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**NIRAG Inc. (Y1992101)**

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NORTHERN ILLAWARRA RESIDENTS ACTION  
GROUP

ABN 60 858 038 414

[nirag@bigpond.com](mailto:nirag@bigpond.com)

34 Point Street

BULLI NSW 2516

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ATTENTION: Silvio Falato [Silvio.Falato@planning.nsw.gov.au](mailto:Silvio.Falato@planning.nsw.gov.au)

**RE: NIRAG Response to Submissions for MP 06\_0094 MOD 5**

Dear Sir,

Thank you for extending the time for our response.

The major additional concern is that the traffic impacts of the modification within the immediate area has been glossed over and treated very dismissively. The change to have 51 terraces/townhouse dwellings in Precincts 2 and 3 has significant traffic impacts because the traffic generated by this type of dwelling will be significantly greater than the original plan. The TTPA report is superficial, totally inadequate and un-professional.

For example the concerns of residents' are dismissed without substantiation in the Response Table (Appendix A, page 29) which states as follows: *"The EAR was accompanied by a Traffic Impact Assessment prepared TTPA. TTPA has undertaken a comparison of the approved and proposed schemes and the modified development has the potential to generate an addition 13 vehicle trips per hour (VTPH) in the AM peak and an additional 7VTPH in the PM peak. TTPA conclude that this very minor increase in generated traffic would be quite imperceptible when it is distributed in 2 directions along Geraghty Street and that the proposed development could be accommodated without adverse impact."* The impact on Craven St, Panmills Dr and Wakefield Streets has not been acknowledged or quantified. There is an assumption that all the traffic will join Geraghty Street at the western end of Wilkies Street, whereas it is more likely that Craven and Wakefield Streets will be used for trips to and from the north.

There are also two statements on page 4 which again demonstrate a clear lack of appreciation of the local issues:

1. The statement that *"it is also pertinent that the most direct access route to/from the 'estate' is in fact provided via the Princes Highway – Point Road – Geraghty Road route which does not require residents/visitors to travel through the residential roads to the north in order to access the Princes Highway"* assumes that traffic is heading "to/from" Wollongong and ignores that for many journeys Thirroul shopping centre, beaches or train station would make Wrexham Road the most direct access route.
2. The claim (Page 4) that *"On balance, the reduced development yield will result in reduced traffic generation outcome, thus lower traffic impact on the road network"* is unsubstantiated and strongly disputed. Terraces/townhouse dwellings are likely to have two vehicles per residence and also will potentially make more trips per day than for the original aged facility, and have more visitor parking requirements.

The changes made to access roads and driveways along Wilkies Street have recognised that there are significant impacts and this change is an improvement over the original proposed modification. The overall width of Wilkies Street has not been addressed and this remains a concern as it would now become a collector road (similar to Geraghty St). There is inadequate width for two way traffic unless parking is not allowed on the southern kerbside. If this is the intention this impact should be clearly stated, however it

would be far preferable to widen the road and, with appropriate traffic calming, design it for the additional traffic that is now proposed.

As stated above Panmills Street and the two streets connecting Wilkies Street to Panmills Street will inevitably be used by ARV traffic travelling north to connect to Brickworks Avenue. Craven and Wakefield Street are narrow streets, only designed to give access and parking for the houses in those streets. Through traffic as a result of the change in the ARV design will be a safety risk which has been ignored in the traffic report and must be addressed.

It is also not acceptable for the proponent to state that the width of Wilkies Street is not part of their site (Appendix A, page 31). This aspect should be addressed in the traffic study. Even with the current development the narrow width is sometimes problematic and any increased traffic as a result of an extra 51 terraces/townhouse dwellings across Precincts 2 and 3 will be a safety issue.

The Geraghty Street extension south to Point Street requires a LATM (Local Area Traffic Management) scheme. With increasing gridlock situations on Lawrence Hargrave Drive, especially on weekends, there is a concern that, even though it is longer than the main road, this will be an attractive bypass with an increased risk of accidents (vehicle, bicycle and pedestrian). A speed limit of 40kmh is required with signage and road markings to make it safe for bicycles, and aged and young pedestrians.

Yours sincerely

Ross Dearden,  
Hon Secretary, NIRAG Inc  
Ph 4267 1734