



Please Quote
Council Ref: PF1180/510
Your Ref No: 09_0016
For Enquiries
Please Contact: Michelle Lynton
Telephone Direct (02) 6670 2756

[dltr]

21 May 2009

Department of Planning
PO Box 39
SYDNEY NSW 2001

Attention: Sally Munk

Dear Sally,

Re: Director General Requirements corner Tweed Coast Road and Cypress Crescent, Cabarita, Tweed Shire.

I refer to your letter dated 4 May 2009 in which you request details of any key issues and assessment requirements which may be included in the Director General's Environmental Assessment Requirements (DGRs).

Council has reviewed the applicant's proposal and raises the following issues and assessment requirements:

Infrastructure Provisions

- 1.1 Any public infrastructure works to the site will require submission of plans and approval by Council in accordance with Part V of the Environmental Planning & Assessment Act prior to the issue of a Construction Certificate for the building.
- 1.2 A hydraulic assessment of the capacity of the downstream pipe and kerb and gutter drainage network will be required with the S68 Stormwater Application. Appropriate on-site detention of roof runoff shall be provided, as required, to ensure that the development does not exceed the capacity of the downstream drainage network.
- 1.3 Address and provide adequate basement car-parking ventilation.

Stormwater Management

- 1.4 On site treatment of stormwater runoff is required prior to discharge into the public system in accordance with Council's "Tweed Urban Stormwater Quality Management Plan" and Development Design Specification D7 – Stormwater Quality.
- 1.5 Application shall be made to Tweed Shire Council under Section 68 of the Local Government Act identifying all site drainage, stormwater quality devices, proposed stormwater outlets and required erosion and sedimentation control measures.
- 1.6 Erosion and Sediment Control shall be provided and maintained in accordance with Tweed Shire Council's *Development Design Specification D7 - Stormwater*



Quality and its Annexure A - "Code of Practice for Soil and Water Management on Construction Works.

- 1.7 It is requested that 'stormwater drainage' be added to Section 4.1 where other issues such as sewerage etc are listed.

Traffic and Access

- 1.8 Application shall be made to Tweed Shire Council under Section 138 of the Roads Act 1993 for any works pursuant to this development located within the road reserve.
- 1.9 Access to the development must comply with Council's "Driveway Access to Property Design Specification".
- 1.10 The existing concrete footpath shall remain along the developments frontage to Tweed Coast Road.
- 1.11 A 1.2m wide concrete footpath will be required along the developments frontage to Cypress Crescent.
- 1.12 The footpaths shall also be integrated into a legible pedestrian movement route through the site.
- 1.13 The application must investigate the need to upgrade the existing intersection of Tweed Coast Road and Cypress Crescent by way of a Traffic Impact Assessment.
- 1.14 Off-street parking and access shall be designed in accordance with AS 2890 – Offstreet Parking. In particular, the 2m sight distance triangle at any proposed driveway / road reserve interface must be complied with.
- 1.15 Inadequate information has been provided to determine whether the car wash bay has adequate space to operate and whether the space is permeable or impermeable. If impermeable, the site needs to be bunded with collected runoff being treated to discharge into the sewer system, which could be addressed under the Construction Certificate. The car wash bay(s) need to be provided in accordance with Tweed Shire Council's Development Control Plan.

Car Parking

- 1.16 Tandem parking in any resident/visitor parking area is not desirable and should be amended.
- 1.17 Car parking must comply with Tweed Shire Development Control Plan – Section A2 - Site Access & Car Parking Code. Council determines that the development is required to provide the following minimum car parking numbers
 - 33 (min) parking spaces for Residence (Current plans nominate 40 spaces for residents)
 - 5 (min) for Visitors (Current plans provide 5 visitor spaces)
 - 34 (min) spaces for bicycle storage (Current plans specify 0 but it is noted that several storage spaces are provided)
 - 6 (min) parking spaces for the Tourist Accommodation (Current plans only provide 4 spaces for the Tourist Accommodation)
 - 1 (min) delivery space capable of servicing a HRV (8.8m long, 4.1m height clearance) (Current plans provide 0 service areas)
 - 6 (min) parking spaces for Staff (Current plans provide 0 spaces for staff)

Hazard Management and Mitigation

Geotechnical

- 1.18 The application shall comply with Council's Landforming criteria, as per Council's Design Specification D6 – Site Regrading.

The development must grade at a minimum of 1% to the street or other approved permanent drainage system. Where necessary, perimeter drainage is to be provided. The development must at no time result in additional runoff or ponding occurring within neighbouring properties.

- 1.19 Council will not permit ground anchors (to retain sacrificial sheet piling for basement excavations) within Council or private property, without prior consent from the property owner being obtained. If the land owner is Council, approval is required from the General Manager or his delegate, and the anchors are required to be removed upon completion of the works, unless a compensation amount is negotiated with Council
- 1.20 Proposed earthworks shall be carried out in accordance with AS 3798, "Guidelines on Earthworks for Commercial and Residential Developments".

Water and Sewer

- 2.1 A section of Council sewer will need to be removed along with construction of a fresh dead end and junction for the connection of the new building.

Building and Bushfire

- 3.1 The applicant will need to confirm with any future bushfire assessment report submissions that a legal bushfire asset protection zone of 30m is available on the adjoining Cudgen Nature Reserve. Planning for Bush Fire Protection 2006 specifies off-site Asset Protection Zones must be via a lawful easement. Alternatively, Asset Protection Zones must be entirely on the subject site.

Waste Management

- 4.1 The applicant is required to submit a Waste Management Plan that details bulk as opposed to individual storage and includes the following information as outlined below:

Waste Management Plan

A. Demolition

- The volume and type of waste generated during demolition
- The methods of storage of material on site. A site plan should be included.
- How recyclable materials will be separated, managed, and where the materials will be sent for recycling
- The location and methods of disposal of all residual waste
- The licensed transporter of the waste
- Ongoing waste management strategies.

B. Construction

- The type of waste generated during construction
- The method and location of waste storage on site
- How any recyclable materials will be managed
- The location of the disposal facility for residual waste
- Ongoing waste management strategies

C. Site Occupation

- Details of waste storage containers to be used by the development (ie mobile garbage bins or bulk bins, how many, frequency of collection etc.)
- Location and design of waste storage areas, reference to Councils Code for Storage and Disposal of Garbage and Other Solid Wastes
- Nominate collection point for servicing
- Details of access for contractor where necessary
- Ongoing waste management strategies

NB: During the demolition and construction phases it is the responsibility of the site manager to ensure that the above management measures are inspected and maintained on a daily basis.

Social Impact

5.1 A detailed social impact assessment is required analysing:

- the functionality of the existing park and how it operates
- the impact the proposed DA would have on ten (10) permanent sites
- options available for these residents (eg. displacement, relocation, compensation), and
- impact on low-cost tourist market available in the immediate locality.

5.2 Discuss the likely impacts on the long term residents of the caravan park and measures to be undertaken to ensure ongoing compliance with the Local Government Act and Residential Parks Act in preparation for the closure of the park.

Hazard Management and Mitigation

Acid Sulfate Soils

6.1 The Management Plan shall also address the need for any dewatering during the construction phase, and where relevant, appropriate treatment and discharge of wastewaters.

Contamination

6.2 Note: whilst aerial photography does not indicate the site was directly impacted by sand mining activities the site was in close proximity and further

consideration should be given to the potential for the use of sand mining residuals for filling of lands.

Flora and Fauna

- 6.3 Direct access to the northern Cudgen Nature Reserve is not desirable. Your application should at least address the potential impacts of illegal waste dumping, informal accesses, vegetation clearing and planting of unsuitable vegetation where individual residences are permitted to access directly onto Cudgen Nature Reserve to the north of the site.
- 6.4 Assess the potential direct and indirect off-site impacts on flora and fauna within the adjoining Cudgen Nature Reserve.

Noise

- 6.5 Address the potential noise impacts including road and driveway access and 'auto door' usage, for existing residents and appropriate mitigation measures.
- 6.6 Address potential noise and dust impacts from construction activities, for existing residents and appropriate mitigation measures.
- 6.7 In regards to your Attachment 3, please address the Draft Construction Noise Guidelines, AS2436-1981 Guide to Noise Control or Construction, Maintenance and Demolition Sites.

Consultation

- 6.8 Please liaise with the Office of Fair Trading in regard to your application and document any correspondence.

General

In addition, the following matters should be included within the assessment requirements for the proposal:

1. Provide a survey plan of all existing vegetation and all existing structures
2. Provide a detailed plan showing all water and sewer connection points, basins, and showers. This will assist in calculating applicable contributions upon determination.
3. Provide a detailed landscaping plan assessing existing and proposed native vegetation. Prepare a regeneration plan for the specific coastal area and adjoining reserve.

The landscaping plan will include the following details:

- a) A site plan (at 1:100 to 1:1000 scale) showing the existing features, including north point, access road and an outline of proposed buildings indicating doors and windows and extent of basement car parking if applicable. Any trees to remain in the vicinity are to be located to scale and identified by botanical and common names.
- b) Proposed and existing site services with potential to impact on landscape space, including water, gas, electricity, sewer, stormwater, etc.

- c) Easements on or adjacent to the site.
 - d) View lines to and from the development and details of pedestrian access and circulation areas within and around the development, including retaining walls, seating, fences, gates, decorative features etc.
 - e) Additional survey plan showing the location, canopy spread, trunk diameter, height and names of those existing tree/s and significant tree/s adjacent to the site likely to be affected by the development. The plan shall also include the existing ground levels at the base of the trunk of the tree/s as well as at the drip lines of the tree/s.
 - f) Existing and proposed ground levels (shown as spot heights and/or contours over the site and direction and degree of slope) indicating the site boundaries, and the base of the trees proposed to be planted or that are to be retained (if applicable).
 - g) Sectional elevations through the site showing the existing and proposed ground lines, building elevations and proposed plantings.
 - h) Construction details of planter boxes (including width and depth), paving, edging, fencing, screening, panels and other hard landscape components. As far as possible deep root zones must be provided for large trees and paving is to be porous. Paving works within 2m of the trunk of the large trees shall be constructed in such a way as to ensure the existing moisture infiltration and gaseous exchange to the tree root system is maintained.
 - i) Planting details for the preparation and planting of tube and potted plants, super-advanced plants, bare-rooted stock and any other planting.
 - j) A detailed plant schedule and plan at a scale of 1:100 to 1:1000 indicating the location of all proposed planting and any existing vegetation to be retained on and adjacent to the site. The plan is to include a detailed plant schedule which shall include;
 - species listed by botanical and common names, with the majority of plants constituting local native species;
 - expected mature size of the species at the site, taking in to consideration site specific parameters;
 - specific location, planting densities and quantities of each species; pot sizes; the estimated sizes of the plants at maturity, and proposed staking methods, if applicable.
 - maintenance methods including the use of drip irrigation and mulching or groundcovers to reduce bare soils areas and including a maintenance schedule for a minimum period of one year after completion of landscaping on site.
 - k) A photomontage illustrating proposed landscaping at maturity overlain over building elevations from street frontages and adjoining development.
4. Provide a Bushfire Management Plan in accordance with Planning for Bush Fire Protection 2006, and a Stormwater Management Plan.
 5. Include a detailed assessment against Tweed Shire's Development Control Plans Section A1 Part C and B26 (Cabarita)

6. Clarify that the proposed building materials will withstand ongoing maintenance requirements having regard to coastal sea/salt spray.
7. Provide an analysis of coastal erosion through a hazard report.
8. Provide a detailed colour and materials board along with a scaled model for Council and the Department of Planning.
9. Include consideration of Coastal Design Guidelines documentation.
10. Provide an acoustic report for residents in relation to designated road noise.
11. If applicable, owner's consent of adjoining Cudgen Nature Reserve for encroachment for use as Asset Protection Zone in addition to a formal easement to make this use lawful.
12. Verification from a qualified architect or urban designer to support the proposal addressing Part 2 Design Quality Principles (10) under SEPP 65.

Conclusion

Please ensure the applicant addresses the above in any Environmental Assessment. When the Environmental Assessment is lodged with the Department, please forward a copy to Council for our consideration and test of adequacy.

Should you have any questions in relation to the content of this letter please do not hesitate to contact Council's Michelle Lynton who is managing the project.

Yours faithfully



Denise Galle
Co-ordinator Development Assessment