Name	[redacted] Further contact via my nephew, [redacted] who I authorise to respond on my behalf [redacted]
DA	SSD-10360337
Location	10 Lomas Lane and 210 Wine Country Drive, Nulkaba
Applicant	St Philip's Christian Education Foundation Ltd
Statement	**Objection** to proposed construction of roundabout (Lomas Lane/Wine Country Drive)
Donations	I have not made a reportable political donation in the past two years.

I am writing in relation to the development application for the St Phillip's Christian Education Foundation – particularly the proposal to construct a two-lane roundabout at the Lomas Lane/Wine Country Drive intersection. The roundabout as proposed will impact access to my property and is unsafe.

While I am not objecting to the proposed expansion of the school, I am deeply concerned about the operation of the roundabout, the impact it will have to farming activities on my site, and safety.

I am disappointed the applicant has made no effort to provide me with safe and unrestricted access to my property. I am willing for discussions to occur with my nephew on my behalf (details provided above and are to be withheld from publication) to explore options for how this issue could be managed. If a satisfactory resolution cannot be reached, then I object to this development proceeding in its current form on the grounds that it:

- restricts access to my property and creates a significant safety risk
- fails to address Austroads design advice
- is supported by a Transport and Accessibility Impact Assessment that is deficient, and
- is inconsistent with the rural character of the area and ongoing farming activity.

Background

I am the owner of [redacted] Nulkaba [redacted] that is zoned RU4: Primary Production Small Lots. This is a family farm and I have continued to use this property for farming purposes for over 70 years. My property is accessed from a driveway located at the intersection of Lomas Lane and Wine Country Drive. My site requires truck access for transporting livestock. The current site configuration and driveway access is shown in Figure 1 (at the end of this submission) and highlighted in yellow.

I have reviewed the civil engineering plans and understand that my existing driveway is to be retained as shown in Figure 2 with my driveway highlighted in yellow. This will have my driveway exiting directly into the path of the through-travel lane of the proposed roundabout.

Restricted site access and safety

If the roundabout is constructed as proposed this will have a significant adverse impact on access to my property and create a serious safety risk. I note travel speeds are indicated to be in the range of 70km/hr (signposted) and designed for 80km/hr.

The proposed roundabout is two lanes with my entry being located off the through-travel lane. There is serious risk of collision given that vehicles will need to slow to enter the driveway, but as this is not a formalised exit, it will not be expected. This lack of a formalised 'leg' will create difficulty in entering the roundabout as it will lead into the through-travel lane which may be traveling at greater speed.

Access to my property will be restricted to left-in/left-out.

As stated, my property is a working farm and has requirements to be accessed by trucks to transport livestock, in addition to regular vehicle movements.

Failure to address Austroads design advice

I am of the view that this roundabout design does not comply with the advice provided by Austroads. Particularly, I would like to draw attention to the following extracts:

Austroads: Guide to Road Design Part 4: Intersections and Crossings

> 7.2.3 Rural Roads
>
> Although rural roads are usually characterised by relatively low turning traffic volumes to and from widely spaced access points, high-speed crashes occur due to low driver expectation of turning vehicles.
>
> Treatment of access to rural properties is dependent on several factors including:
> - through traffic volume
> - turning volume
> - vehicle type
> - single or divided carriageway
> - land use
> - general topography.
>
> To enhance safety for the turning vehicle and minimise interference to through traffic it is common to widen the shoulder or provide an auxiliary lane. This is usually achieved by providing indented turning lanes on divided roads or a basic (BA) or channelised (CH) treatment on a two-lane two-way road (AGTM Part 6 (Austroads 2013a)).
>
> The location for the point of access will be governed by the following:
> - sight distance (refer to AGRD Part 4A (Austroads 2017a))
> - median width/storage space
> - largest design vehicle to utilise the facility
> - distance to intersection
> - possible confusion with intersections
> - deceleration/acceleration movements
> - drainage
> - topography.
>
> The number of access points off a high-speed road should be reduced either by consolidating them or by using existing side roads and service roads.
>
> The minimum design vehicle for a rural access should be the single unit truck. However, an access should be designed for the largest vehicle likely to use them (e.g. milk tanker, semi-trailer, B-double).

Austroads: Guide to Road Design Part 4B: Roundabouts

> 2.2 Design Principles
>
> - Entering drivers must be able to see both circulating traffic and potentially conflicting traffic from other approaches early enough to safely enter the roundabout.

- Sufficient entry, circulating and exit lanes should be provided to ensure that the roundabout operates at an appropriate level of service.

Given that my driveway is located in the centre of the roundabout it provides no 'distance to intersection' and will result in 'possible confusion' within the intersection. This will be particularly caused by the unexpected deceleration movement to enter the driveway and also the slower entry speed into the roundabout when exiting the property.

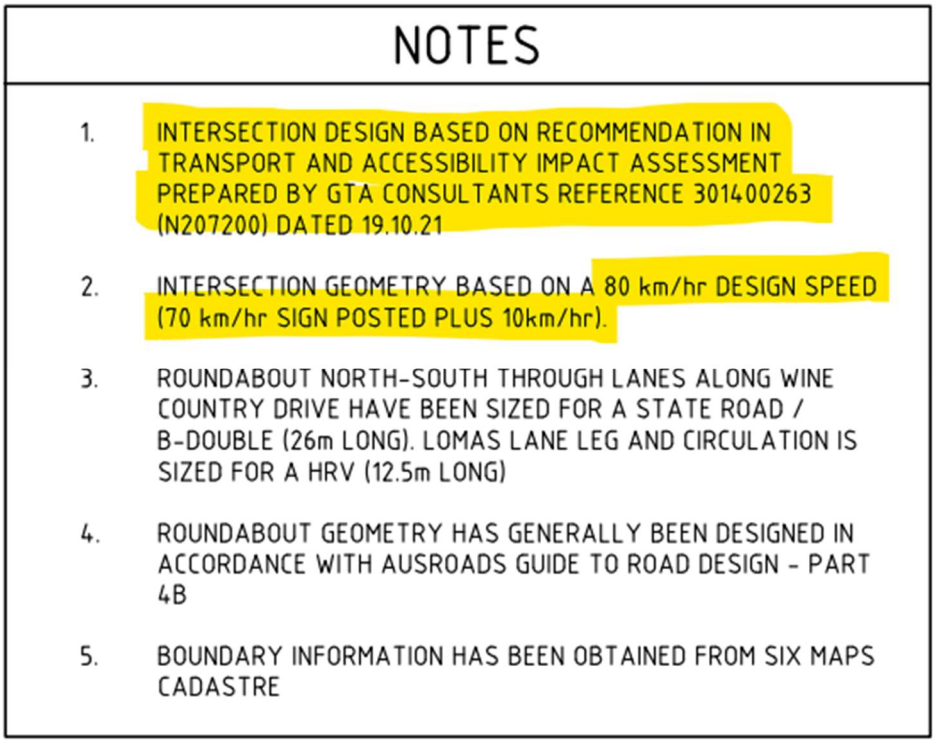
As the current design does not treat my driveway as a formalised 'leg' of the roundabout, it fails to meet the roundabout design principles.

Transport and Accessibility Impact Assessment is deficient

I would also like to express that Appendix G9: Transport and Accessibility Impact Assessment is deficient as it does not provide any commentary regarding the retention of my driveway access.

My driveway is shown only as 'to be retained' in Appendix G: Concept Intersection Designs (page 173). I note that the drawing provided is in fact the same civil engineering drawing from *G4 Concept Civil Engineering Plans* as both documents produce the same plan noted as Drawing Number DA-C06.01.

The notes to the Civil Engineering Document state (extracted from Drawing Number DA-C06.01 – page 18 of Attachment G4 Concept Civil Engineering Plans):



NOTES

1. INTERSECTION DESIGN BASED ON RECOMMENDATION IN TRANSPORT AND ACCESSIBILITY IMPACT ASSESSMENT PREPARED BY GTA CONSULTANTS REFERENCE 301400263 (N207200) DATED 19.10.21
2. INTERSECTION GEOMETRY BASED ON A 80 km/hr DESIGN SPEED (70 km/hr SIGN POSTED PLUS 10km/hr).
3. ROUNDABOUT NORTH-SOUTH THROUGH LANES ALONG WINE COUNTRY DRIVE HAVE BEEN SIZED FOR A STATE ROAD / B-DOUBLE (26m LONG). LOMAS LANE LEG AND CIRCULATION IS SIZED FOR A HRV (12.5m LONG)
4. ROUNDABOUT GEOMETRY HAS GENERALLY BEEN DESIGNED IN ACCORDANCE WITH AUSROADS GUIDE TO ROAD DESIGN - PART 4B
5. BOUNDARY INFORMATION HAS BEEN OBTAINED FROM SIX MAPS CADASTRE

The report contains no discussion about my existing driveway or the proposal to retain it. It is only the plan that shows the retention. I am of the view that the applicant has failed to adequately consider the existing site conditions and plan accordingly.

With a travel speed of 70-80 km/hr, the proposed design presents a significant safety risk that the impact assessment has failed to address.

Rural character

The *'Vineyards District Study'* prepared by RMCG on behalf of Cessnock Council dated March 2017 identifies my site being located within the 'viticulture district'. While the current status of this document is unclear, it does contain commentary on traffic management issues for the area. The following is extracted from *Section 7.7 – public realm – landscape protection, traffic management and road infrastructure* (pp.63-64):

> Traffic congestion, traffic speed and a mismatch in the needs of road users within the Vineyard District: tourists, farmers and local residents; poses challenges for road managers. Road engineers and planners need to effectively manage traffic flows to ensure it flows both freely and safely. However, in practice, the application of traffic management principles could be more conscious of the need to preserve rural landscape values. For example, the recent upgrade of Broke Road has facilitated traffic flow but increased traffic speed through a busy tourism precinct as well as detrimentally impacting the landscape and views with removal of roadside vegetation.
>
> Planning of road upgrades in future should consider reducing risk through both structural and non-structural measures such as reducing traffic speed and encouraging local commuters to use designated routes away from tourism nodes. Protection of landscape amenity and retention of roadside vegetation must be a key consideration in upgrade of road infrastructure and changes to traffic management within the Viticulture District.
> Consideration should also be given to:
>
> - Touring visitors unfamiliar with the road network and traveling between attractions at a leisurely pace to appreciate the scenery
> - Movement of farm vehicles and heavy equipment, particularly during harvest
> - Accommodating other forms of tourism transport such as bikes and horses

The proposed design of the roundabout has failed to consider the movement of farm vehicles for my property.

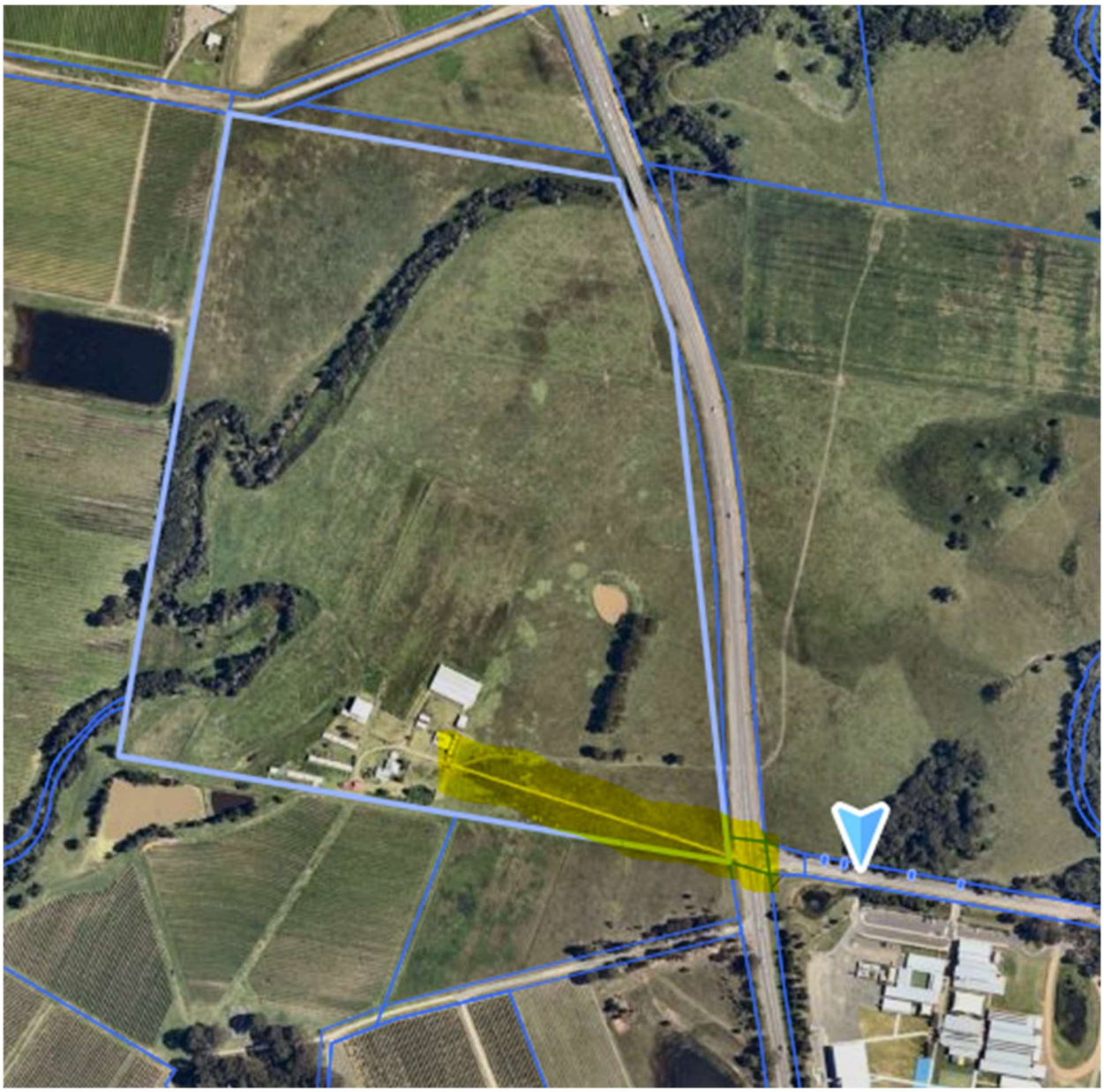
Conclusion

As stated, I am not objecting to the proposed expansion of the school and would be willing for discussions to occur with my representative to identify potential options to address my site access needs. If a suitable resolution can be reached, I would consider withdrawing this objection.

In its current form, the proposed roundabout creates a safety risk and adversely impacts access to my property. As the applicant has not sought to discuss and resolve this with me, I have no alternative but to make clear my strong objection.

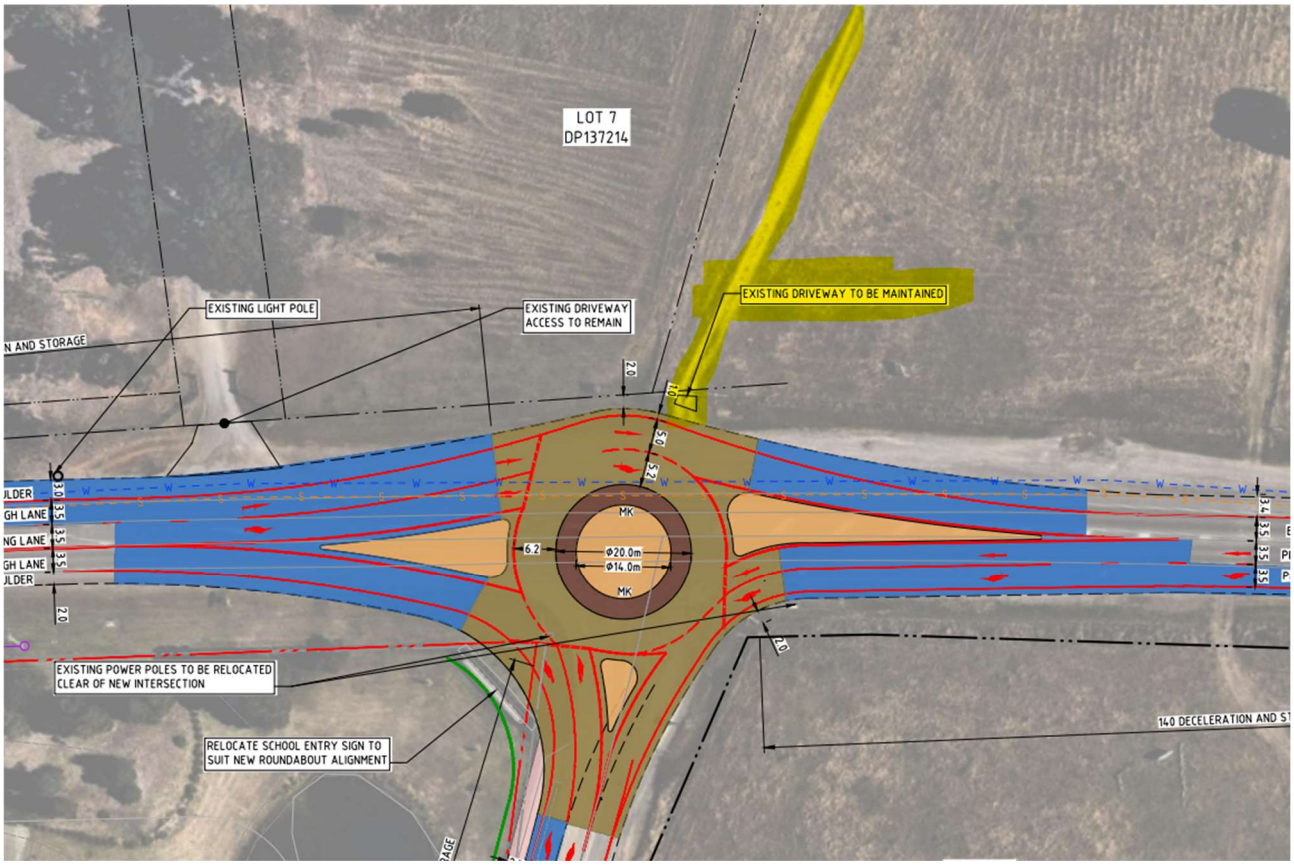
Figures

Figure 1: 313 Wine Country Drive, Nulkaba – driveway access at intersection of Lomas Lane and Wine Country Drive



(Image obtained from Nearmap)

Figure 2: Civil Engineering Plan Drawing Number DA-C06.01



(Image extract from G9/G4 documents attached to the application).