

COUNCIL REFERENCE: SF9367
CONTACT PERSON: Alison Dalyell
YOUR REFERENCE: DA 485-12-2002 MOD 1

20 February 2017

Department of Planning & Environment
Planning Services
GPO Box 39
Sydney 2001

Attention: Amy Robertson

Dear Madam

**Modification of Residential Subdivision
Lot 5 DP 788159, The Park Drive, Sanctuary Point**

Council's submission addressing the additional information submitted on 1 February 2017 is provided below.

Submission to DA 485-12-2002 MOD 1: 47 Lot Residential Subdivision Nadine St, Sanctuary Point

Additional information submitted 1/02/2017:

- *Solar Access for Lots, Guidelines for Residential Subdivision in NSW;*
- Proposed Residential Subdivision, 26522-03, Revision 2, dated 06.09.2016, revised 30/01/2017, by Allen Price & Scarratts;
- Residential Subdivision On Site Detention Report, dated 20/01/2017, Allen Price & Scarratts.

The revised plan of subdivision includes the road widths. No other changes have been made.

Drainage

The calculations provided by the applicant appear to be valid indicating an overall decrease in the 1:100 year ARI discharge from the sites and no increase in the 1:5 year ARI. As a result of the agreed deletion of the original detention basin from the development site, upgrading works within the existing adjacent detention basin will be required.

Lot Layout

The applicant has provided an informative and useful document on solar access but has not indicated how this is applied to the lots under consideration.

The size of Lots 39 and 47 are 2055m² and 2066m² respectively. The size creates an expectation that they are potentially suitable for medium density development. As previously stated, the road frontage to these lots is inadequate for higher density development. If it is

the intention of the proponent to provide medium density lots, alternative lots of equivalent size and with full road frontage could be identified.

Roads and Access

The proposed road reserves originally approved at 18m remain at 16m. None of the surrounding through roads are less than 18m unless they are a cul-de-sac.

Condition B2:

- specifies a pavement width of 5m, the consent does not specify the road reserve width;
- (m) states that *Roads are to be constructed to meet the public road construction requirements outlined in Section 4 of the Planning for Bushfire Protection 2001(PBP2001).*

PBP2001 section 4.3.1 Public Roads dot point 2 requires that *Roads should be two-way, that is, at least two traffic lane widths (8m minimum) with shoulders on each side, allowing traffic to pass in opposite directions.* This requirement obviously applies to the trafficable width of the road, i.e. the pavement. The approval for a 5m pavement in condition B2 (a) is clearly a significant concession to PBP2001 requirements. A similar concession was not applied to the width of the road reserve. Furthermore, the pavement width is less than that required in Council's Development Control Plan 2014, i.e. minimum pavement width for a Local Road is 6m.

A 5m pavement width will result in the use of the nature strip for car parking, contrary to the NSW Road Rules 289 *Driving on a Nature Strip* and 197 *Stopping on a nature strip*. The narrower the roadway the more likely it is that motorists will stop (park) on a nature strip.

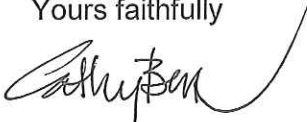
It should also be noted that Corella Crescent off Links Avenue is a similar loop through road and it has a roadway width of 6m and a road reserve of 18m leaving a nature strip of 6m on both sides. The application is not consistent with adjoining approvals and the applicant has not provided any justification for the narrower road reserve.

Vegetation Removal

Council notes that the land has been cleared, removal of the remaining trees can be assumed at building stage under the 10/50 rule. As such, the potential impact of the development on the remaining vegetation is evident and that impact must be assessed.

If you have any further enquiries about this matter, please contact Alison Dalyell, Development Planner - Subdivision on (02) 44293464. Please quote Council's reference SF9367.

Yours faithfully



Cathy Bern
Development Services Manager
Planning & Development Services Group