
From: Jennifer Jarvis <Jennifer.Jarvis@tasrail.com.au>
Sent: Friday, 12 April 2024 7:44 PM
To: TPC Enquiry
Subject: Draft amendment RZ-2022-05
Attachments: Images showing drainage into rail corridor.docx

Your Reference Tasmanian Planning Scheme – Brighton – Draft amendment RZ-2022-05

TasRail submits the below response to the latest submission to the Commission by from Brighton Council (as the planning authority) as submitted on 28 March and published on the TPC website.

TasRail's response is limited to the matter of BRI-S11.8.3.2 Stormwater – Precinct A.

We refer to section 8.2 of the document authored by Council's Director Development Services dated 28 March 2024 and acknowledge the intention of this clause is to ensure that the entire catchment is considered when designing the stormwater system for the relevant catchment(s) as shown in Figure BRI-S11.4.

TasRail's concern is that the existing stormwater system appears to rely on discharge points that take water through culverts under the Midland Highway which then flow directly into State Rail Network land, flowing under the railway culvert before discharging into the Jordan River. The DSG culverts appear to have been installed at the time of the highway upgrade but TasRail is not privy as to what hydrology or other data informed water capture and discharge decisions at that time and the rail culvert was not upgraded at this time (or since). The culverts each side of the highway which discharge directly into the railway are on higher land than the railway.

As can be seen from the attached photos, the size and capacity of the road culverts relative to railway culvert confirms the rail culvert does not have the matching capacity to take the volume /velocity of water flowing into it from the road drainage system. At 900mm the rail culvert is substantially smaller than the DSG culverts under the highway and on the railway side of the highway. TasRail is therefore concerned that the base case (current conditions) and the anticipated increase in stormwater loading from the stormwater catchments as shown in BRI-S11.4 rely on the existing rail culvert which was not designed to take urban/residential run-off.

We acknowledge that Draft Amendment RZ-2022-5 requires an approved stormwater management plan. However, it is not clear to TasRail at what point Council considers its responsibilities for management of stormwater flows terminate – is it on the precinct side of the highway or is it at the end point where stormwater flows are ultimately discharged into the Jordan River via the railway culvert? It is important this is clarified as context to BRI-S11.8.3.2.

Similarly TasRail is unaware if there currently exists hydrology modelling to confirm both the existing stormwater capacity and current loading, but has consistently raised its concerns raised with the Brighton Council during the development of the South Brighton Development Precinct Master Plan and draft amendment RZ-2022-05 as well as in response to other relevant planning applications within the region. TasRail considers the establishment of a baseline for the existing stormwater system imperative to inform proposed future stormwater investment and management plans to support development which must not expose or increase risk to the safety, operability and integrity of rail assets and operations.

As a primary stakeholder for decisions associated with management of stormwater in this region, TasRail would like to see the Performance Criteria (P1) further expanded so that advice is not only sought from the stormwater authority but also other authorities (including TasRail) with assets directly or potentially impacted by stormwater management. The advice sought should also include consideration of existing capacity of rail culverts and an understanding of requirements for any proposed new stormwater infrastructure within rail corridor boundaries

which will need to comply with relevant rail standards, but also for review of hydrology modelling and related assessments including risk and engineering design.

Kind regards

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