivity remaining within the subject area (4.98 hectares) that a case can be made for the conservation of Zone 1 and the two registered sites (AHIMS Site # 52-2-2150 Scarred Tree (Airds 01) & AHIMS Site # 52-2-2151 Open Artefact Scatter (Airds 02) during their redevelopment of the Airds Bradbury area. OEH supports this assessment.

## 10. Management principles

The consultant also argues that the following management principles should be applied for sites and landscapes with Aboriginal heritage values within the subject area. These principles are predicated on the assessment of archaeological sensitivity based on previous levels of land use disturbance:

- Sites/landscapes with high archaeological sensitivity or Aboriginal significance should be identified as worthy of conservation and development impacts should be avoided.
- Sites and/or landscape with moderate archaeological sensitivity or Aboriginal significance would be avoided if possible by development proposals. If impacts are unavoidable, further investigation to ensure that information is retrieved prior to their destruction. A selection of 'salvage areas' should be made on a 'whole of development' approach and be landscape based.
- Sites and/or landscapes of low or no archaeological sensitivity or Aboriginal significance do not require planning consideration or further archaeological investigation in relation to the proposed development.
- The majority of the subject area has high levels of previous subsurface disturbance and has been assessed as being either Zone 3 or Zone 4. These zonings do not require further archaeological consideration.

OEH supports the proposed management principles.

## 11. Strategy – Avoidance / Conservation

An Indigenous heritage conservation strategy should be applied to the Airds Bradbury Renewal Project based on the results of this assessment, OEH supports this strategy. This strategy should identify a meaningful conservation outcome, incorporating a representative number of landscapes with high archaeological potential and lands identified as having cultural significance. There would be considerable overlap with ecological considerations, and a Conservation Zone based on lands with these combined values should be identified. OEH supports this proposal.



All lands which fall outside such as Conservation Zone should be considered developable lands. OEH supports this assessment in principle but would need formal classification of specific sensitivity mapping prior to providing support.

## **12. Strategy – Future Heritage Management**

Once a Conservation Zone has been identified, an Aboriginal Heritage Management Plan (AHMP) will be required to ensure ongoing survival of Aboriginal cultural and archaeological values. OEH supports the development of an AHMP.

## **13. Strategy – Community Consultation**

All further work requires community consultation with all registered Aboriginal stakeholders. OEH requires this to occur.

## **14. Strategy – Archaeological Excavation**

There is one identified archaeological surface site AHIMS Site # 52-2-2151 Open Artefact Scatter (Airds 02). Ideally this site should be conserved, if this is not possible, the consultant recommends that archaeological subsurface testing and salvage occur. OEH supports this outcome if conservation can not be achieved.

There will also be a range of impacts on lands with moderately archaeological sensitivity. A sample of these should be selected for subsurface investigation (testing with possible salvage) as mitigation against their destruction if they cannot be conserved. OEH supports this outcome if conservation can not be achieved.

Lands within the subject area with a low and no archaeological potential (Zones 3 and 4) should be considered developable without archaeological constraint. OEH supports this assessment in principle.

All Aboriginal heritage sites should be managed on the basis of their individual and collective assessed significance and/or potential in accordance with an AHMP. OEH supports this strategy.

The assessment concludes by stating that once a Conservation Zone has been agreed upon, development impacts finalised and location chosen for archaeological salvage, an Aboriginal Heritage Impact Permit (AHIP) will not be required from OEH but 'signoff' from OEH on the AHMP should be sought. It should be noted that under Part 3A of the *Environmental Planning and Assessment Act, 1979*, 'signoff' from OEH on the AHMP is not required. Furthermore, OEH does not agree to provide a 'signoff' role and should not be prescribed such a role in any condition of approval.



18 July 2011

The General Manager  
Campbelltown City Council  
PO Box 57  
Campbelltown NSW 2560

Attention: Mr Adam Coburn, Senior Assessment Planner

Dear Mr Coburn

**AIRDS BRADBURY RENEWAL PROJECT (YOUR REFERENCE 1007/2011/DA-MP)**

I refer to your letter dated 10 June 2011 concerning the above.

Endeavour Energy has reviewed the Airds Bradbury Renewal Plans and submits the following comments:

**Kentlyn Zone Substation**

Endeavour Energy's Kentlyn Zone Substation is located within the Airds Bradbury renewal area. Noise control measures are required if the development is to be located adjacent to the zone substation. This issue is being discussed with the developer.

**Transmission Mains**

There are 66kV overhead lines 861 and 867 located in the existing easement that is within the proposed development and twenty four hour access is required to these lines for maintenance purposes. The 66kV lines can be undergrounded through the renewal area at the developer's cost if required.

**Distribution Substations**

Distribution substations are used to supply the low voltage network in residential subdivisions. The substations are generally located within an easement on individual lots. There are restriction zones for fire rating and earthing applying around the substation, please refer to the attached drawing showing the restrictions zones and a typical easement drawing. The house set/back on the lots with distribution stations needs to be large enough to take into account the required easement and restriction zones.



**Electricity Supply to the Development Area**

There are existing 11kV underground feeder cables emanating from Kentlyn Zone Substation along with easements located within the renewal area. Where 11kV cables require relocating as part of the development they must remain as through feeders, as they supply load outside of the renewal area. Buildings cannot be constructed over any of Endeavours Energy's infrastructure.

The renewal area can be supplied by installing additional mains and extending the existing electrical network. Easements may be required as part of these works. The electrical reticulation to this development will be in accordance with Endeavour Energy's codes and policies applying at the time of application for each subdivision.

If you require any further information please contact Charles Howat on telephone 9853 6573 or Kevin Potter on 9853 6581.

Yours faithfully



Michael Tamp  
**Acting Manager Strategic Asset Management  
Network Development**

In reply please quote file no.: 2011/00095/001



### 5.9 Segregation requirements from other structures

Full details of segregation requirements are detailed in MCI 0006.

There are a number of restrictions to construction near substations. Figure 5.9 A shows the overall view with the following sections detailing individual requirements.

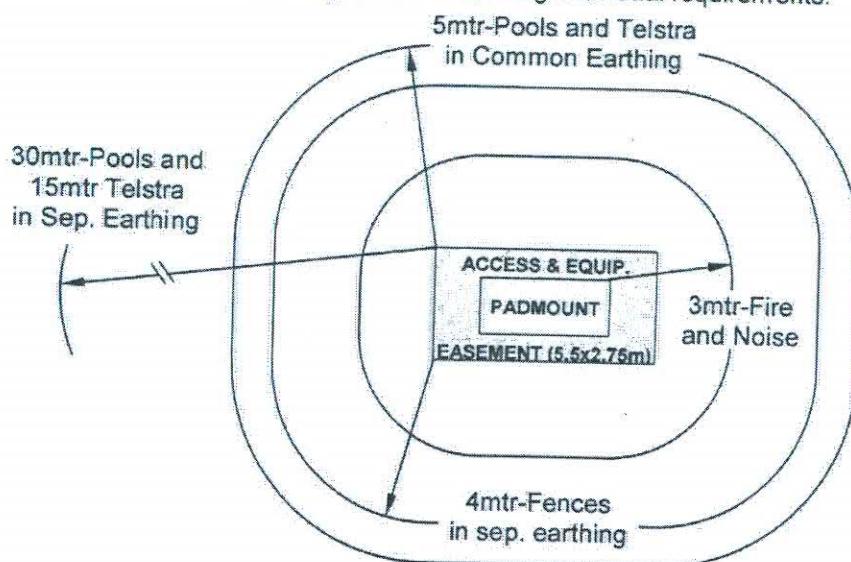


Figure 5.9 A – All restrictions

#### 5.9.1 Fire

Padmount substations are not fire rated; therefore, a fire risk zone is present around the substation and should be considered during design. Separation may be by means of adequate clearances or building components having minimum fire resistance level (FRL) as set out in figure 5.9 B.

Fire ratings shall be achieved by static means (that is, walls or distance) rather than active system (that is, deluge showers and the like).

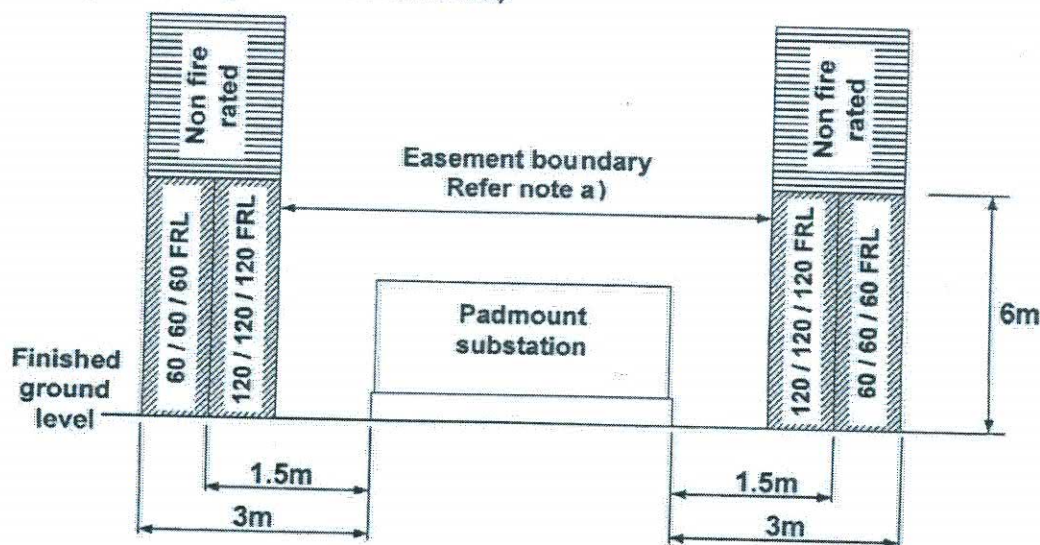


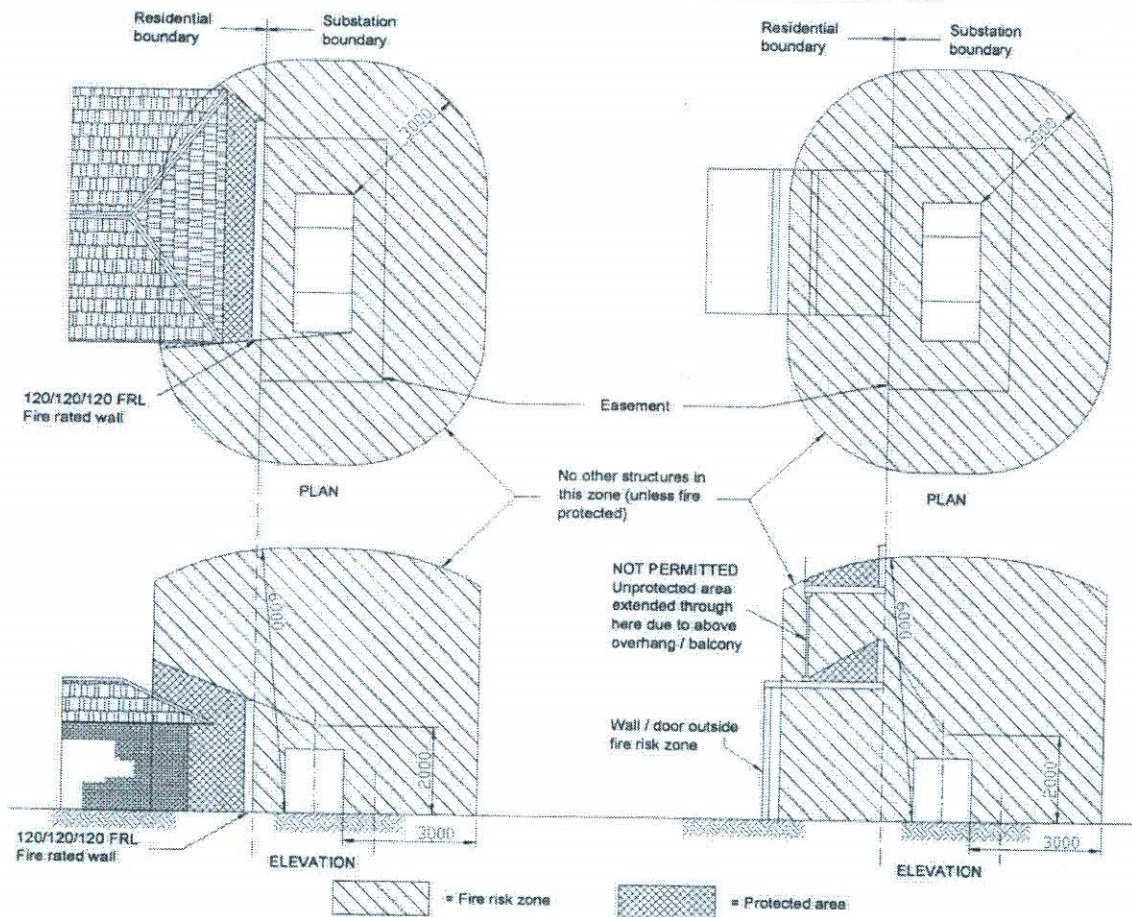
Figure 5.9 B - Minimum FRL clearances for components



**Notes:**

- a) When a padmount substation is located under the overhang of a building (which is generally not allowed), the substation may be considered to be within the building and the elements of the building above and adjacent to the substation must have an FRL of 120/120/120. In these circumstances, a ruling must be obtained from the relevant government body.
- b) Personnel access doors and fire exit doors to a building are **not** permitted within three (3) metres of the padmount plinth.

Where minimum clearances cannot be achieved, non FRL openings, for example, windows, may be permitted within the fire rated area of Figure 5.9 B provided that suitable screening walls are installed to create sheltered areas. Such openings shall be within these sheltered areas as shown in Figure 5.9 C. Screen walls shall have a 120/120/120 FRL.



**Figure 5.9 C – Typical effect of screen walls**

**Note:** Screen walls shall be located outside the easement and no structure should overhang the easement. No structure should overhang a protected area that could trap smoke or fire and cause it to enter any openings in the structure.



### 5.9.2 Noise

Padmount substation sites shall comply with a nominal 3m noise separation between the substation and any building/living area. This 3m will usually satisfy acceptable noise levels in residential premises. Where a suitable fire/baffle wall is erected (by that customer without cost to Integral Energy) the noise restriction may be reduced accordingly if approved by Integral Energy.

Integral Energy does not accept any responsibility for work that may be necessary in order to comply with a noise control order in respect of a substation on a customer's property. For a substation required to supply an individual customer, this may involve measures such as the erection of a baffle wall and all such work is required to be carried out by that customer without cost to Integral Energy.

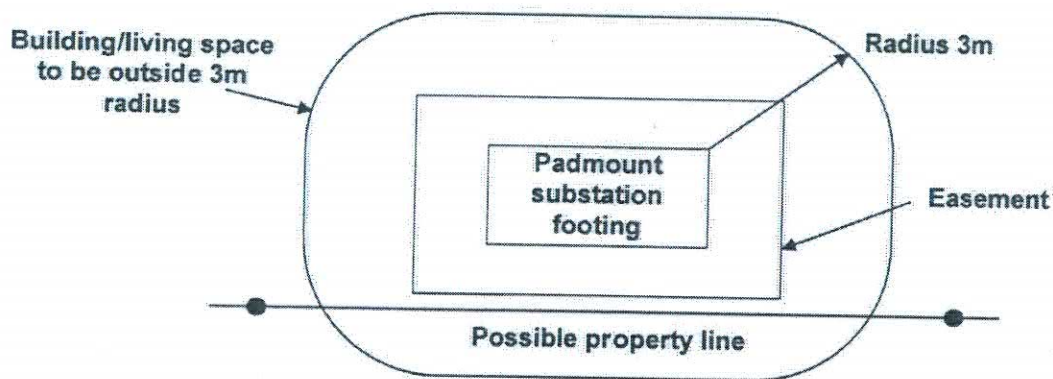


Figure 5.9 D – Minimum clearance to building/living areas

### 5.9.3 Earthing

All earthing shall be carried out in accordance with SDI 100, which is included in MCI 0006.

An accredited designer should complete the design of the earthing system.

#### 5.9.3.1 Pools and spas

Pools and spas should not be located near substations, if possible. Typically, separations of 5m in common earthed areas and 30m in separately earthed areas are required.

#### 5.9.3.2 Telecommunications equipment

Telecommunications equipment should not be located near substations. Typically, separations of 5m in common earthed areas and 15m in separately earthed areas are required.

#### 5.9.3.3 Metallic objects including fencing and metal clad buildings

- If the padmount substation has common earthing (as set out in the earthing section), no restrictions beyond those required for easement and fire rating need be placed on its siting in respect of metal clad buildings and metallic fences.
- Where a substation has separate earthing (as set out in the earthing section), any metal clad building or metal fence shall not be located within four (4) metres of the padmount footing and earth grid.



- c) If a metal object/s, including pipes, buildings or fences, passes through the area, they shall be constructed so that the objects/posts insulate the adjacent panels from each other and from the ground (refer Figure 7.3.1E and Drawing no. 016665 located in MCI0006). A suggested method of isolating a metallic fence is shown on Drawing no. 061674 located, in MCI0006.

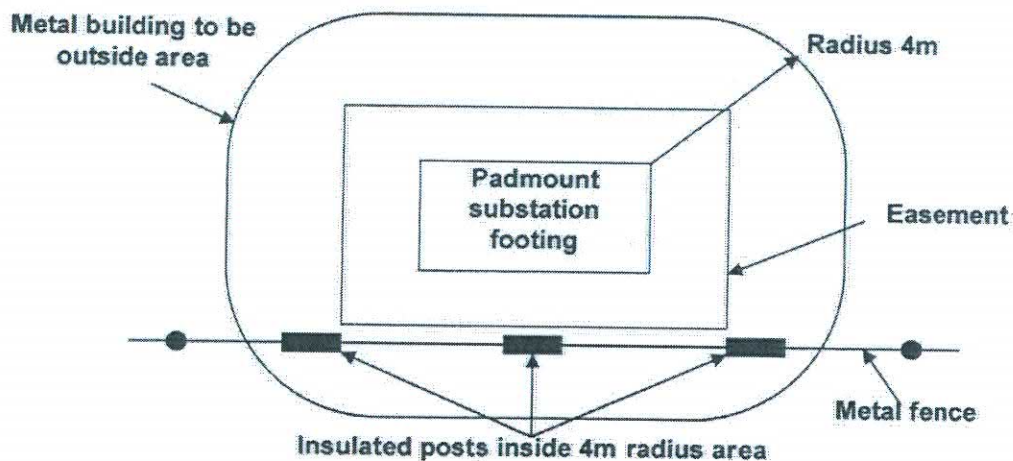


Figure 7.3.1E – Metal fence or metal clad building exclusion area

## 5.10 Substation site

### 5.10.1 Site contours and retaining walls

The easement represents the minimum working area required for normal operation of the substation, and the following requirements must be adhered to:

- The substation site shall be flat and level **over the entire easement area**.
- Where it is necessary to carry out excavations to provide a level site, the batter adjacent to the easement site shall be no steeper than one (1) in three (3).
- The maximum step to be allowed without a retaining wall is 300mm.
- Retaining walls are to be used only when absolutely necessary. The retaining wall may be up to 700mm in height (a max of 1000mm with special approval), constructed from concrete or brick, but not treated pine. Where required, the retaining wall shall be constructed outside the standard easement and at the ASP's cost. It is the responsibility of the ASP to liaise with Integral Energy for the location of the easement. The retaining wall must comply with the relevant building codes and local government requirements.
- Where necessary, the substation easement location and size shall be altered and increased as shown to ensure that the retaining wall (or vehicle impact protection device, such as bollards) is wholly within the one property boundary and the easement includes the retaining wall (or vehicle impact protection device). If this condition cannot be met, an alternative may be considered on application.



**AMENDMENTS**

**A** ORIGINAL ISSUE  
J.R. NO. 900019  
D.R.N. R. J. D.  
C.H.O. D. J. Z.  
DATE 14-6-90  
J.R. NO. 900019

**G** REDESIGNED & REDRAWN, 22kV PLINTH DIMS ADDED.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.  
DATE 23-7-91  
J.R. NO. 910121

**H** ISSUE WAS 1-5-90, PAGE NO. WAS 13.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.  
DATE 21-8-92  
J.R. NO. 920101

**J** LV WAS HV, REF. DRG 061674 ADDED, NOTES 2 & 4 AMENDED.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.  
DATE 18-9-92  
J.R. NO. 920101

**K** 1 OF 2 SHEETS WAS 1 OF 1 SHEETS, REFERENCE DRG PAGE NO. 5 REMOVED.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.  
DATE 15-7-93  
J.R. NO. 9300027

**L** UPO DETAIL NOTATED, 1111E AMENDED, NOTE 1 AMENDED, NOTE 5 ADDED.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.  
DATE 20-10-93  
J.R. NO. 930206

**M** SDI 117 WAS TYP, BUILDING SETBACK EXCEEDS 7.5m ADDED TO DRG & UPO.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.  
DATE 25-8-95  
J.R. NO. 950159

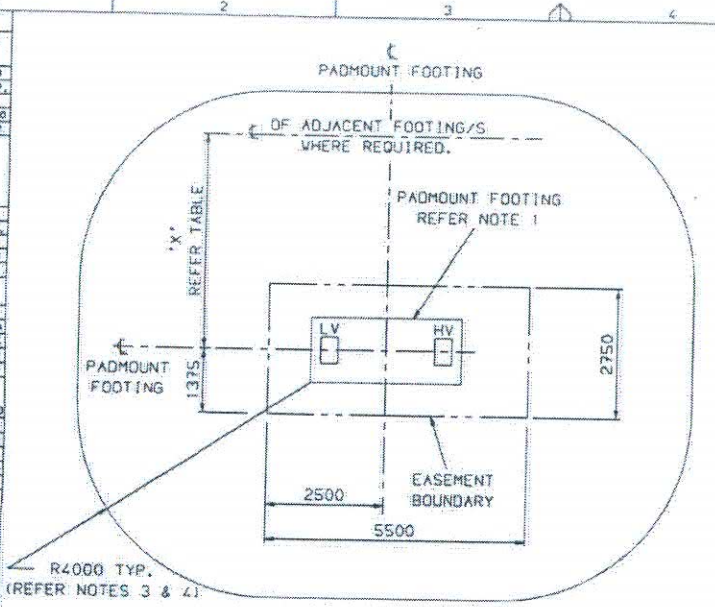
**N** NOTE 2 REVISED, NORMAL INSTALLATION HEIGHT CLEARANCE WAS 3000mm, FOOTING REF DRGS DELETED.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.  
DATE 05-2-96  
J.R. NO. 960001

**P** NOTE 1 REVISED, ISSUE 10 SDI 104, 114 & 117 DELETED, NOTES 2, 3 & 4 SDI 104 WAS SDI 105.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.  
DATE 04-7-96  
J.R. NO. 960001

**O** DIM 5500 WAS 5000 (C3), DRG10 NOTE 5 DELETED, NOTE 10A REVISED ACCORDINGLY.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.  
DATE 20-10-96  
J.R. NO. 9611100

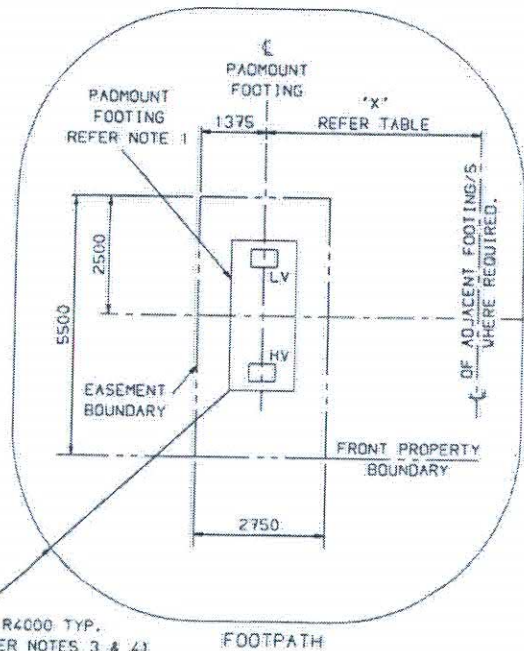
**R** EASEMENT AREA FINISH, NOTE DELETED, CLAUSES REMOVED FROM NOTES 2, 3 & 4, NOTE 5 ADDED.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.  
DATE 18-6-99  
J.R. NO. 9901160

**S** FINV PADMOUNT FTG WAS 2390 x 1230.  
S.D.E. J. K.  
D.R.N. D. J. Z.  
C.H.O. D. J. Z.



**COMMERCIAL, HIGH DENSITY & INDUSTRIAL DEVELOPMENT**

- ARRANGEMENT CAN BE FOR FOOTPATH ON EITHER LV OR HV SIDE OF PADMOUNT.



**MULTIPLE PADMOUNTS WITHIN THE SAME EASEMENT**

NO. OF PADMOUNTS	DIMENSION 'X' OF FOOTINGS.	EASEMENT WIDTH
2	1 x 2250	5000
3	2 x 2250	7250
4	3 x 2250	9500

- ALL OTHER DIMENSIONS REMAIN THE SAME.

**UNDERGROUND RESIDENTIAL DEVELOPMENT WHERE BUILDING SETBACK EXCEEDS 7.5 METRES & UNDERGROUND INDUSTRIAL DEVELOPMENT**

- SUBSTATION TO BE POSITIONED WHEREVER POSSIBLE ON LOW SIDE OF STREET. IF SUBSTATION MUST BE POSITIONED ON HIGH SIDE, DIM 5500 MUST BE INCREASED TO 6500 TO CLEAR WATER BOARD SEWERS.
- SUBSTATION TO BE POSITIONED PREFERABLY WITH HV TO FOOTPATH SIDE (AS SHOWN).

This drawing and the copyright therein is the property of Integral Energy and may not be copied, reproduced, distributed, loaned or used without the written consent of Integral Energy.		DO NOT SCALE DIMENSIONS IN MILLIMETRES		FENCE ISOLATED PANEL INST DET 061674	
SCALE 1:75 DRAWN R. J. D. DATE 23-7-91 CH'D D. J. Z.		APPROVED C. Howat		D.B. Britten/CH ASSIST. G.N. ENG. 23-7-91	
INTEGRAL ENERGY				SUB 016665 S	
11kV & 22kV PADMOUNT SUBSTATION EASEMENT LAYOUT				SHEET No 1 OF 2 SHEETS INDEX REF 5001E	
ORIGINAL				THIS ISSUE PAGE NO	
DATE 23-7-91				IDENTIFICATION	
CH'D D. J. Z.				THIS ISSUE	
1				PAGE NO.	









## Juvenile Justice

Attorney General & Justice

Doc Ref: D11/04338  
File Ref: D11/02592

14 July 2011

Mr Adam Coburn  
Senior Development Assessment Planner  
Campbelltown City Council  
PO Box 57  
Campbelltown NSW 2560

Drear Mr Coburn,

### **RE Airds Bradbury Renewal Project (1007/2011/DA-MP)**

I refer to your letter dated 17 June 2011 regarding the application by Housing NSW for the Airds Bradbury Renewal Project.

Juvenile Justice operates Reiby Juvenile Justice Centre within the boundary of the Renewal Project. The centre is located at 20 Briar Road, Airds, and accommodates young offenders from the age of 12 to 21 years.

Juvenile Justice is concerned with the impact of the heights and types of development proposed directly adjacent to the centre. Juvenile Justice is concerned about the impact on the centre's safe and secure operation within an encroaching residential area. Juvenile Justice notes that the Master Plan identifies an increase in density of residences to the western boundary and the development of new residences on the southern boundary.

The National Guidelines for Juvenile Justice Centres identifies that a clear perimeter of 30 metres should be established around a juvenile justice centre as part of the secure perimeter. The Airds Bradbury Renewal Project compromises the security perimeter of Reiby Juvenile Justice Centre by developing domestic residences within this perimeter.

Juvenile Justice requests that Council consider the following conditions of approval of the Airds Bradbury Renewal Project so that the safe and secure operation of the Reiby Juvenile Justice Centre is maintained within the encroaching urban environment:

- o Perimeter Security Fence to Reiby Juvenile Justice Centre is upgraded by Housing NSW including roll-top fencing, metal clad privacy screening and

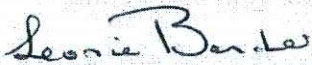


concrete strip footing to Juvenile Justice design specifications along the southern and western perimeter boundaries and associated turn-backs.

- Vehicle Access is maintained throughout and following the Airds redevelopment for deliveries and emergency access response to Reiby Juvenile Justice Centre from Burrundulla Crescent.
- New development adjoining Reiby Juvenile Justice Centre is preferred as open parkland to 30 metres from the boundary. An 8-metre lane is established between the centre boundary and the redevelopment of existing residences.
- All adjacent residential development to the Centre is restricted to single storey low density with full privacy screening.

Further, Juvenile Justice notes that the Airds Bradbury Renewal Project identifies the potential development of part of Juvenile Justice's property for approximately 11 residences facing Burrundulla Crescent, Airds. Juvenile Justice supports this development with the same conditions of approval as noted above. Juvenile Justice advises Council that it will be entering into discussions with Housing NSW in regards to a land-swap of equivalent area in Merino Park (Lot 8080 DP1063276) to secure a clear southern boundary to Reiby Juvenile Justice Centre.

Sincerely



Leonie Bender 18/11/11  
A/Chief Executive

cc. Housing NSW





**Health**

Health Reform Transitional  
Organisation Western

Our Ref: WCSCD11/787

Campbelltown City Council  
PO Box 57  
CAMPBELLTOWN 2560

JUL15/11 08:04:31 RQVD

Attention: Adam Coburn

**Re: Airds/Bradbury Urban Renewal Project Concept Plan  
Application Number 1007/2011/DA-MP**

Dear Mr Coburn

Population Health, Health Reform Transition Organisation Western aims to protect and promote the health of the local population and recognises that many local and global factors affect health and illness. One of our strategic directions 2007-2012 is to develop our capacity to influence healthy urban design and to work with planning agencies to develop healthy urban environments. Together with NSW Health we have developed the NSW Healthy Urban Development Checklist as a guide for health services when commenting on development policies, plans and proposals. A copy of the Checklist can be found at:

[http://www.health.nsw.gov.au/pubs/2010/hud\\_checklist.html](http://www.health.nsw.gov.au/pubs/2010/hud_checklist.html)

Population Health has worked closely with Housing NSW and Landcom on some aspects of the development of the Airds/Bradbury Urban Renewal Project Concept Plan and we are pleased to submit the following comments.

Overall the Airds/Bradbury Urban Renewal Project Concept Plan is a comprehensive document with a strong emphasis on the key issues which are known to impact on the health of the community: healthy food, physical activity, housing, transport and physical connectivity, quality employment, community safety and security, public open space, social infrastructure, social cohesion and social connectivity, and the environment.

In particular, positive aspects of the plan are:

- The focus on addressing equity issues such as access to services and social infrastructure
- Actions to address physical connectivity with surrounding suburbs by developing new road links and transport corridors
- The emphasis on community and service provider participation in planning and development including the *Design OUTLOUD!* community consultations
- The emphasis on housing diversity and affordability and actions to address the concentration of disadvantage in the Airds / Bradbury area
- The emphasis on quality open space such as the renewal of the Pond and surrounding areas
- The development of an Integrated Sustainable Social and Health Impact Assessment.

**Head Office**  
Liverpool Hospital (Eastern Campus)  
Elizabeth Street  
Liverpool NSW 2170  
ABN 47 572 552 025

**Mailing Address**  
Locked Bag 7002 Liverpool NSW 1871  
TEL 61 2 9828 5701  
Fax 61 2 9828 6987



Population Health would welcome the opportunity to continue to work in partnership with Housing NSW and Landcom in the implementation of the Airds/Bradbury Urban Renewal Concept Plan. Please contact Peter Sainsbury, Associate Director of Population Health by phone on 9612 0706 or by email [sainsburyp@email.cs.nsw.gov.au](mailto:sainsburyp@email.cs.nsw.gov.au) if you would like to discuss this further or any of the comments provided in this advice.

Yours sincerely



Mike Wallace

**Chief Operating Officer**

**Health Reform Transition Organisation Western**

Date 12/7/11