

Ref: DRA2500321

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Major Projects
NSW Government

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Dear Fiona,

**BROADLANDS SOUTH WEST ROCKS
STATE SIGNIFICANT DEVELOPMENT (SSD-82352708)
PUBLIC AUTHORITY CONSULTATION – CASE ID (PAE-89572254)
286-310 GREGORY STREET SOUTH WEST ROCKS**

Thank you for the opportunity to provide input on the proposed development application SSD-82352708 for the proposed Broadlands South West Rocks development, currently on public exhibition from 5 August 2025 to 1 September 2025.

At this stage, Council is not in a position to recommend conditions of consent as a number of significant issues identified during the assessment remain unresolved. Until these matters are adequately addressed, Council cannot support the proposal in its current form.

The applicant has previously attended two pre-lodgement meetings (attached to the comments in the portal), where several key issues were raised and discussed. In summary, and to be read in conjunction with the pre-lodgement notes, the following matters must be considered prior to making any determination:

Planning Considerations

- **Multi-dwelling housing**
The proposed development constitutes multi-dwelling housing, which is permitted within the zone. Accordingly, all relevant provisions applicable to multi-dwelling housing must be satisfied.
- **Gregory Street Streetscape**
While the amended proposal presents an improved response to Gregory Street, the proposed fence height is considered unsatisfactory. The choice of fencing materials should also ensure adequate privacy for the proposed dwellings. In addition, Crime Prevention Through Environmental Design (CPTED) principles should be incorporated when designing the frontage along Gregory Street.
- **Lot Size and Density**
The proposal has not adequately demonstrated compliance with the minimum lot size and density requirements for each lot. Based on the masterplan site areas, it appears that these provisions will not be achieved.

- **Setbacks**
The development does not comply with the required setbacks along Gregory Street or within the internal layout of the site.
- **Private Open Space (POS)**
The proposal does not adequately demonstrate that compliant private open space areas can be achieved for each dwelling. Furthermore, it remains unclear how compliance with the requirement for north-oriented POS will be ensured when the orientation is left to the purchaser's discretion. Each housing design must be individually assessed against all relevant DCP provisions to confirm compliance.
- **Contributions**
Section 7.11 and Section 64 contributions are applicable to the proposed development. Council will provide the applicable contribution requirements for inclusion as conditions of consent once the Department reaches the draft conditions stage.

Traffic and Engineering Considerations

- **Road and Intersection Layout**
The development is proposed to be accessed from a new intersection with Gregory Street and an emergency only access connection with Tallowood Place. Proposed Road No.1 is proposed as a primary access perimeter road providing access to internal roads numbered 2,3,4,5 &6.

Proximity of the new intersection with the existing opposite Medical Centre access driveways raises a concern to potential turning conflicts, which will require further assessment through the CC phase to ensure suitable turning facilities are provided for both sites. Warrants for right turn and left slip median shelter lanes should be examined further to ensure the intersection functions as proposed.
- **Road Reserve and Carriageway Widths**
Whilst the road reserve and carriageway widths are designed for a Manufactured Home Estate with roads to be under private ownership and management, concern is raised to their functionality. The proposed road reserve and carriageway widths do not comply with current Council adopted Aus Spec D-01 Table D1.1 requirements for residential subdivisions. The development proposes 101 lots plus support service centres , with potential to generate around 1200 vehicle movements per day. The proposed perimeter road is essentially an Access Road (100 lots) which Table D1.1 recommends reserve width 16m and carriageway width 8m. Internal Roads are essentially Access Places (30 lots) which Table D1.1 recommends reserve width 15m and carriageway width 7m.
- **Pedestrian Access**
The development proposes an off road footpath along the Gregory St frontage to the site and within the Perimeter Road No.1. A footpath is also proposed through the centre of the site linking Gregory Street with the community centre. Safe crossings of Gregory Street is proposed via provision of a pedestrian refuge . It appears the internal roads will function as "share ways" between vehicle and pedestrian movements. It is recommended a refuge crossing facility or similar be installed at the northern end of Road 6 to ensure safe crossings and connectivity with proposed footpaths.

Stormwater Considerations

- **On-Site Detention**

Without sufficient on-site detention (OSD) or staged outlet control for catchment 1.0 & 1.1, there's potential for short-duration peak flows to exceed minor system capacity and create nuisance flooding, even if 20%, 5%, 1% AEP targets are technically met. (D05.30, D05.36 Hastings council)

Outlet structure for Detention basin requires outlet structure sizing, invert levels, control devices, and stage–discharge curves to be specified at DA stage for capacity verification. Deferring this leaves uncertainty on performance and compliance.

- **Stormwater Management Plan**

The SMP doesn't clearly show how these flows are separated from or integrated into the site's minor/major system without causing bypass or overloading.

The drawings show swales and pipes but do not clearly demonstrate safe conveyance of >1% AEP flows without property inundation.

- **Erosion Sediment Control Plan**

No specific ESCP drawings or measures (sediment basins, diversion drains, stabilised entry points) are included in the current package.

- **Detention Basin Layout**

Detention Basin Layout Missing, only an indicative location and volume are shown — no plan/section with embankment heights, spillway sizing, freeboard, or fencing as required by D05.35. (Hastings council).

- **Music Modelling**

MUSIC model lists two Atlan basins and two Atlan Ecoceptors but does not provide sizing calculations, drawings, or maintenance access details.

Council is happy to discuss these matters with the Department or the applicant at any time to work towards resolving the identified issues. However, until the above concerns are adequately addressed, Council is unable to provide recommended conditions of consent or support the approval of the development in its current form.

If you wish to discuss the application, please contact MELISSA ZIADE on 0428 016 391 or by email on melissa.ziade@kempsey.nsw.gov.au.

Yours faithfully



MELISSA ZIADE
Principal Planner