

PRE DEVELOPMENT APPLICATION LODGEMENT ADVICE

Application number	PRE-DA-31/2025
Applicant	Mirvac Residential (NSW) Developments Pty Ltd
Description of proposed development	Tree removal, site remediation (excluding works carried out as category 2 works), vegetation management and conservation, subdivision into residential lots (Stages 1-3) and super lots (Stages 4-7), construction of all civil works including excavation, civil and road and stormwater works across the site, delivery of 3 public parks, and construction of 49 dwelling houses.
Property	2A Bullecourt Avenue, MILPERRA NSW 2214, 2 Bullecourt Avenue, MILPERRA NSW 2214
Site Details	Lot 1 DP 101147, Lot 2 DP 1291984
Meeting Date	5 September 2025 – letter issued prior 3 September 2025

The Pre-Development Application (Pre DA) advice below is provided following the review of the documentation submitted. The Pre DA documentation provided did not contain all relevant reports and documentation that would be required should a development application (DA) for the proposal be lodged. The below comments should be considered on that basis, noting that a comprehensive review was limited by the submission.

Should a DA be lodged for the proposal further updated and additional detailed reports are required to enable a complete and comprehensive assessment of the project. This may alter comments provided below.

Planning

1. The applicant must ensure that all reports and documentation prepared and submitted for assessment have been prepared and reviewed collectively. For example, the Biodiversity Assessment Report (BDAR), Contamination Report and Bushfire Report must be consistent in consideration of vegetation to be removed from the site i.e. where a contamination report notes that contamination works are proposed around the base of a tree which will result in its failure and therefore removal, the BDAR must have accounted for this removal in its considerations. Likewise, should the Bushfire Report require asset protection zones to be maintained on lots with vegetation, the report must outline if the asset protection requirement is limited to tree canopy cover, under storage growth etc and ensure that the BDAR has accounted for this.
2. An updated survey plan prepared by a registered surveyor must be provided for assessment of the DA. In accordance with Council's guide to lodging development

applications, the survey must be prepared within 6 months of the date of lodgement. Given the age of the survey submitted and the changes on site, the current survey is not sufficient for assessment.

3. A Stormwater System Report (SSR) must be submitted as part of any lodgement package.
4. A flood report is to be prepared and submitted as part of the DA. The flood report must address the relevant provisions in Council's standards, controls, the advice previously provided and as outlined further below.
5. The application shows work/tree removal occurring outside of the site on adjoining land. Owner's consent and property details for any lots proposing work to facilitate the DA must be provided. All reports and documentation must correctly reflect the extent of works and ensure that the considerations have included these areas in the assessment (i.e. tree removal shown outside of the site along the M5 must be included in the expert reports prepared including but not limited to, Bushfire Report, BDAR, Contamination Report, Civils etc).
6. The general arrangement and staging plan prepared by Beverage Williams sheet 02 of 02, Rev A, dated 23.06.2025 should include the notations for all residue lots providing the indicative lot dimensions and areas.
7. The master staging plan would not form part of a stamped approved set of drawings (should a DA be approved) as it indicates future residential lots not sought within this DA. This should be updated and the residue lots only shown where the current application does not seek consent for the final 'residential' lots (outside of lots within stage 11, 12, 21, 22 and 23).
8. The civil plan set should not show the internal 'lot' layout that will be sought in future DA's in other stages i.e. stage 4 indicative lot boundaries should not be shown. The remaining area should only depict the residue lots and roads (infrastructure) as sought within the DA. The civil plans should note the existing and proposed earthwork levels, retaining walls etc however the smaller indicative lots, not sought within this DA, should be removed from all plans.
9. An overall site plan showing the street parking as required by the DCP should be provided for review and assessment. The submission does not appear to provide all the on-street parking identified within the concept plan (figure 2) of the Canterbury Bankstown Development Control Plan 2023 (CBDCP 2023), Chapter 11.13. An overall plan that demonstrates compliance should be provided for review and assessment.
10. Further details and an address of the driveway placement for lot 2101 must be provided. The current design and kerb extension on the allotment appears to result in a driveway that would not be suitable in the current location. This should be reviewed and where necessary the lot width increased to enable a suitable driveway location to

be provided for accessing the lot (should the pedestrian crossing design be accepted).

11. The creation of lot 30 (E1 and C2 zoned land) and the inclusion of a further community title subdivision of proposed lot 30 has not provided sufficient detail for consideration. It is unclear on what the intention of this will achieve and currently it is considered it should not be pursued as part of the initial DA. Sufficient details have not been provided to demonstrate why this should be considered and form part of a DA lodgement.
12. Council will not accept a community title scheme that removes the car parking required for the childcare centre operations to be located on a separate allotment.
13. Details are required to be provided to demonstrate how the childcare centre will continue operations during the development or where it is not sought to continue operating details outlining and surrendering the current consent that applies to the land is required. Where the centre is proposed to remain operational, the statement of environmental effects must comprehensively outline how the proposal and use will remain compliant with the relevant approval in place or seek to obtain further approval within the DA submission.
14. The plans note that a new car parking area is proposed on site for the childcare centre. The parking shown is not supported as it appears to propose several spaces in excess of what would be required. Further the parking arrangement and location utilising stacked/tandem car parking fails the CBDCP 2023 Chapter 3 as previously advised in the withdrawn DA and will not be accepted. Where the childcare centre's car parking is required to remain operational, the parking spaces required for the operations only in accordance with the current approval will be considered. The new parking arrangement must be compliant with the CBDCP 2023, and the stacked spaces removed. The advice previously provided for the childcare centre and the car parking arrangements in the withdrawn DA remain unchanged.
15. No detailed plans have been provided for the embellishment of the open space areas; therefore no detailed comments can be provided at this stage.
16. EV charging infrastructure and substations are not shown. The plans need to note the proposed locations for this infrastructure. These facilities need to be shown, where they are located within areas to be dedicated to Council in the future, do not form part of the minimum area required.
17. All pedestrian crossing details, and any calming devices required, are to be shown on plan and included in any Traffic Impact Assessment (TIA) prepared for the development to evaluate the suitability of the location and treatments proposed.
18. Currently sheet 18 shows distances between vehicle footway crossings (VFC) for some lots within stage 11, but not all. The civil drawings need to be updated, and distances demonstrated between all driveways proposed for residential lots. The plans must cover all lots proposed within residential stage 11, 12, 21, 22 and 23. The

driveway plan must show the indicative driveway locations, street trees, on street car parking to be retained, and any other infrastructure provisions (light poles, stormwater pits etc) for review and assessment.

19. The submission needs to ensure that the proposal complies with the requirements of the CBDP 2023, Chapter 11.13, Section 3.1 C8 and C9 for the Laneways proposed. Detailed plans noting how vehicles will enter and exit in a forward direction must be provided. For laneway 2 and 3, demonstration of the ability for Council's service vehicles to access the lane and leave in a forward direction must be provided. Where this cannot be demonstrated to Council's satisfaction, in accordance with C10, these roads will be retained in private ownership.
20. The cross section provided within the civil engineering plans for the pedestrian access pathway must be updated and demonstrate compliance with the CBDP 2023, Chapter 11.13, 3.1, C23. The plans submitted do provide for the 5m shared path required by the control. A variation to the width is not supported.
21. The submission needs to ensure that the pedestrian site link and required easements by the DCP are shown on the relevant subdivision plans in accordance with the CBDP 2023, Chapter 11.13, Chapter 3.1, C24.
22. The application submitted does not make provisions for a future pedestrian link to the south as outlined by the CBDP 2023, Chapter 11.13, Section 3.1, C 25. The plans must be updated, and more details provided to demonstrate the pedestrian link along the southern boundary of the site (north of the M5) to Horsley Road. It is considered that suitable provisions could be accommodated within the development to achieve this link.
23. In accordance with the CBDP 2023, Chapter 11.13, Section 3.2, C9 the applicant must ensure that all lots proposed within residential Stage 11, 12, 21, 22 and 23 that are 9m wide have the relevant dwellings proposed within the DA for assessment.
24. The canopy cover and landscape plan submitted are not satisfactory to demonstrate compliance. The plans appear to assume and consider the canopy cover over the street along Ashford Avenue outside of the 'site' which is not to be included.
25. Any submission provided must detail compliance with the CBDP 2023, Chapter 11.13, section 3.4 Canopy cover. The canopy cover and landscape plans have not provided sufficient details on how the indicative area of the 85% mature canopy cover spread shown was considered. Plans need to outline the species selected, the size to be planted, the canopy cover at full maturity to establish that the 85% indicative shown is accurate.
26. A site plan that shows the entire site and road network is to be provided with the zoning map overlay for assessment. A preliminary review appears that the location of Road 2B accessing of Horsley Road is located partially within the C2 Environmental Conservation zone and E1 Local Centre zone. The objectives and controls within the CBDP 2023, Chapter 11.13, Section 3.4 require that the

development of the site enhance and conserve existing canopy cover and retain trees. A concern is raised over the placement of this road within the conservation zone. The road alignment should be reviewed and shifted south to ensure that the conservation zone is not impacted by the access into the development site.

The access shown to Horsley Road is unorderedly and at this stage the access design would not be supported. It is unclear how the design is operationally the best solution for accessing the site along Horsley Road.

The design should be revised, and the road alignment shifted to ensure the C2 zone is not impacted unnecessarily. Any access for the development needs to be detailed in a Traffic Impact Assessment submitted within any DA lodgement. The Traffic Impact Assessment must evaluate alternative treatments and locations for the Horsley Road access, and detail how the proposed access sought is suitable in the context of the site, and ensures the best outcome and safety of any user (pedestrian and vehicle) and limits any implications on traffic flows/restrictions as a result of the design selected.

27. The development must ensure that the comprehensive tree survey for the site required by the CBDP 2023, Chapter 11.13, Section 3.4 C11 is submitted and that any relevant report including an updated Arborist report, BDAR, Bushfire report etc have adopted the same numbering convention to ensure consistency across the reports in reference to the trees on site.
28. The application was not accompanied by detailed drawings and design for the open space areas and public domain, as such no assessment can be provided. Any proposal lodged will need to provide the necessary plans and documentation to demonstrate compliance with the CBDP 2023, Chapter 11.13, Section 3.5.
29. Driveway locations for lots 2301-2303 adjoining the park need to demonstrate suitable manoeuvring in accordance with CBDP 2023, Chapter 11.13, Section, Section 3.5 C15. Driveways in proximity to the open space areas need to ensure they are located to minimise conflicts with pedestrians and cyclists, in particular the place of driveways for lots 2301-2303 should be reviewed.
30. An acoustic report has not been provided for review. An acoustic report is required to be provided that evaluates the development and potential impacts to future residents in accordance with CBDP 2023, Chapter 11.13, Section 3.8. Detailed plans and reports must be provided to outline compliance.
31. Details within any application need to be provided addressing CBDP 2023, Chapter 11.13, Section 4.7 Sustainability. It is noted that the submission has said substations will be provided to support EV charging. It is unclear why the infrastructure hasn't been provided within the DA as outlined by the DCP. More details will be required.
32. Details within the DA must be provided to demonstrate the achievement of the controls within CBDP 2023, Chapter 11.13, Section 5 in relation to the creation of lot 30 containing the E1 Local Centre and the C2 Environmental Conservation.

Details and plans need to be provided to address the controls and objectives set out for assessment. Retained structures are required to demonstrate compliance with the controls set out in the both the CBLEP 2023 and CBDP 2023 in relation to floor space ratio, setbacks etc for the on the new lot proposed. Plans demonstrating compliance with these requirements must be provided.

33. Details within the DA must be provided to demonstrate the achievement of the controls within the CBDP 2023, Chapter 11.13, Section 6 Bushfire Hazard Management. A Bushfire Report must also be prepared and accompany the DA lodgement.
34. The architectural plans for dwellings on site must ensure that they demonstrate the existing natural ground level in accordance with the updated survey required, the proposed natural ground level based on the civil works proposed within the DA to ensure complete and accurate assessment of building height, visual privacy and solar access and impacts on adjoining properties.
35. Further details and documentation are required to enable the complete assessment of the built form proposed within the DA (dwellings). Details ensuring the plans demonstrate compliance with the CBDP 2023, Chapter 5.1 and Chapter 11.13 are required. Following a preliminary review of the plans the following comments are provided to be addressed in any DA lodged:
 - Plans should note on elevations orientation, not just side 1, 2 etc.
 - Existing natural ground levels and proposed natural grounds levels should be shown on site plans and elevations.
 - Further details are required to be provided to address the flooding controls within the DCP and ensure compliance with the minimum floor levels required by any applicable SSR and flood study submitted.
 - Landscape plans need to be provided for each dwelling demonstrating compliance with the DCP including calculations, plant species and sizes proposed.
 - Where a first floor is proposed, the building outline must be shown on the plans, including the ground floor plan (some have, some haven't).
 - Further review and design to the dwellings within lots 1114 and 1201 adjoining the pedestrian lane require review and revision as the current plans have not provided a sufficient address of the laneway as required by the DCP.
 - The dwellings fail to demonstrate compliant solar access to the primary living area in accordance with the DCP. This was raised in the previous DA's lodged, and remains within the plans provided for review.
 - The first-floor side bathroom windows should have sill heights increased to 1.5m to achieve optimum visual privacy for future residents.
 - The proposal needs to be supported by additional coloured 3D to show articulation as required by the DCP for the elevations. The plans must clearly show where proposed changes in colours and materials occur on plan for assessment.
 - A number of VFC's appear to fail the DCP requirement limiting them to a maximum width of 3.5m.

Biodiversity

36. Figure 5 (Layout of the project) in the Biodiversity Development Assessment Report (BDAR) proposes the removal of vegetation outside of the subject land that has not been mapped or considered in the BDAR. This vegetation is located outside of the southern boundary of the subject land adjacent to the M5. Given the location of this vegetation outside of the subject land, impacts to this vegetation could be avoided through design refinements.

37. Biodiversity Assessment and Mitigation Hierarchy

- a) The BDAR does not adequately demonstrate that the mitigation hierarchy has been applied, specifically in relation to avoidance and minimisation of impacts.
- b) The BDAR attempts to justify avoidance on the basis that the north-eastern portion of the site zoned C2 – Environmental Conservation was excluded from development at the rezoning stage. Council notes that the Accredited Assessor has previously been advised and agreed that the C2 zone cannot be considered avoidance in subsequent assessments, as the protection of this land was a requirement of the rezoning and its use for residential development is prohibited.
- c) Despite the above, the BDAR continues to present the C2 Environmental Conservation zone as an area of avoidance. This approach is inconsistent with the Biodiversity Assessment Method (BAM) and the Biodiversity Conservation Act 2016 (BC Act). The BDAR must be revised to:
 - a. clearly identify the C2 zoned land,
 - b. exclude this land from being treated as avoidance, and
 - c. ensure no additional impacts are proposed within this zone.
- d) Council also notes that the current proposal includes impacts to land zoned C2 – Environmental Conservation, which is not accepted. These impacts must be removed from the proposal.
- e) With the C2 zoned land excluded, the BDAR must then identify the areas of Cumberland Plain Woodland proposed for retention and removal.
- f) Council further notes that the Accredited Assessor has submitted multiple environmental assessments that are inconsistent with the BAM and the BC Act.
- g) No genuine attempt has been made to retain vegetation within the proposed subdivision. Vegetation shown for retention within the RE1 – Public Recreation zone is limited to planted native vegetation and does not comprise Cumberland Plain Woodland. Accordingly, reasonable avoidance has not been demonstrated.
- h) Council rejects the argument put forward in the BDAR that the R1 – General Residential zoning justifies the removal of vegetation, including Cumberland Plain Woodland. The provisions of the BC Act prevail over Part 4 of the Environmental Planning and Assessment Act 1979 to the extent of any inconsistency. As such, the zoning of the site cannot override the requirement to demonstrate reasonable avoidance under the BAM and BC Act.
- i) It is clear from the plans provided that much of the vegetation proposed for removal could be retained under the current design and further design amendments could allow for the retention of further vegetation. These are considered avoidable impacts.

38. Tree Replacement Plan and Landscape Plan - The Draft Landscape Plan is inconsistent with the Tree Replacement Plan. While it is understood that both plans are in draft form, these plans would need to be consistent when the development application is submitted. The species, number of individuals, provenance and canopy cover area at 80% maturity must also be listed or otherwise identified for each tree species in the Landscape Plan.

Engineering

Stages 1 to 7 (all stages)

39. All proposed street lighting poles and green voltage kiosks shall be centrally located within the 0.6m offset between property boundary and edge of footpath. There shall be no obstruction or abutment of these infrastructure to the footpath. Cross sections of all road reserves (proposed and existing) shall clearly indicate this.
40. Easement widths for the inter-allotment drainage shall be in accordance with the minimum width requirements as outlined in Council's Development Engineering Standards.

Stage 1

41. On-street parking spaces of a minimum 5.5m length (measured from VFC wing to wing) shall be provided along each lot frontage on Ashford Avenue.
42. Existing lintel pits along Ashford Avenue impacted by proposed VFCs shall be modified in accordance with Council standard drawing S-118 with butterfly grated pits and new lintel pits.
43. The front property boundary levels for the proposed lots 1101 – 1114 and 1201 – 1208 shall remain as existing levels at the interface with the finished levels of the internal driveway for the dwellings. The proposed internal driveway levels shall match into existing front boundary levels.

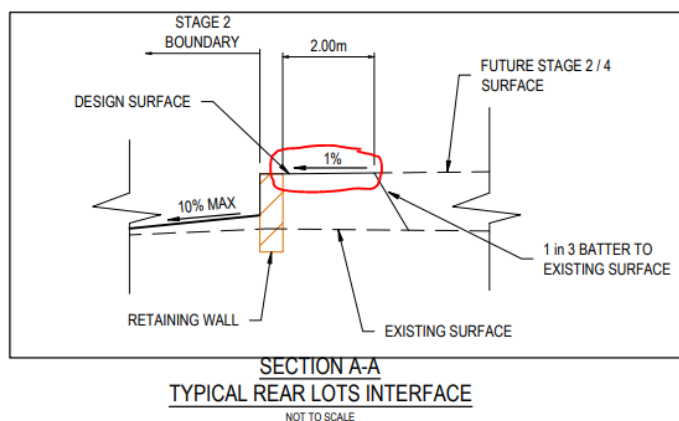
Stage 2

44. VFC layout plan shall be provided for the proposed VFCs along rolled kerb on Road 2A which indicates the following:
- VFC widths at the property boundary
 - Clearances from proposed infrastructure within the future Road Reserve in accordance with Council Standard Drawing S-004
 - Minimum 1.0m offset from side property boundaries to edge of VFC
 - Minimum one (1) on-street parking space of 5.5m length per lot frontage
45. The rolled kerb VFC profiles and specifications shall be in accordance with Asset Planning – Roads Team requirements.
46. Swept path analysis for vehicles entering and exiting the rolled kerb VFCs from the road shall be provided for the following scenarios:

- 2 vehicles parked adjacent to a 3.0m width rolled kerb VFC.
- 3.0m width rolled kerb VFC adjacent to a kerb inlet pit with lintel cover.

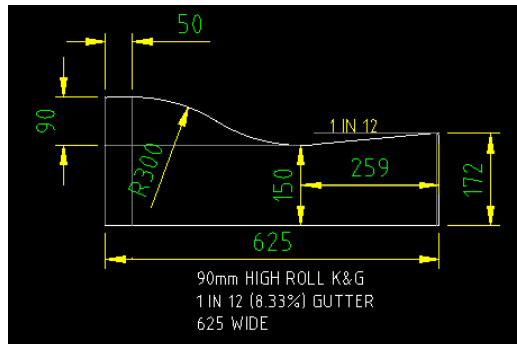
Stages 1 & 2 (combined)

47. Raingarden and sediment basin with associated swales and endwalls shall be made permanent until the bio-basins are established within Stage 4 works so that Stage 1 and 2 works can be connected into these bio-basins. Temporary endwalls discharging into the swales shall be permanent structures such as sandstone block headwalls or similar.
48. Ownership and maintenance of the raingarden and associated swales and endwalls shall be placed solely on the developer. Appropriate restriction on use of land and positive covenants on title to be registered that can be extinguished once Stage 4 works are completed.
49. Further clarification is required on the total storage volume of the sediment basin with raingarden to be retained in the post-developed scenario of Stages 1 and 2. The storage volume needs to be sufficient to ensure that there will be no adverse impacts onto the M5 drainage system that lies outside the subject development site during major storm events (i.e 1% AEP Design Storm). *Note: Concurrence from TfNSW for the sediment basin storage volume and discharge is required as it is their drainage infrastructure and assets that will ultimately be affected by this (i.e. it is not discharging onto any Council owned drainage infrastructure).*
50. VFC clearance requirements shall be adhered to in accordance with Council Standard Drawing S-004. These clearances are related to, but not limited to, existing infrastructure such as street trees, Telstra pits, street lighting infrastructure, etc.
51. Berm around stage 1 and 2 lots are to be graded away from the lots at minimum 1% grade.



52. Applicant is required to demonstrate that the proposed lots are capable of achieving an FFL for the future dwellings at minimum or above the Flood Planning Level (FPL) which is 0.5m freeboard above the 1% AEP flood level.
53. Refer to Section 5.1 of Civil Engineering Design Report, Version A issued on 30/7/2025 by BW – clarification is required on the determination of the 1% AEP flood

63. Roll kerb Fig 7 is superseded. New revised profile to be used as per the below;



64. Porous pavement details are as follows;

75mm Gap Grade asphalt is specified.

Gap graded asphalt has “gaps” filled with bitumen. It is not permeable. Use 75mm OPEN Graded asphalt for permeable surface.

Provide geocomposite layer (Combigrd 30-30 or equivalent) under 50mm aggregate layer instead of geofabric

Use F10 aggregate to TfNSW QA spec 3580 instead of 5mm gravel.

20-40mm gravel to be aggregate complying with RMS 3580 Aggregate Filter Materials

Geofabric to be A24 to TfNSW R63

Subgrade to have CBR>4%.

65. Provide Shared Path bollard vehicle barriers to CBC Dwg S-033 across all Walkways and Pathways at connections to roads.

66. Provide splays on all footpath changes of direction: 600x600 for 90° change of direction; 1000x1000 for >90° changes of direction.

67. Kerb ramps to have same length (1500) along each edge. Currently drawn with different lengths along the edges.

68. Road 2B VFC construction to comply with CBC Dwg S-008, not S-004.

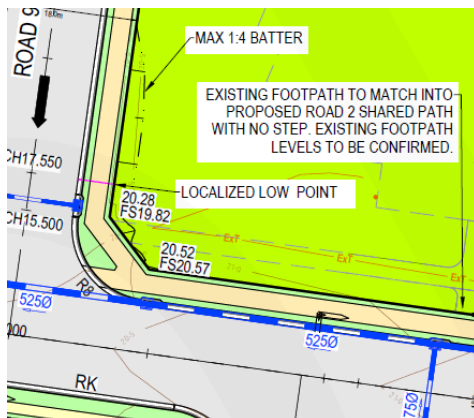
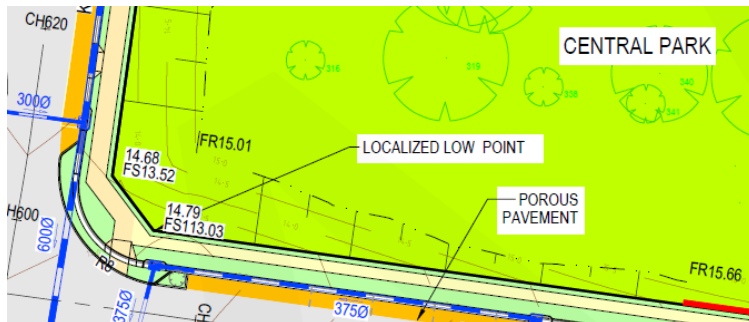
69. Pavement design report and specification to be provided for review and assessment.

70. The following documentation and model shall be submitted as part of the DA:

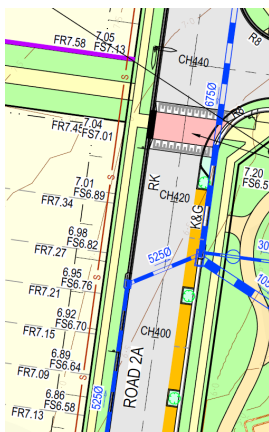
- a. Flood impact assessment report – assess proposed development impacts on local overland flow path originating from Ashford Ave and Flanders Ave to ensure there are no adverse impacts.
- b. Drainage design report – outline design approach and parameters adopted for drainage and OSD design and sizing
- c. DRAINS model – model and HGL results for the simulated design events

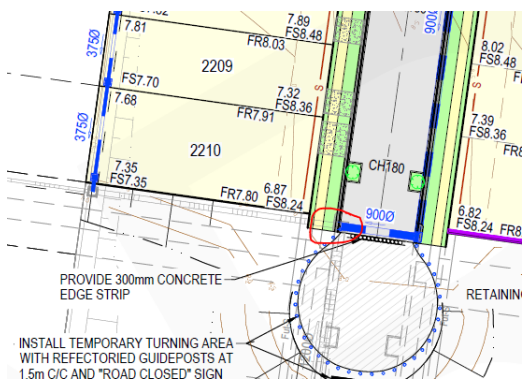
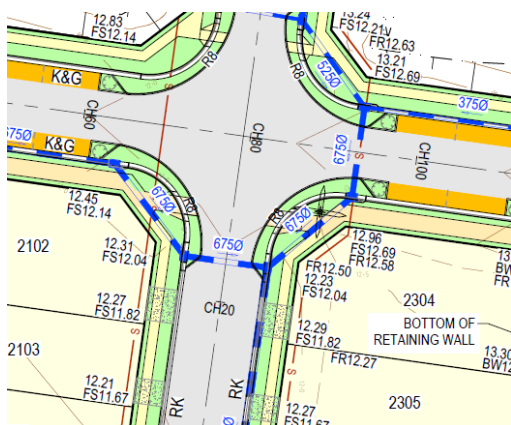
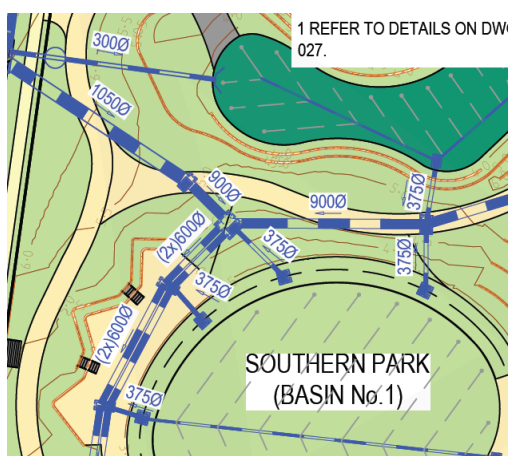
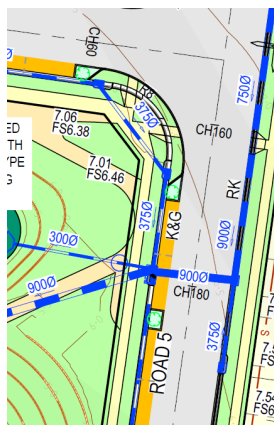
71. The following are comments related to the Civil Engineering Plans, Rev A issued on 1/8/2025 by BW:

- a. Overall Stormwater Layout Plan shall be provided to show the entire stormwater drainage network, OSDs and water quality devices in the ultimate development scenario (inclusive of Stages 1 to 7)
- b. All drainage pipes crossing roads shall be angled at less than 90-deg, ideally 45-deg, if possible, to minimise hydraulic losses within the junction
- c. Drainage shall be provided to drain localised low point at Central Park (refer Drawing 052) and ChildCare (refer Drawing 054) below;



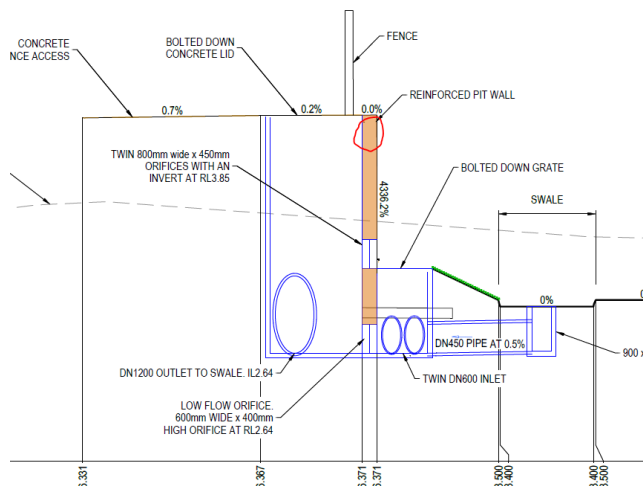
- d. Council advises against sharp angles, particularly changes in direction more than 90-degrees. All converging drainage pipes from opposite directions shall be avoided and realigned (refer Drawings 052, 053, 056)





e. All pits and pipelines shall be numbered in the DA submission

- f. All Stage 6 drainage pipe sizes shall be indicated (refer Drawings 059 and 060)
- g. Council advises against sharp angles for drainage pipe alignment, particularly changes in direction more than 90-degrees.
- h. Minimum pipe size of 375mm diameter required for raingarden connections at Basin No.1 (refer Drawing 056)
- i. Please provide clarification regarding the decreasing pipe capacity going from 1050mm to 900mm to 2x600mm at Basin No. 1 (refer Drawing 056)
- j. Scour protection shall be required downstream of the overflow weirs to prevent scouring of the existing swale
- k. Please confirm design capacity of all basins (i.e. designed to accommodate flow volume for which design event and to accommodate both local catchment and Georges River backwater flows?) and at which AEP design event the basins are meant to overtop
- l. Please confirm width of overflow weir for Basin No. 1, i.e. 0.5m (refer Drawing 505) or 0.25m (refer Drawing 401)
- m. The narrow width of overflow weir for Basin No. 1 is prone to blockage. Please redesign or provide blockage prevention measures
- n. Management Plan shall be required to prevent usage of sports court and fitness zone at Basin No. 1 during rain or flood event
- o. Flood signs shall be installed at/proximity of all basins and floodways
- p. AP Stormwater has concerns the complex basin outlet design is prone to sedimentation
- q. Suggest providing a higher orifice outlet for Basin No. 1 outlet (circled in red as follows)



- r. AP Stormwater preference is for the Basin No. 1 overflow to discharge via the 1200mm diameter outlet for frequent flood events, rather than through the narrow overflow weir. This is to maximise the usage of the 1200mm diameter pipe capacity
- s. Existing Council lintel pits on Ashford Ave affected by the Stage 1 proposed driveways shall be relocated upstream with the lintel size retained, rather than converting to grated inlets
- t. All overflow weir locations shall be indicated on the basin plans
- u. Please provide clarification as to why the Basins 3A and 3B OSD system needs to be separated
- v. GPT (as a primary treatment device) shall be installed upstream of Basins 3A and 3B instead of downstream

72. The following comments relate to the Civil Engineering Design Report, Version A issued on 30/7/2025 by BW;
- a. Stormwater drainage and OSD basins shall be designed in accordance with ARR 2019 version 4.2, utilising uplifting factors to increase design rainfall IFDs to account for climate change up to year 2030 as recommended in ARR 2019 version 4.2
 - b. Refer to Section 8.2 Water Quantity Management – please clarify if the storage volume of both Basins No.1 and 2 for managing local overland flow is added on top of the flood storage that would be occupied by the Georges River backflow
 - c. Refer to Section 8.2 Flood Compensatory Storage – please clarify how the Georges River backflow will enter Basins No.1 and 2 with the proposed retaining wall in place? Would the flows enter through the basin outlet and weir system? Has this been modelled using the regional Georges River flood model to confirm the compensatory storage in Basins No.1 and 2 indeed could be utilised?
 - d. Refer to Figure 10, GPTs for Basin 3 are located at a different location than shown on the Engineering Plans

Open space

73. All plant selections are to be approved by Councils' maintenance team.
74. All pathways are to be formal and of a hard surface. Deco granite or similar will not be supported.
75. Gardens abutting the playground soft fall areas will not be supported.
76. Play equipment is to be Australian made with demonstrated availability of replacement parts.
77. Play equipment is to be constructed of metal and plastic only. Timber features and equipment will not be supported.
78. Upon completion of the playground construction, the equipment is to be assessed for compliance by Council's playground inspection contractor prior to handover. Council's asset planning team will supply detailed list of requirements for the playgrounds upon approval of the DA.

Traffic

79. The pre-DA submission did not include any traffic report for review. Therefore, the DA must provide a full Traffic Impact Assessment (TIA) addressing, at a minimum, and not limited to the following:
- i. Turning path diagrams for all movements of the largest vehicle anticipated to access each access road on Bullecourt Avenue, Ashford Avenue, and Horsley Road and any other intersections that this may apply to.
 - ii. The Traffic Unit does not understand the justification for the traffic treatments shown in the submitted Civil Drawings. The TIA must clearly explain the reasoning for each proposed treatment and provide justification for not adopting the treatments previously requested by Council.

For example:

- The DCP stipulates a raised pedestrian crossing on Ashford Avenue; however, the civil drawing shows a slow point with kerb extensions, which creates uncertainty about whether pedestrians or vehicles have right of way.
- A slow point is also proposed on Horsley Road, which again does not clearly indicate right of way. Traffic previously requested an upgrade of the existing roundabout with splitter islands incorporating pedestrian gaps, so that pedestrian safety is improved without unnecessary loss of on-street parking.

- iii. Driveway mapping – The drawings must clearly show existing and/or approved driveways opposite the development site, such as the proposed driveways for No. 270 Horsley Road (currently being redeveloped). This will allow assessment of the alignment of the proposed treatments in relation to both existing and future driveway locations.
- iv. Raised pedestrian crossings should be located a minimum of 5 metres clear of an intersection to allow for the storage of at least one car length before the crossing, ensuring safe vehicle approach and improved pedestrian visibility. Detailed drawings showing the design aspect of the Pedestrian Crossing must be submitted in accordance to Council Standards.
- v. Plans showing all proposed regulatory signage related to traffic regulation must be submitted to Council for review to ensure their location and details are accurate.

80. Any Traffic Impact Assessment prepared for the development must include swept paths and the ability for a Heavy Ridged Vehicle manoeuvre throughout the subdivision/road network must be provided.

Waste

81. Suitable Waste collection allowing for a Heavy Ridged Vehicle (HRV) for the collection of waste to Lanes 2 and 3 residential properties has not been provided.

82. Further details need to be provided demonstrating that a HRV can access the site and the entire road network. Concern is raised over the ability for a HRV to access Lanes 2 and 3 as well as the access road onto Bullecourt Avenue. Further details are required.

Community safety

83. A full CPTED report should be included with any lodgement to include a range of important site management recommendations that assist in the operational response to crime risk within your development. CPTED assessment of any commercial, residential, mixed use, landscape and government developments in accordance with the NSW Safer by Design evaluation process must be undertaken and provided in the assessment of the DA.

Environment and Health

84. An acid sulfate soil assessment is required as the site is within 500 metres of a Class 3 Acid Sulfate Soil Classification and the proposed development has the potential of removing greater than one (1) tonne of soil from the site or lowering the water table below one (1) metre. This is to be carried out by a suitably qualified environmental consultant in accordance with the 'Acid Sulfate Soils Assessment Guidelines' (NSW Acid Sulfate Soils Management Advisory Committee, 1998).
85. A detailed site investigation with adequate subsoil sampling must be undertaken and submitted to Council. The detailed site investigation report must comply with the NSW EPA guidelines for "Consultants Reporting on Contaminated Land 2020". The report is to be undertaken by a suitably qualified environmental consultant.

Should the detailed site investigation identify that the land requires remedial works to be made suitable for the proposed development:-

A remedial action plan (RAP) will be required to be submitted to and approved by Council prior to commencing remediation works. A review of the site and previous documentation submitted the works are considered as Category 1 requiring consent. The remedial action plan must be prepared by a suitably qualified environmental consultant and submitted to Council. This RAP must comply with the NSW EPA Guidelines for 'Consultants Reporting on Contaminated Land 2020'. The remedial action plan must set the remediation objectives and determine the most appropriate remedial strategy to ensure that the site will be suitable for the proposed land use.

86. A site audit statement and Site Audit Report must be provided to Council from the site auditor that clearly states that the site is, or can be, made suitable for the intended use. The site audit statement and site audit Report must include any restrictions or management requirements for the site. A NSW Environment Protection Authority accredited site auditor must be appointed to audit reports compiled as part of the contaminated land assessment, remediation, and validation process.
87. An acoustic report prepared by a suitably qualified Acoustic Consultant, must be submitted to Council certifying that the development complies with all relevant requirements.

Heritage

88. Any future development application requires the submission of a Statement of Heritage Impact (SOHI) which details the impacts the proposal has on the significance of the streets and what measures have been considered and implemented to mitigate such impacts. Furthermore, a precinct wide Heritage Interpretation Strategy and Plan is to be submitted.

The Heritage Interpretation Strategy and Plan should be prepared by a suitably qualified consultant in accordance with NSW Heritage Council guidelines Interpreting Heritage places and Items (2005) and Heritage Interpretation Policy (2005). The document is to provide policies, strategies, and detailed advice for interpretation. It is to be based on research, analysis and plans to communicate the history and significance of the item to the intended audience. The Interpretation Plan is to identify

key themes, storylines and audiences and provide recommendations about interpretation media. The Plan must also detail how it will be delivered across the precinct and at what stages.

Any DA lodged will require referral to a number of external agencies, including but not limited to, RFS, TfNSW and Ausgrid. This has not undertaken as part of the Pre DA and may require further additional changes/comments.

The application, based on the cost of works advised will be determined by Sydney South Planning Panel. Please be advised that panel will set time frames for briefings for both Council and the applicant through the DA process.

A handwritten signature in black ink, appearing to read 'C Gibbons', written in a cursive style.

Casandra Gibbons

DEVELOPMENT ASSESSMENT OFFICER

Person on behalf of the consent authority

For further information, please contact 9707 9871.