



RESPONSE TO SUBMISSIONS AND PREFERRED PROJECT REPORT

Prepared for NSW Land and Housing Corporation | Landcom | Campbelltown City Council
By BBC Consulting Planners | October 2011

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1. INTRODUCTION

This Response to Submissions and Preferred Project Report relates to the Concept Plan by Landcom and NSW Land and Housing Corporation (formerly Housing NSW) for the Airds Bradbury Renewal Project (MP10_186). The Airds Bradbury Renewal Project seeks to improve the quality of the social and urban environment by creating conditions conducive to the establishment of a sustainable place to live.

The Environmental Assessment report relating to the above project was exhibited from 15 June 2011 to 15 August 2011.

The Proponent (NSW Land and Housing Corporation) has considered the issues raised in the submissions made during the exhibition period and has implemented various actions in relation thereto. This included some minor changes to the Concept Plan which are described in Section 4. This includes a summary of the requests for Minister's determinations.

A revised Statement of Commitments is contained in Section 6.

1.1 Summary of Submissions

During and after that period 35 submissions were received by Campbelltown Council. 27 of these submissions were from the public and 8 from public authorities. These submissions are summarised in Section 2.

Additional comments were received from Council. These are also addressed in the table to Section 2 and in Section 3.

Three of the 8 submissions from public authorities (Rural Fire Service, Sydney Water and NSW Office of Water) were submitted after the exhibition period had closed.

The submissions from public authorities made comments relevant to areas of their responsibility.

Of the 27 submissions from members of the public, 20 raised objections to the development in part or in whole and 7 submissions did not object outright but nonetheless raised concerns or some issues for further consideration.

2. CONSIDERATION OF SUBMISSIONS

The following table presents a summary of the issues raised in the submissions made during and after the exhibition period. A total of 35 submissions were received by Campbelltown City Council. Of these:-

- 27 were from private individuals;
- 8 were from State and local government agencies;

The table provides the proponent's response to the submissions.

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
Public Submissions				
1	Public Submission – Brian and Marie Holmes	<ul style="list-style-type: none"> Concerned about loss of open space 	Refer to Section 3.2.	
		<ul style="list-style-type: none"> Concern about loss of parks 	Refer to Section 3.2.	
		<ul style="list-style-type: none"> Destruction of remnant Cumberland Plain Woodlands; 	Refer to response to OEH in this table.	
		<ul style="list-style-type: none"> Lack of cycle tracks 	Cycle and pedestrian access is greatly enhanced by this proposal both on streets and within the open space system.	
		<ul style="list-style-type: none"> How will existing high voltage powerlines be treated; and 	It is intended that these will be placed underground.	
		<ul style="list-style-type: none"> Needs to be more aged housing as part of proposal. 	There are currently a total of 90 seniors housing units within the project area, 52 of these built within the last year. A minimum of a further 15 will be constructed as part of the project. An analysis of the configuration of the intended new social housing dwellings to be provided is being undertaken based on the social housing demand in the area. It is likely that there will be additional seniors housing built as part of this component. A location for a seniors housing development is shown on the revised Concept Plan contained in Appendix 8. General housing will be designed to	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
			<p>seniors housing standard over the site.</p> <p>Furthermore, more than 200 new social seniors housing units have been built recently or are planned in surrounding housing estates in the Campbelltown LGA.</p> <p>Seniors housing is permissible with consent generally on land zoned for an urban purpose. Additional housing can be provided as demand warrants and subject to the funding process by NSW Land and Housing Corporation or any other housing provider.</p>	
2	Public Submission	<p>Opposed to Stage 9 of proposal, the removal of Baden Powell Reserve from public open space to building blocks for following reasons:-</p> <ul style="list-style-type: none"> • Reduction of open space, Should be retained and enhanced; • Increase in vehicular traffic in and around Melaleuca Grove estate; • Two additional and potentially dangerous junctions leading into St Johns Road (between the roundabout at the entrance to McLaughlin Circuit and the T- 	Refer to Section 3.2.	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>intersection with Docherty Road).</p> <ul style="list-style-type: none"> • Recommends BP Reserve be retained. 		
3	Public Submission – John and Bev King	<ul style="list-style-type: none"> • Oppose introduction of new road connecting Campbellfield Avenue with Airds Town Centre for following reasons:- <ul style="list-style-type: none"> ○ reintroduce problems of anti-social behaviour as the street will be a thoroughfare between two pubs; ○ new street will be a speedway for cars. ○ Opening Karingal Place will increase traffic and result in accidents; ○ Demolition of houses of long term residents; ○ Another roundabout on St Johns Road in close proximity to existing roundabouts is not required; ○ Creigan Road and Docharty Road could be used to provide access to Bradbury and houses would not be 	<p>Refer to Section 3.1.</p> <p>Individual tenant needs will be assessed prior to moving and a dwelling suitable to those needs will be offered to each tenant. A Strategic Social Plan is being formulated to respond to the issues identified in the Integrated Social Sustainability and Health Impact Assessment (Appendix 11 of EA). As part of this a person based approach is being proposed to ensure that the needs of individuals affected by the proposed development is taken into consideration.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>required to be removed.</p> <ul style="list-style-type: none"> Would like to see shopping centre upgraded and new walking paths, seating and public toilets. 	Refer to Section 4.11	
4A & 4B	Public Submission – 26A Karingal Place	Opposed to continuation of Campbellfield Avenue at the front of house which will result in increase in noise and decrease in value of property.	Refer to Section 3.1.	
5	Public Submission	Oppose new road connecting Campbellfield Avenue with Airds Town Centre. There are already 3 other roads that provide access from Bradbury (Creigan, Docharty and Briar Roads).	Refer to Section 3.1.	
6	Public Submission	<ul style="list-style-type: none"> Opposed to extension of Campbellfield Avenue into housing estate. Or if extension is to take place make Bow Bowing Crescent a cul-de-sac to stop this as a shortcut to Bradbury shops and facilities. Bow Bowing Crescent already has quite a lot of traffic; Bow Bowing reserve should be 	<p>Refer to Section 3.1.</p> <p>This reserve is outside the concept plan area.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>provided with pathways and lighting;</p> <ul style="list-style-type: none"> Existing facilities such as 884 Busways bus should be upgraded. A name change for the suburb should be considered to elevate existing stigma. 	<p>Council is responsible for pathways and lighting.</p> <p>Provision is made in the concept plan for improved bus services throughout the site.</p> <p>This is a matter for Council and the community to consider and is outside the scope of the concept plan application.</p>	
7	Public Submission	Plans could be further developed to take advantage of Georges River Reserve with cycleways, parks, etc.	Concept plan provides improved connectivity to this reserve via the proposed street system.	
8	Public Submission	<ul style="list-style-type: none"> Opposed to loss of Baden Powell Reserve for following reasons:- <ul style="list-style-type: none"> Building on reserve will remove trees; Increase noise for Melaleuca Grove residents and those of St Johns Road; Increase traffic on St Johns Road; Bring estate closer to Melaleuca Grove which will increase crime problem 	Refer to Section 3.2.	
9	Public	<ul style="list-style-type: none"> Supports broad principles of renewal project with a revised layout, 	Noted	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
	Submission	<p>particularly connection with Campbellfield Avenue (Bradbury), Bellingen Road and Junction Road (Ruse). The creation of intersections with these roads will ensure Airds will be better integrated with the road network of surrounding suburbs and offer the possibility of alternate bus and travel routes.</p> <ul style="list-style-type: none"> Concerned for the redeveloped sites along Georges River Road (Figure 20) where significant demolition is occurring. Transit orientated development in the form of mixed use development should be located along the Georges River Road frontage. The northern aspect offers opportunity for residential flat buildings with some retail at intersections. There is a privileging of single detached dwellings. The Concept Plan does not address the diversity of housing needs in the private market. Zoning impediments to allow a higher form of housing density along the Georges River Road corridor should be addressed at this concept stage. 	<p>Commercial and retail development is best located in defined commercial precincts such as the town centre.</p> <p>The Concept Plan and the associated development control guidelines seek to provide a variety of housing types through varying lot sizes and flexible development controls appropriate to a variety of lot sizes. Not all dwellings will be detached with attached and zero lot line housing envisaged.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<ul style="list-style-type: none"> In the interest of housing affordability, a higher form of housing density should be provided along the Georges River Road corridor. At the very least row housing facing Georges River Road with rear lane access would ensure an active frontage rather than a continuous fence which only serves to cut off the Airds community from the adjoining neighbourhood of Ruse. Nowhere in Campbelltown are long rear fences facing connector roads attractive or desirable. The landscaping plan shown in Figure 21 should extend to the northern side of Georges River Road. Landscaping the northern side will assist in compensating for the loss of trees which will not be able to replicated in new development in the clusters as they now appear making Georges River Road a green boulevard which already contains a well used pathway/cycleway. 	<p>Higher densities are envisaged through smaller lots sizes and locating smaller lots adjacent to the town centre, near parks and on high accessible areas.</p> <p>This area is outside the Concept Plan area and additional landscaping on the northern side of the road is a matter for the roads authority to consider. It is not part of the application and is not required for the development.</p>	
10	Public Submission	<ul style="list-style-type: none"> Support the proposed redevelopment except for one major concern. Strongly oppose the plan to build a connecting road from 	Refer to Section 3.1.	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>Campbellfield Road to Airds-Bradbury for the following reasons:-</p> <ul style="list-style-type: none"> o The earlier upgrade was done to stop anti-social behaviour occurring in the area because of the inappropriate layout in this area, being too many accesses between properties. o Since the upgrade the area has been trouble free, residents have taken pride in their homes and Karingal Place is a quiet and nice place to live; o There is no reason for another road as we have 3 connecting routes via Docharty, Creigan and Briar Roads. 		
11	Public Submission	<ul style="list-style-type: none"> • Oppose introduction of new road connecting Campbellfield Avenue with Airds Town Centre for following reasons:- <ul style="list-style-type: none"> o reintroduce problems of anti-social behaviour as the street will be a thoroughfare between two pubs; o new street will be a speedway for 	Refer to Section 3.1.	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>cars.</p> <ul style="list-style-type: none"> Opening Karingal Place will increase traffic and result in accidents; Another roundabout of St Johns Road is close proximity to existing roundabouts is not required; Creigan Road and Docharty Road could be used to provide access to Bradbury and houses would not be required to be removed. 		
12	Public Submission	<ul style="list-style-type: none"> Objects to removal of houses to extend road from a hotel in Bradbury to a hotel in Airds. The extension of the street would see more traffic to and from the hotels. The removal of the houses will make a more unsafe and unpleasant environment especially for the children and elderly in the street. 	Refer to Section 3.1.	
13	Public Submission – Terry Hawes	Opposed to Stage 9 of proposal, the reclassification of Baden Powell Reserve from public open space to building blocks for following reasons:-	Refer to Section 3.2.	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<ul style="list-style-type: none"> Reduction of open space, Should be retained and enhanced; Increase in vehicular traffic in and around Melaleuca Grove estate; Two additional and potentially dangerous junctions leading into St Johns Road (between the roundabout at the entrance to McLaughlin Circuit and the T-intersection with Docherty Road). 	Refer to Section 3.1.	
14	Public Submission	<ul style="list-style-type: none"> Opposed to the extension of Campbellfield Roads to Airds as it will impact on privacy and value of home and destroy a quite well cared for area. A continuation of Creigan Road would open up the area as Housing NSW wishes. 	Refer to Section 3.1.	
15	Public Submission	<ul style="list-style-type: none"> Opposes demolition of house and opening up of road. As a long term resident has spent time and money on the property. Creigan Road can be opened without loss of homes. The walk way was closed 8 years ago 	Refer to Section 3.1.	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		for good reason.		
16	Public Submission	<ul style="list-style-type: none"> • Supports east west link. • The proposed roundabout linking Airds at Campbellfield Avenue needs to be at least as large as the existing one at the Briar Road entrance. If too tight vehicles will simply use local roads to avoid it. There will be a significant increase in traffic into Alliot/Donaldson Street which is already subject to three blind corners, two right-angled bends, two key holes and one cul-de-sac and will not cope with additional traffic from Campbellfield Avenue. 	Noted and discussed in Section 3.1.	
17	Public Submission	<ul style="list-style-type: none"> • Opposes demolition of house and opening up of east west link road. As a long term resident has spent time and money on the property. • Karingal Place is a quiet cul-de-sac. The planned road will be one road between two hotels, making it unsafe for residents. • The proposal will increase traffic in Karingal Place, making it unsafe for two residents who use the special 	Refer to Section 3.1.	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>school buses.</p> <ul style="list-style-type: none"> Kids playing on roads as it is safe now. No consideration has been given to road next to the private homes. 		
18	Public Submission	<ul style="list-style-type: none"> The proposal will reduce Council services such as the Airds Bradbury Community Centre, the PEPS programme, the Amarina Child Care Centre, Youth Centre (early learning centre). It has been conveyed that these services will be combined and relocated to a multi purpose centre but this is no shown on the plans. What specific Council owned land, properties, parks, sportfields are been considered for development in the proposal? The plans do not show what types of dwellings are to be constructed (single or multi-storey). Advised that dwellings would only be two storeys, however this is contradicts other advice of three storey walk ups. Previously advised that there was going to be single storey villas for over 50's however these turned out to be 	<p>Refer to Section 3.5</p> <p>Matter for Council to advise</p> <p>Dwellings will be mostly detached dwelling houses but could include some attached or zero lot line housing. Seniors apartments are also envisaged similar to recent developments in the area. Dwellings will be 1 or 2 storeys in height only.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>two storey flats.</p> <ul style="list-style-type: none"> Previously faced proposal of mutli-storey building at Bradbury shopping centre. Could the same occur at Airds? The proposed road from Campbellfield Avenue to Riverside Road then through to Junction road will not increase retail flow or make the commute to Campbelltown quicker. However, it will make an easy trip from Bradbury Pub to Airds Pub then onto Ruse Tavern. Has consideration been given to the flooding of bushland that has been chosen for playing fields? Parking and toilet facilities are lacking in the plan. Will the existing residential areas listed on the proposal be demolished at a later date? 	<p>The town centre is considered to be a preferred location for higher density development. The concept plan does not envisage dwellings greater than 2 storeys in height.</p> <p>Refer to Section 3.1</p> <p>Flooding has been investigated as part of the concept plan application (Appendix 8 of EA).</p> <p>Facilities are proposed as part of the open space provision.</p> <p>It is the intention of the project that existing residential areas will remain with some properties being sold to the private market and others remaining as NSW Land and Housing Corporation properties.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
19	Public Submission	Opposes moving out of existing community in which they have friendship and are involved in volunteer work.	This matter has been comprehensively addressed in the Integrated Social Sustainability and Health Impact Assessment and Plan submitted with the EA (Appendix 11). The issues associated with relocation of residents will be managed by NSW Land and Housing Corporation.	
20	Public Submission	<ul style="list-style-type: none"> • Opposes relocation out of area. • Concern for the amount of public space that will be left after project is complete. • No need for more access roads in and out of the area. 	<p>This matter has been comprehensively addressed in the Integrated Social Sustainability and Health Impact Assessment and Plan submitted with the EA (Appendix 11).</p> <p>As part of the relocation needs assessment, all residents will be asked to nominate an area for relocation. Where possible NSW Land and Housing Corporation aims to rehouse residents in suitable locations of their choice. Recognising that not all residents will be able to stay locally, NSW Land and Housing Corporation will apply a locational needs assessment to ensure those households with the greatest need will be given priority for local allocations. Where local relocation is not possible residents will be well supported to manage the transition to a new area.</p> <p>The issues associated with relocation of residents will be managed by NSW Land and Housing Corporation.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
			In relation to public space, refer to Section 3.2 In relation to access roads refer to Section 3.1.	
21	Public Submission	<ul style="list-style-type: none"> Opposes the whole-sale sell off and relocation of residents 	This matter has been comprehensively addressed in the Integrated Social Sustainability and Health Impact Assessment and Plan submitted with the EA (Appendix 11). The issues associated with relocation of residents will be managed by NSW Land and Housing Corporation.	
22	Public submission	<ul style="list-style-type: none"> Opposes demolition of house and other families displaced. As a long term resident has spent time and money on the property. Does not wish to live in a small unit. 	This matter has been comprehensively addressed in the Integrated Social Sustainability and Health Impact Assessment and Plan submitted with the EA (Appendix 11). The issues associated with relocation of residents will be managed by NSW Land and Housing Corporation.	
23	Public Submission	<ul style="list-style-type: none"> Agrees with proposal for 70% and 30% public housing. Pathways needs updating. Lighting areas around bus stops, ovals and open space needs to be looked at for safety. More up to date buildings needed for child care and PEPS programme. Sporting fields been used and getting 	<p>Noted</p> <p>Noted and able to be accommodated.</p> <p>Street lighting and park lighting form part of the proposal.</p> <p>Refer to Section 3.4.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>clubs back in the area.</p> <ul style="list-style-type: none"> The introduction of more school holiday activity for children in local area. The need for more transport for the elderly and a local group to assist the elderly. The introduction of a health centre for people who cannot get on public transport. Government should develop a programme where public housing tenants can buy their homes. Closer look at where new roads are going, how it will impact on housing and the safety of children. Overall look at the drainage system to ensure it can cope with further development. 	<p>Noted</p> <p>Noted and a matter for agencies to implement.</p> <p>Noted and a matter for various agency implementation.</p> <p>Noted and a matter for various agency implementation.</p> <p>This is a policy matter for NSW Land and Housing Corporation.</p> <p>Traffic impacts of concept included in Appendix 12 of EA.</p> <p>Refer to Appendix 8 of EA.</p>	
24	Airds Bradbury Masterplan	<ul style="list-style-type: none"> See the proposed development as largely positive and note a number of 	Noted	No additional commitments needed.

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
	Group	<p>positive aspects of the proposal.</p> <ul style="list-style-type: none"> No indication on plans for provision of bus shelters and seating at bus stops. Urgent need for more convenient bus stops No indication of improved street lighting in areas with traffic control devices. The new roads need to be wider to accommodate traffic. More details needed regarding community facilities such as the Kevin Wheatley reserve and Riley Park facilities. Current problem with accessibility to street parking and garbage services for senior units near roundabouts. No details of pedestrian crossings or pedestrian refuge islands. Need to eliminate the dangerous walkway behind the new senior units 	<p>This will be discussed with Council and bus operators at the time bus services are provided by the bus operator. Shelters will be provided through the VPA.</p> <p>Noted</p> <p>Street lighting to Australian Standard will be provided for all new streets.</p> <p>Street will be constructed in accordance with current Council standards.</p> <p>These details will be provided as part of the VPA.</p> <p>This is an operational matter that will be taken up by NSW Land and Housing Corporation.</p> <p>Issues of pedestrian safety will be resolved at DA stage for each stage of the development.</p> <p>This walkway is owned by Council. The concept</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>at the corner of Riverside Drive and Greengate Road. The walkway serves no purpose and attracts anti-social behaviour.</p> <ul style="list-style-type: none"> The provision of more two storey units without a lift. First floor residents will need to move if they develop a disability or need assistance. Provision of community facility in the seniors housing developments (room out outdoor area). Appreciated if Council could assist with better mobile phone services in the area. The proposal lacks details for parks such as walking tracks, dog parks, rubbish bins, cycle tracks, signage, toilets, lighting, etc. No detail of accessibility for seniors and people with a disability such as kerbs and gutters. 	<p>plan does not preclude its removal.</p> <p>Seniors housing is proposed that will be accessible to each unit.</p> <p>This is a matter for consideration by NSW Land and Housing Corporation in the design of individual developments. Any new additional seniors housing developments that may occur as part of the renewal project will consider the request to include a community space as part of future seniors housing development.</p> <p>Noted but outside project scope.</p> <p>The concept plan and VPA provide sufficient detail of the strategy for provision of parks and cycle tracks and the like with the detail to be resolved at development application stage.</p> <p>Pram ramps will be provided.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<ul style="list-style-type: none"> Need for high level of sustainable design including new buildings. Airds-Bradbury community be consulted regarding naming of new roads. Need for shared bike and pedestrian paths to ensure a safe link with other paths in the Macarthur area. 	<p>Buildings will be designed to comply with BASIX requirements.</p> <p>Noted. This matter is to be determined by Council.</p> <p>Noted and provided.</p>	
25	Public Submission	<ul style="list-style-type: none"> Opposes street from Campbellfield Avenue for following reasons:- <ul style="list-style-type: none"> it will be costly and cause hardship to the residents of the affected homes; the walkway was closed for good reason (to address people travelling between pubs). amount of money spent developing the region over the last 10 years including new trees seems a waste; there are already 2 entrances that would only be a small detour for traffic to enter Creigan Road or 	Refer Section 3.1.	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>Docharty Street.</p> <ul style="list-style-type: none"> possible congestion of Karingal Place making it unsafe. 		
26	Public Submission	<ul style="list-style-type: none"> Pleased with members of Council and work in Campbelltown area and Airds. Notes Airds is in good order and improving for families. 	Noted	
27	Public Submission	<ul style="list-style-type: none"> Concern for existing Department of Housing residents who will be forced to move. Residents should be ensured of a right of return. Concern for impact on schools. Previous renewal projects have resulted in shrinking enrolments and transient enrolments. To avoid this a 	<p>This matter has been comprehensively addressed in the Integrated Social Sustainability and Health Impact Assessment and Plan submitted with the EA (Appendix 11). As part of the relocation needs assessment, all residents will be asked to nominate an area for relocation. Where possible NSW Land and Housing Corporation aims to rehouse residents in suitable locations of their choice. Recognising that not all residents will be able to stay locally, NSW Land and Housing Corporation will apply a locational needs assessment to ensure those households with the greatest need will be given priority for local allocations. Where local relocation is not possible residents will be well supported to manage the transition to a new area.</p> <p>Impacts on schools were specifically considered as part of the ISSHIA (Appendix 11 of EA), including recommendations for action by a number of authorities to mitigate the impacts</p>	

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		right of return should be ensured for residents.	<p>associated with reduction in enrolments and loss of programs and services. HNSW in constant communication with DET through quarterly meetings, but also through BANC, etc. Impact on local school discussed and planning is being carried out.</p> <p>The ISSHIA recommends the development of an education strategy to be prepared by NSW Department of Education and Training. NSW Land and Housing Corporation is currently working with Education to progress this recommendation.</p>	
Government Authority Submissions				
1	Office of Environment and Heritage	<ul style="list-style-type: none"> 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. <p>It is unclear from the Concept Plan whether any further loss and/or modification, of CPW and SSTF is likely</p>	<p>The reason for the reported change in area of EEC being affected is due to more accurate mapping and calculation of the areas for the April 2011 report, not due to a change in the Concept Plan.</p> <p>There is no intention for additional areas of EEC to be affected for asset protection zones, easements, footpaths, landscaping etc. There are</p>	<p>The EA has accurately measured impacts and the concept plan design process included the avoidance of areas of high quality bushland.</p> <p>The EA contains justification for the preferred concept plan which has evolved from a balanced consideration of all issues and community views. Impacts on biodiversity values of the site have</p>

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>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 their magnitude, extent and significance of any further Impacts of the proposal on EEC & and their habitats.</p> <ul style="list-style-type: none"> • OEH seeks clarification on measures to avoid or mitigate impacts associated with the proposal on EECs and their habitats and also the feasibility of retaining CPW SSTF along the Smiths Creek Corridor. To date this information has not-been canvassed in the EA. • The EA should contain justification of the preferred options, including the identification and evaluation of alternatives, where impacts cannot be avoided or mitigated. 	<p>existing cleared areas that will be used for such features.</p> <p>Hayes Environmental was commissioned in the early master planning stages of the project to identify ecological constraints to development within the subject site. Hayes Environmental mapped areas and features of ecological value within the subject site, and prepared a Constraints Map to facilitate ongoing discussion and design of options for the project.</p> <p>The Concept Plan has been significantly informed by a comprehensive consultation process that has involved key stakeholders, a multi-disciplined technical consultant team, government agencies and the community.</p> <p>The culmination of the consultation process was a</p>	<p>been avoided and minimised and finally offset by a suite of measures appropriate to the site and the condition of bushland on the site.</p>

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
			<p>three day Enquiry by Design (EBD) workshop held in Airds Bradbury in May 2010, that brought together key stakeholders, residents, government agencies, and a range of specialist consultants to discuss the potential for new development and renewal within Airds Bradbury.</p> <p>The key outcome from the EBD workshop was the identification of three concept master plan options. These options were refined and further developed with input from stakeholders, and further testing by specialist consultants. The Concept Plan is the result of this process.</p> <p>On the basis of master planning process, the following important ecological values were retained and protected:</p> <ul style="list-style-type: none"> • the main stand of Cumberland Plain Woodland (CPW); • linkage of the main stand of CPW to the Smiths Creek corridor; • space for a vegetated corridor to be re-established along Smiths Creek; • existing corridors extending into the site from the Georges River reserve area in the east which provide potential access for Koalas. <p>The purpose of the Renewal Project is to address</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<ul style="list-style-type: none"> Offsetting should only proceed if an appropriate legal mechanism or instrument is used to secure the 	<p>various social and physical problems. Current significant threats to native vegetation within the subject site include frequent fire, rubbish dumping, recreational impacts and weed invasion.</p> <p>Further impact mitigation measures such as street tree planting arrangements and species, Koala friendly fencing, traffic calming measures, detailed revegetation works etc have been discussed, and will be implemented during the detailed design of each progressive stage of the project.</p> <p>A Concept Bushland Management Plan has been prepared by Hayes Environmental (October 2011) (Appendix 1) to document the range of measures that are to be implemented within the site, to mitigate and compensate for impacts on biodiversity values.</p> <p>The bushland on the site is in a disturbed state as indicated by the aerial photographs contained in Appendix 2. The BMP will result in a significant improvement on the quality of the retained bushland.</p> <p>A Biodiversity Offset Package has been developed for the project (Hayes Environmental, October 2011) (Appendix 1). Off-sets will be</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>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.</p> <ul style="list-style-type: none"> Reconstruction of ecological communities is not sufficient to offset against the loss of SSTF. Any impact to CPW and SSTF along the Smiths Creek Corridor should be offset by measures within the 'priority conservation lands. 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. To date this information has not been addressed in the EA. OEH recommends the following Statement of Commitment or 	<p>secured through a Voluntary Planning Agreement (VPA). Off-sets include increased legal protection of retained vegetation, management of retained vegetation to improve condition, connectivity and long-term viability (see Concept Bushland Management Plan, Hayes Environmental, October 2011), and revegetation of strategically important lands.</p> <p>Additional lands along and including Smiths Creek have been obtained for the purpose of restoring the SSTF community in this area.</p> <p>There are no Priority Conservation Lands close to the site, and no PCL's within the Campbelltown LGA that are practicable for off-setting for this project.</p> <p>A Concept Bushland Management Plan and Biodiversity Offset Package have been prepared by Hayes Environmental (October 2011). The purpose of the Concept Bushland Management Plan is to set out the native vegetation management actions and protection measures that will be implemented as part of the Airds Bradbury Renewal Project.</p> <p>Further specific details will be provided for each area of vegetation progressively, as part of the staged detailed planning of the project. These</p>	<p>The proponent is committed to implementing the Bushland Management Plan October 2011 and the Biodiversity Offsets Package (October 2011).</p>

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>condition of approval:</p> <ul style="list-style-type: none"> Biodiversity Offset Package <p>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:</p> <ol style="list-style-type: none"> The Offset shall be developed in accordance with the Principles for the Use of Biodiversity Offsets in NSW (DECCW, 2009). The Offset-shall be developed in consultation with OEH. The Offset shall be directed towards priority conservation lands identified in the Cumberland Plain Recovery Plan (DECCW, 2070), Identify the offsetting that would be required to meet the 'improve 	<p>specific details will be based on the Concept Bushland Management Plan, and will progressively form a detailed Bushland Management Plan for the Airds Bradbury site.</p> <p>The Concept Bushland Management Plan and Biodiversity Offset Package contains the proponents response to the matters raised by OEH.</p>	<p>Provision for this is made in the VPA with Council.</p> <p>A Statement of Commitment to this effect has been included (See Section 4).</p>

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>or maintain' standard.</p> <p>5. Identify the conservation mechanisms to be used to ensure the long term, protection and management of the offset sites.</p> <p>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.</p> <ul style="list-style-type: none"> o The three preferred mechanisms for securing biodiversity offsets are: <p>The establishment of biobanking sites with biobanking agreements under the Threatened Species Conservation Act 1995,</p> <ul style="list-style-type: none"> • The retirement of biobanking 		

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		<p>credits (where appropriate credits are available).</p> <p>The dedication of land under the National Parks and Wildlife Act 1974, where this option is agreed to by OEH.</p> <ul style="list-style-type: none"> • OEH considers that opportunities exist as part of rejuvenation to implement programs to increase biodiversity values for threatened species, populations and EECs and their habitats. OEH has 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: <ul style="list-style-type: none"> ◦ Landscape Rehabilitation Management Plan. <p>The Proponent shall prepare and implement a Landscape Rehabilitation Management Plan</p>		

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>(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:</p> <ol style="list-style-type: none"> 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 		

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>rehabilitation.</p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • OEH is satisfied that the Consultation process has been completed in accordance with the Part 3A <i>Draft Guidelines for Aboriginal Heritage impact Assessment and Community Consultation 2005</i>. • The Aboriginal site survey and assessment meets current OEH requirements. • There are two locations of-potential 	<p>Noted</p> <p>Noted</p> <p>Noted and these are discussed and assessed in</p>	<p>A Statement of Commitment has been included regarding the implementation of the recommendations of the assessment of Aboriginal Heritage Impact in Appendix 7 of the EA has been included (See Section 4).</p>

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>conflict between high sensitivity areas and likely development impacts:</p> <ul style="list-style-type: none"> o 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 o in an area in the northeast of the bushland where there are proposed houses. <p>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.</p> <ul style="list-style-type: none"> • The following options were discussed as options to reduce impacts to Aboriginal sites arising from the Concept Plan: <ul style="list-style-type: none"> o Changes could be made to the current design placement of playing fields away from zones of 	<p>the EA</p> <p>Noted</p> <p>The playing fields play an important role in meeting the recreational needs of the community and in reinvigorating the town centre area. The</p>	<p>The relocation of the playing fields is not considered necessary to ensure conservation of the identified site #2.</p>

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>archaeological density including AHIMS Site # 52-2-2151 Open Artefact Scatter (Airds 02). This would be OEH's preferred conservation option,</p> <ul style="list-style-type: none"> o 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 o 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. • Portions of Zones 1 and 2 with moderate and high archaeological sensitivity will be affected by various 	<p>playing fields are located mostly outside of the zone containing potential archaeological deposit with only a minor intrusion.</p> <p>Disagree that burial is harming of an Aboriginal site – so long as strict measures are implemented to aid its conservation during the process and for future management. However, OEH's opposition to this proposal is noted and should be taken as a final option (before the salvage option).</p> <p>Acknowledged that OEH see archaeological salvage as a final option for sites and areas with archaeological potential.</p> <p>Agree</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>aspects of the proposed Concept Plan. The consultant argues that If it is not possible to avoid Impacts on these zones including AI-IIMS Site If 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.</p> <ul style="list-style-type: none"> 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 It 52-2.2150 Scarred Tree (Airds 01) & AHIMS Site it 52-2-2151 Open Artefact Scatter (Airds 02) during there redevelopment of the Airds Bradbury area. OEH supports this assessment. OEH supports the proposed management principles to be applied for sites and landscapes with Aboriginal heritage values within the 	<p>Noted and will be achieved to the extent possible given the preferred location of development.</p> <p>Noted</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>subject area.</p> <ul style="list-style-type: none"> 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. 	Noted	
2	Endeavour Energy	<ul style="list-style-type: none"> Endeavour Energy's Kentlyn Station is located in renewal area. Noise control measures are required if the development is to be adjacent to the zone substation. 24 hour maintenance access is required to the 66kV overhead lines 861 and 867 within the existing 	<ul style="list-style-type: none"> EE to provide attenuation to meet current standards for existing or previous dwellings. Attenuation will be provided as required for any new dwellings under the concept plan that are closer to the substation than existing or previous dwellings such that they would increase attenuation obligations on EE. Noted 	A Statement of Commitment to this effect has been included.

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>easement. The lines can be underground at developers cost if required.</p> <ul style="list-style-type: none"> The house setback on lots with distribution stations needs to be large enough to take into account the required easement and restriction zone. Where the existing 11kV underground feeder cables emanating from Kentlyn Substation require relocating they must remain as through feeds, as they supply load outside the renewal area. Buildings cannot be constructed over 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. 	<ul style="list-style-type: none"> Noted Noted Noted 	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
3	Sydney Regional Development Advisory Committee	<ul style="list-style-type: none"> The proposal should be referred to the Department of Planning & Infrastructure given the proximity of the two transport corridors in this location. Council should ensure the applicant is aware of the potential for future road traffic noise to impact of 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. The proposed development will generate additional pedestrian and cycle movements in the vicinity of the site. The pedestrian and cyclist facilities should be provided to Council's satisfaction. It is strongly recommended that the Department of Transport and State Transit Authority be consulted to determine if additional bus services can be provided or rerouted to this development to achieve a 	<p>Noted. The DoPI has been involved both pre-planning and approval phases of this project.</p> <p>The RTA will consider noise impacts of any proposal for development in an existing or future road corridor once any proposal is formalised.</p> <p>Noted - proposed pedestrian and cycling network and facilities are provided in the Concept Plan and assessed in the Traffic Assessment.</p> <p>Provision has been made for bus services and bus routes are recommended in the Transport and Accessibility Study. The proponent consulted with DoT who referred the proponent to the local bus company. A letter of support was provided as part of the EA.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>reasonable mode shift to public transport.</p> <ul style="list-style-type: none"> It is strongly recommended that the developer provide any sustainable initiatives and measures which will reduce care dependency and the increased use of sustainable mode of travel including buses, bicycles and walking. 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 for consideration. All internal roads shall be designed and constructed in accordance with Council's requirements. All works/regulatory signposting associated with the proposed development are to be at no cost to the RTA. 	<p>A practical bus, walking and cycling network has been proposed to maximise the use of sustainable transport mode at this stage of the project. The interconnective street system, formalised pedestrian and cycle paths and identified bus routes that improved on current bus services will lead to reduced car dependency particularly given the proximity of the site to the centre of Campbelltown.</p> <p>This would occur in accordance with Council's standard practices as part of subsequent development applications.</p> <p>This will be addressed in the detailed design stage of the project in consultation with Council.</p> <p>Noted</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
4	Department of Transport	<ul style="list-style-type: none"> It is necessary that the proposal nominate a public and active transport mode shift target 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 Green Travel Coordinator to facilitate increased public and active transport patronage. 	<ul style="list-style-type: none"> The transport plan has recommended the most practical bus, walking and cycling network to maximise the use of sustainable transport mode and to reduce car dependency. The NSW State Plan aims to increase the proportion of total journeys to work by public transport in the Sydney Metropolitan Region to 28% by 2016. Airds has a public transport mode splits of 19% (plus another 3% of walking and cycling trips) for all current journey to work trips. The improvements in the public transport network and facilities and the expected increased in private housing mix should encourage increased PT use to reach the state targets. Noted. There is already a commitment to undertake the project in accordance with the EA including the TMAP. Noted 	The SoC includes a commitment to undertake the project in accordance with the EA which includes the various appendices to the EA including the TMAP. No further commitment is considered necessary.

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<ul style="list-style-type: none"> Bicycle parking should be provided, particularly for multi-dwelling units, as part of the development proposal. The proposed changes to the local road network are supported. However, the proposed indicative bus network appear to maintain the same circulation network which is portrayed in the transport study as a disincentive to public transport use. The east-west link through the site require improvement. 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 may be faster to connect trains for travel to Liverpool and Bankstown. The study cites only 5% of journey-to-work trips to Camden. 	<ul style="list-style-type: none"> Bicycle parking will be provided as per Council DCP. The indicative bus network was proposed in consultation with the local bus operators and DoT. The structure of the bus network in this region has bus routes serving each suburb directly to Campbelltown. Therefore, the proposed bus routes has improvements locally within Airds to improve accessibility. Further refinement opportunities to the bus routes exist during the implementation of the various stages of the proposed development and on-going liaison with DoT and STA. Noted 	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
5	Juvenile Justice	<ul style="list-style-type: none"> Concerned with the impact of the heights and types if development proposed directly adjacent to the centre. 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 project compromises the security perimeter of the Reiby Juvenile Justice Centre by developing domestic residences within this perimeter. Juvenile Justice requests that Council consider the following conditions of approval of the project so that the safe and secure operation of the Reiby Juvenile Justice Centre is maintained within the encroaching urban environment:- <ul style="list-style-type: none"> 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 	<p>It is submitted that any required secure perimeter should be within the JJC site and not rely on areas outside the site that cannot be considered secure. Existing housing adjoins the existing centre.</p> <p>Security fencing requirements are the responsibility of JJC not NSW Land and Housing Corporation. The western and part of the south boundary of the JJC adjoins existing housing and this will not change.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>and western perimeter boundaries and associated turn-backs.</p> <ul style="list-style-type: none"> Vehicle access is maintained and throughout and following the Airds re-development 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 	<p>The remaining part of the southern boundary adjoins Merino Park. It is considered that dwellings adjoining this southern boundary improve security at the JJC by the removal of a publically accessible rear boundary condition. Whilst consideration could be given to a public laneway at rear of dwellings adjoining the centre, it is considered that this would increase public access to the common boundary and provide an area for anti-social behaviour contrary to CPTED principles.</p> <p>Noted</p> <p>It is noted that there is an outer perimeter security zone within the JJC site on the outside of the main security fence.</p> <p>It is considered unnecessary to limit development to a single storey particularly when existing development adjoining the centre is one or two storeys. The lots adjoining the centre are deeper</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>density with full privacy screening.</p> <ul style="list-style-type: none"> o The project identified 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. 	<p>lots enabling a dwelling to be located to the street frontage away from the centre and providing a suitable rear setback for private purposes.</p> <p>JJC land has been excluded as not part of the concept plan area. JJC can now undertake their own development assessment.</p>	
6	NSW Rural Fire Service	<ul style="list-style-type: none"> • Asset protection zones in accordance with <i>Planning for Bush Fire Protection 2006</i> would be required for new dwellings, school etc that are impacted by the Campbelltown Bush Fire Prone Land Map. • Public Roads are to comply with section 4.1.3 and 4.2.7 of <i>Planning for Bush Fire Protection 2006</i>. • Water, electricity and gas are to comply with section 4.1.3 and 4.2.7 of <i>Planning for Bush Fire Protection 2006</i>. • Construction for future dwellings in 	<p>The comments of RFS are noted. The requirements are standard requirements that are to be implemented at DA stage. The bushfire consultant advised that no change to the Concept Plan layout is required.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>accordance with Appendix 3 of <i>Planning for Bush Fire Protection 2006</i> and <i>AS3959 – Construction of Buildings in Bush Fire Prone Areas 2009</i></p> <ul style="list-style-type: none"> Landscaping and property maintenance within the site is to comply with the principles of Appendix 5 of <i>Planning for Bush Fire Protection 2006</i>. 		
7	Office of Water	<ul style="list-style-type: none"> Uncertainty over the location of Smiths Creek and its riparian area; Uncertainty over the width and treatment of the riparian zone; Concern about residential and sportsfield development in riparian zone and impacts on riparian vegetation 	<p>The down stream end of the creek within the site is Georges River Road. Upstream of this point the creek in with proposed bushland where a sufficient riparian buffer is provided within the development site) see diagram contained in Appendix 6). Within this area the creek is partially off site within the boundary of the adjoining school or adjoining the existing bus depot site that does not form part of the concept plan. The upstream end point for the creek is Creigan Road. Beyond that point the water flow is piped.</p> <p>The proposed residential and sportsfield developments are not within the riparian zones with a suitable buffer provided. As can be seen from the drawing in Appendix 6 is it not possible to re-establish a creek connection between the existing creek north of Creigan Road and the existing dam in the site adjacent to the town</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
			<p>centre because of:</p> <ul style="list-style-type: none"> • Biodiversity constraints imposed by existing threatened ecological communities; • No evidence of a previous drainage line in this area; • Topographic constraints; • Location of existing residential areas to be retained; • Existing piped system in the retained Creigan Road. <p>The diagram contained in Appendix 6 shows that an adequate riparian corridor is provided adjacent to Smiths Creek adjacent to the proposed development.</p>	
		<ul style="list-style-type: none"> • Concern over proposed online detention basin and detention structure. 	<p>Detention will be achieved by a minor restriction to the size of the size of the culvert under Georges River Road to detain water. A small wall along the rear boundaries of the properties to the west upstream of the culvert may be required.</p>	
		<ul style="list-style-type: none"> • Recommends avoiding or under boring areas of remnant vegetation for electricity infrastructure being placed underground; 	<p>Noted</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<ul style="list-style-type: none"> • Recommends that APZ requirements are outside riparian land and the remnant native vegetation. • Requests groundwater assessment as part of any project application stage; • Requests further investigation into groundwater dependent ecosystems as part of any project application 	<p>Noted</p> <p>This can be undertaken at DA stage.</p> <p>This can be undertaken at DA stage.</p>	
8	Sydney Water	<ul style="list-style-type: none"> • Development to be serviced by a 200mm drinking water main in Greengate Road which may need to be upsized or replaced. • A new drinking water main is required from College Road to Creigan Road. • Trunk sewer system has adequate capacity; • SW major assets include existing water mains serving the Macarthur area which will need to be taken into account; • SW is in discussion with Landcom to ensure that SW assets are not 	<p>Noted. All SW comments can be reviewed at DA stage.</p> <p>To be determined at DA stage.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		compromised.		
9	Campbelltown Council	<ul style="list-style-type: none"> • <i>Lots fronting Georges River Road</i> <ul style="list-style-type: none"> ○ There are a number of proposed lots that propose direct frontage onto Georges River Road. Concern is raised that the proposed development will have an adverse impact upon the safety and efficiency of Georges River Road and the Masterplan should be modified to delete or amend any direct vehicle access from the future residential allotments onto Georges River Road. ○ Furthermore there should be a landscape treatment between the rear fences of proposed allotments adjoining Georges River Road and the public road. This should consist of screen planting or similar for the length of the frontage to Georges River Road. Details of rear fencing proposed should also be included with the proposed landscaping treatment. ○ Consider impact of water pumping 	<p>Further work undertaken by Urbis indicates that an alternative design arrangement can be achieved that restricts direct access to Georges River Road. This is shown in the plans included in Appendix 8.</p> <p>Thus if Council is of the view that direct access to Georges River Road is to be restricted in accordance with Clause 42 of the LEP, this can be achieved and is a matter that would be implemented and resolved at DA stage. The relationship with the existing water pumping station could be considered at a future DA stage.</p> <p>Noted</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		station on Georges River Road		
		<ul style="list-style-type: none"> Merino Park - The layout and overall design Merino Park should be reconfigured to achieve an increased level of integration of the park with existing and proposed housing. The design should also address the interface of the park and new residential areas with Reiby Juvenile Detention Centre. 	<p>It is proposed that the streets around the park are clearly delineated as shareway zones with pavement treatment (ie raised paved thresholds) providing access to new dwellings which front the park and to existing retained dwellings. The revised park designs are included in the revised landscape report contained in Appendix 7.</p> <p>The details of this treatment will be resolved at DA Stage.</p>	
		<ul style="list-style-type: none"> Riley Park - Further details to be provided on the laneway design and implementation of a shared pathway in lieu of the laneways that are currently proposed. The shared pathway should incorporate soft edges with bollards or similar treatment adjoining the park to improve the aesthetics and reduce the extent of hard surfaces. Threshold treatments within the road surface should also be incorporated in shared ways, so that it clearly signifies to the public and vehicle traffic the change in road type. Consideration should 	<p>A shared way with pavement treatments (ie raised paved thresholds) is proposed around Riley Park to connect Riverside Drive and Deans Road. The details of the treatment will be resolved at DA stage.</p> <p>The parking at Riley Park will be reviewed as part of the DA process to remove some on site parking and provide perimeter parking.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		also be given to the control of car parking within the share way and/or 180 degree or 45 degree car parking.		
		<ul style="list-style-type: none"> • DCP: <ul style="list-style-type: none"> o The environmental assessment identifies that there will be a number of non-compliances with the proposed residential development when assessed against Campbelltown (Sustainable City) DCP 2009, specifically in respect to subdivision, site size, frontage, solar access and the quantum of open space. o A statement outlining the desired urban form and character which shall be reflected in a set of objectives and accompanying development controls for any proposed amendments against Council's DCP. Included in this statement shall be a development standards table, identifying the intended controls for residential development under the 	<p>Proposed development guidelines for Airds are contained in the Development Control Guidelines contained in Appendix 4. These guidelines have been prepared having regard to the provisions of the EA, Council's existing DCP and the desired future character of the area. Consideration has also been given to State Environmental Planning Policy (Exempt and Complying Development) 2008, current Minto DCP standards and Landcom built form design guidelines and housing diversity guide.</p> <p>It is anticipated that the Minister will make a determination on any approval of the concept plan application to the effect that subsequent development applications are to be designed having regard to the Airds Bradbury Renewal Project Development Control Guidelines contained in Appendix 4.</p> <p>Should Council wish to amend the DCP to include the guidelines, this can happen in due course and</p>	<p>Inclusion has been made in the Statement of Commitments to the effect that the subsequent developments will be designed having regard to the Development Control Guidelines included in Appendix 4 of this report.</p>

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		Masterplan.	at Council's convenience.	
		<ul style="list-style-type: none"> • Roads - Confirmation and/or clarification of the following road design matters are requested: <ul style="list-style-type: none"> ○ The configuration of the roundabout at Merino Rd and whether it could be designed to accommodate the new north/south road directly to the north of this roundabout? This may include redesigning the roundabout to accommodate additional connecting roads. ○ Laneway adjacent to Dalkeith to a shared type treatment, and increased width to 6.5-7m. Shared and soft edges to be applied when the road adjoins a park/reserve with a view to establishing within the road hierarchy a new road type that addresses these road types. ○ Road layout and master plan maps needs to incorporate new street 	<p>The traffic consultant has advised that Merino Crescent roundabout has currently got four approaches so the new north-south road will not be able to be connected directly to this roundabout due to geometric constraints. The new road will be connected into Merino Crescent between the roundabout and Waterhouse Place as a T-intersection.</p> <p>Shareways can be provided. See previous comments. Road widths as proposed.</p> <p>Drawings have been amended to be consistent.</p>	

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>proposed south of Thawaral, which is depicted on the indicative lot layout plan (figure 20).</p> <ul style="list-style-type: none"> o Concern regarding laneway proposed within the residential area in between shops and Thawaral. This roadway has frontages from either side of the street and should be converted to a local street. o Consideration to be given to the extension of Creigan Road (next to seniors living development) onto Briar Road. o Conformation of the treatment, decommissioning, and timing of College Road (adjoining bus depot). The Masterplan indicates that this road is to be severed at the Bridge crossing over Smith's Creek 	<p>Agreed and concept plan changed accordingly.</p> <p>The traffic consultant has advised that this will only have a short-term benefit in improving accessibility to the town centre of Airds. The proposed connections to the new north-south road will improve connectivity of the residents on Creigan Road to the town centre of Airds without the need of this extension to Briar Road.</p> <p>Bus access to depot will be resolved at DA stage. It is proposed that College Road would not be closed until alternative access is available to the current landowners.</p>	
		<ul style="list-style-type: none"> • Building Typologies - Further information is required in respect to indicative building design and typologies, particularly in the 		

No.	Submitter	Issues Raised	Response and Mitigation Strategy	Commitment
		<p>following areas where there are irregular lot configurations or sensitive development interfaces:</p> <ul style="list-style-type: none"> o Details of proposed building form for long narrow blocks adjoining Kullaroo and fronting Peppin Crescent. o Further details on proposed configuration of future residential allotments, which include lot size, lot width and lot depth. o Details on dwellings adjoining Reiby, with future lots able to accommodate increased rear dwelling setbacks for properties adjoining the detention centre. 	<p>Additional building typologies have been prepared by Urbis leading to a revision of Appendix 16 of the EA. The revised building typologies are contained in Appendix 5</p> <p>Details of further residential allotments will not be known until development application stage. The EA envisages that there may be changes to the concept plan layout to provide a more efficient layout or a more appropriate urban form. Details of allowable lot sizes and dimensions are provided as part of the Development Control Guidelines contained in Appendix 4.</p> <p>The dwelling layout adjoining Reiby would be located toward the street providing a significant rear setback. A rear fence of 1.8 metres will be provided. All setback provisions for Reiby should be provided within JJC land.</p>	
		<ul style="list-style-type: none"> • The status of the surplus land within south Dorchester Park, immediately to the west of Merino Crescent and whether this land could be included in the Masterplan, either now or in the future 	<p>This land is outside the concept plan area and therefore has not been included in this application.</p>	

3. RESPONSES TO KEY ISSUES

3.1 East West Link Road

A key urban design objective of the concept plan is to integrate Airds Bradbury with the surrounding urban areas and transform the current situation from an inwardly focussed street system to an interconnective street system. This connection together with the overall improved road network in Airds results in improved access for Airds Bradbury residents to other services in Campbelltown allows for improvements to bus services and encourages walking and cycling. The key benefits are discussed below and are discussed graphically in Appendix 3.

Urban Design Benefits

- A more interconnective street system that will integrate Airds with the surrounding area and complement the social integration that will be achieved by the renewal program;
- Airds Bradbury better connected with broader Campbelltown through four connection points;
- Two major intersecting roads creates a hierarchy within Airds;
- Improved access to Campbelltown via Campbellfield Road which continues to The Parkway providing a more efficient bus link from Airds Bradbury to Campbelltown;
- Town Centre located at the nexus of two major intersecting roads and with more public land uses towards the intersection;
- The new street will provide important vistas into Airds travelling from the west and to the town centre providing a point of entry and gateway and enhance wayfinding. This gateway will function as a point of arrival at Airds;
- Improved access from Bradbury to the proposed new Kevin Wheatley VC Park and to Airds town centre.

Social Benefits

- The Integrated Social Sustainability and Health Impact Assessment (Appendix 11 of EA) recommends good road access to surrounding suburbs to support integration of the site into the surrounding suburbs this assisting in integrating the communities;
- Improved opportunities for walking and cycling that accompany a more interconnective street system foster healthy living;

- The increase opportunities for improved public transport routes increases community accessibility;
- The provision of better overall amenity to residents in the area through improved access and facilities;
- The new link was the result of extensive consultation process culminating in Design Out Loud in May 2010. Residents in the area affected by the link were invited and attended. Street meetings were held in the area in April 2011 which was attended by the residents affected by the east west access road. Residents also attended the project office at Airds Bradbury Central during the public exhibition period. The proposal is backed by consultation and awareness.

Traffic Issues Can be Managed

Briar Road is the only road that currently provides access to Airds Town Centre from Bradbury (St Johns Road). Creigan Road and Docharty Road do not provide connection to Airds from St Johns Road.

The new link will be a local road with an appropriate cross-section to serve its local road function which would not encourage a fast traffic environment. The subdivision pattern will have dwellings fronting the street to discourage anti-social behaviour.

The proposed new roundabout at Campbellfield Avenue and St Johns Road intersection will be located more than 300m north of Briar Road roundabout. The spacing of these major intersection is considered acceptable along St Johns Road. The design details of this intersection will be resolved at development application stage.

Karingal Place can be designed so that it does not have a direct connection to the new road. This can be dealt with at DA Stage. Although seen to be of benefit in providing access to the town centre, Karingal Place can remain a cul-de-sac accessed off Docharty Road.

The local impacts of Campbellfield Avenue extension such as impacts of additional traffic on the safety of Karingal Place are not expected to be significant and will be further investigated as part of the subdivision application that creates the connection.

Similarly other local impacts such as impacts of additional traffic to Bow Bowling Cres and Alliot Street are not expected to be significant and will also be investigated as part of the subdivision application with local traffic control measures included as appropriate to minimise impacts on adjoining residential areas.

Landcom to work with Council and its Local Traffic Committee to ensure that suitable traffic calming measures are undertaken within the project.

3.2 Open Space and Parks

Planning for open spaces has been a key consideration in the preparation of the Concept Plan with consideration given to this element in the DesignOutLoud process, other elements of the community consultation and in discussions with Council. It has been informed by a number of investigations and studies by Urbis throughout the design process and on-going discussions of Council as the managers of open space assets.

Section 2.5.6 of the EA provides a description of existing open space. The study area includes a number of reserves and parks totalling approximately 18.9ha of Council open space. There are five distinct parks including Deane Park, Riley Park, Kevin Wheatley VC Reserve, Brindley Park and Merino Reserve. A long corridor of undeveloped land at the eastern extent of the study area comprises Peppin Park, River Reserve, Georges Parkway Reserve, Greengate and Hagan Reserve.

The Smiths Creek Corridor also acts as a vacant area, separating Airds and Bradbury. The abandoned road corridor is predominantly used for informal pedestrian pathways and public utility services. There is also a range of other smaller areas of undeveloped land that act as informal parks.

There are a number of parks in close proximity to the site in Bradbury and there is a significant area of school playing fields. The area is bordered on the east by a large amount of open space classified as bushland.

Issues with the present open space provision include:

- Lack of causal surveillance and visual ownership of open space creates safety issues for users;
- Lack of connectivity between public open spaces and areas of activity such as shops and schools;
- Spaces and facilities are not well maintained with dumped rubbish and graffiti;
- No recreational facilities of any real consequence are provided;
- Visual dominance of open space is detrimental to the quality of the public domain, which should provide a degree of enclosure to users;
- Ongoing maintenance costs associated with large extent of underutilised open space.

Opportunities to improve open space include:

- Better use of open space areas to provide a more focused area with a defined role and function;

- Relocate open space to encourage highest and best use of land within the study area and around the town centre;
- Provide recreational opportunities via play equipment, shelters, cycleways etc for a range of age groups;
- Redesign open spaces to improve the casual surveillance of the public domain and open space areas consistent with CPTED principles;
- Improve accessibility to important destinations such as shops and schools by re-arranging open space areas;
- Link open space network with broader Campbelltown open space network;
- Reduced maintenance.

The concept plan results in the removal of poorly performing open space areas and their replacement with a network of connected and well designed spaces with function and facilities and which are accessible to the community. This results in a more efficient use of land, safer, more useable parks and a reduction in the on-going maintenance costs for Council.

Planning for future open space had regard to issues of security and the rationalisation of other areas of open space which are not useable or well patronised. Council staff have indicated that some open space areas have low retention value.

The Integrated Social Sustainability and Health Impact Assessment (Appendix 11 of EA) identified significant benefits from an improved open space outcome with parks that are better located, safer and well designed and appointed for social interaction and healthy living.

The open space to be provided includes a range of active and passive parks and bushland reserves resulting in a total area of approximately 18.6 hectares. Active and passive parks have been located so as to be generally within walking distance of residents. An important element of the public domain is the proposed interconnective street system with its network of pathways and cycleways designed to augment the parks as a recreational resource and facilitate healthy living by encouraging walking and cycling.

The reconfigured open space network responds to community needs, is safe and accessible and is linked to the pedestrian and cycle network.

The provision of parks is included in the Voluntary Planning Agreement which identifies to a considerable amount of detail the facilities and services to be provided. This will ensure the timely provision of parks and greater community certainty as to the facilities that are to be provided.

3.2.1 Loss of Parks including Baden Powell Park

Baden Powell Reserve adjoins undeveloped NSW Land and Housing Corporation land. This remaining portion of Baden Powell Reserve comprises an area of passive parkland with mostly lawn and no facilities.

The consolidation of underutilised, poorly embellished isolated open areas is a critical item in the open space strategy.

The redesign results in a smaller pocket park for the residents to the north and significantly improved access to the new Kevin Wheatley VC Park and the town centre. This will enable activities to be focussed towards the centre of the renewal area readily accessible to residents of the Melaleuca estate and further assist in social integration of new and existing communities.

3.3 Biodiversity Management

The proponent has prepared a Draft Concept Bushland Management Plan and a Draft Biodiversity Offset Package (prepared by Hayes Environmental October 2011 and contained in Appendix 1).

The Concept Plan has been developed having regard to the location and condition of threatened ecological communities on the site with the proposed urban form seeking to avoid and minimise impacts on such communities. Notwithstanding these avoidance measures development in accordance with the Concept Plan would result in loss of 5.62 hectares of degraded native vegetation and habitat. This loss is necessary to achieve required social outcomes for the Airds Bradbury Renewal Project.

The loss is compensated by:

- implementation of protection and management measures to enhance the viability of 6.6 hectares of highly degraded vegetation within the site; and
- revegetation of 12 hectares of additional highly degraded bushland of strategic biodiversity value adjoining the site.

The existing degraded qualities of the bushland on the site can be seen from the diagrams contained in Appendix 2.

The Concept Plan establishes a Voluntary Planning Agreement (VPA) whereby biodiversity values would be maintained and/or improved and guaranteed.

It is considered that these measures are sufficient to offset any impacts on the biodiversity qualities of the site.

3.4 Development Control Guidelines

The renewal project requires new streets and land uses to integrate into and with existing built form resulting in some restrictions on the ability to locate streets and regular block patterns. NSW Land and Housing Corporation and Landcom propose to accommodate a range of housing types on lot sizes that are less than the minimum of 550 square metres allowable under the Campbelltown (Sustainable) City DCP 2009 (the DCP). This means that a range of controls in the DCP that reflect this minimum lot size are no longer applicable for the renewal project.

Consequently alternative development control guidelines are proposed (Appendix 4). These guidelines have been prepared having regard to the provisions of the EA, Council's existing DCP and the desired future character of the area. Consideration has also been given to State Environmental Planning Policy (Exempt and Complying Development) 2008, Council's approved site specific DCP for the Minto Renewal Project as well as Landcom's built form design guidelines and housing diversity guide.

It is anticipated that the Minister will make a determination on any approval of the concept plan application to the effect that subsequent development applications are to be designed having regard to the Airds Bradbury Renewal Project Development Control Guidelines contained in Appendix 4.

Should council wish to amend the DCP to include the guidelines, this can happen in due course and at Council's convenience.

3.5 Community Facilities and Services

The provision of community services and the social impacts of the development have been the subject of a comprehensive Integrated Social Sustainability and Health Impact Assessment and Plan submitted with the EA.

Since exhibition of the EA, discussions have continued with Council, service providers and the community regarding the community facilities to be provided under the concept plan and as part of the VPA.

NSW Land and Housing Corporation is to prepare a Strategic Social Plan that will address the provision of services for residents on the site. The ISSHIA (Appendix 11 of EA) makes recommendations about identification of services (including child and family services) required as part of the development. The Strategic Social Plan will provide greater detail on the location and number of these services which is still to be determined.

The Strategic Social Plan being developed in response to the ISSHIA aims to address the social service needs of residents before during and after the renewal. Importantly, facilities will not be removed until alternative facilities are provided.

The provision of community facilities includes a proposed new multipurpose community facility located within the town centre and the provision of land for a child care centre. This new facility would integrate the services currently provided at Council's Youth Centre, the Family & Neighbourhood Centre and the Amarina Child Care Centre. An alternative strategy would be for these existing facilities to remain. Discussions are continuing with Council in this regard and will be part of the VPA between NSW Land and Housing Corporation and Council.

4. PREFERRED PROJECT

The response to the above submissions has resulted in a number of minor changes to the Concept Plan for which approval is sought. The Concept Plan is described as follows.

Approval is sought for a Concept Plan for the Airds Bradbury Renewal as shown on **Figure 1** (also contained in **Appendix 8** of this report). The Concept Plan comprises the following development:

- The demolition of approximately 645 dwellings, vegetation and structures including roads and services (131 already demolished);
- Subdivision of land including the consolidation of existing super lots and the re-subdivision of land for residential and related purposes;
- Subdivision works including:
 - new roads;
 - new stormwater management works;
 - extended and upgraded utility services; and
 - bulk earthworks;
- Public domain improvements including new and upgraded parks as part of a network of landscaped public open spaces and street trees and pedestrian and cycle paths;
- The construction of a new multipurpose community facility located within the town centre and the provision of land for a child care centre. This new facility would integrate the services currently provided at Council's Youth Centre, the Family & Neighbourhood Centre and Amarina Child Care Centre. An alternative strategy would be for these facilities to remain. Discussions are continuing with Council in this regard;
- Alterations and additions to existing NSW Land and Housing Corporation dwellings to be retained on the site.
- The use of land for housing and related purposes.



Figure 1 – Concept Plan

The general features of the renewal are:

- Approximately 531 mostly town house dwellings will be demolished, with the balance (880 cottages/dwellings – 789 public and 91 private) retained;
- Rehousing the occupants of approximately 1058 dwellings from public houses to be demolished or sold;
- The construction of approximately 1,160 new dwellings and 52 seniors housing units (30% for public housing) located mainly within the demolished townhouse precincts and the undeveloped Smith Creek road corridor;
- A resulting increase in dwellings from 1,542 to 2,104, 30% of which will be public housing and 70% private and approximately 56% of which will be new dwellings and approximately 44% existing or retained dwellings;
- New and upgraded roads, utility services, parks and community facilities in association with the new development.

These numbers are approximate and may vary during more detailed design of subdivisions for each stage of the development and as a consequence of market forces or NSW Land and Housing Corporation needs. Thus they are indicative of the development envisaged under the Concept Plan.

There will be the progressive release of some 856 residential lots and 527 renovated existing cottages for sale to private home buyers/home builders.

The development will see the staged construction of new roads to provide more direct pedestrian and vehicular links to Bradbury (St Johns Road) and Ruse (Georges River Road) and to provide a more connective and robust urban structure together with an extensive street planting program to improve the amenity of the area.

Works are planned to be completed by 2026 subject to market demand and the rehousing program, providing a 15 year development time frame.

4.1 Street Systems and Access Arrangements

The Concept Plan provides an upgraded urban structure based on a more interconnective street system and improved access from the surrounding main road network. This provides an improved sense of arrival and gateway presentations for the area while improving the integration of the estate with the surrounding area.

The key transport objectives for the Concept Plan are:

- “De-Radburnise” the study area by improving linkages and overall connectivity within Airds Bradbury and to surrounding areas, focused on improvements to Riverside Drive, the main circular route through the study area;
- Improve vehicular and public transport access within Airds Bradbury and to adjoining areas;
- Optimise the location of the town centre having regard to existing and future road network, and public transport networks;
- Remove existing unsafe pedestrian underpasses;
- Provide safe and direct cycleways and pedestrian linkages connecting local services, schools and open spaces in Airds Bradbury as well as to other neighbourhoods;
- Identify recommended changes to existing road network to improve connectivity within the estate and to adjoining areas and to support the renewal process;
- Reinforce key internal and external east-west connections.

These are achieved by works that include:

- Relocating the existing Riverside Drive access at Georges River Road to the west which connects to a central spine through the new town centre of Airds.
- Providing a new access at Georges River Road through the extension of Deans Road.
- Providing a new direct connection to Junction Road through the extension of Peppin Crescent.
- Providing a new direct connection to Campbellfield Avenue through a new east-west collector road to the town centre of Airds (discussed in Section 3.1 above and **Appendix 3**).
- Integrating public transport, cycle paths and pedestrian paths into the above network.

The access strategy incorporated into the Concept Plan is described in greater detail in the *Transport and Accessibility Study* prepared by Aecom contained in **Appendix 12** of the EA.

Existing accesses at Briar Road, Akuna Avenue and Greengate Road will be retained. A number of new internal roads improve the connectivity of the study area including:

- A realigned Riverside Drive from the town centre to Georges River Road along the Smiths Creek Corridor. This forms part of the main collector into Airds from Georges River Road.
- A new grid road network surrounding the new town centre.
- A new east-west road (extension of Campbellfield Avenue) connecting Riverside Drive to St Johns Road.
- A new north-south road connecting the new Campbellfield Avenue extension and Merino Crescent along the Smiths Creek Corridor.
- An extension of Riverside Drive to the south of Briar Road to connect with Greengate Road.
- A new road along the edge of the proposed Georges River Parkway, south of Briar Road.

Existing roads will be retained and incorporated into the new structure as indicated on **Figure 2¹**. Minor works may be required to existing streets to integrate with new works.

During registration of future subdivisions the proponent's intention is to dedicate all new and reconstructed roads to Council.

¹ Figure 2 not amended to reflect final concept plan as per Figure 1.

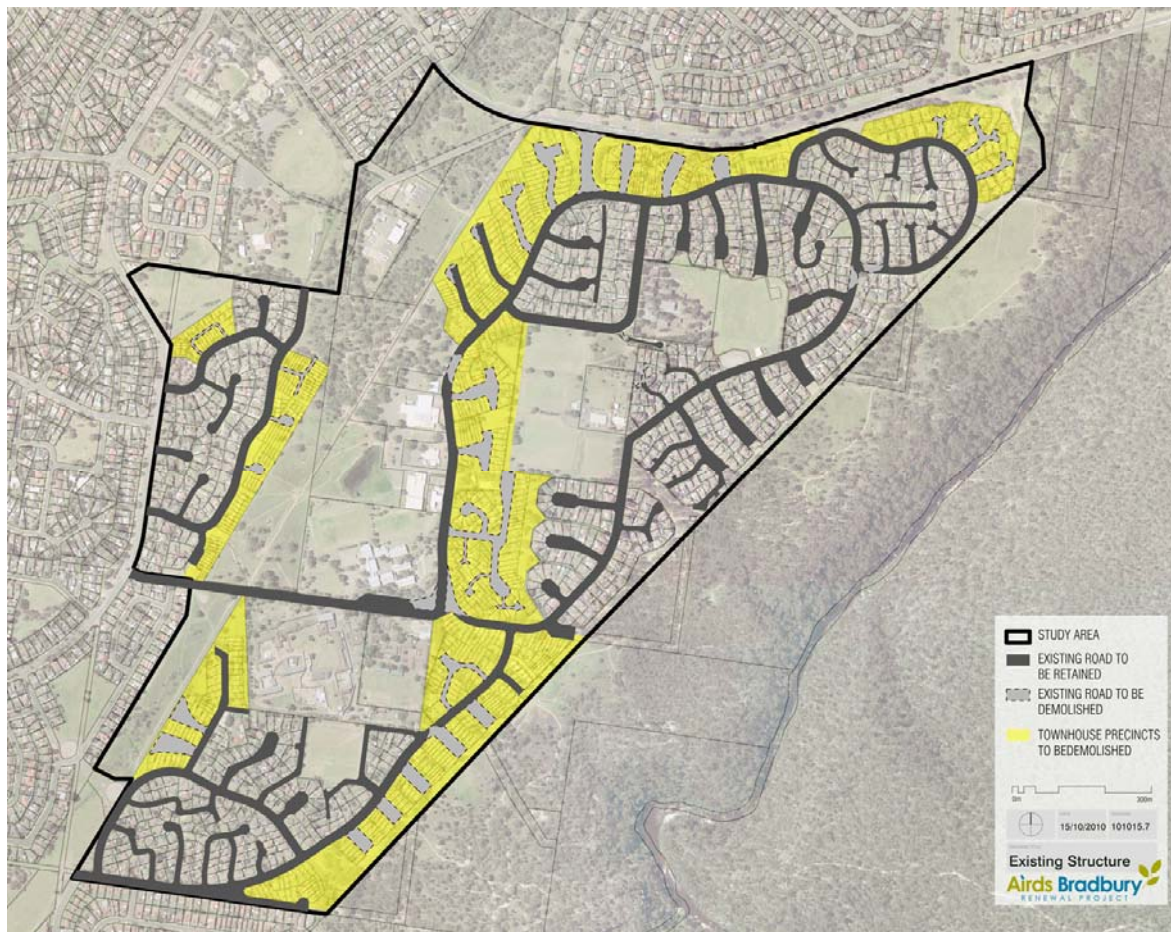


Figure 2 - Demolition

4.1.1 Street System

Appendix 8 contains the revised concept plan layout with the street hierarchy shown generally in *Figure 3*².

Proposed road cross-sections have been designed to ensure that all road users (such as pedestrians, cyclists, buses and cars) are catered for within the road reserve. Cross-sections of all roads within the proposed development are included in *Appendix 12* of the EA.

Most of the road cross-sections, except laneways will have on-street parking provision on both side of the road. On some of the existing local streets such as Riverside Drive and Greengate Road, on-road cycleways will be relocated to off-road shared paths to facilitate on-street parking while maintaining the carriageway width and road reserve.

² Figure 3 not amended to reflect final concept plan as per Figure 1.



Figure 3 – Indicative Road Hierarchy

4.1.2 Public Transport

The road network and intersection treatments have been designed to accommodate efficient bus movements between Airds and Campbelltown. Early consultation with Busways has been undertaken to develop an indicative bus network for Airds Bradbury.

The proposed bus routes are shown in *Figure 4*³.

Busways is confident that the proposed bus routes will be acceptable by Transport NSW given its experience of bus route planning in the region. The proposed bus catchment (400m on each side of the bus route) will cover over 90 percent of the Airds Bradbury study area.

³ Figure 4 not amended to reflect final concept plan as per Figure 1.



Figure 4 – Indicative Public Transport

4.1.3 Walking and Cycle Network

Concept walking and cycling networks have been developed with reference to a range of published guidelines and policies including the Planning Guidelines for Walking and Cycling (Department of Planning, 2004). The network is intended to provide safe and efficient routes that present a viable alternative to car travel for local and regional trips. The improved road network within the study area improves cycle and pedestrian connections.

A network of off-road shared paths and on-road cycle paths is proposed to link key amenities such as open spaces, schools and the facilities in the town centre. The internal cycle network will also connect with the on-road cycle network along St Johns Road and Campbellfield Avenue as well as the off-road shared path link on the northern side of Georges River Road.

The proposed bicycle routes are shown in *Figure 5*⁴.

⁴ Figure 5 not amended to reflect final concept plan as per Figure 1.

The majority of existing on-road cycleways will be converted to off-road shared path to provide a safer environment for cyclists and to cater for on-street parking provision. On-road cycleways are provided in the vicinity of the town centre to segregate pedestrian and cyclists.



Figure 5– indicative Cycle Routes

New off-road cycleways are proposed along the Smiths Creek Corridor and the Georges River Reserve.

Footpaths are provided along all roads (except laneways) Additional pedestrian refuges are proposed outside schools, major open spaces, senior living areas as well as the town centre to facilitate safe crossing opportunities for pedestrians.

The proposed pedestrian facilities in Airds Bradbury are shown **Figure 6⁵**.

⁵ Figure 6 not amended to reflect final concept plan as per Figure 1.

The existing pedestrian underpasses in the vicinity of the town centre will be closed and replaced by more direct on-road pedestrian crossing facilities.



Figure 6 – Indicative Pedestrian Network

4.1.4 Sustainable Travel Measures

In addition to the infrastructure and service upgrades discussed above, other sustainable travel initiatives have been identified for investigation of viability during project implementation including items such as:

- Household Information Packs for the new dwelling units within Airds Bradbury, which would incorporate public transport leaflets, route maps and timetables, pedestrian and cycle network maps including leisure maps, and information on

sustainable community initiatives and other local community projects to reduce travel or encourage uptake of sustainable modes.

- A local Bicycle User Group (BUG), which the local community could be encouraged to set up or join an existing BUG which is active in the local vicinity and which works to encourage bicycle use and promotes bicycle rides and initiatives.
- School travel plans for the local schools (including a walking school bus program), which can lead to a mindset which encourages active travel throughout life for both children and parents for other journeys. Access by walk and cycle will be facilitated by continuous, high quality pedestrian and bicycle paths.
- Car share scheme, which would reduce the residents' need to own and operate their own vehicle, safe in the knowledge that they can get access to a vehicle if they require one. Campbelltown Council could consider extending the provision of established car share schemes using an established provider (such as GoGet) to set up a car sharing network for Airds Bradbury.

4.2 Urban Structure

The Concept Plan approach is to create an urban structure of a scale and appearance that responds to the residential areas. It increases residential density around the town centre location to ensure walkable catchments. A series of main vehicular entry points into the study area positively reinforce a sense of arrival with formalised major pedestrian and cycle movement paths integrated into the street system. The Concept Plan incorporates the following:

- Reconfigured the open space network to respond to community needs, is safe and accessible and is linked to the pedestrian and cycle network;
- Use an appropriate combination of building location, material selection and landscape treatment to create appropriate edge treatments and transition zones;
- Preserve key community cultural resources;
- Reward higher densities with greater amenity;
- Improve community safety by introducing street edges to open spaces and fronting housing towards open spaces;
- Establish new roads to create new blocks of a size suitable for a variety of residential densities and to improve vehicle and pedestrian accessibility and safety;

- Locate new roads along the edges of open spaces to encourage surveillance and improved access;
- Locate high density residential development near the existing town centre and new community and retail facilities;
- Establish new pedestrian and vehicular links to the town centre and within open space.
- Align new roads to link with adjoining residential areas.

4.3 Subdivision Pattern

The Concept Plan (*Figure 1*) contains an indicative street layout. Subdivision to create lots within the blocks formed by the new streets is proposed to be subject to subsequent applications. A range of lot sizes and average lot sizes are proposed as indicated in *Figure 7*. This is subject to refinement and change during the detailed design process.

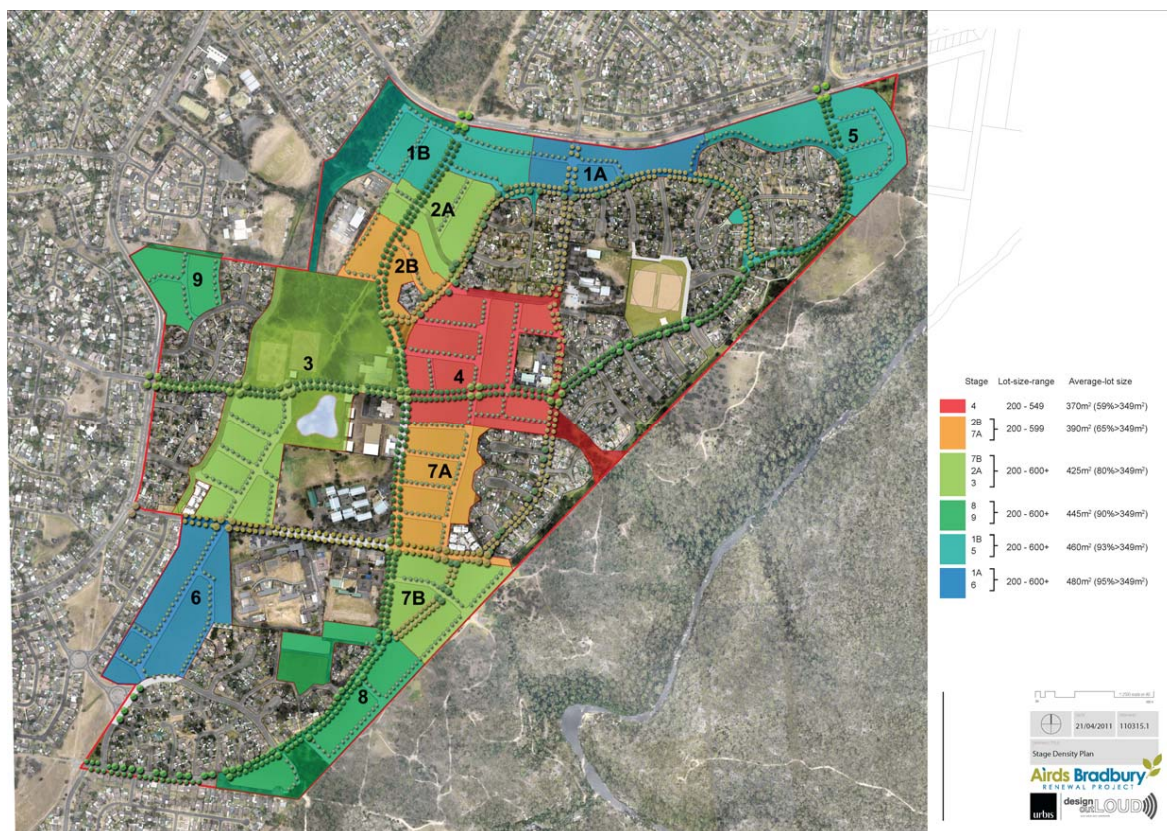


Figure 7 – Average Lot Size and Staging Plan

Figure 8 is an illustrative design of a subdivision pattern envisaged by Concept Plan with indicative dwellings. This drawing is also included in Appendix 8.

The proposed subdivision pattern provides a range of lot sizes with the more intensive development located closer to the town centre and along the main north south access street.

The subdivision and built form will be guided by sound planning principles in accordance with the Development Control Guidelines contained in Appendix 4.

Lot sizes range generally from 300 square metres to 500 square metres with some lots with a minimum of 200 square metres. These will be located primarily in close proximity to the town centre.

Lots will be designed to accommodate dwelling houses envisaged in the Development Control Guidelines contained in Appendix 4.



Figure 8 - Illustrative Lot Layout

4.4 Activities and Land Use

The Concept Plan seeks to integrate and improve upon the existing activities and improve accessibility to the wider regional network. It aims to connect destinations and population by an integrated pedestrian, cycle, public transport and vehicle network through the streets and parks. It also aims to:

- encourage a variety of retail and community developments within the town centre;
- integrate the open space in Kevin Wheatley VC Park, Smiths Creek Corridor and the pond with Town Centre retail and commercial development;
- make Airds Bradbury a viable centre for retailing, commercial, community, cultural, and entertainment uses;
- enhance and improve the amenity of the site through redevelopment of the existing social housing, introduction of increased private housing and improved access to local services by non-car based transport;
- develop social uses and spaces for the local community;
- reinforce the vehicular, pedestrian and visual links between shopping and community facilities and the surrounding residential areas; and;
- create a safe and enjoyable environment.

The Concept Plan achieves these aims by:

- supporting the broader retail role of the town centre via new road, cycle and pedestrian links and increased densities near the town centre;
- creating the potential for a multi-purpose community centre and land for a child care centre;
- retaining important elements of the community such as the schools;
- supporting existing and future initiatives for a community garden;
- encouraging walking and cycling via pedestrian and cycling networks that lead to destinations and provide safety and interest;
- encouraging greater informal social interaction via building that front public spaces, and designing properties to have semi-private areas to the front of the dwelling;

- supporting employment by increasing densities near the town centre and improving connections;
- Increase activity on the street by formalising on-street parking.

4.5 Built Form

The built form envisaged under the Concept Plan has been driven by the suburban character of the surrounding area and the need to increase density and achieve increased housing provisions in areas with good access to services and transport.

The renewal project will reduce the concentration of social housing to 30% of all dwellings and will follow the traditional pattern of houses and front yards addressing the street. The project, like Minto aims to emphasise the special qualities of the local environment through the built form and landscape design. Like Minto it is intended to pursue house designs that promote an indistinguishable streetscape of private and social dwellings.

The Concept Plan seeks to:

- Provide a range of dwelling types in response to market demands;
- Provide a subdivision layout whereby new dwellings address and reinforce the street through appropriate building siting and orientation;
- Provide buildings that can be constructed to enhance safety through design, by providing casual surveillance over areas of public open space, including streets and paths;
- Provide varied built edges which respond to open spaces, reinforcing their importance to the community and improving their surveillance;
- Improve the character with higher density housing types, such as attached homes which are designed to resemble a large two-storey home;
- Improve community safety and encourage social interaction by orienting dwellings to the street, parks, and other public spaces;
- Reduce stigma of social housing by designing all dwellings to present a similar indistinguishable built form to the surrounding private housing;
- Encourage more active and inviting streetscapes by designing car parking structures and hardstand areas to complement the built form of dwellings and to avoid dominating the streetscape.

4.6 Height, Bulk and Scale

The majority of the renewed estate will be one or two storeys in height so that the proposed development is consistent with the suburban character of the adjoining residential suburbs.

The Concept Plan seeks to:

- Reinforce the extension of Campbellfield Avenue as a main street by providing an active retail edge, allowing direct access to shops, outdoor dining, and discrete vehicle entries;
- Create a strong built edge to the existing and proposed streets in the town centre to reinforce the public domain in terms of definition, amenity and safety;
- Increase density within and adjacent to the town centre to gradually fall to meet the surrounding residential context;
- Provide a varied built edge, which responds to the town centre recreational areas, reinforcing its importance to the community and improving its surveillance;
- Maintain the suburban feel and character of the area through the selection of appropriate density housing types;
- New dwellings are to present a similar built form and external appearance so that a casual observer is less likely to be able to distinguish a difference in public and private ownership.

4.7 Housing

The Concept Plan envisages housing as follows:

- Approximately 827 retained cottages, some of which will be sold and some retained as public housing which will be upgraded as part of the Community Renewal Strategy;
- 1,160 new dwellings to be constructed on lots created through the new subdivisions, some of which will be for public housing and some by purchasers of new lots;
- seniors housing units on sites selected by NSW Land and Housing Corporation as suitable for this purpose (52 units in addition to the 53 recently completed units);
- multi-unit housing by NSW Land and Housing Corporation.

It is expected that the predominant built form will be detached and attached dwelling houses with some small lot housing forms and seniors units.

The nature of housing to be constructed on lots proposed under the Concept Plan has not been determined at this stage. Examples of building types that may be appropriate on the range of lots envisaged are provided in **Appendix 5**. This includes typical street elevations and solar access diagrams to give an indication of the anticipated built form character and resulting residential amenity.

4.8 Public Domain

The public domain comprises the proposed parks and reserves and the streets including off street movement systems.

The public streets and open space areas provide both legibility and unity to the renewal. The functional and operational restrictions placed on the public domain leads to the adoption of a strategic approach in the identification of the areas which may deliver maximum impact in the elements of the public domain. The critical areas within the open space, the town centre and the streetscape have been highlighted to maximise the potential outcomes delivered by the public domain and open space strategy.

It should be noted that as part of the HNSW 'Green Street' Program substantial numbers of semi-mature street trees have been planted in the existing streets. Where possible these trees will be retained and supplemented.

4.8.1 Open Space

The design objectives for the open space system (as described in the Landscape Statement prepared by JMD Design contained in **Appendix 7**) are:

1. Design to consider context, history and future use;
2. Open spaces to be contemporary in nature and innovative;
3. Passive parks to cater for a broad range of users, mix of spaces and both structured and informal recreation activities;
4. Design to promote passive surveillance of open space;
5. Maximise co-location and sharing opportunities of active recreation facilities;
6. Park buildings to be functional and aesthetically pleasing in design and be located to integrate not dominate open space areas;
7. Lighting restricted to key pedestrian thoroughfares only;

8. Minimise visual impact of carpark and other infrastructure in open space;
9. To encourage planting and landscape treatment which build the environmental value of the site including biodiversity and native fauna habitat.

The indicative landscape plan is shown on **Figure 9**.



Figure 9 – Indicative Landscape Concept

Park design requirements are:

1. Parks shall generally be located as illustrated on the Landscape Master Plan;
2. Include facilities within public open spaces generally in accordance with Concept landscape plans which have been developed with Council's input;

3. Where existing significant trees are located within the park areas consider detailed grading to maintain existing ground levels and allow retention of trees;
4. Lighting shall conform with the current Australian Standards, including AS 1158 Lighting for Roads and public spaces AS 2560 –Sports field Lighting;
5. Landscaping and built structures shall not create obscured areas. Ensure tree species selected in public areas can be maintained with a clear trunk to a minimum of 2 metres;
6. Incorporate planting of indigenous species and vegetation communities to enhance native fauna habitats;
7. Reduce water usage by using indigenous and low water tolerant species and efficient irrigation systems;
8. Native planting should be considered as deep root planting to reduce salinity risk;
9. Circulation and connections: Generally Bicycle Paths in road verges shall comply with Austroad Guide to traffic Engineering Practice Pt 14- Bicycles and AS 1742.9 Manual of Uniform Traffic Control Devices Part 9 Bicycle Facilities. Cycling and walking pathways in open space shall be 2.5m for shared cycleway/pedestrian pathways and 1.5m for other pathways". Reinforced and coloured concrete vehicular crossing points shall be included to allow maintenance vehicles.

Parks are provided at Kevin Wheatley VC Park, Riley Park and Merino Reserve. Additional linear open spaces and bushland connectivity provide an interface with the Georges River Parkway and access to the parkway. The Smiths Creek Corridor is also included.

Details of the parks and park embellishment are contained in the Landscape Statement prepared by JMD Design in **Appendix 7**.

4.8.2 Streets

The landscape character of the street is created by well defined front gardens, street trees and the visibility of backyard trees beyond the house. The streetscape is a major contributor to the quality of the overall neighbourhood. (Built Form Guidelines for Landcom Projects May 2008)

The streetscape strategy objectives of the Concept Plan are:

- Establish a logical street hierarchical pattern;

- Facilitate easy accessibility within the site by building and augmenting where necessary, the existing street layout and hierarchy;
- Reinforce connections to existing road patterns adjoining the site;
- Provide strong repetitive elements of appropriate character and in scale with the residential development to create a unity for the suburb;
- Highlight gateways and nodes to provide legibility within the suburb;
- Promote solar access through the use of deciduous trees;
- The landscape overlay is intended to reinforce the street hierarchy as part of the public domain streetscape strategy.

Street tree principles of the Concept Plan are

- Define and reinforce site entrances by introducing landmark planting;
- Reinforce legibility of street hierarchy by defining node typology, facilitate orientation/navigation across the site by reinforcing nodes / intersections along Collector Roads (landmark planting);
- Preserve and enhance views, reinforce gateways to Airds
- Street trees shall be planted to both sides of all streets, where feasible;
- Use of predominantly indigenous species for street tree plantings in outer perimeter streets to enhance existing character and biodiversity of native vegetation;
- Deciduous trees have been located on east west road axis and evergreen species on north south road axis to increase solar access and temperature control;
- Use species for street tree plantings which will reach a mature size appropriate to the scale of the streets;
- Street tree planting shall be coordinated with subdivision layout, traffic plans and services layouts to ensure appropriate integration with vehicle crossovers, sight lines, lighting and other services;
- Large scale tree planting: where space allows in the road verge such as at road intersections and corners larger scale evergreen trees are utilised to provide an emergent tree canopy over and above the general roofline of housing to give Airds a verdant appearance when viewed from a distance;

- Street trees planted will be in accordance with the Council's specifications.

The street tree strategy is shown on **Figures 10 and 11** with additional details included in **Appendix 7**.



Figure 10 – Indicative Street Tree Strategy 1



Figure 11 – Indicative Street Tree Strategy 2

4.9 Community Facilities and Services

The provision of community services and the social impacts of the development have been the subject of a comprehensive Integrated Social Sustainability and Health Impact Assessment and Plan submitted with the EA.

Since exhibition of the EA, discussions have continued with Council, service providers and the community regarding the community facilities to be provided under the concept plan.

The provision of community facilities includes a proposed new multipurpose community facility located within the town centre and the provision of land for a child care centre. This new facility would integrate the services currently provided at Council's Youth Centre, the Family & Neighbourhood Centre and the Amarina Child Care Centre. An alternative strategy would be for these existing facilities to remain. Discussions are continuing with Council in this regard.

NSW Land and Housing Corporation is to prepare a Strategic Social Plan that will address the provision of services for residents on the site. The ISSHIA (Appendix 11 of EA) makes recommendations about identification of services (including child and family services) required as part of the development. The Strategic Social Plan will provide greater detail on the location and number of these services which is still to be determined.

The Strategic Social Plan being developed in response to the ISSHIA aims to address the social service needs of residents before during and after the renewal. Importantly, facilities will not be removed until alternative facilities are provided.

4.10 Land Use

The Concept Plan envisages the following land uses:

- Residential uses which include detached and attached dwellings, seniors housing and multi-unit housing. The Concept Plan envisages a variety of residential types would be permissible on the site;
- Open space in the form of parks and reserves including active spaces and conservation managed spaces;
- Community facilities to meet the needs of the development including the facilities discussed above;
- Continuation of the retail centre, tavern and service station with the potential for redevelopment and alterations and additions to town centre functions.

4.11 Town Centre

The town centre is envisaged as a focal point where shopping, working, leisure, sporting and community activities can take place. The Concept Plan envisages an expanded Town Centre with additional retail, commercial and community uses. These uses have sought to integrate in with the existing shopping centre, in the context of integrating the town centre into the renewal area.

The revitalised town centre is located at the intersection of two main roads being the existing Riverside Drive, and the extension of Cambellfield Avenue, incorporating and to the south of the existing shopping centre. The identity of the town centre will be clearly delineated from other areas of Airds and Bradbury, through proposed expanded retail/commercial activities, signage, street furniture and landscape treatment evocative of town centres.

The Concept Plan can only outline desired urban design principles for the existing shopping centre site as it is in external ownership.

As the Town Centre seeks to attract a concentration of pedestrian activity, pedestrian safety is to be safeguarded through proposed discrete vehicular entry/exit points to car parks located away from main pedestrian flows. Convenience parking can be incorporated into the Town Centre to enable passing drivers to easily access retail services.

Efficient pedestrian movements can be incorporated into the Town Centre concept through a dedicated pedestrian zone to provide a high quality and safe public realm. Pedestrian links are to be reinforced between the existing shopping centre and proposed town centre uses to the south. Bicycle paths are proposed to connect from the town centre to the adjoining recreational area that accommodates natural assets and facilities such as the pond, rugby fields, basketball courts, and barbeque and picnic areas.

4.12 Alterations and Additions to NSW Land and Housing Corporation Houses

Alterations and additions to dwelling houses owned by the NSW Land and Housing Corporation that will be retained on the site will be undertaken. It is anticipated that approximately 770 cottages will be upgraded with some 527 sold and the balance retained by NSW Land and Housing Corporation. These figures are subject to minor changes during the project's lifecycle.

Alterations and additions include external and internal alterations. It is intended that there will be no discernable differences externally between social and private dwellings.

4.13 Utility Services

Utility services serving the site are described in **Appendix 10** of the EA. All utility services are available or can be readily extended to meet the needs of the development. The Concept Plan seeks to minimise the disruption to the existing services and thus the residents within the precincts where private residents are being retained.

4.14 Water Cycle Management

The proposed Concept Plan water cycle management strategy is described in detail in the Water Cycle Management Report prepared by Storm Consulting Pty Ltd and contained in **Appendix 8** of the EA.

The strategy comprises a range of elements that work together to deliver an integrated outcome addressing each of the following:

- stormwater quality improvement;
- flooding and detention;
- potable water substitution;
- environmental restoration/rehabilitation.

A number of options for stormwater detention have been investigated with the preferred option being the provision of limited detention in the Smiths Creek corridor. Detention will be achieved by a minor restriction to the size of the culvert under Georges River Road to detain water. A small wall along the rear boundaries of the properties to the west upstream of the culvert may be required. This requires minor adjustments to an existing situation.

Drainage corridors for the development must be designed to convey flows for the 100 year ARI storm event.

The eroding channel within the Smiths Creek corridor will be rehabilitated by employing the Natural Channel Design Guidelines (Brisbane City Council, 2003). Combinations of rock armouring balanced with vegetation will stabilise the stream. The weeds in the corridor need to be removed, commencing with noxious weeds and followed by environmental weeds. A revegetation plan will allow for the introduction of enhanced biodiversity, however, this must not increase the stream roughness above acceptable levels for flooding.

There is also the potential for stormwater harvesting for the two proposed playing fields in the Smiths Creek corridor should this have any long term impact.

It should be noted that the cumulative effect of rain tanks, bioretention systems, the pond and stormwater harvesting will also provide distributed detention across the proposed development, meaning that the results are conservative. The detention effects of these items has not been modelled or reported in the results.

Stormwater quality targets for the development can be met by combining the effects of rainwater tanks on individual lots with bio-retention systems either in road corridors or as end of line basins. End of line bio-retention is preferred which can have pre-filtering using gross pollutant traps (GPTs), or by installing sediment/litter trapping devised. The proposed water quality strategy is shown on **Figure 12**.

All watercycle management elements will be discussed with Council during the future DA stages.

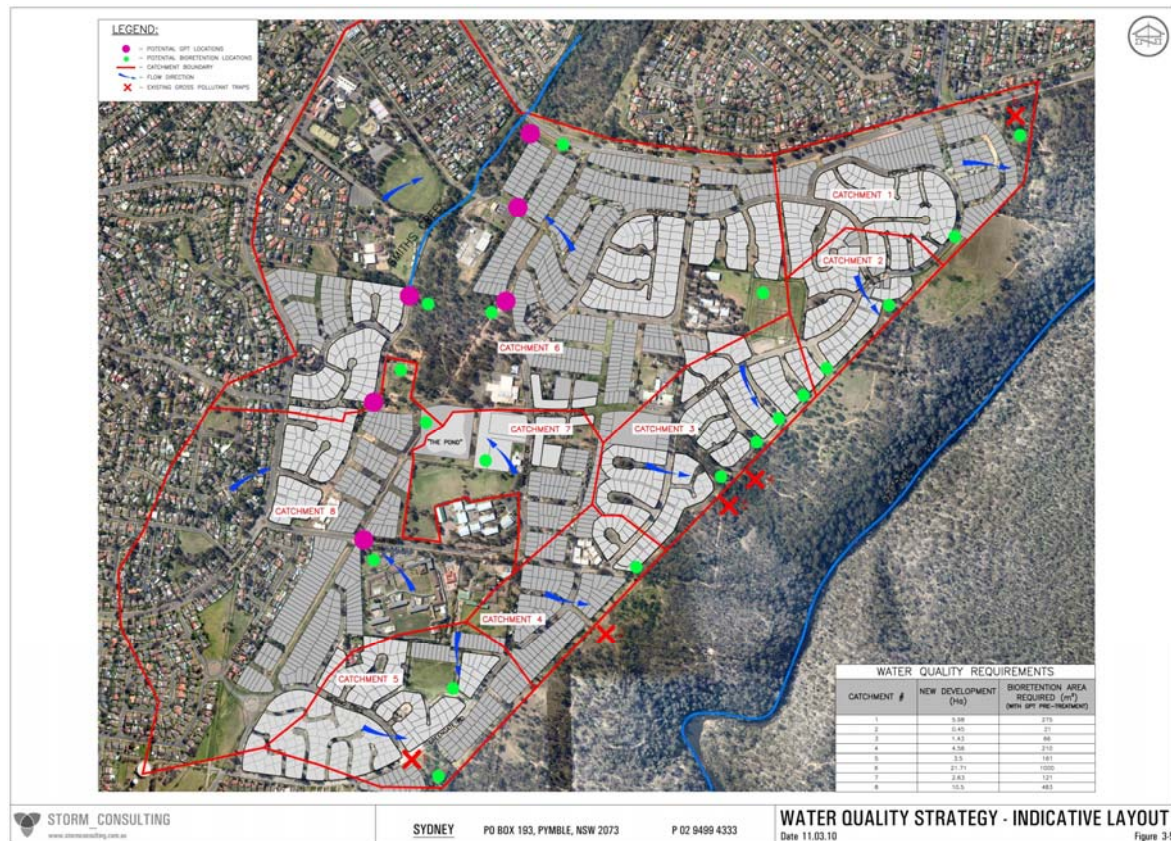


Figure 12 - Stormwater Quality Strategy

4.15 Demolition

Development envisaged under the Concept Plan requires the progressive and managed demolition of existing dwellings primarily within the town house precincts on the site. As with the construction phases, the demolition of existing dwellings will be staged.

It is envisaged that a further 531 dwellings are to be demolished although it is expected that this figure may change as detailed design progresses and as more information comes to hand on the condition of existing dwellings.

Demolition will take place progressively within each stage. Residents will be progressively rehoused. NSW Land and Housing Corporation has established a rehousing team to assist tenants through this period, similar to Minto.

Approval is sought for the demolition of existing dwellings and structures on the site which are necessary for the development to proceed.

The demolition will be in accordance with the requirements as set out under the Australian Standard AS2601 – 2001: The Demolition of Structures which is incorporated into the Occupational Health and Safety Act 2000 which is administered by WorkCover NSW.

Demolition will include:

- the removal of all improvements;
- breaking down and removing all foundations and footings;
- breaking up and removing road pavements, footpaths and services not required for the development;
- removal of debris and rubbish.

Barriers will be erected around the work area to protect the public.

A Hazardous Building Materials Management Plan will be prepared prior to demolition commencing. This report will indicate the construction materials to be demolished on-site and the mechanism for controlling and managing the demolition and disposal of possible hazardous materials. Methods used to safely demolish and dispose of any hazardous materials will be provided. The demolition process will be controlled by specific guidelines including the Occupational Health and Safety Regulation 2001 and all WorkCover requirements.

An erosion and sediment control plan will be prepared to control run off during the demolition process.

A Waste Management Plan will be prepared prior to demolition commencing. Where possible materials will be recycled for reuse on the Site.

Gas, electricity, water, sewer and telecommunications will be sealed at relevant Site entrance points and will be undertaken according to the relevant utility standard.

A Site Management Plan will be prepared to ensure the safety of the existing residents during the demolition program. This will include, but will not be limited to:

- means of providing pedestrian and vehicular access to existing dwellings including temporary access as required;
- means of managing noise and dust;
- means of advising the community of the construction program on a regular basis;

- means of communicating with the contractor and clear procedures for registering complaints and follow-up.

The demolition program will involve consultation with the rehousing and community renewal teams.

It is considered that these works can proceed without further environmental assessment and a determination to this effect is requested.

4.16 Earthworks

Bulk earthworks will be undertaken on a stage by stage basis although there will be some transfer of excavated material between stages requiring short term stockpiling. Regrading works will be undertaken to modify and enhance overland flow paths, to provide for new road construction and to provide suitable building platforms. All efforts will be made to achieve a balance of cut to fill. Additional earthworks will be required for road, drainage and utility works.

4.17 Tree Removal

The site contains a number of mature trees that have grown following completion of the housing estate. These are located in a number of areas including parks and vacant lands, in front and rear yards and occasionally along streets. The Concept Plan has been prepared having regard to the location of trees. Consideration has been given to locating trees within parks where consistent with other planning objectives. Most of the trees in the cottage precincts retained as part of the Concept Plan will be kept. Other trees along or adjoining streets to be retained are also likely to be not affected.

It is inevitable that the renewal process will result in the removal of trees in the areas to be redeveloped. This is necessary to redesign the street network and construct new dwellings. Trees to be removed will be replaced with new street trees as outlined in Section 4.8.

4.18 Waste Management

Waste materials result from construction and demolition (C&D) activities. C&D waste quantities can be significant for urban renewal projects, such as Airds Bradbury. Effective planning and management can prevent unnecessary disposal to landfill and consumption of resources. Recycling and reuse options must be considered on all projects with significant quantities of C&D waste.

Landcom's minimum targets will be incorporated in the delivery stage project management brief, tender package (sustainability returnable schedule) for development partners and associated Project Delivery Agreement (PDA), Builder

Agreements, civil works contracts and building contracts (where building activity is a direct Landcom contract). The overarching Landcom target is to achieve 95% recovery (reuse and recycle) of total construction and demolition waste materials generated from sum of civil works contracts completed in that year.

The Concept Plan application does not envisage any works other than demolition of existing dwellings. It is proposed that a construction waste management plan will be prepared prior to commencement of construction as part of a construction management plan and a commitment to this effect is included in the statement of commitments.

4.19 Sustainability

In striving for sustainability, development should contribute to the enhancement of the natural environment and to provide land and resources in an appropriate condition for future generations.

A major aim of sustainability is to decouple economic growth from increased use of resources and generation of waste. This can be achieved through more efficient use of resources – getting more value out of each unit of energy and mineral extracted from the ground and increasing the efficient use of water. Minimising waste in all stages of production, together with reuse and recycling of the end product, all contribute to resource efficiency and an improved ecological footprint. The Concept Plan is founded on the principles of sustainability. Sustainability is enhanced by the Concept Plan in a number of ways:

- Reuse of an existing developed site to provide improved housing, improved public transport accessibility and better use of available urban services in a location that is accessible to the centre of Campbelltown;
- Providing an urban form that facilitates walking and cycling in safety and with more direct access to facilities and services;
- Minimising impacts on existing endangered ecological communities within the less developed sections of the Smiths Creek bypass corridor;
- The requirement for all new dwellings to be designed to achieve BASIX requirements;
- The provision of a stormwater management system that provides controls over water quality prior to discharge off site and opportunities for rainwater harvesting;
- Providing a housing mix and urban form that is conducive to the on-going social sustainability of the precinct.

Subsequent applications for approval for stages of the renewal will give further specific consideration to sustainability.

Sustainability initiatives will be implemented during design construction and operational phases of the project and will include the following.

4.19.1 Design

- Retention of core biodiversity areas within the site and provision of conservation and open space connectivity;
- Water sensitive urban design measures that will result in improvement in water quality, incorporate the riparian network and integrate with urban design;
- Connectivity to regional infrastructure to support more efficient transport within the wider region;
- Potable water supply conservation and identification of integrated options for stormwater harvesting and re-use in parklands;
- Reduction in travel distances and improved mode share split by:
 - Revitalising the Town Centre and locating related land uses centrally to maximise the opportunity for multipurpose trips;
 - Providing a street network with a high level of connectivity and permeability;
 - Locating public transport corridors within 400 metres walking distance of the majority of dwellings;
 - Connecting public transport corridors to key local destinations;
 - Providing an interconnected network of pedestrian priority streets and open space corridors to encourage walking between residences and facilities; and,
 - Providing a system of on-street and off-street cycleways to encourage bicycle usage.

4.19.2 Construction

- Re-use of the existing developed site to provide improved housing, improved public transport accessibility and improved community and recreational facilities;

- Reduction of subdivision construction waste going to landfill by recycling excavated materials 'in-situ';
- Recovery and recycling of waste materials from existing dwellings to be demolished;
- Reduction in waste from homes, during and after construction, by educating builders and residents on the benefits of waste minimisation;
- Undertake environmental and OH&S audits on all civil works and building contracts;
- All construction contracts let to include sustainable materials, design and practices requirements.

4.19.3 Operation

- Reduction in potable water usage through BASIX initiatives;
- Reduction in greenhouse emissions through BASIX initiatives;
- Achieving a 6 star thermal efficiency rating through NatHERS;
- Providing homeowner/resident kits to inform residents of the resource efficiency features and initiatives and the benefits available.

4.20 Safety and Security

Subdivision layout enhances safety through design, by providing casual surveillance over areas of public open space, including streets and paths. Building design and orientation, subject to further approval will also be considerate of safety and security.

Additional road and pedestrian connections are proposed to improve permeability and safety across the site. Pedestrian amenity and safety can be enhanced throughout the development precincts by establishing formal pathways that are clearly visible from the public domain.

Parks have been designed and located to encourage passive surveillance and public safety through their location in relation to adjoining streets, choice of landscaping, street furniture and lighting.

Subsequent applications will give further consideration to principles of CPTED when design details are advanced.

4.21 Development Staging

Subsequent to the approval of the Concept Plan application, separate applications will be lodged for all works and development on the land, including subdivision, the carrying out of works, the erection of buildings, and any other matters for which further approvals or environmental assessment as required by the terms of the Ministers approval.

As stated above, it is submitted that no further environmental assessment is required for the demolition of buildings, structures, vegetation or services.

The indicative staging plan is shown in **Figure 13**. The development will proceed generally from the north to the south. The sale of NSW Land and Housing Corporation properties will occur generally at the time new lots are produced and sold.

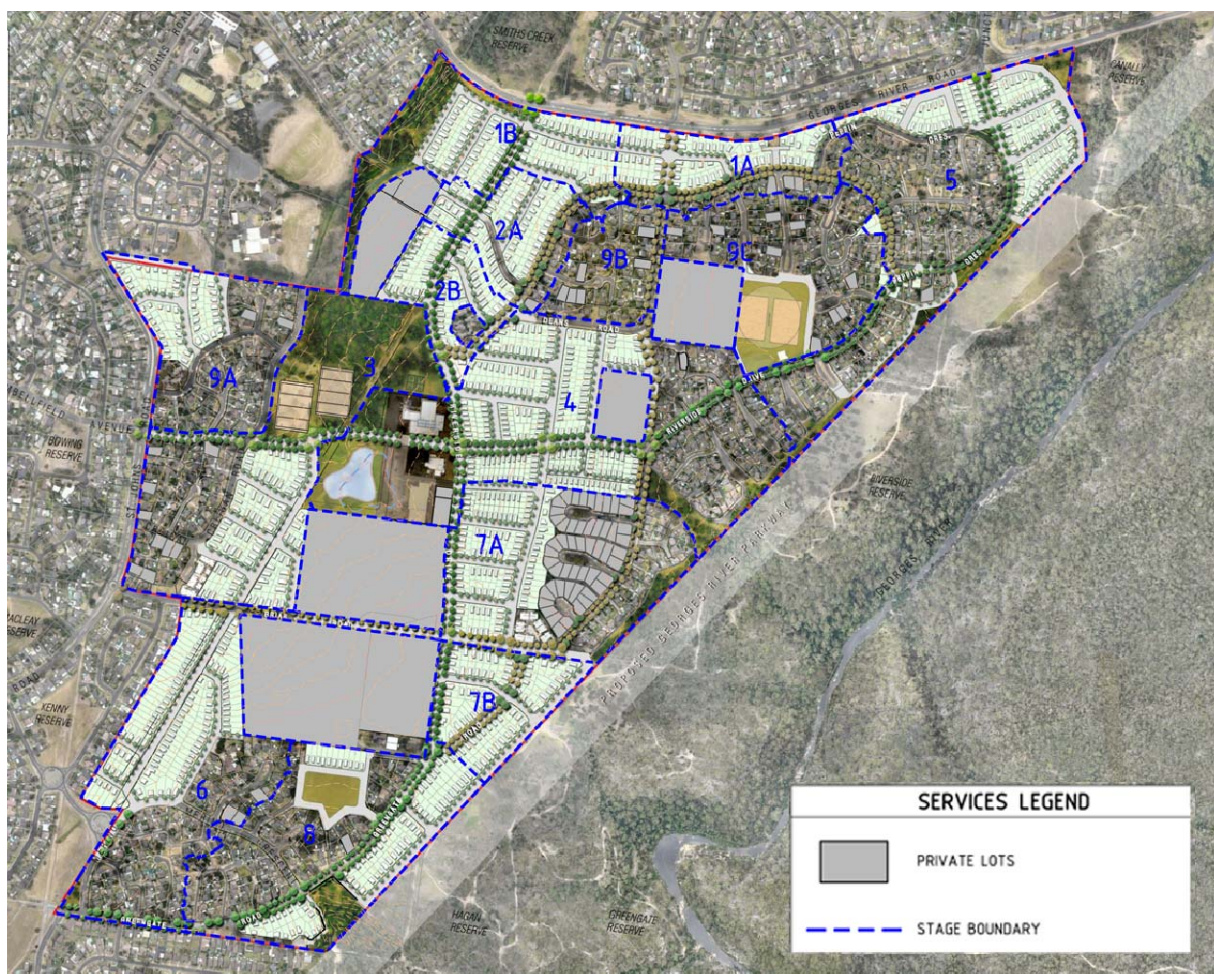


Figure 13 - Staging

4.22 Off-Site Works

The implementation of the Concept Plan may require additional works located off site this might include intersection works and works to lead in infrastructure trunk mains and services. Such works to be the subject of separate applications pursuant to the Concept Plan are envisaged by the Concept Plan.

4.23 Ministerial Determinations

The EA requests the following Minister's determinations pursuant to S75P:

1. That demolition as described in Section 4.15 above can be undertaken without further environmental assessment.
2. It is anticipated that the Minister will make a determination under S75P(1)(b) to the effect that approval to carry out subsequent stages of the project is to be the subject of Part 4 of the Act. If this determination is made, the Minister is also requested to direct, pursuant to S75P(2)(c1), that a provision of an environmental planning instrument prohibiting or restricting the carrying out of the project under Part 4 does not have effect. This will enable early stages of the project to be approved prior to any housekeeping amendment to the LEP to be consistent with the Concept Plan as approved.
3. That the Minister will make a determination on any approval of the concept plan application to the effect that subsequent development applications are to be designed having regard to the Airds Bradbury Renewal Project Development Control Guidelines contained in Appendix 4.

5. STATEMENT OF COMMITMENTS

A draft Statement of Commitments was provided in the Environmental Assessment Report. Following consideration of the submissions made during (and after) the exhibition period, changes have been made to the draft Statement of Commitments as highlighted below.

5.1 Statement of Commitments

5.1.1 Introduction

The Director General's Requirements require the proponent to include in an environmental assessment a statement of the commitments the proponent is prepared to make for environmental management and mitigation measures on the site showing how the project will be managed in an environmentally sustainable manner.

In submitting this statement of commitments, it is recognised that the application is for concept plan approval and that additional environmental assessment, including additional statements of commitment or conditions of approval, will be required prior to works commencing (other than demolition).

5.1.2 General

- A. The development will be undertaken generally in accordance with the Environmental Assessment Report dated March 2011 prepared by BBC Consulting Planners (including accompanying Appendices) and the Response to Submissions Report prepared by BBC Consulting Planners dated October 2011.
- B. NSW Land and Housing Corporation and Landcom are committed to the principles of sustainability as defined in the Environmental Planning and Assessment Act 1979.
- C. The proponent will continue to consult with the local community during the development process.
- D. The proponent will continue to liaise with the Council during the development process.
- E. The proponent will enter into a planning agreement with Council to provide roads, social and community infrastructure, drainage and facilities and amenities generally as indicated in the Environmental Assessment Report.

5.1.3 During Demolition

- A. Demolition will be undertaken in accordance with the requirements of Australian Standard AS2601 – 2001: The Demolition of Structures which is incorporated into the Occupational Health and Safety Act 2000 administered by WorkCover NSW.
- B. A Hazardous Building Materials Management Plan will be prepared prior to demolition commencing.
- C. An Erosion and Sediment Control Plan will be prepared to control run off during the demolition process.
- D. A Waste Management Plan will be prepared prior to demolition commencing. Where possible materials will be recycled for reuse on the Site.
- E. A Community Access and Safety Plan will be prepared to maintain access to, and to ensure the safety of, the existing community through the demolition process.
- F. Demolition will occur in consultation with the community and will be integrated with the strategies to be put in place to manage the process of change and rehousing on the site.

5.1.4 Social Impacts

- A. The proponent will prepare and implement a Strategic Social Plan to develop a coordinated approach to service planning, service delivery and change management as recommended in the *Integrated Social Sustainability and health Impact Assessment* contained in Appendix 11 of the Environmental Assessment Report.
- B. The proponent will prepare and implement a Rehousing Process including establishing a Rehousing Team within NSW Land and Housing Corporation.
- C. The proponent will prepare and implement a Communications Strategy throughout the development process.
- D. The proponent will obtain all necessary approvals required by State and Commonwealth legislation in undertaking the project.

5.1.5 Access and Movement

- A. Roads will be constructed in accordance with the objectives principles and design criteria contained in Appendix 12 of the Environmental Assessment Report.

5.1.6 Urban Design

- A. Development will take place generally in accordance with Development Control Guidelines design guidelines contained in the Environmental Assessment Appendix 4 of the Response to Submissions Report dated October 2011.

5.1.7 Water Cycle Management

- A. Stormwater management works will be undertaken generally in accordance with the Water Cycle Management Plan contained in Appendix 8 of the Environmental Assessment Report.
- B. Any existing stormwater infrastructure to be retained shall be designed and modified in accordance with the guidelines of the major and minor stormwater system in Australian Rainfall and Runoff, Water Cycle Management Plan in Appendix 8 of the Environmental Assessment Report and Australian Standards.

5.1.8 Biodiversity and Vegetation

- A. The proponent will implement the measures outlined in the Concept Bushland Management Plan prepared by Hayes Environmental dated October 2011 and the Biodiversity Offset Package prepared by Hayes Environmental dated October 2011.
- B. The proponent will undertake a survey of all trees and other site features prior to the commencement of construction of any stage of the project and will seek to retain as many trees as possible for incorporation into the new urban form.
- C. The proponent will provide landscaping to all streets and parks as outlined in the Environmental Assessment Report.

5.1.9 Aboriginal Culture

- A. The proponent will implement the recommendations on page 46 of the Assessment of Aboriginal Heritage Impact in Appendix 7 of the EA.

5.1.10 Open Space and Community Facilities

- A. The public domain will be constructed and enhanced in accordance with the objectives and principles contained in Section 4.8 of this Preferred Project Report.
- B. Community facilities will be provided in accordance with the objectives and principles contained in Section 4.9 of this Preferred Project Report.

5.1.11 Construction Management

- A. Prior to commencing construction, a Construction Environmental Management Plan will be prepared. This Plan will include:
 - Development of a site specific soil erosion and sediment control plan,
 - Construction hours,
 - Air quality/dust control procedures,
 - Noise management procedures,
 - Waste management plan,
 - Flora and Fauna Protection Plan,

- Community Safety Plan,
 - Arrangements for temporary pedestrian and vehicular access,
 - Storage and Handling of Materials Procedures,
 - Environmental Training and Awareness,
 - Contact and complaints handling procedures,
 - Emergency Preparedness and Response.
- B. All trees on the site that are not approved for removal are to be suitably protected by way of tree guards, barriers or other measures as necessary are to be provided to protect root system, trunk and branches, during construction.

5.1.12 Utilities

- A. EE to provide attenuation to meet current standards for existing or previous dwellings. Attenuation will be provided by proponent as required for any new dwellings under the concept plan that are closer to the substation than existing or previous dwellings such that they would increase attenuation obligations on EE.

APPENDICES

APPENDIX 1

APPENDIX 2

APPENDIX 3

APPENDIX 4

APPENDIX 5

APPENDIX 6

APPENDIX 7

APPENDIX 8
