



Your ref: MP 05_0129 MOD 3
Our ref: (0698/09DA & 0098/20DM)

20 April 2020

NSW Department of Planning, Industry and Environment
Attention: Ms Emma Butcher
Regional Assessments
Emma.Butcher@planning.nsw.gov.au

Dear Sir/Madam,

Response to Proposed Modification – Lakes Estate Residential Subdivision (MP 05_0129 MOD 3)

Reference is made to the proposed modification described above.

Council has reviewed the information provided to support the proposed modification and the following comments are provided for the Department's consideration as part of the assessment:

Biodiversity:

The Ecological report by Biodiversity Australia dated April 2020 includes inconsistencies in regard to how many trees are to be removed. Section 7.3 and 8.2.2 references 11 trees to be removed while elsewhere in the document, and in other documents, only 6 trees are acknowledged for removal. Council recommends that the Department seek clarification concerning this aspect of the proposal.

The arborist report has clarified that Tree 34 can be retained with appropriate protection. Should the modification be approved it is recommended that the Department include conditions relating to:

An offset replanting plan, including site preparation and maintenance, to be submitted and approved prior to works commencing that accords with the compensatory requirements of the CH DCP 2015. A requirement that the replanting works are to occur prior to issue of the Subdivision Certificate. Tree Protection Works are to be undertaken as per the recommendations of the Arbpro Arborist report dated 2 April 2020.

Engineering:

Council notes that the road design for the development has been modified and offers the following comments:

Road Verge

The current road design incorporates a verge of 3m, which is in contravention of the minimum Auspec requirement of 4m. If the Department were to support a reduced road width, Council recommends that the Department satisfy themselves that all services, including paths, trees, stormwater, sewer, electrical and telecommunications can be accommodated within the reduced verge.

Grades

The road design incorporates sections with a grade of up to 20% which exceeds the maximum recommended grade of 16% under Auspec. Road grades above 16% have implications for sight distances and pavement treatments. Council recommends that the design be amended to comply with the 16% maximum grade under Auspec to improve sight distances and to maintain consistency in pavement treatment.

The vertical curves between Ch140 and 245 on RS1 do not comply with Auspec requirements and consequently, the use of the forced sag is not supported due to its effect on riding comfort and sight distances.

Speed/Radius Relationship

It is not evident from the information provided that the proposed road design is suitably safe having regard to the speed/radius relationship. The horizontal curves appear way too tight. Councils Specifications identify for urban roads the minimum radius to be as per the table 2.2 (Auspec - Geometric Road Design) to suit the speed environment. Considerable evidence is required to demonstrate that the proposed design is safe, noting that the horizontal curves have tightened since the previous design was submitted. The horizontal speed environment needs to match the vertical speed environment.

Table 2.2(A) Speed/radius relationship

Desired vehicle speed (km/h)	Curve Radii (m) on road centreline	
	Curvilinear alignment (no tangents)	Isolated curve alignment (with tangent sections)
20	15	10
25	20	15
30	30	20
35	50	30
40	90	40
45	105	50
50	120	60
55	140	70
60	160	80

NOTE: Tables 2.2(A) is derived from AMCORD.

Extension of Amadeus Place

Additional space will need to be provided in the verge for barriers if clear zones cannot be provided in accordance with Austroads – Guide to Road Design - Part 6. Verge slopes within road reserves and reserves need to comply with Council standards (max 1:4 fill, 1:3 cut). The 1:2 verge slope in this location is not supported.

The extension of Amadeus Place will need to be 8m wide to comply with Planning for Bushfire Protection 2019 as it adjoins a vegetated reserve (the current section does not adjoin reserve – it adjoins private property).

For further information, please contact Renah Givney on 6648 4647.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Renah Givney', with a stylized flourish extending to the right.

Renah Givney
Development Assessment Officer – Senior