Bilambil Heights Concept Plan Modification 3 Submission (MP08_0234-Mod-3)

The following submission on MP08_0234-Mod-3 is made by the owners of 147 McAllister's Road Bilambil Heights. We do not object to the proposed development in principle. We do object to aspects of the application documents that do not address significant planning and infrastructure servicing matters that impact the coordinated planning and servicing of development within the Rise/McAllister's urban release area.

These matters are addressed below.

1. General Comments

- We note that 300 and 147 McAllister's Road are in the process of preparing development applications. This development together with 300 and 147 McAllister's Road cover the majority of the Rise/McAllister's urban release area. As such we feel that this development cannot be assessed and approved in insolation from other developments within the Rise/McAllister's urban release area.
- The proposed development, a concept plan for 147 McAllister's Road and the balance of the Rise/McAllister's urban release area is shown within Attachment 1.
- Attachment 1 highlights the need for the proposed development to consider at a strategic level how the development supports the coordination of planning and servicing of development within the Rise/McAllister's urban release area.
- We support the shared funding of necessary infrastructure apportioned based upon generated demand by all development within the Rise/McAllister's urban release area.

2. Modification Report

- The Modification Report does not address how the site sits within the context of Rise/McAllister's urban release area and connectivity between the site and adjoining properties. The site sits within the urban release area and does not address at a strategic level how the development supports the coordination of planning and servicing of development within the Rise/McAllister's urban release area.
- The Modification Report does not address or show within the concept plan road connectivity between the site and adjoining properties.
- The Modification Report does not address how the development will support the planning and delivery of road infrastructure identified in the 2017 Tweed Shire Road Development Strategy to service the Rise/McAllister's urban release area. Namely, Scenic Drive Diversion, extension to McAllister's Road and Cobaki Parkway.
- Available vehicle capacity on Kennedy Drive is not for the exclusive use of one development. Councils' resolution is clear that no development within the

- Rise/McAllister's urban release area can proceed without the Scenic Drive Diversion, extension to McAllister's Road and Cobaki Parkway.
- It is not fair or equitable for other properties within the Rise/McAllister's urban release area to carry the full cost of future road infrastructure that the proposed development will utilise but not financially contribute to in the future.
- The Modification Report does not address how planned water supply upgrades and reservoir duplication will support the planning and delivery of regional water supply infrastructure with sufficient capacity to service the Rise/McAllister's urban release area.
- The Modification Report does not address how planned sewer upgrades will support
 the planning and delivery of regional sewer infrastructure (sewer pump stations and
 rising mains) with sufficient capacity to service the Rise/McAllister's urban release
 area.

3. Updated Concept Plan

- The Updated Concept Plan does not address how the site sits within the context of Rise/McAllister's urban release area and connectivity between the site and adjoining properties. The site sits within the urban release area and does not address at a strategic level how the development supports the coordination of planning and servicing of development within the Rise/McAllister's urban release area.
- The Updated Concept Plan does not address or show road connectivity between the site and adjoining properties.

4. Traffic and Transport Assessment

- The Traffic and Transport Assessment does not address how the development will support the planning and delivery of road infrastructure identified in the 2017 Tweed Shire Road Development Strategy to service the Rise/McAllister's urban release area. Namely, Scenic Drive Diversion, extension to McAllister's Road and Cobaki Parkway. Available vehicle capacity on Kennedy Drive is not for the exclusive use of one development. Councils' resolution is clear that no development within the Rise/McAllister's urban release area can proceed without the Scenic Drive Diversion, extension to McAllister's Road and Cobaki Parkway.
- Traffic from the development onto Marana Street flows onto McAllister's Road and Scenic Drive. Scenic Drive Diversion, extension to McAllister's Road and Cobaki Parkway provide additional capacity to service traffic on McAllister's Road and Scenic Drive. As such the proposed development should support future road infrastructure that will support the proposed development.

- It is not fair or equitable for other properties within the Rise/McAllister's urban release area to carry the full cost of future road infrastructure that the proposed development will utilise but not financially contribute to in the future.
- The Traffic and Transport Assessment assumes that there will be minimal development outside of the development. This assumption does not consider development within the Rise/McAllister's urban release area in the short term at 300 McAllister's Road and 147 McAllister Road that are currently preparing to lodge development applications. These developments have shared road infrastructure with the proposed development. This development together with 300 and 147 McAllister's Road cover the majority of the Rise/McAllister's urban release area.
- Multiple developments staged and developed in parallel will share available spare capacity on Kennedy Drive and trigger the need for the Scenic Drive Diversion, extension to McAllister's Road and Cobaki Parkway.
- We support the shared funding apportioned based upon traffic generation of regional transport infrastructure including Scenic Drive Diversion, extension to McAllister's Road and Cobaki Parkway by all development within the Rise/McAllister's urban release area.

5. Statement of Commitments

- The Statement of Commitments does not support the coordination of planning and servicing of development within the Rise/McAllister's urban release area but rather supports the development in isolation.
- We support the shared funding of necessary infrastructure apportioned based upon generated demand by all development within the Rise/McAllister's urban release area.

6. Preliminary Engineering Report

- We support the proposed new 4.5ML reservoir with capacity to support the Rise/McAllister's urban release area. How has the reservoir been sized without a network analysis?
- The Preliminary Engineering Report does not contain network analysis that demonstrates that the development supports the coordination of planning and servicing of development within the Rise/McAllister's urban release area.
- The Preliminary Engineering Report notes discussions with Tweed Shire Council regarding sewer reticulation and pump stations. Without a network analysis and plan for infrastructure upgrades that will support coordination of planning and servicing of development within the Rise/McAllister's urban release area, how can the modification application be approved?

- A network analysis should show a plan to service the Rise/McAllister's urban release area with required upgrades to water mains, reservoirs, sewer mains, sewer rising mains and sewer pump stations that is costed and endorsed by Tweed Shire Council.
- A network analysis would facilitate the establishment of a cost per lot payable by all development within the Rise/McAllister's urban release area and support the coordination of planning and servicing of development.
- It is not fair or equitable for other properties within the Rise/McAllister's urban release area to carry the full cost of water and sewer infrastructure that the proposed development will utilise but not financially contribute to in the future.
- We support the shared funding of necessary water and sewer infrastructure apportioned based upon generated demand by all development within the Rise/McAllister's urban release area.

