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**From:** Frazer Read <Frazer@allurbanplanning.com.au>  
**Sent:** Wednesday, 15 July 2026 9:47 AM  
**To:** Naomi Billett; Barlund, Paola; TPC Enquiry; Jack Tammens  
**Subject:** RE: Clarence- draft amendment PDPSAMEND-2025-054641- Joint traffic submission  
**Attachments:** K Midson Commission Response.pdf

Dear Paola, please see Mr Midson's supplementary statement

Regards

**Frazer Read**

Principal

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14<sup>th</sup> July 2026

Michael Hogan  
Delegate (Chair)  
Tasmanian Planning Commission  
Level 3, 144 Macquarie Street  
Hobart TAS 7000

Dear Mr Hogan,

**Draft Amendment PDPSAMEND-2025-054641 - Response to Commission Direction  
- Traffic Matters**

I refer to the Commission's direction requiring the traffic experts to confer and prepare a Joint Statement addressing the matters identified by the Commission.

**1. Matters Agreed by Experts**

Following correspondence between the traffic experts, agreement has been reached on the following matters.

**Existing road network**

The experts agree that:

- East Derwent Highway is a Category 3 State Road.
- East Derwent Highway carries high traffic volumes.
- East Derwent Highway is a divided four-lane highway in the vicinity of the subject site.
- East Derwent Highway performs an important regional movement function.
- Property access to East Derwent Highway should be carefully managed having regard to the road's traffic function, traffic volumes and urban arterial environment.

**Existing local road network**

The experts agree that:

- Ballawinnie Road is a local road.
- Ballawinnie Road provides access to residential properties, the existing shopping centre, and other local land uses.

- The existing shopping centre access from Ballawinnie Road creates some existing localised operational issues, including short-term queuing associated with vehicle movements into and within the shopping centre car park.
- Those operational issues are an existing characteristic of the surrounding road environment.

### **Existing signalised pedestrian crossing and platooning**

The experts agree that:

- The existing pedestrian-operated traffic signals on East Derwent Highway form part of the existing road environment adjacent to the subject site.
- All signalised traffic control, including pedestrian-operated traffic signals and signalised junctions, can create platooned traffic flow.
- Platooned traffic flow has the potential to create clustered vehicle arrivals at downstream accesses or intersections.

### **Additional traffic from future development**

The experts agree that:

- The proposed rezoning would enable future development that is likely to generate additional traffic compared with the existing residential use of the land.
- The level of additional traffic would depend on the scale and nature of any future development.
- The indicative concept plan provides one basis for estimating traffic generation, although the final development form would be determined through a subsequent development application process.
- Any future development application would require assessment of traffic generation, access arrangements, parking, internal circulation, servicing, pedestrian movements and road safety impacts.

### **Development assessment context**

The experts agree that:

- The current matter before the Commission is a rezoning application, not a development application.
- The concept plan is indicative and does not represent a final detailed development layout.
- Detailed design matters, including the final access configuration, driveway geometry, internal circulation, parking layout and servicing arrangements, would need to be assessed at development application stage.

**Baseline Clarifications and Remaining Areas of Disagreement**

In addition to the matters agreed above, I note the following baseline matters and remaining areas of disagreement:

- Existing traffic volumes on East Derwent Highway are addressed further in Section 2.
- The experts agree that the existing supermarket access can result in short-term localised queuing in Ballawinnie Road. The disagreement is whether traffic generated by future development of the rezoned land would materially worsen that existing condition.
- The experts agree that signalised traffic control can create platooned traffic flow and that platooned traffic flow has the potential to create clustered vehicle arrivals. The disagreement is whether the proposed access strategy would create an unacceptable additional safety or operational issue.

**2. Baseline Traffic Data and Growth Rate Assumptions**

The Commission requested that the experts establish an agreed baseline dataset where possible, including daily and peak hour traffic volume levels on relevant roads and lanes, and an estimate of traffic volume growth over the next decade.

In relation to existing traffic volumes on East Derwent Highway, I do not understand there to be a substantive disagreement regarding the order of magnitude of existing traffic volumes. My Traffic Impact Assessment referred to approximately 19,900 vehicles per day, based on AADT data. Mr Hubble referred to approximately 22,000 vehicles per weekday, which I understand to be an AWDT figure. The difference is likely to reflect the averaging period, namely average annual daily traffic compared with average weekday traffic, rather than a fundamental disagreement regarding traffic conditions.

In relation to future traffic growth, I do not understand that an agreed growth rate has been confirmed between the experts. I have therefore reviewed the available Building Tasmania traffic count history for East Derwent Highway in the vicinity of the site.

The available AADT traffic data for East Derwent Highway is summarised as follows:

| Year | AADT   |
|------|--------|
| 2018 | 19,165 |
| 2021 | 21,405 |
| 2022 | 18,800 |
| 2024 | 19,901 |

The traffic data history is relatively limited and includes some year-to-year variation. The 2021 count is higher than the surrounding data points, while the 2022 count is lower. I therefore consider that caution should be exercised in deriving a trend from any single count year.

Over the longer period from 2018 to 2024, recorded AADT increased from 19,165 vehicles per day to 19,901 vehicles per day. This represents an increase of 736 vehicles per day over six years, equivalent to approximately 0.6 percent per annum on a compound annual growth basis.

On that basis, I consider that an adopted growth rate of 1 percent per annum represents a conservative and reasonable assumption for a future-year assessment over the next decade. A 1 percent per annum

growth rate would increase the 2024 AADT of 19,901 vehicles per day to approximately 22,000 vehicles per day after 10 years. This is higher than the historical compound growth rate indicated by the available count data and therefore provides an appropriate level of conservatism.

A 1 per cent per annum growth rate would increase the 2024 AADT of 19,901 vehicles per day to approximately 22,000 vehicles per day after 10 years (2036 forecast year).

This growth assumption is not critical to my overall opinion. The key access and safety issues identified by the Commission relate primarily to the form of access, driveway location, turning arrangements, sight distance, and the scale of traffic generation from a future development of the rezoned land. Nevertheless, I consider that 1 percent per annum provides an appropriate conservative basis for future assessment should the Commission require a nominated growth assumption.

### **3. Context of the Current Proceedings**

It is important to recognise that the current proceedings relate to a rezoning application, rather than a development application.

The indicative concept plan prepared as part of the Traffic Impact Assessment is intended to demonstrate that the land is capable of accommodating an appropriate mixed-use development under the proposed zoning. It is not a detailed development proposal and does not represent the final design of any future development.

Irrespective of whether the land is rezoned, any substantive future development would likely be required to be supported by a Traffic Impact Assessment prepared in accordance with Building Tasmania's Traffic Impact Assessment Guidelines. That assessment would examine the detailed development proposal, including traffic generation, access arrangements, parking provision, internal circulation, servicing requirements, pedestrian movements and road safety impacts. It is at that stage that the detailed access arrangements would be assessed against the relevant engineering standards and guidelines, and any necessary mitigation measures identified.

The Tasmanian Planning Scheme also provides a development assessment framework that would require access arrangements to minimise adverse effects on the safety and efficiency of the road network. Consequently, while it is appropriate to consider whether the rezoned land is capable of supporting an appropriate future development, the rezoning itself would not remove the need for a subsequent detailed traffic and road safety assessment.

### **4. Left Turn Treatment into the Site from East Derwent Highway**

In my opinion, a dedicated left-turn deceleration lane into the site from East Derwent Highway is unlikely to be warranted for a representative mixed-use development of the site.

East Derwent Highway in this location operates as a 60 km/h urban arterial road with good forward visibility. Comparable accesses and intersections along this section of highway generally do not incorporate auxiliary left-turn lanes. This includes the nearby Ballawinnie Road intersection, which accommodates substantially greater turning volumes than would be expected from the indicative development, and the adjacent service station access, neither of which provide a left-turn deceleration lane.

The proposed East Derwent Highway access would also be entry-only. It would not permit vehicles to exit onto the highway and would not introduce right-turn movements across the divided carriageway. The movement would be limited to a conventional left-turn entry movement from the northbound kerbside lane within an urban 60 km/h environment.

While Austroads provides guidance regarding circumstances where auxiliary turn treatments may be considered, I do not consider that the traffic volumes or operating environment associated with a representative development of the site demonstrate that such a treatment would be warranted at this location.

If a left-turn auxiliary lane were required, the general spatial footprint would likely involve removal or modification of the existing indented parking lane and kerbside area along part of the site frontage and upstream approach, together with associated taper and kerb works. In my opinion, that outcome would be inconsistent with the established access environment along this section of East Derwent Highway and is not justified by the likely traffic generation of the rezoned land.

## **5. Left Turn Exit onto East Derwent Highway**

In my opinion, provision of a left-turn exit from the site onto East Derwent Highway is unlikely to be appropriate for anything other than a low-volume domestic driveway access.

The proximity of the existing pedestrian-operated signals significantly constrains the available spacing for a commercial left-turn exit arrangement. While domestic driveway access currently exists along the frontage, I do not consider that a commercial access serving a future mixed-use development could realistically achieve appropriate separation from the pedestrian crossing.

Importantly, the indicative concept plan does not rely upon a left-turn exit to East Derwent Highway. The concept adopts an entry-only arrangement from the highway, with all outbound traffic directed to Ballawinnie Road. In my opinion, this is the appropriate access strategy because it avoids vehicle exit movements in close proximity to the pedestrian signals and avoids the need for drivers leaving the site to assess gaps in the northbound highway traffic stream.

## **6. Corner Clearance and the Ballawinnie Road Access**

In my opinion, an appropriately located driveway access can be provided from Ballawinnie Road.

The Commission's question refers to desirable corner clearance distances for a channelised intersection. In my opinion, that is not the appropriate basis for assessing the proposed access because the future connection would be a private property access, not a new public road junction.

I do not suggest that Austroads is irrelevant. Rather, the relevant Austroads guidance is the guidance dealing with property access and access management, with the detailed driveway design then assessed against Australian Standards, AS2890.1. Applying public road intersection spacing criteria to a private driveway would overstate the design requirement and would not reflect the way similar urban commercial accesses are normally assessed.

I also wish to clarify the sight distance assessment associated with the proposed Ballawinnie Road access.

The proposed access to the rezoned land from Ballawinnie Road would be a private driveway, not a new public road junction. The relevant sight distance assessment is therefore the sight distance between vehicles exiting the driveway and vehicles travelling along the frontage road. In this case, the frontage road is Ballawinnie Road.

East Derwent Highway is not the frontage road for the proposed Ballawinnie Road access. Rather, East Derwent Highway is the priority road to which Ballawinnie Road connects at its eastern termination. Ballawinnie Road forms a T-junction with East Derwent Highway, with East Derwent Highway having priority.

In my Traffic Impact Assessment I noted that the proposed Ballawinnie Road access has clear visibility to the eastern termination of Ballawinnie Road at East Derwent Highway. This should not be interpreted as a requirement to achieve driveway sight distance into, or along, East Derwent Highway. It simply identifies that there is no physical obstruction to visibility between the proposed driveway and the eastern end of Ballawinnie Road.

Vehicles entering Ballawinnie Road from East Derwent Highway must first slow and turn from East Derwent Highway into Ballawinnie Road. Those vehicles would not be travelling at the general urban speed limit at the point they pass the proposed driveway. The turning movement, short separation distance, local street environment and junction geometry would all act to reduce vehicle speeds within this section of Ballawinnie Road.

Accordingly, the available sight line from the proposed driveway to the eastern end of Ballawinnie Road is effectively no different to being able to see to the end of a short local access street or cul-de-sac. It does not represent a road safety deficiency.

The proposed arrangement would also be generally consistent with numerous commercial driveway accesses located on comparable urban arterial roads, including East Derwent Highway, Sandy Bay Road and Elizabeth Street. Some specific corner site examples include:

- Spencer's café, corner East Derwent Highway/ Beach Road. Access to car park is located approximately 30 metres from East Derwent Highway within Beach Road. The access configuration is located offset opposite to the disused service station/ tyre store in a similar manner to the subject site and the IGA access.
- Gregory Street/ Sandy Bay Road – car park access located approximately 30 metres from the Sandy Bay Road junction within Gregory Street.
- Queen Street/ Sandy Bay Road – service station access located approximately 30 metres from the Sandy Bay Road junction within Queen Street.
- Augusta Road/ Elizabeth Street – Hill Street Grocer supermarket located on the corner, approximately 25 metres from the Elizabeth Street junction along Augusta Road.

These examples demonstrate that commercial driveway accesses close to arterial road intersections are a normal feature of established urban road networks, provided they are designed and managed as property accesses rather than as new public road junctions.

## **7. Right-turn exit from the site onto Ballawinnie Road**

In my opinion, a safe right-turn exit from the site onto Ballawinnie Road can be achieved.

Ballawinnie Road is a 50 km/h local road. The proposed driveway can be located so that it does not directly conflict with another public road intersection or directly oppose the existing supermarket access. Right-turn movements from commercial driveways onto local roads are common and accepted traffic movements, provided appropriate sight distance and driveway geometry are achieved.

Again, I consider the detailed design of the driveway should be assessed as a property access under AS2890.1 and relevant Austroads property access principles, rather than as a new public road intersection.

I do not consider there is any traffic engineering reason why right-turn exit movements from the site to Ballawinnie Road could not be safely accommodated, subject to detailed design at the development application stage.

It is also relevant that AS2890.1 provides specific guidance on the location of access driveways near intersections. Figure 3.1 of AS2890.1 (reproduced in Figure 1 below) identifies prohibited driveway locations in the immediate vicinity of an intersection, generally associated with the kerb return and the short section of road adjacent to the tangent points of the intersection. This is a driveway-specific requirement and is materially different to applying Austroads intersection spacing guidance for new public road junctions.

The proposed access to the rezoned land would be a private driveway to Ballawinnie Road. It would not form a new public road junction. Accordingly, the relevant design consideration is whether the driveway can be located outside the prohibited driveway area identified in AS2890.1 and whether it can provide appropriate sight distance and geometry for the expected traffic movements.

In my opinion, this can be achieved. The driveway can be located toward the western side of the rezoned land frontage to Ballawinnie Road, providing clear separation from the East Derwent Highway junction. This location would also provide separation from the existing supermarket access on the northern side of Ballawinnie Road. While the supermarket access is an existing commercial driveway rather than a public road junction, the likely access location for the rezoned land can be offset and separated from it in a manner that avoids direct conflict between opposing access movements.

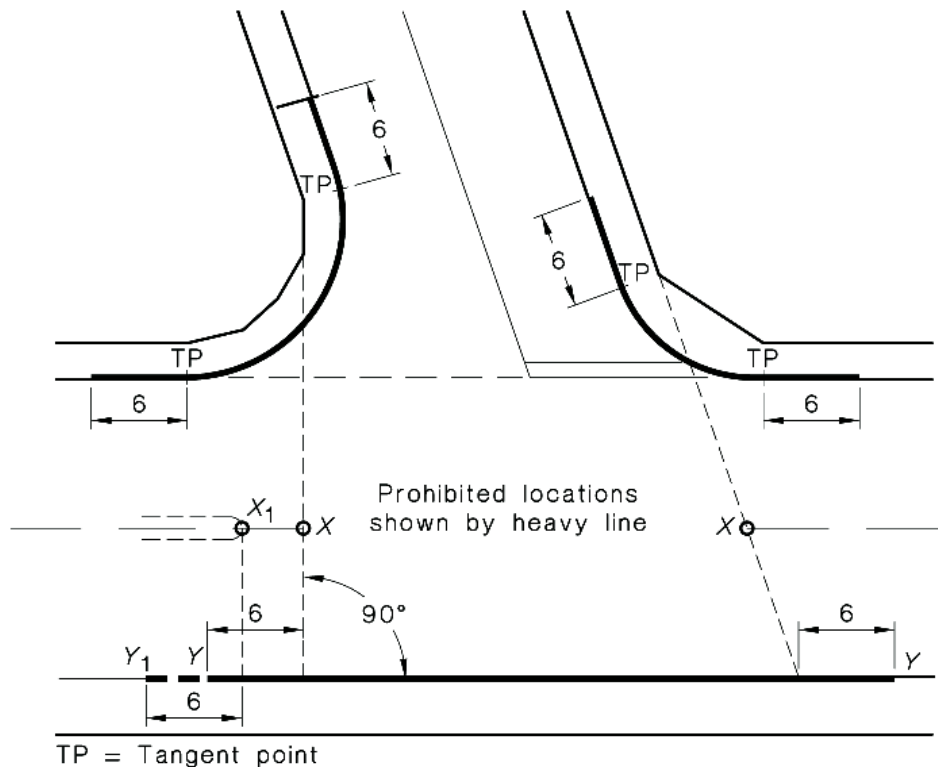
On this basis, I do not consider that the potential for a right-turn exit movement from the site onto Ballawinnie Road represents a traffic safety constraint to the rezoning. The final driveway position, width, kerb geometry, sight lines and internal circulation would be matters for detailed assessment at development application stage.

**Figure 1 AS2890.1 – Prohibited Locations of Access Driveways**



**Figure 3.1 — Prohibited locations of access driveways**

Dimensions in metres



NOTE 1 Accesses to domestic driveways are excluded from the prohibition in respect of the kerb section marked Y-Y (see [Clause 3.2.3\(a\)](#)).

NOTE 2 The points marked X<sub>1</sub> and X are respectively at the median end on a divided road and at the intersection of the main road centre-line and the extensions of the side road property lines shown as dotted lines, on an undivided road. On a divided road, dimension Y-Y extends to Point Y<sub>1</sub>.

## 8. Traffic Generation Potential

The Local Business Zone permits a range of neighbourhood-scale commercial activities. While the precise tenancy mix cannot be known at the rezoning stage, the physical characteristics of the site naturally limit the intensity of future development. Having regard to the site area, parking requirements, access arrangements, internal circulation and servicing requirements, a future development is likely to comprise several small commercial tenancies of a scale similar to the indicative concept assessed in the Traffic Impact Assessment.

It is possible to speculate about high traffic-generating uses, but any such scenario must remain realistic. For example, a very large restaurant, a large supermarket or a high-intensity drive-through use would be unlikely to be capable of being accommodated on the site once parking, queuing, loading, waste management, pedestrian access, internal circulation and road authority requirements are properly considered.

The upper end of this range is therefore not based on an unconstrained theoretical use of the land, but on a realistic development outcome having regard to the physical and planning constraints of the site.

Based on the TfNSW Guide to Transport Impact Assessment, neighbourhood-scale commercial developments of this nature would typically generate traffic in the order of 50 to 140 vehicle movements during the peak hour, depending upon the final tenancy mix. The indicative concept assessed in the

Traffic Impact Assessment, which generates approximately 141 vehicle movements during the PM peak hour, therefore represents the upper end of the range of traffic generation reasonably expected from future development of the site.

This is also why the development application process is important. If a future development proposed a substantially more intensive traffic-generating use, that proposal would require a new TIA and would need to demonstrate that its access arrangements, internal circulation, queuing, parking and road safety impacts were acceptable. If those matters could not be demonstrated, the development should not be approved in that form.

## **9. Overall Opinion**

In my opinion, the matters raised by the Commission do not identify a traffic engineering constraint that would prevent the land from being rezoned to Local Business.

The likely traffic generation of a representative future mixed-use development is capable of being accommodated by the surrounding road network, subject to detailed design and assessment at development application stage. The appropriate access strategy is likely to involve an entry-only access from East Derwent Highway and an access to Ballawinnie Road for outbound movements, generally consistent with the indicative concept assessed in my TIA.

The detailed design of the access arrangements, including final driveway location, internal queuing capacity, sight distance, pedestrian treatments, loading arrangements and any kerbside changes, can and should be resolved through the subsequent development application and TIA process.

I therefore remain of the opinion that the proposed rezoning can be supported from a traffic engineering and transport planning perspective.

Please contact me on [REDACTED] if you require any further information.

Yours sincerely,



Keith Midson BE MTraffic MTransport FIEAust EngExec

**DIRECTOR**

**Midson Traffic Pty Ltd**