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St Leonards TAS 7250

Launceston City Council
Planning Department
PO Box 396
Launceston Tas 7250

25/02/2020

Dear Mr Stretton (CEO)

DA0467/2019 – Letter of Concern and Objection to Proposed.

In relation to the proposed Zoning Amendment and proposed subdivision I to provide the following points of concern that I request are considered as part of the planning application process by LCC planning department and council.

As a preliminary comment, my wife and I have resided at the current address for over five years, in this time I have become intimately aware of certain matters of concern that we feel must be addressed.

Proposed Rezoning

We have no objection to the rezoning of the property as advertised from Rural Resource to Rural Living.

Proposed Subdivision

We have sufficient concerns on the proposed subdivision that we object to its approval until substantial changes are undertaken to the proposed subdivision and further information is provided in the design and mitigation of our concerns.

1.0 - Traffic

The planning application DA0472/2019 indicates that all access to the proposed subdivision will use the current White Gum Rise/Tasman Hwy intersection. This proposal has been supported by a Traffic Impact Assessment by consulting engineers TCM.

While the intersection at initial consideration is no different to many similar interchanges as found throughout Tasmania's Highway system, it does have specific issues that have not been adequately addressed in the Traffic Impact Assessment report. After review of this report, we are provided with a number of concerns on issues that do not have been adequately considered.

In response, due to the following concerns we consider that the proposed subdivision should have its own access point onto the Tasman Highway at a point closer toward Launceston.

1.1.0 - Number of movements.

It is noted that there was a count of vehicles using the White gum Rise/Tasman Hwy intersection. The date of the counts being undertaken were in March 2019. The current application is some 12 months later. In March 2019 to level of occupancy in the Drivers Run subdivision has changed and will continue to change as not all allotments have been occupied. The data provided from the counts is likely inconsistent with application of known traffic movements that was multiplied with known allotments to provide a much more accurate number that relates to full occupancy in the current subdivision.

The Assessment appears to assume an approximate number of vehicle movement leaving and arriving at Drivers Run Subdivision per hour at peak time. The methodology does not appear to be supported by actuals when the "Driver Run" subdivision and in the future for the proposed subdivision are fully occupied.

1.2.0 – Sight Lines

The Traffic Impact Assessment provides comments on available sightlines for relevant vehicle movements at each intersection, these are supported by photographs.

Exiting White Gum Rise turning right onto the Tasman Hwy provides the highest risk of all movements as the vehicle crosses one lane of Highway traffic before being able to accelerate on the west bound lane toward Launceston.

The Traffic Impact Assessment notes that a sign line distance of some 250m is provided in this instance. The supporting photograph in the Traffic Impact Assessment shows a clear sign line from the intersection to the corner on the Tasman Hwy. This photograph is at the very point of entering the Tasman Hwy where there is acceptable unobstructed sight distance. The report however does not consider or mention the large metal "Driver Run" signage or the existence of the boundary fence hedging on No. 2 White Gum Rise that impedes nearly all visual sight lines of the Tasman Hwy as a vehicle is approaching the Tasman Hwy intersection.

The vehicles travelling west on the Tasman Hwy also leave a shaded area and are generally accelerating as this is a downhill section after a long sight incline after transiting a series of curves through the cutting.

While very few of the issues I have listed can be mitigated, it is disappointing that they have not been considered in the Traffic Impact Assessment where the indication is that there are no current issues that will cause greater potential with an increased traffic flow through the intersection.

I also note that the boundary hedging at the boundary fence line parallel to the Tasman Highway has grown substantially in the last 12 months since the report was undertaken. This hedging is of Cyprus or similar trees which as they grow will cause further impairment of the current poor sightlines.

One improvement would be that the proposed subdivision proponent has the large "Drivers Run" sign moved from its current location to a new location immediately before the dam wall, some short distance past the proposed new access point off White Gum Rise.

This would allow a longer period of time to see possible traffic movement approaching in a westerly direction on the Tasman Hwy by persons driving down White Gum Rise.

The final concern is that at two time of the year, the rising sun blinds the driver leaving White Gum Rise onto the Tasman Highway. Both of these times of the year, the conditions are when a vehicle is affected by internal and external fogging. At these times, I have found that the intersection is one of the more dangerous that I encounter in my extensive travels in Tasmania.

1.3.0 - White Gum Rise/Proposed access junction

The proposed roadway plan for access to the proposed subdivision is at the entry roadway that is divided with a central vegetated median strip.

Currently White Gum Rise requires a vehicle exiting the subdivision to turn left while dropping down a slight incline immediately before approaching the first median strips. This section of road has been poorly constructed and unsettles all vehicles as they pass through this section of roadway as a vehicle is required to turn while in the dip of the roadway.

As it is immediately before the proposed access road, and the interference of the visual sight lines due to the vegetation on the medial strip, and unsettled vehicle will require longer stopping distances to avoid a vehicle entering from the right.

We consider that an upgrade of this section of White Gum Rise is undertaken to remove the dip and turn situation as now occurs.

It is also noted that the location of the proposed access roadway into the new subdivision will provide very tight turning for large of articulated vehicles across the median strip. It is likely that to mitigate this issue, a section of median strip will be either removed or altered. This has not been discussed in the planning application. A change to this will alter the original design and intent of the "Driver Run" layout and its tree lined entry way. It is unacceptable that such a change could occur without consultation with the current residents of the Driver Run subdivision.

2.0 - Services

It is noted in the proposed subdivision documents that there is no planned allowance for potable water reticulation and/or connection to Taswater infrastructure. While being surprised at this obvious oversight, I assume that either from future proponent requirements or from possible conditions on the Planning Permit, potable water reticulation will occur.

I note the revised comments from Taswater on the amended submission, where certain issues and conditions are required to be considered and implemented as part of Taswater's acceptance to provide potable water reticulation to the proposed subdivision.

While we acknowledge that the current infrastructure is the concern of Taswater not Launceston City council, as residents we wish to highlight a number of issues in the current potable water reticulation that affect the majority of the "Driver Run" residents.

2.1.0 - Water Reticulation Reliability

At specific high usage times of the day the water flow and pressure provided in the existing reticulated water supply are very poor. The design of the current system servicing Driver Run subdivision does not appear to cope with peak usage of the existing subdivision. While it may be adequate to consider that 85% of the time it is adequate, it is not acceptable as a resident. This has been as much been inferred in the comments from the Taswater submission.

A further issue has been raised with both LCC and Taswater previously in that the supply is unreliable. Water is provided via a reservoir near the top of White Gum Rise, which is unfortunately lower than a number of residences. To supply adequate pressure in the main, the water supply is provided with a pressure pump system, with water being pressurised via an electric pump system. From experience and comments from Taswater, this current main supply does not appear to be a backup when there is a power cut to the subdivision. The result is that when the power is not available, the majority of the residents do not have water.

I have concerns that any further expansion of the of the potable water reticulation is provided to the proposed subdivision that the new system will be patched into the already over-stretched system.

2.2.0 - Bushfire Services – Resilience

A number of residences at Driver Run subdivision make allowance of the use of a street side fire hydrant on the water main as an integral part of the fire management/firefighting in their Bushfire Hazard management Plans. Our residence is one such property as the dwelling is within the allowable distance from a fire hydrant on the roadside water main.

Due to the issues we have noted in the previous section, a key fire fighting tool, water from the fire main, could be unavailable in the time of a bushfire that threatens the subdivision if the power fails. It is noted that Tasmania Fire Service will often use the hydrant adjacent to the Tasman Hwy to fill their firefighting appliances to fight local fires in the immediate district as it is the last available hydrant.

We have concerns that if the current design is implemented in a new potable water reticulated system, additional dwellings will be placed at risk in a bushfire emergency. It also will ensure that the members of the Tasmania Fire Service are provided the water that would be expected to be provided from a marked and serviceable hydrant that has been and will continue to be used in fire fighting activities in the immediate area and for dwellings and land between "Driver Run" subdivision and Nunamara township.

It is our strong desire that the current reservoir/pumping system is upgraded to provide a backup power system if a new or expanded potable water supply reticulation system is installed in the

proposed subdivision. This is to ensure that water is available in the potable water reticulation mains at all times to both the existing Drivers Run subdivision and the proposed adjacent subdivision when a reticulated main is provided to the proposed subdivision.

3.0 – Allotment size.

The proposed subdivision has a smaller overall average allotment size compared to the “Drivers Run” subdivision. The average allotment size also appears to be less than the minimum allotment size within the planning scheme zone.

The smaller average allotment size will substantially change the visual overview from the Tasman Highway from what is currently rural use landform to an almost residential feel. This visual impact of each of the allotment’s buildings will be increased due to the sight lines being down into the gully from the Highway. The visual outcome will be a vista of sheds and houses as per a residential extension of St Leonards or Waverly.

We expect this outcome is not the intent of the “Rural Living” zoning nor is it the intent of the original design for a “eco” subdivision as provided at “Drivers Run”. And noting that the proposed subdivision will piggyback off the “Drivers Run” subdivision framework, in that its entry is from White Gum Rise, the congested allotment size will have a detrimental affect on the “Drivers Run” subdivision original intent and values.

3.1 - Waste water management

From know outcomes with the “Drivers Run” subdivision, the operations of onsite waste-water management systems have been problematic with a number of systems failing and needing to be redesigned and constructed.

The high clay content of the subsoil, which also affects the proposed subdivision does not allow adequate deep absorption of wastewater. During winter, the ground simply becomes saturated which causes extensive surface water runoff.

The majority of the proposed allotment sizes are slightly over 1Ha on a substantial gradient that will allow for future system a failure and potential overflow onto adjoining allotments of wastewater that cannot soak into the soils.

3.2 – stormwater management

As previous noted, the soils in the immediate area of “Driver Run” and the proposed subdivision provide limited absorption when affected by a wet time period.

The design of the subdivision appears to consider that all rainfall will slowly percolate doe to the roadway and soak into the natural water course. While this may occur in a limited manner currently, the removal of vegetation and provision of catchment and concentrated overflows from tanks etc will cause adverse water transfer at ground level.

While the allotments on the higher parts of the subdivision will not be affected, those immediately below will require extensive surface stormwater management system to protect buildings. The stormwater management systems will increase to risk to properties below them as the allotments are not of sufficient area to allow this surface stormwater to be controlled in a manner that it does not affect properties on the down grade.

4.0 – Access to the “Driver Run” Conservation Reserve.

While the proposed subdivision does not state that the future residents of the proposed subdivision will have access to the existing “Private” conservation reserve, the provision of a walkway from the Subdivision to Magpie Court provides adequate intent of this future situation and expectation of the residents of the proposed subdivision.

While outside the parameters of the proposed subdivision, we must note a number of issues that will occur due to the design of the proposed subdivision.

4.1 – *Authorised Access*

The conservation reserve was originally available to residents of “Drivers Run” only, and this right is provided on the certificate of title for the Drivers Run allotments. The “cost” of each allotment included authorised access to a private conservation reserve. It would be considered questionable that what each of the residents of “Drivers Run” paid for is now made available without cost to the residents of the proposed subdivision.

As access to the reserve is restricted to authorised person, access also requires an extensive list of conditions for its use. All of these conditions are on my and the other titles and made available as a purchaser of an allotment; however, these conditions and will not be on the titles of the proposed subdivision and the documents providing its values and manner of use will not be provided to the owners of the allotment of the proposed subdivision.

This situation will clearly lead to unauthorised use and a manner of use outside of the conservation objectives of the reserve. It will also lead to unnecessary angst between the residents of the proposed subdivision and the residents of “Drivers Run”.

Additionally, the use of the reserve will likely increase to a level that has an adverse impact of the conservation outcomes and values that were proposed and agreed in its formation.

4.1 – *Enhanced Fire Risk*

Our final concern is that the majority of access will be via Magpie Crescent into the conservation reserve via the narrow unsealed access laneway. This access is the lowest point of the forested area below a number of houses in the existing subdivision. Unauthorised access and uncontrolled use will provide an increased potential for an uncontrolled wildfire that will adversely affect a number of existing allotments in “Driver Run” subdivision.

This one issue is of critical concern to the current “Driver Run” residents. We are aware that the initial Tasmania Fire Service requirements and the subsequent fire management conditions on the initial planning permit for the “Drivers Run” subdivision have not been implemented and remain unresolved. This concern by the residents has been further confirmed after an onsite review of the existing situation of the non-compliance of the approved fire management process by a senior Tasmania Fire Service officer.

We note that the main reason that the “ownership” of the conservation reserve remains in limbo is that the fire management requirements have not been provided as listed in the original planning permit issued by Launceston City Council for the “Drivers Run” subdivision.

In this instance, it is disappointing to know that the LCC Planning Department firstly failed to initially implement the fire management requirements provided in the response from Tasmania Fire Service for the original subdivision, and then did not enforce its own conditions that were on the planning permit ; and now will allow a situation that will increase the risk to the current residents of “Drivers Run” subdivision.

5.0 - Conclusion

We strongly request that the proposed subdivision is required to undertake further design and modelling to mitigate our concerns as expressed in this submission.

We recommend these comments for consideration with respect.

Andrew and Karen Tuma