

14 November 2016

Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Fiona Gibson

Dear Madam

Subject: Modification To North Cooranbong Concept Approval - MP07_0147 MOD 4

Thank you for your email of 3 November 2016 in which you invited Council to make a submission in regard to the proposed modification of the North Cooranbong Concept Approval.

Council's submission is provided below.

Land Zoning

A report will be submitted to Council's Meeting of 14 November 2016 that recommends that Lot 12 DP 1158508 is rezoned in accordance with the plan provided in Appendix 4 of the Environmental Assessment submitted for the modification. Council does not raise any objection to the modification based on the land zonings.

Road Design

The road that is the subject of the modification will form one of the main access roads into the North Cooranbong development. The road is identified with a total width of 17 metres with a 9 metre constructed carriageway width. Council supports this road standard. Council recommends that the road is designed to have minimum horizontal curve radii of 120 metres to meet a design speed of 50 km/hr. The curve radii are not shown in the submitted information. It is recommended that the minimum horizontal curve radii are confirmed with the applicant prior to approval of the modification.

Lot 2 DP 825266 (Dabson's land)

Council is aware that there has been negotiation between the owner of Lot 2 DP 825266 (Dabson) and the Johnson Property Group in regard to the provision of road access to Lot 2 DP 825266. It appears that there is currently not sufficient road access to Lot 2 to allow for the development of this land. As this modification will remove a road access to Lot 2, Council requests that Planning and Environment consider how road access can be provided to Lot 2 so that the land can be developed.

Environmental Impacts

Our Ref: MISC/86/2010 Your Ref: MP07_0147 MOD 4

It is of concern that the proposed road layout and development on Lot 12 DP 1158508 (No. 617 Freemans Drive) is being considered in isolation of the other adjoining allotments that are zoned RU6. This makes it difficult to ensure that biodiversity offsetting and native vegetation corridors are of sufficient quantum and quality and are located strategically to maximise their function.

It is recommended that where possible the proposed road should be located along the proposed E2 and R2 zoning boundary so that it provides an effective edge between the proposed residential development and retained native vegetation.

The Land and Environment Court ruling for DA/714/2014 (the water treatment works on Lot 12) required a 30 metre wide vegetation corridor along the eastern site boundary. The proposed road should also allow for this 30 metre wide vegetation corridor. From Council's interpretation of the plans, it doesn't appear to allow for 30 metres at the northern site boundary.

The proposed road would clear a further 7 *Tetratheca juncea* and 11 *Angophora inopina* plants. Both species are listed as vulnerable on the TSC Act and EPBC Act and biodiversity offsets are required to compensate for their loss. Any offsets that were provided as part of the original North Cooranbong development do not cover this additional development or the proposed clearing on No 617 Freemans Drive. These offsets should be calculated using the Biobanking Methodology and secured in perpetuity with suitable management funding.

Should you require further information on any of the above matters, please contact me on 4921 0281.

Yours faithfully



Greg Field
Chief Subdivision Engineer
Development Assessment & Compliance Department