

**Graeme Gibson**  
8 Seascope Close,  
NARRAWALLEE NSW 2539  
Tel: 0418239359  
[graemegibson1@bigpond.com](mailto:graemegibson1@bigpond.com)

30<sup>th</sup> September, 2017

Director,  
Department of Planning & Environment,  
[Jane.flanagan@planning.nsw.gov.au](mailto:Jane.flanagan@planning.nsw.gov.au)

Dear Sir,

RE: Your ref: Application No. MP 06\_0267 MOD 2  
Narrawallee Residential Subdivision.

---

I am a resident of Seascope Close, Narrawallee.

I declare that neither myself nor any associate of mine has made any reportable political donations or gifts in the previous two years.

I object to the proposal on the following grounds:

**1. Traffic generation.**

Clearly a full traffic study is required to assess precisely how many cumulative vehicle movements per day will occur in Scorpio Grove, Gemini Way, Seawinds Parade and Seaspray Street as a result of the proposed modification request, and also as a result of the other Hazcorp land subdivision at the current end of Seaspray Street. Access to the Hazcorp land subdivision uses Scorpio Grove. A roundabout constructed on Scorpio Grove and Seawinds Parade limits the desirability of vehicles accessing the Hazcorp Land along Scorpio, but does nothing to militate against a "rat run" exiting the subdivision along Scorpio, such is the positioning of the roundabout which gives a straight run exiting the Hazcorp subdivision.

However, even when a traffic study is undertaken, the bottom line is that there is insufficient width in Seaspray Street, alone, for any increase in traffic volumes, let alone the various other streets mentioned above.

A physical examination of Seaspray Street reveals that the street is approximately 6 to 6.5 metres wide from kerb to kerb.

The average sedan motor vehicle is approximately 1.9 metres wide, more with side mirrors, etc.

Whilst many motorists parking in these narrow streets do not park "close and parallel" to the kerb as required by law, but park partly on the nature strip, if there is a vehicle legally parked on each side of Seaspray Street this would leave only 2.2 metres between the vehicles. This is barely sufficient width for one sedan vehicle to safely pass through, let alone oncoming vehicles, and let alone delivery trucks, garbage trucks, street sweepers, emergency Fire and Ambulance Vehicles, and the like. Certainly insufficient for the trucks carrying equipment to establish the proposed

residential subdivision or for the construction of houses and other infrastructure on the proposed modified residential subdivision.

Additionally, it would also result in a very dangerous situation for persons, particularly children and the elderly, crossing the road when vision is severely restricted by vehicles parked on both sides of the road.

Of significant importance is the lack of room for emergency vehicles, particularly fire fighting vehicles. Of even greater importance is the ability of future residents of the subdivision to be able to exit the subdivision in the case of bush fire. An inability to flee the area quickly is dangerous to life.

The Department should be acutely aware that if it approves the subdivision with the current proposed access it is putting the health, and indeed the lives, of residents of the proposed subdivision at great risk. The Department should also be aware that increasing the traffic flow in these streets will detrimentally affect the quiet enjoyment of the existing residents of those streets.

The Department has a duty of care to the community as a whole, and in these circumstances a duty of care to the future residents of the proposed subdivision. The duty here is not to give access to the subdivision via these narrow roads referred to above because of the risks of injury or to lives.

It is also noted that the surfaces of Seaspray and the other streets mentioned have been detrimentally affected by current traffic, let alone the significant proposed increase in traffic. Clearly the surfaces have not been designed with sufficient strength for existing traffic and will need repair and strengthening to cope with the increase in traffic.

See attached photographs supporting the above.

**Again, on the basis of these facts standing alone:**

- 1. The application for subdivision should be refused.**
- 2. That if the application for subdivision is to be approved, then alternate access should be provided which does not depend upon access to the subdivision using the narrow streets referred to above.**
- 3. That if the application for subdivision is to be approved, and alternative access is unavailable, then any approval should be conditional upon:**
  - a. Each of Gemini Way, Seawinds Parade, Seaspray Street and Scorpio Drive being widened to a safe width, at the expense of the developer and prior to the commencement of any work on the subdivision. However, widening of these carriageways has never previously been contemplated or included in S. 149 Certificates and would be an unfair imposition on the property owners in those streets.**
  - b. At the expense of the developer, and prior to the commencement of any work on the subdivision, Leo Drive traffic suitable and safe traffic calming should be assessed and be marked and/or roundabouts constructed.**
  - c. That, prior to commencement of work on the subdivision, and at the cost of the developer, that the pavement of all relevant streets be strengthened and resurfaced in a proper and workmanlike manner sufficient to withstand the increased traffic movements and sufficient to withstand heavy vehicles required for the construction of the subdivision and houses thereon.**



A small vehicle attempting to pass between legally parked vehicles.



A larger vehicle attempting to pass between legally parked vehicles.



Showing narrowness of Seaspray Street with vehicles legally parked close and parallel to the kerb.



Examples of cracked and broken pavement on Seaspray Street.

Clearly the proponents, having developed land in the area in earlier subdivisions, had ample opportunity when constructing those subdivisions to ensure that access roads to future planned subdivisions, such as the present proposed subdivision, were of sufficient width and pavement strength to service their future subdivisions. Clearly the proponents have attempted to maximize the residential block numbers in the earlier subdivisions. The proponents should not now seek to rely on those narrow roads to service their later subdivisions, but should provide proper, separate, sufficiently wide access roads, for example, directly off Leo Drive, terminating Seaspray Street prior to entry into the subdivisions; or from Matron Porter Drive.

If any of the matters raised above cannot be adequately addressed, then the subdivision application should be simply refused.

I look forward to the Department taking all matters into account when considering the Subdivision Application ensuring the protection of the residents of the access roads, and ensuring the safe passage of vehicles and pedestrians on all relevant streets.

I thank the Department for the opportunity of commenting on the Application.

Yours faithfully,

A handwritten signature in black ink. The signature is stylized, with a long horizontal stroke that loops back under the name. The name appears to be 'Graeme Gibson'.

Graeme Gibson OAM JP