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**Submission – Draft Amendment LPS2022003, Central Coast Local Provisions Schedule (LPS)
and Permit DA2022107 – 6 Johnsons Beach Road, Penguin**

Thank you for the opportunity to provide a submission on the abovementioned applications.

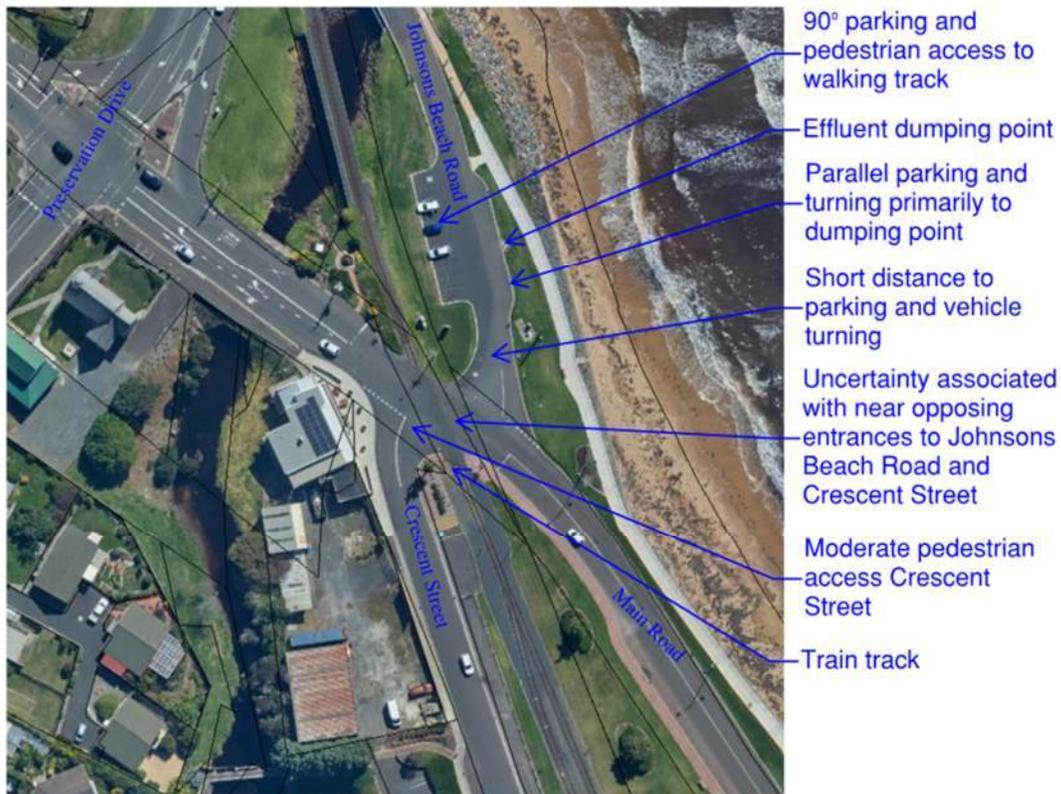
Intersection between Johnsons Beach Road and Main Road

The intersection between Johnsons Beach Road and Main Road is problematic and modifications to the intersection should be included to mitigate the adverse effect of additional vehicle movements. The area is shown on the following image taken from www.thelist.tas.gov.au (the List) with markups.

In the following image a number of the existing features that make this intersection problematic are identified including the fact that there are 2 x T intersections in close proximity on opposing sides to Main Road and there are features Johnsons Beach Road that cause congestion near the intersection raising safety concerns with the intersection.

The Penguin Master Plan approved by the Council in 2022 (Attachment 1.00) identifies this intersection as the western gateway to the town and places importance on improving the intersection (see image on page 11). At page 24 an illustration is provided that includes modifications to the intersection of Johnsons Beach Road and Main Road that may be considered as a way of improving safety at the intersection.

It is also noted that the intersection is further complicated by train movements (typically long freight trains).



In the Traffic Impact Assessment Report 2022 prepared by Howarth Fisher and Associates (included in the application for scheme amendment) the following comments are provided;

- At section 4.5 (page 7) it is noted there have been two report accidents at the intersection of Johnsons Beach Road and Main Road.
- Existing traffic volumes are identified at section 4.3 (page 7).
- At section 5.3 (page 11) the report identifies that there is an increase in trips per day and additional trips during the peak hour.
- There is a discussion about sight distance at the intersection of Johnsons Beach Road and Main Road at Section 8.1 (pages 28 and 29) where it is concluded that there is sufficient sight distance.

The following comments are provided on the report;

- The assessment of sight distance did not consider or comment on the site distance to the traffic from Crescent Street. This seems to have been the source of one of the accidents at the intersection in the past.
- The report does not consider or comment on the impact of additional traffic movements at the intersection where there is a distance of approximately 20m where parked vehicles are reversing (potentially) into traffic turning into Johnsons Beach Road. Likewise, the report does not consider or comment on caravans and other larger vehicles turning at that carpark to access the effluent dump on the opposite side of the road. Also, the report does not consider or comment on pedestrians crossing Johnsons Beach Road to access the walking track.
- The report does not consider or comment on the potential for bus movements associated with the proposed development. With this number of units to be developed there is a possibility /

probability that the accommodation may be serviced by tour buses. Having buses entering and exiting from Johnsons Beach Road would be a significant change in the current use where it is plausible and foreseeable that a bus may be caught on the railway line where there is congestion within Johnsons Beach Road. The provision of buses is likely to adversely impact on the proposed modifications to the intersection in the Master Plan as shown (extracted) below. The provision of tree planting as illustrated may also make visibility of congestion in Johnsons Beach Road more difficult.



In this submission it is concluded that there has not been sufficient consideration for this intersection in the proposal and that the reference to sight distances is not a sufficient assessment of the existing arrangement. This is a complex intersection where there is a history of accidents and concern about pedestrian safety. There is an increase in vehicle movement proposed that may include buses and this is likely to make an already poor intersection worse.

Amenity and Safety at Johnsons Beach

Johnsons Beach is a very popular destination and the most popular swimming beach in Penguin. A Master Plan was developed for Johnsons Beach Reserve was developed in 2016 and is provided at Attachment 2.00.

Consistent with the above discussion on the intersection between Johnsons Beach Road and Main Road the following comments are also provided;

- The provision of additional width in Johnsons Beach Road to allow for passing traffic (as proposed) is likely to lead to increased vehicle speed as well as increased vehicle volume (as predicted in the traffic report).
- The obvious conflict occurs with respect to the perpendicular parking off Johnsons Beach on the opposite side of the road to the beach where there are vehicles potentially reversing into the

traffic stream and there is a potential for pedestrians (children) to dash across the road from the carpark to the beach. This is a new arrangement built as a function of the bike and walking track and so there is limited experience about how this will operate during peak traffic and pedestrian movement periods (summer).

- It is noted that there is limited carparking provided opposite Johnsons Beach and traditionally beachgoers have resorted to parking on the grass at times because of the shortage of carparking. It is noted that there is additional carparking near the skate park however this may be a less desirable for beachgoers for various reasons (visibility of the beach, distance to carry items etc). If the intention is to provide a wider road from the Beach to the proposed development and a kerb is proposed, this may prevent carparking overflowing onto the grass and detract from the existing amenity of the area and adversely impact on the amenity of the area.

Consistent with the discussion on the intersection with Johnsons Beach Road and Main Road, it is considered that there is insufficient consideration for the impact on the user experience. For example, it is likely that food vendors may want to set up to provide food options to users of Johnsons Beach and this may be impaired if there are more vehicles travelling at greater speed where pedestrians give way to vehicles. If there is an increased width in the road and a greater number and faster vehicle movements, the potential for a safe and recreational environment may be reduced.

It is also noted that the existing road past Johnsons Beach is identified as a 'shared zone' where the speed limit is 10km/hour. There is an anomaly in the traffic report where it is identified as being 50km/hour (at section 4.4 of the traffic report). This is a significant shift, particularly where vehicles currently share the road with pedestrians, if the outcome is that pedestrians need to give way to vehicles. This raises concerns about pedestrian safety that is not considered in the traffic report.

Finally, there is uncertainty about whether buses will be used to transport occupants to the proposed development. This needs to be clearly established as this impact on traffic movement through Johnsons Beach Road and the intersection with Main Road.

Access to Knoll to Northwest of Property and Foreshore

A rocky knoll is provided to the northwest side of the Property (as identified by a blue marker on the following image) that has access from the existing caravan park (Open Space land). Access has traditionally been provided along the foreshore and / or through the caravan park to the track up the knoll though it may not be necessary to pass through the property to reach the track to the knoll.

Likewise, there has been access to the foreshore for fishing, snorkelling and diving off the front of the caravan park. This type of use is consistent with the recreational and Open Space use for the property and the foreshore.

In this submission it is argued that it should be made clear that access to the foreshore should continue to be made available for these uses of the land and that a condition should be provided in the scheme amendment that acknowledges this access for the public and maintains the access in perpetuity.



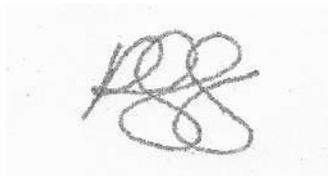
Planning Assessment

It is noted that there is a broader consideration of the provisions of the previous planning scheme at section 2.1 of the Planning Scheme Amendment Report by Ireneinc (forming part of the application) compared to the reduced discussion of the current planning scheme provisions at section 2.2. It is not clear why a commensurate (or even expanded) discussion is not provided of the current planning scheme provisions. Some discussion is provided on the Codes in the current scheme (at section 3.3) without elaboration on the purpose and application of the Open Space provisions of the current scheme.

Likewise, there seems to be a selective discussion on the provisions of the Cradle Coast Regional Land Use Study 2010-2030 that favours the application.

Thank you for the opportunity to provide this submission.

Yours sincerely

A handwritten signature in black ink, appearing to be 'RM', enclosed in a rectangular box. The signature is stylized and somewhat illegible.

Ross Murphy

ATTACHMENT 1.00
PENGUIN TOWN CENTRE MASTER PLAN AND STRATEGIES