

Iain More

From: Daniel Warring <danielwarring@me.com>
Sent: Sunday, 1 March 2020 11:21 PM
To: Contact Us
Subject: Submission regarding DA0472/2019

Attention: Chief Executive Officer

I make the following submissions regarding DA0472/2019.

General

The proposal does not meet the following requirements:

The lots do not comply with the development standards in that they are all less than 4ha.

The lots do not connect to a reticulated water supply despite being capable of being connected.

The lots increase the traffic on White Gum Rise/Tasman Highway by more than 10% or 10 vehicle movements per day

The lots increase the traffic on White Gum Rise by more than 20% or 40 vehicle movements per day

Some lots are to be developed on areas of medium land slip risk.

Access to Infrastructure

Reticulated Water Supply

It is noted that the subdivision will not be connected to a reticulated water supply.

On 24 Dec 19 there was a significant grass fire on the subject subdivision area. TFS vehicles refilled multiple times over multiple hours at the hydrant in front of 4 White Gum Rise. The area of the fire would have blocked the proposed road from White Gum Rise into the proposed subdivision. By having only one entry and exit into Drivers Run and the new subdivision, it poses a risk during a bushfire. With the typical North Westerly winds, any fire on the proposed sub division risks my property.

7.4 Clause 13.4.7 Performance criteria states “ it must be demonstrated that the lots are in a locality where reticulated services are not available or capable of being connected” yet the response statements states “a significant upgrade of the water storage tank...extension of the reticulated system. Given the significant costs involved, the subdivision is practically incapable of being connected to the existing water supply”

The performance criteria are quite clear in stating “not available or capable” it does not say unless it has a significant costs.

If it is such an issue that Taswater are concerned about the existing pump losing power during a bushfire events and the developer is using this as a reason to not have a reticulated supply, then wouldn't this also be a concern for Council for the existing Drivers Run properties that rely on the reticulated water supply for firefighting?

By not being connected to a reticulated water supply, then the proposed subdivision is not “comparable to Drivers Run” as stated elsewhere in the document.

In regards to supply of rural residential allotments, this would make this development less attractive than allotments already available in other areas with a reticulated water supply, especially as Launceston is currently in Level 1 water restrictions due to below average rainfall.

NBN

There is no detail in any documentation regarding the NBN technology to be used and the effect of the development on NBN services for existing residents. The Drivers Run area is serviced by fixed wireless technology which is already suffering with routine slow speeds, dropouts and at times is unusable. A 50% increase of subscribers on the same sector from the Abels Hill Rd tower would render it unusable for a greater period of time. What consultation with NBN has been made by the Proposer regarding availability of further subscribers to the tower in that sector?

Objection

I therefore object to the development based on that it will not have a reticulated water supply and also the further reduction of NBN Fixed Wireless performance.

Vehicle Access

2.8 The proposed sub division development will have direct access onto White Gum Rise

Only being able to enter the new subdivision via White Gum Rise will significantly increase the traffic on White Gum Rise with during the construction of the subdivision, construction of dwellings and ongoing traffic post construction phase. Considering there is still construction and heavy vehicles delivering construction materials, to some lots in Drivers Run, sometimes many times per day to the same lot, many years after development, any increase in traffic will be felt for years just for the contraction phase.

Installation of a street light on this intersection will mean that a streetlight will shine into the 3 bedrooms on the western side of my house. Streetlights also attract wildlife and there are already significant wildlife deaths on White Gum Rise/Escarpment Drive.

Vehicles turning right out of the new development will also shine headlights into the bedrooms on the western side of my house.

The proposed development will significantly interrupt the quiet enjoyment of my property by way of vehicle traffic, noise and light.

6.5 Clause E4.5.1 A2 The annual average daily traffic of vehicle movements to and from a site, using an existing access or junction, in an area subject to a speed limit of more than 60 km/h, must not increase by more than 10% or 10 vehicle movements per day, whichever is greater

The assessment then states that on completion of subsequent dwelling development will increase traffic through the junction "by 261 vehicles or greater than 10%"

This is clearly a significant increase of vehicles using the White Gum Rise/Tasman Highway intersection. The intersection is already dangerous and in fact I have previously made contact to the Department of State Growth regarding this intersection. As it is dual width westbound, multiple cars and heavy vehicles use this as a stopping lane for extended periods such as heavy vehicle rest breaks. I have seen numerous near miss accidents occur at this intersection. Particularly at times of low sun angles and reduced visibility such as fog which is common throughout the year.

I requested that they paint a dedicated turning in and out lane from White Gum Rise. They chose not to do this but instead installed "No Stopping" signs along Tasman Highway adjacent to the intersection which has had no effect. They therefore acknowledge that cars stopping create an unsafe condition or else they would not have installed signs.

More recently I have contacted the owner of Sainty's bus service as they stop on the Tasman Highway eastbound in the left turning lane into White Gum Rise. The intersection is already dangerous and should not be subject to increased traffic by 261 vehicles per day.

These numbers are based on completion of dwelling development, so during construction of the subdivision and also construction of dwellings this is likely to be higher and consisting of more heavy vehicles. Despite what is stated in the Traffic Impact Assessment, how can an increase of 261 vpd from 400 vpd not reasonably impact the Tasman Highway/White Gum Rise intersection and the residents of White Gum Rise?

Data in the TIA only refers to crashes. I live on the intersection and see the near misses daily. Traffic numbers do not allow for construction, which using the Drivers Run example, is still occurring years later.

This intersection is continuously covered with loose gravel, which as a motorbike rider is hazardous. I have contact council and the Department of State Growth previously to have it swept and there is always a pass the buck about who is responsible. Debris will be worse during the construction phase and with increased traffic.

6.5 Clause E4.5.1 A3 The annual average daily traffic of vehicle movements to and from a site, using an existing access or junction, in an area subject to a speed limit of 60 km/h or less, must not increase by more than 20% or 40 vehicle movements per day, whichever is greater

I object to the assessment as ultimately all lots will be exiting to the Tasman Highway utilising White Gum Rise, therefore in my opinion the total increase "with each lot generating 9 vehicle movements per day" should be 270 and therefore does not comply.

These numbers are based on completion of dwelling development, so during construction of the subdivision and also construction of dwellings this is likely to be higher and consisting of more heavy vehicles.

Even using basic numbers where Drivers Run consists of 60 lots, increasing this by 30 lots is a 50% increase in traffic

The White Gum Rise and Escarpment Drive roadways are already in poor condition as seen by the numerous potholes and repairs carried out. The road surface outside lots that are undergoing construction have deteriorated the road where there are multiple heavy vehicles using the roadway. Having all vehicles to the new subdivision enter through White Gum Rise will rapidly deteriorate the already poor condition road.

Lot 18 contains an area reserved for potential future road connection. As this appears as part of this development then vehicle movements to include any attached area should be considered.

Traffic Impact Assessment August 2019

No allowance has been made for the impact of vehicles on White Gum Rise up to the New Access Road Junction. This is the area that my lot is located on. I will be affected by all vehicles that enter and leave the proposed subdivision during construction of the sub division, construction of dwellings and then routine vehicle access.

The Traffic Impact Assessment data is also flawed as vehicle and pedestrian movements were only counted during two 1 hour time periods on a single day during morning and afternoon peak. Given that there are multiple shift workers that live in Drivers Run, this assessment is not an accurate reflection of actual vehicle movements. The fact that no pedestrians were recorded is also flawed as the whole of Drivers Run is used by pedestrians, people riding horses and people including children on bicycles. Myself and others walk their dogs daily and given there are no footpaths, any increase in traffic further exposes those people to traffic.

5.3.2 Figure 26 The estimated 2029 AM/PM peaks data is inaccurate as it only allows for the 27 lots that are accessed from White Gum Rise. There are 3 lots that are access from Magpie Crescent, however these will still need to use the Tasman Highway/White Gum Rise intersection.

6.2 Figure 27 Tasman Hwy/White Gum Rise SISD is 250m and Available Left is 250m. This should be classed as marginal and highlighted amber? What method of measurement was used for this assessment as a plot on Google Earth indicates that this is less than 250m?

Figure 7 - Sight distance to the right is stated as 300m. The photo is not even taken from the position that a driver of a car would be located on the road. A car turning right would position on the right hand side of the lane. It is taken further East from a higher elevation which would give a measured sightline greater than actual due to the hump in the road. This can be seen in Figure 8 which shows where the photo was taken from. What height is the photo taken at? Is the photo been taken at the typical eye height of a car driver?

Figure 8 - Sight distance left is not taken from a position where a car would be positioned if it was turning left.

6.4 Section E4.5.1 Acceptable Solution A2 is not satisfied. Performance Criteria P2 is satisfied. I object to the response provided for Performance Criteria (a), (f) and (g)

(a) The increase in traffic generated by the use is “well within junction capacity”. The TIA assessment of traffic does not take into consideration the additional 3 lots accessed from Magpie Crescent. It also does not take into account the increased traffic due to construction. Simple maths say that an additional 30 lots on top of the 60 existing lots is a 50% increase in traffic which far exceeds the 20% in the acceptable solution.

(f) and (g) The need for the use “unavoidable for the proposal to proceed”. This is absolutely avoidable if the proposed subdivision had its own entrance from the Tasman Highway it would be avoided.

6.5.1 An increase of 50% traffic will have an impact on noise and pedestrian amenity. The lack of footpaths in Drivers Run require pedestrians, horses and cyclists to use the roadways.

6.5.2 The introduction of a street light will affect the use of my lot. It will also attract wildlife and create a traffic hazard.

Objection

I absolutely object to the road access to the subdivision being off the existing Tasman Highway and White Gum Rise roads. This will severely impact the enjoyment of my lot in regards to traffic, noise and unwanted light and does not meet the acceptable solution. The TIA contains inaccurate data regarding vehicle movements and available sight lines. It also creates a single point of entry for 90 lots to an area with a bushfire hazard. It also does not take into account further developments linked as demonstrated by the “potential road connection” through Lot 18.

Demand

The proposal states that there is a “low availability of rural residential stock, as opposed to a weakening of demand”.

Low availability does not mean increase in demand. Any conversations with real estate agents to support this is subjective.

2.3

The Launceston Residential Strategy 2009-2029 states that “There is a considerable shortfall in supply of rural residential allotments and some justification for zoning additional Rural Residential land in the period un to 2024” (p.51). Supply does not mean demand. There are lots west of the proposed developments (Boomer Road/Tasman Highway) that are on the market and have been for many months.

The criteria which lends support to potential rural residential development includes access to services such as reticulated water. This development does not intend to provide reticulated water.

3.2 T3

The proposal states that “there are currently no market ready lots available in ...St Leonards and Relbia”. There is Lot 2 Corner Boomers Road and Tasman Highway (7.6 acres) is currently for sale and has been on the market for some time. There is also Lot 1, 102 Station Road West, Norwood (2.3 acres) available for sale. If there is such demand, then why are these still on the market and why aren't they included in the report?

4.4.2

The report states that Drivers Runs is “Close proximity to the CBD (6.5km and 8 min drive)” when it is 9.9 km and 11 minutes). It is 8 minutes to Newstead. It is important to establish the actual times as this reports compares the proposed development to other available lots in different areas. This makes the proposed property seem much closer to the CBD than the other currently available properties.

4.5

States that Dilston and Swan Bay are 20-25 minutes however Dilston is 15km and 14 minutes and Swan Bay is 23km and 20 minutes according to Apple Maps. Swan Bay lots advertised on realestate.com.au are advertised as “15 minutes from Launceston”.

Therefore there are rural residential properties available already with a further 53 lots already approved in the Swan Bay Area.

A search of realestate.com.au shows 10 lots currently available at Sanwae Drive, Swan Bay

4.6

States that the proposal will be at a lower price per hectare than Relbia however no lot prices have been published so how can this claimed?

The proposal is not similar to Drivers Run and other developments in the Launceston area and so may be less attractive to any purchaser given that

- a) there is no reticulated water and owners will be required to install water and firefighting tanks. This additional expense should be considered when comparing
- b) 10 lots located within a medium landslide hazard band may need stormwater piped to the roadside
- c) 5 lots contain small areas within a medium landslide hazard band and “may” still be able to accomodate on site stormwater disposal
- d) 1 lot contains a spring and poor drainage area and requires a more detailed investigation prior to any development
- e) 2 lots will be subject to minor inundation should the dam break
- f) 3 lots are affected by a future road connection

Objection

I therefore object to the development based on supply or demand given the current availability of rural residential properties in the Launceston area.

I am available to discuss any of these matters on the number below.

Regards,

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