

Natasha,

I refer to our meeting on site last week and SCC's most recent letter dated 20 February 2017.

I provide additional comments and response to the SCC submission.

Issued Raised at Site Inspection

Removal of Detention Basin

The removal of the detention basin complies with Shoalhaven DCP2014 Chapter G2 Sustainable Stormwater Management and Erosion and Sediment Control P4/A4.7 which states "For subdivisions, it is recommended that OSD is at the individual dwelling scale."

A copy of the relevant page of the DCP is attached as Appendix 1.

The modified proposal therefore complies with the Acceptable Solutions of the DCP.

(Note: It is noted in SCC's letter that they have now accepted the removal of the stormwater detention basin. This is discussed again later in this submission under our response to the SCC letter.)

Loss of Open Space

Section 6.2 of the Shoalhaven City Council Public Open Space Plan -2008 contains guidelines on what is suitable open space. A copy of an extract from this policy is attached as Appendix 2 and a section of text is highlighted which outlines that land reserved for stormwater control that is subject to periodic inundation is not viewed by Council as suitable open space for community use.

In light of Council viewing the proposed detention basin site as unsuitable passive open space for the community use, the conversion of the detention basin site into additional allotments does not constitute loss of open space. Appendix 3 attached, which is the original stamped plan for the subdivision shows the detention basin covering almost the entire reserve area and leaving virtually no open space area for the community anyway.

SCC Owners Consent

The signed owners consent from Shoalhaven City Council was emailed to Natasha Harras on 20/12/16. A copy of that owners consent from SCC is attached as Appendix 4.

Adjoining Subdivision Consent to the South

A copy of the subdivision consent and stamped plan for land immediately to the south is attached as Appendix 5A and 5B, respectively.

Adjoining Subdivision to the East

A copy of the registered DP for adjoining land to the east is also attached as Appendix 6 showing 50' wide "east-west" allotments which equate to 15.24m wide as outlined in our previous submission.

Stormwater Concerns from Adjoining Neighbours to the East

Your comments are noted regarding overland flows adjoining the eastern boundary of our allotment. Based on the topography of the land, it is likely that this runoff would be generated from lots on Park Drive. Further, the construction of a subdivision and dwellings along with stormwater detention measures will reduce overland flows and runoff, which will please adjoining residents.

Issued Raised in SCC letter dated 20/2/17

Drainage

SCC advises that they are now comfortable with the removal of the detention basin and with the concept of providing "OSD ... at the individual dwelling scale" as per Shoalhaven DCP2014 Chapter G2 Sustainable Stormwater Management and Erosion and Sediment Control P4/A4.7.

However, they advise that upgrading of the existing basin is required.

As stated in our stormwater report, the original basin design accommodated the subject site (see Appendix 7 attached) and made allowances to cater for the stormwater flows from the site. In addition, the updated design provides additional stormwater detention on the individual dwelling sites to further compensate for the loss of the originally proposed detention basin. Apart from a minor storm connection to the basin, it is hard to see a nexus to upgrade the basin if the flows entering the basin post-development are lower than the existing "natural" pre-development flows.

It is acknowledged that a low flow pipe is proposed within the basin but any additional "upgrading" should not be the responsibility of my client who is decreasing the flows entering the basin.

SCC should advise what upgrading works it considers are appropriate.

Lot Layout

Appendix 6 attached shows multiple lots that are 15.24m wide approved by SCC on the adjoining land to the east.

Appendix 8 shows multiple lots that are 15m wide approved by SCC in only August 2016(see stage 11 for 15m wide east-west allotments). I have attached both the scanned SCC stamped drawing and a clearer unstamped original of the same drawing for clarity.

It is very clear from the "Solar Access for Lots Guide" for NSW Subdivisions submitted with our previous submission that 15m wide lots on a north facing slope have sufficient space to contain the required solar access zones as previously outlined.

Medium Density Development on Corner Allotments

SCC is concerned about medium density development on consolidated corner allotments.

Medium density development on any allotment does not form part of this proposal.

If medium density development is proposed on the corner allotments, it would be subject to a DA to be assessed by Council and would be required to demonstrate the merit of any proposal.

Roads and Access

SCC is correct in stating that road reserves are now proposed to be 16m wide. This is in accordance with Shoalhaven DCP2014 Chapter G11 Table 3 (see Appendix 9 attached) which states Access Streets are to have a Street Reserve Width of 16m. Access streets can service up to about 50-60 dwellings. The proposed roads service approximately half this number so Access Street widths fully comply with the Shoalhaven DCP. It is noted that Local Streets which serve up to 200 allotments may require 18m wide road reserves, but this does not apply in this situation. We appreciate the narrower street reserves is a change from the earlier layout but I cannot understand why SCC has a problem with street reserve widths that fully comply with their own DCP. It is acknowledged that surrounding road reserves on new allotments to the south are 18m wide which was based on a subdivision originally approved in 2003.

Pavement widths in the existing consent document stipulate 5m width required – no change to this requirement is requested. SCC notes that the adjoining land to the south has 6m wide roads. This is not factual. I note at our site meeting the 5m carriageway width was paced out personally by myself. I also attach the subdivision document as Appendix 5A for land to the south with condition 7 requiring a 5m wide carriageway. I also attach as Appendix 10 the approved Construction Certificate drawings for the development to the south stamped by SCC on 1/7/15 which certifies 5m wide carriageways. The reasons outlined by SCC are interesting but irrelevant as to why this road width is not suitable. SCC approved 5m carriageways next door and DPE approved 5m carriageways on this site. You will also note on Appendix 8 that road reserve widths are 16m wide as per the DCP requirements.

Further, verge widths also comply with Shoalhaven DCP2014 Chapter G11 Table 3 (see Appendix 9 attached) which require 4m (min) verge widths. Verge widths will be approximately 5.5m wide (16m road reserve less 5m pavement = 2 x 5.5m verges.)

So in summary, there are some differences between the subdivision to the south and some similarities. This occurs whenever two subdivisions adjoin – just like the similarities and differences with the subdivision to the east as outlined.

Vegetation Removal

SCC's comments on vegetation removal are noted. As no additional clearing is proposed as a result of the proposed s75W Mod, there is no additional assessment of impacts required.

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I trust this provides the Department, who is the consent authority for this application, with sufficient information to make a positive determination on these matters.

Attachments:

Appendix 1 - Shoalhaven DCP2014 Chapter G2 Sustainable Stormwater Management and Erosion and Sediment Control P4/A4.7 page 6

Appendix 2 – extract from Shoalhaven City Council Open Space Plan

Appendix 3 – original stamped drawing from the subject consent showing extent of detention basin

Appendix 4 – SCC owners consent

Appendix 5A - Shoalhaven City Council Development Consent for land to the south

Appendix 5B – stamped plan for land to the south

Appendix 6 – DP of land to the east on Park Drive showing 15.24m wide allotments

Appendix 7 – existing detention basin catchment plan showing design catering for the subject site

Appendix 8 – stamped drawing of Green Orchid Gardens showing 15m wide allotments (one stamped and unclear – one unstamped but clear for your reference)

Appendix 9 – Shoalhaven DCP2014 Chapter G11 Subdivision Table 3 showing acceptable solutions for street reserve and verge widths

Appendix 10 – Shoalhaven Construction Certificate approved engineering drawings for land to the south

Regards

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