

From: col_kay
Sent: 17 Nov 2020 22:16:10 +1100
To: Planning @ Meander Valley Council
Subject: Representation For Draft Amendment 3/2020 - 10 and 12 Neptune Drive, Blackstone Heights.
Attachments: Draft Amendment 32020 - 10 and 12 Neptune Drive, Blackstone Heights..docx
Importance: High

Dear Sir / Madam,

Re: Draft Amendment 3/2020 - 10 and 12 Neptune Drive, Blackstone Heights.

Please find attached our submission of our representation regarding the above proposal to effectively rezone to high-density residential and build up to 650 dwellings and associated infrastructure.

If you have any queries please do not hesitate to contact us via the contact details in our submission.

Thanking you in advance,

Kay and Colin Farmer

Cheers,

Kay & Col Farmer

The Planning Officer
26 Lyall Street,
PO Box 102,
Westbury TAS 7303

Re: Draft Amendment 3/2020 - 10 and 12 Neptune Drive, Blackstone Heights.

Dear Sir / Madam,

My wife and I are submitting our representation regarding the above proposal to effectively rezone to high-density residential and build up to 650 dwellings and associated infrastructure.

Our arguments against the proposal are:

1. This is a high-density residential development which contravenes the plans for Blackstone Heights as set out in the **Prospect Vale – Blackstone Heights Structure Plan** and the **Meander Valley Interim Planning Scheme 2013**.
2. The roads proposal appears to make minimal changes to existing access roads, with no thought given to providing extra thoroughfares which are needed for safety in the case of an emergency evacuation and traffic management. This contravenes the Planning Scheme and Structure Plan which proposed to plan extra thoroughfares for Blackstone Heights
3. The traffic analysis statistics provided by TCS do not appear to be robust or independent.
4. There is still a lack of infrastructure in Blackstone Heights which was proposed in the Structure Plan, and desired by Council and the developer Ross Harrison for this development but has not been addressed by this proposal.

The following pages contain my explanations of each point and how they contravene the Structure Plan and, where applicable, the Planning Scheme.

1. This is a high-density residential development which contravenes the plans for Blackstone Heights as set out in the **Prospect Vale – Blackstone Heights Structure Plan** and the **Meander Valley Interim Planning Scheme 2013**.

(a) Firstly, on Page 85 of **Meander Valley Interim Planning Scheme 2013** contains the following objectives, desired character and definitions pertaining to Blackstone Heights:

“12 Low Density Residential Zone

12.1.1.1 To provide for residential use or development on larger lots in residential areas where there are infrastructure or environmental constraints that limit development.

12.1.2 Local Area Objectives

Blackstone Heights a) Infill development on existing lots will be supported, however infrastructure constraint will determine the rate and density of future residential development. a) Future subdivision will be determined on the basis of infrastructure capacity.

12.1.3 Desired Future Character Statements

Blackstone Heights a) Blackstone Heights is characterised by large, prominent single dwellings and outbuildings on larger lots. This character is to be maintained with due consideration to the mitigation of building bulk through landscaping and the minimization of cut and fill works where development is viewed from public open space.

Table 12.4.3.1 – Lot Size

Blackstone Heights 1600m²

We submit to Council that the proposed development contravenes the Planning Scheme being that:

- The residential use lots in the development are not on larger lots (12.1.1.1 and 12.1.3 – Desired Future Character).
- There is not the infrastructure to determine that this subdivision be approved i.e. there is still only one access road to Blackstone Heights where all inbound and outbound traffic must funnel to, that being Blackstone Rd. (12.1.2).
- The residents of Blackstone Heights have not been informed of any sewerage treatment plans other than verbal undertakings given by the developer, Ross Harrison. My last knowledge about this matter is that sewerage infrastructure in Blackstone Heights was not adequate enough for further development (12.1.2).
- The residential use lots in the development do not meet the minimum Blackstone Heights lot size of 1600m² (12.4.3.1).

(b) The Meander Valley Council's website page containing the link to the **Prospect Vale – Blackstone Heights Structure Plan** contains the following information:

*“The Prospect Vale – Blackstone Heights Structure Plan provides a blueprint for development in Prospect Vale and Blackstone Heights **for the next twenty years.** It identifies where new housing should be located, the future character of the area, and the facilities needed to service our growing community.”*

With the Structure Plan being written in 2015, one would assume that the Council want the desired outcomes and future character of Blackstone Heights contained within until at least 2035.

(c) Page 4 of the Structure Plan says:

“The key strategic land use objectives in these documents include:

- *Recognition that Prospect vale and Blackstone Heights will continue to be one of greater Launceston's primary growth areas*
- **Recognition that there is potential for further housing within Prospect Vale, especially within the current Particular Purpose Zone (see Figure 2)**

If Council are recognising the current land use zoning map as shown in Figure 2 on Page 4, then it must recognise that Blackstone Heights, including the site for the proposed 650 dwellings, is predominantly zoned Low-Density residential, with no zones being High Density or even General. It must also recognise that Prospect Vale has the General Residential zoning which fulfills the potential for further housing within Prospect Vale. From our point of view, it is not the role of Blackstone Heights with its current zoning to fulfill a potential housing shortfall.

(d) Page 4 of the Structure Plan says:

“The key strategic land use objectives in these documents include:

- **Maintenance of the scenic vistas that define the area**
- **Maintain the low-density character and environment in Blackstone Heights**

Page 12 of the Structure Plan says:

“Protect and leverage the area's environmental qualities

New residents to Prospect Vale and Blackstone Heights are attracted by environmental values in the area – including gorges, hills, open space, and water access. Protecting, enhancing and creating better linkages to environmental assets will benefit the community and differentiate housing development in the context of Greater Launceston.

Strategies

- **Maximise vistas to natural assets such as waterways and hills.**
- *Consider the prominence, profile, and vegetation values when exploring potential development on hills in the area.*
- **Maintain predominately low-density housing in Blackstone Heights.”**

We submit to Council that the proposed subdivision contravenes the Structure Plan in the following ways:

- Scenic vistas will not be maintained, let alone maximised. Vistas will be lost for people, especially those in Glover Ave and Canopus Dr. This fact was confirmed by the developer Ross Harrison in Community meetings
- The residential use lots in the development do not meet the minimum Blackstone Heights lot size of 1600m² and therefore do not “maintain the low-density character and environment in Blackstone Heights”
- The residential use lots in the development do not meet the minimum Blackstone Heights lot size of 1600m² and therefore do not “maintain predominately low-density housing in Blackstone Heights”

(e) Page 16 of the Structure Plan contains **Section 3. “Urban Growth Framework”** with a sub-heading **“Urban Growth In Prospect Vale and Blackstone Heights”**. It says the following:

*“This section provides a framework to guide urban growth across Prospect Vale and Blackstone Heights until the year 2035 and beyond. This section provides a blueprint for residential growth and infrastructure investment in the area. **The recommendations are based on planning and transport analysis, community consultation and the vision and strategies detailed in Section 2.....**”*

The major elements of the framework plan are:

- (a) *Long-term provision for a variety of housing types across Prospect Vale and Blackstone Heights. These include medium density lots and housing, conventional suburban densities **and innovative models of low-density housing in Blackstone Heights.**”*

We submit to Council that the proposed subdivision contravenes the Structure Plan in the following ways:

- The residential use lots in the development do not meet the minimum Blackstone Heights lot size of 1600m² and therefore do not provide “innovative models of low-density housing in Blackstone Heights”

(f) Page 18 of the Structure Plan entitled **“Land Use And Housing”** says:

*“**Cluster residential development areas will accommodate clusters of residences placed within a high amenity environment. The overall density of cluster residential areas will be low and respond to the character of the surrounding areas”***

Figure 10 shows on this page shows the proposed development site as “Cluster Residential”. We submit to Council that the proposed subdivision contravenes the Structure Plan in the following ways:

- The residential use lots in the development do not meet the minimum Blackstone Heights lot size of 1600m² and therefore do not meet Council’s definition that “the overall density of cluster residential areas will be low and respond to the character of the surrounding areas”

2. The roads proposal appears to make minimal changes to existing access roads, with no thought given to providing extra thoroughfares which are needed for safety in the case of an emergency evacuation and traffic management. This contravenes the Planning Scheme and Structure Plan which proposed to plan extra thoroughfares for Blackstone Heights

(a) Page 85 of **Meander Valley Interim Planning Scheme 2013** contains the following objectives, desired character and definitions pertaining to Blackstone Heights:

“12 Low Density Residential Zone

12.1.1.1 To provide for residential use or development on larger lots in residential areas where there are infrastructure or environmental constraints that limit development.

12.1.2 Local Area Objectives

Blackstone Heights a) Infill development on existing lots will be supported, however infrastructure constraint will determine the rate and density of future residential development. a) Future subdivision will be determined on the basis of infrastructure capacity.

We submit to Council that the proposed development contravenes the Planning Scheme being that:

- There is not the infrastructure to determine that this subdivision be approved i.e. there is still only one access road to Blackstone Heights where all inbound and outbound traffic must funnel to, that being Blackstone Rd. (12.1.2).

(b) Page 253 of **Meander Valley Interim Planning Scheme 2013** contains the following standards for Bushfire-Prone Areas.

“E1.0 Bushfire-Prone Areas Code

PAGE 253 - E1.6 Development Standards

E1.6.2 Subdivision: Public and firefighting access

Objective: Access roads to, and the layout of roads, tracks and trails, in a subdivision:

- (a) allow safe access and egress for residents, fire fighters and emergency service personnel;***
- (b) provide access to the bushfire-prone vegetation that enables both properties to be defended when under bushfire attack and for hazard management works to be undertaken;***
- (c) are designed and constructed to allow for fire appliances to be manoeuvred;***
- (d) provide access to water supplies for fire appliances; and***
- (e) are designed to allow connectivity, and where needed, offering multiple evacuation points.***

Performance criteria

A proposed plan of subdivision shows access and egress for residents, fire-fighting vehicles and emergency service personnel to enable protection from bushfires, having regard to:

- (v) provision of passing bays;***

(viii) **use of through roads to provide for connectivity;**

(ix) **limits on the length of cul-de-sacs and dead-end roads;**

We submit to Council that the proposed development contravenes the Planning Scheme in the following ways:

- Blackstone Heights is regarded by the TFS as a Bushfire-Prone Area.
- Given that there are 650 dwellings in this proposal in an area of 115 hectares, and another 95 dwellings recently approved in a development in Panorama Rd, based on an average population of 2.8 people per dwelling (per 2016 Census), potentially there will be another 2086 (745 x 2.8) people to be evacuated out of the area in the event of an emergency. The current population is around 1300 (2016 Census). In other words, the population will essentially almost triple once these developments are finished.
- Therefore, the one access road that Blackstone Heights has and all traffic must funnel through, i.e. Blackstone Road / Pitcher Pde / Casino Rise, will contravene paragraph (a) and NOT “allow safe access and egress for residents.... and emergency personnel” because of the increased population.
- There will NOT be connectivity in contravention of paragraph (e) by not “offering multiple evacuation points”
- There are ten (10) cul-de-sacs in this proposed development which compromises safety in a land area of 115 hectares in contravention of paragraph (ix). There does not appear to be any limiting, in aggregate terms, “on the length of cul-de-sacs and dead-end roads” in this proposal.

(c) Page 4 of the Structure Plan says:

“The key strategic land use objectives in these documents include:

- **Improved and alternative access to Blackstone Heights for emergency management –**

We submit to Council that the proposed development contravenes the Structure Plan given that:

- the proposal does not discuss any provision for “improved and alternative access to Blackstone Heights for emergency management”
- the one access road that Blackstone Heights has and all traffic must funnel through, i.e. Blackstone Road / Pitcher Pde / Casino Rise, will not be adequate in case of an emergency because of the increased population.

(d) Page 6 of the Structure Plan says under “**Community Priorities**”:

“Consultation was undertaken with key stakeholders and the wider community over two stages in March and June 2014. Over 300 people actively participated in workshops, surveys, drop-in sessions and one-to-one interviews, highlighting community priorities:

Access risks in Blackstone Heights There was high awareness of the safety issues associated with having a single road access into Blackstone Heights, especially during emergencies such as bush fires.”

We submit to Council that the proposed development contravenes the Structure Plan given that:

- the proposal does not address the “safety issues associated with having a single road access into Blackstone Heights, especially during emergencies such as bush fires”
- the one access road that Blackstone Heights has and all traffic must funnel through, i.e. Blackstone Road / Pitcher Pde / Casino Rise, will not be adequate in case of an emergency because of the increased population.

(e) Page 8 of the Structure Plan says under “**Community Priorities**”:

“Consultation was undertaken with key stakeholders and the wider community over two stages in March and June 2014. Over 300 people actively participated in workshops, surveys, drop-in sessions and one-to-one interviews, highlighting community priorities:

“Fire risk Vegetation along the Blackstone Hills, as well as one road access into Blackstone Heights, create fire risks in this area.”

We submit to Council that the proposed development contravenes the Structure Plan given that:

- the proposal does not address the issue of “one road access into Blackstone Heights creates fire risks in this area”
- the one access road that Blackstone Heights has and all traffic must funnel through, i.e. Blackstone Road / Pitcher Pde / Casino Rise, will not be adequate in case of an emergency because of the increased population.

(f) Page 12 of the Structure Plan under “**Planning Strategies**” says:

“Distribute road traffic to enhance safety and minimise congestion

Country Club Avenue provides a single route in and out of Country Club Tasmania, Blackstone Heights, and parts of Prospect Vale. This creates a safety risk during emergencies, and capacity issues during major events. New road investments provide alternative access points, and distribute traffic across the wider network.

Strategies

- **Provide alternative to Country Club Avenue for those accessing Blackstone Heights, Prospect Vale and Country Club Tasmania.** Again, not even being discussed by Council apart from the implementation of some slip lanes (???)
- **Create a more permeable network of roads in the growth areas of Prospect Vale and Blackstone Heights”**

We submit to Council that the proposed development contravenes the Structure Plan given that:

- the proposal does not propose to “distribute road traffic to enhance safety and minimise congestion”. On the contrary, the tripling of the population with no addition to Blackstone Heights’ thoroughfare will only risk safety and exacerbate congestion.
- the one access road that Blackstone Heights has and all traffic must funnel through, i.e. Blackstone Road / Pitcher Pde / Casino Rise, will not be adequate in to carry the traffic caused by an almost tripling of Blackstone Heights’ population. This proposal has not discussed an “alternative to Country Club Ave for those accessing Blackstone Heights” or

creating “a more permeable network of roads in the growth areas of Prospect Vale and Blackstone Heights”

(g) Page 16 of the Structure Plan contains **Section 3. “Urban Growth Framework”** with a sub-heading **“Urban Growth In Prospect Vale and Blackstone Heights”**. It says the following:

*“This section provides a framework to guide urban growth across Prospect Vale and Blackstone Heights until the year 2035 and beyond. This section provides a blueprint for residential growth and infrastructure investment in the area. **The recommendations are based on planning and transport analysis, community consultation and the vision and strategies detailed in Section 2.....***

The major elements of the framework plan are:

An extended Mount Leslie Road, providing a crucial second connection into Prospect Vale’s growth areas. The road will be complemented by improved links to Pitcher Parade.”

We submit to Council that the proposed development contravenes the Structure Plan given that:

- the one access road that Blackstone Heights has and all traffic must funnel through, i.e. Blackstone Road / Pitcher Pde / Casino Rise, will not be adequate in to carry the traffic caused by an almost tripling of Blackstone Heights’ population. This proposal has not discussed “An extended Mount Leslie Road, providing a crucial second connection into Prospect Vale’s growth areas. The road will be complemented by improved links to Pitcher Parade.”

(h) Page 20 of the Structure Plan under **“Public Roads And Transport”** says:

*“A number of key road infrastructure changes are required to facilitate population growth. **These changes will create a more efficient road network, accommodate population growth in Blackstone Heights and Prospect Vale, and increase the safety of residents.** The changes include:*

- **Extending Mount Leslie Road to Dalrymple Creek before turning to meet Pitcher Parade.** Mount Leslie Road has sufficient capacity to accommodate population growth in Prospect Vale. **The extension will provide crucial extra capacity in the local road system in case of emergencies, such as fire.”**

We submit to Council that this proposed development contravenes the Structure Plan given that:

- This proposal does not address these planned changes to Mount Leslie Rd. The Structure Plan itself mentions these changes are “crucial” for the safety of residents and will “accommodate population growth”.
- The effect of 745 extra dwellings and the recently approved 95 dwellings in Panorama Rd will almost triple the population of Blackstone Heights, causing extra daily traffic creating bottlenecks at the corners of Neptune Dr / Panorama Rd, Glover Ave / Panorama Rd, Panorama / Blackstone Rd, Casino Rise / Country Club Ave and then Country Club Ave / Westbury Rd.

(i) Page 29 of the Structure Plan under “**Enabling Infrastructure**” says:

“New road infrastructure will be essential to delivering adequate capacity and guaranteeing safety for residents in Prospect Vale and Blackstone Heights. Council and major land owners in the area will be jointly responsible for the timing and delivery of these new roads. – Therefore, Council and Ross Harrison have to discuss the timing and delivery of these new roads.”

We submit to Council that it is incumbent on them:

- and Ross Harrison as the major land owner in this venture, as they are jointly responsible for the timing and delivery of proposed new roads, to discuss a way forward to provide better and safer access to Blackstone Heights.
- and other land owners in the area to discuss a way forward to provide better and safer access to Blackstone Heights.
- To ensure that proper road infrastructure is provided before this proposal is approved to ensure that Blackstone Heights is not ruined by traffic and noise that a tripling of its population with no commensurate increase in roads will provide, that it does not lose the peaceful and tranquil demeanour that sets it apart.

3. The traffic analysis statistics provided by TCS do not appear to be robust or independent.

Page 6 of the Structure Plan under “**Community Priorities**” says:

*“**Traffic issues** Many community members noted traffic issues at particular ‘pinch points’ including Mount Leslie Road near where it meets Westbury Road.”*

We submit to Council that the proposal does not address this issue of traffic, not only in Blackstone Heights but also in surrounding roads such as Westbury and Mount Leslie Rds. that Blackstone Heights residents use regularly. That may be because the traffic analysis data provided by TCS appears neither robust or independent.

Data based on a traffic survey conducted by TCS on Panorama Rd at 5:10 – 5:30 pm and Blackstone Rd at 5:35 – 5:55 pm, both on Thursday 3rd January 2019 appears to lack robustness.

3rd January in any given year, even at peak traffic times, is far quieter because it is during the Christmas / New Year holiday period and school children are on holiday.

A reasonable assumption would be that there are approximately half the number of vehicles per hour in peak times in holiday times as there would be in more day-to-day peak times.

Therefore, I would have to question the figures obtained of 120 vph for Panorama Rd, under normal circumstances this figure would be more like 240 vph. This is borne out anecdotally as I live on the corner of Neptune Dr and Panorama Rd and can see and hear the traffic every single day.

This means that Blackstone Rd’s figures would be more like 380 vph instead of the 190 vph obtained by TCS.

In addition, a 20-minute timeframe out of a 24-hour day appears a sample size that is far too small

Traffic figures also do not take into account traffic generated by the newly approved 95-dwelling development in Panorama Rd.

With TCS's figures showing that they estimate 70% of the traffic generated by the new development to be using Neptune Dr to access Panorama Rd, then factoring in the traffic generated by the new Panorama Rd development, the traffic and traffic noise generated around my property, already substantial today in peak times, will be unbearable. It will completely and adversely alter the quiet relaxed nature of Blackstone Heights for us to that of a noisy busy higher density urban neighbourhood such as Prospect or Summerhill.

TCS are estimating that the traffic the proposed development will generate at the corner of Neptune and Panorama Rd will jump from 14 vph to 154 vph in peak times leaving Blackstone in the morning, returning to Blackstone in the afternoon.

In addition, traffic going in the opposite direction will jump from 7 vph to 78 vph. In both cases that's a 1,100% increase! And, again, that's not taking into account the 95-dwelling development approved for Panorama Rd. Nor is it accounting for TCS extrapolating from ultra conservative figures in the first place.

TCS were commissioned by the developer, Ross Harrison, which would appear to be a relationship that is not independent. Frankly, we call into question the validity of these traffic figures.

At the very least, before this proposal was approved, we would request that council perform its own independent traffic analysis at least to give the appearance that this process has been conducted fairly, robustly and independently.

4. [There is still a lack of infrastructure in Blackstone Heights which was proposed in the Structure Plan, and desired by Council and the developer Ross Harrison for this development but has not been addressed by this proposal.](#)

(a) Page 85 of **Meander Valley Interim Planning Scheme 2013** contains the following objectives, desired character and definitions pertaining to Blackstone Heights:

“12 Low Density Residential Zone

12.1.1.1 To provide for residential use or development on larger lots in residential areas where there are infrastructure or environmental constraints that limit development.

12.1.2 Local Area Objectives

Blackstone Heights a) Infill development on existing lots will be supported, however infrastructure constraint will determine the rate and density of future residential development. a) Future subdivision will be determined on the basis of infrastructure capacity.

- We submit to Council that the proposed development contravenes the Planning Scheme being that there is not the infrastructure to determine that this subdivision be approved i.e. many roads in Blackstone Heights still have no safe footpaths to walk on and have open drains instead of kerb and guttering. (12.1.2).

(b) Page 6 of the Structure Plan under “**Community Priorities**” says:

Consultation was undertaken with key stakeholders and the wider community over two stages in March and June 2014. Over 300 people actively participated in workshops, surveys, drop-in sessions and one-to-one interviews, highlighting community priorities:

Community disconnection – physical and social In Blackstone Heights, the lack of pedestrian pathways was an important issue. - Panorama Rd after Neptune Dr, Canopus Dr and Zenith Ct still have no footpaths or kerb/guttering.

Public transport Infrequent bus services, lack of shelters and poor walking access to bus stops were prominent issues. Comes back to the issue of lack of footpaths and kerb/guttering

We submit to Council that the proposal does not address these issues. There are still no footpaths or kerb & guttering on:

- Panorama Rd between Neptune Dr and Bayview Dr
- Canopus Dr
- Zenith Court
- Each cul-de-sac end of Bayview Dr, after Columbus Dr and after Longvista Rd
- Longvista Rd has kerb & guttering but no footpaths
- Kelsey Rd between Blackstone Park Dr and Longvista Rd
- Blackstone Rd after Kelsey Rd
- Lakeview Court

(c) Page 14 of the Structure Plan under “**Planning Strategies**” says:

Encourage facilities that respond to the needs of an ageing population

Strategies

• Recognise the benefits of walking and public transport access for older residents when accessing services and recreating. – Not enough footpaths in Blackstone as it is. No footpaths on Kelsey Rd between Blackstone Park Dr and Longvista Rd and non on Longvista Rd.

Provide for a mix of transport choices

Strategies:

• Resolve pedestrian and cycling infrastructure shortfalls in Blackstone Heights. – Still to be resolved.

We submit to Council that the proposal contravenes the Structure Plan by:

- Not recognising “the benefits of walking.....access for older residents whenrecreating” as there are still no footpaths on the following roads, particularly important in light of the proposed aged living facility:
 - Panorama Rd between Neptune Dr and Bayview Dr
 - Canopus Dr
 - Zenith Court
 - Each cul-de-sac end of Bayview Dr, after Columbus Dr and after Longvista Rd
 - Longvista Rd has kerb & guttering but no footpaths

- Kelsey Rd between Blackstone Park Dr and Longvista Rd
- Blackstone Rd after Kelsey Rd
- “Pedestrian ...infrastructure shortfalls in Blackstone Heights” still not having been resolved.

We have a more personal note to add, realising that this will not come into consideration of the decision to approve this development or not, it just makes us feel better to make these points.

When we moved to Blackstone Heights in 2002, we were looking for a large property in the serenity of a low density residential semi-rural setting but still close to the Launceston CBD.

Blackstone Heights and the property we chose fulfilled this requirement perfectly and there were no plans at all for the rezoning of surrounding properties.

We cannot see the point of having zonings in the first place if they can be arbitrarily changed at the whim of developers and council.

We submit that this is not fair and we would hope that we are going to be treated fairly.

As we have stated previously in the representation, we live on the corner of Panorama Rd and Neptune Dr. TCS say 70% of the new traffic created by this proposal will use Neptune Dr to access Panorama Rd which is busy enough right now. Tripling the population with this development and the Panorama Rd development already approved without regard to increasing road infrastructure will only cause massive traffic noise and congestion and completely change the face of Blackstone Heights. Completely ruin it and destroy the reason people move here in the first place. They want peace and quiet and that's what they get here. Please don't allow this gorgeous suburb to go under like that.

We say this without even having regard to the constant noise, trucks and heavy machinery we will have to endure during construction. In addition, please remember that, ignoring everything else, the proposal simply does not meet Council's own Planning Scheme guidelines written only 7 years ago, or its own Structure Plan guidelines, written only 5 years ago.

Blackstone Heights is zoned a low-density residential area. It will not be Blackstone Heights with a 650-dwelling high density development

We thank you for taking the time to read this representation and wish you much wisdom in the approval process.

Yours sincerely,

Kay and Colin Farmer