

**From:** Craig Elliott  
**Sent:** 17 Nov 2020 17:02:52 +1100  
**To:** Planning @ Meander Valley Council  
**Subject:** Submission re Draft Amendment 3/2020 - 10 and 12 Neptune Drive,  
Blackstone Heights  
**Attachments:** Submission re Glover Ave development.pdf

Please find a submission in relation to this proposal attached for Council's consideration.

Regards



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17 November 2020

Meander Valley Council

By email: [planning@mvc.tas.gov.au](mailto:planning@mvc.tas.gov.au)

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

### **Introduction**

Whilst I appreciate that I do not need to establish my legal standing to make a submission on this proposed development, I wish to draw the decisionmaker's attention to my background to establish my interest and commitment to the area. I am a resident of Blackstone Heights, having lived in the suburb for almost 10 years and also own an investment property in the suburb. My family and I were drawn to this area due to both the proximity to the river and the Launceston CBD as well as the amenity of the area including the natural areas. Key to this was the low density development and an apparent commitment by government to maintain the amenity of the area and a low density residential footprint.

My background includes a lengthy career in State Governments in Queensland and Tasmania and as a private consultant to government, industry bodies and the private sector. I hold a Bachelor of Science majoring in Environmental Planning and post graduate qualifications in urban and regional planning and management.

Given that no notice was provided to affected residents other than those immediately adjacent to the proposed development, this submission was drafted very quickly and without the chance to fully assess the information provided. I appreciate that the notification process was legally correct but I am disappointed by the lack of consultation with residents.

### **Background**

An application has been made under Section 33 of the *Land Use Planning and Approvals Act 1993* by Woolcott Surveys on behalf of Tasland Developments for an amendment to the *Meander Valley Interim Planning Scheme 2013* to insert a Specific Area Plan (SAP) over land at 12 Neptune Drive, Blackstone Heights to provide for a 115.2 hectare residential estate under a community development scheme. The development involves precincts for:

- residential housing development;
- open space and what is claimed to be a regenerated bushland area;
- common community facilities to support the residents of the estate; and
- 'eco cabin' tourist accommodation.

The land is currently included in the Low Density Residential Zone that encompasses most of Blackstone Heights.

The project includes 650 residential units in a high density configuration and 50 hectares of open space. This includes 265 residential lots at 660m<sup>2</sup> and up to 160 assisted living units

as well as another unspecified residential development, presumably also at a high density configuration, of 4 hectares. The residential development includes social infrastructure through a community services precinct including management office, meeting spaces, communal recreation facilities with on-site package wastewater treatment and services managed by the body corporate.

The amendment is required as the Low Density Residential Zone in the *Meander Valley Interim Planning Scheme 2013* does not allow for residential development under a community development strata scheme as this is classified as a 'multiple dwelling' use. As such, the application proposes a Specific Area Plan to implement a master plan under a community development scheme, including ancillary supporting services for residents and large tracts of private communal open space.

### **Key Issues**

The development and amendment to the planning scheme is strongly opposed as it is inappropriate to the amenity of the area and current planning scheme requirements. There has been no basis provided to support the amendment other than for commercial gain above what would be achieved by the developer if the proposed development complied with the current planning scheme requirements.

The supporting reports by consultants commissioned by the developer are deficient and lack the rigour and sufficient data collection and analysis that should be required in a professional report.

There are many claims made in the application which are not founded on evidence and Council should rely on those claims in forming a decision as to the appropriateness of the proposed development.

### **Compatibility of High Density Development in the Blackstone Heights area**

Whilst the tone of the developer's application is commendable with regard to the commitment to on-site wastewater treatment and electricity generation, the density of the development is incongruous to the area, the existing planning scheme and stated Vision and Strategy for the area. All existing residents that I have spoken to are strongly opposed to this amendment due to the expected impact of a higher density residential configuration on the amenity of the area and additional stress on the suburb's infrastructure (see below for specific comments in relation to traffic). The scale and style of the proposed development is more appropriate to adjoin an existing urban area of a similar nature rather than contributing to create urban sprawl in a low density residential area.

The proposal will more than double the existing housing stock in the area and potentially triple the resident numbers. To claim this as a positive for the area is not supported by evidence.

The supporting documentation notes that:

*“Blackstone Heights is a unique low density residential suburb located in close proximity to services and amenities in Prospect and the Launceston CBD whilst enjoying a rural outlook and unique vistas over the South Esk River. Blackstone Heights is unique amongst other Launceston suburbs and it is important to maintain the existing character whilst broadening the range of residential options and community services.”*

The need to ‘broaden the range of residential options and community services’ has not been established. The desire of ratepayers to protect the unique character of the suburb to protect those values stated above is clear however and this proposal to introduce higher density residential lots at a massive scale is contrary to achieving this.

The Prospect Vale – Blackstone Heights Structure Plan cited in the online documentation provides sufficient information to identify that the nature of the proposal is contrary to Council’s land use and planning strategy. It identifies the issue of present fragmentation of activity centres, which this development would increase that fragmentation, and the need to invest in traffic infrastructure, which this proposal does not do and will place significant stress on the existing network. The Structure Plan does indicate the desire to increase the population base to support the Westbury Rd precinct. This can be achieved by maintaining the existing minimum lot size and not destroying the nature and amenity of the area by enabling a ‘McMansion style’ development. The ‘Vision’ proposed in that structure plan, and numerous other documents, reflects the attraction of the area by virtue of the lower density developments. High density developments should be concentrated on the periphery of the existing higher density developments and not in amongst a low density area such as Blackstone Heights. There are other locations within the Council area where this may be more appropriate and not have the traffic and amenity impacts that this development have. It must be noted that the other proposed residential development – the infill between Panorama Rd and Long Vista – will further exacerbate these issues.

The council officers report states

*“The application submits that the proposed dwelling yield is equivalent to that which is available under the current zone provisions, which provides for subdivision to a lot size of 1600m<sup>2</sup>. The future Tasmanian Planning Scheme Low Density Residential Zone subdivision standards provide for a minimum lot size of 1500m<sup>2</sup> with discretion to reduce the lot size to no less than 1200m<sup>2</sup>. Allowing for approximately 100 hectares of the land that is reasonably capable of development, this would equate to approximately 660 lots at 1200m<sup>2</sup> lot size, allowing for approximately 20% of the land area that would be required for roads and services.”*

On the face of it this statement may be true however it does not account for the topography of the land nor the suitability for all areas to be developed as residential lots. The open space in the proposed master plan should not be permitted as some form of offset to permit additional lots to be crammed into given that some of that open space allocation would never be suitable for residential development and 600+ residential lots could not be realistically developed.

The application repeatedly claims that the scale is not in conflict with what is currently permitted. This is disingenuous and if it was factually correct, the amendment is not required. The fact is that much of the area is not suitable for development due to slope, riparian protection and other restrictions and whilst the developer may see the benefit of planting olives on steep hillsides, it is not appropriate nor should high density development be permitted on the basis of what technically is permitted over a larger area be crammed into a high area to achieve a profit

The additional bushland walking trails would be a welcome addition to the suburb but at the expense of the current amenity of the area. It is noted that the substantial increase in the residential population would far outweigh the benefits and that the proposed walking trails will not be linked to existing recreation areas.

The developer proposed a commercial precinct as a part of the master plan. The increase in population may make this commercially viable and not result in the same outcome as the existing failed commercial site on Neptune Drive. It is noted that the developer has noted approached existing residents to identify if the commercial development is desired. Personally, I would not value this addition and bought in this area recognizing that I had a very short drive or ride to the existing commercial retail developments on Westbury Road and the recreational / dining offerings at the Country Club. Existing retail offerings are sufficiently close and, had I wished to be in walking distance of such offerings, I would have bought in Prospect or Launceston itself.

It is noted that the development will require a Community Development Scheme (CDS) which would require council approval. The developer has made commitments in the application in relation to the parameters of the CDS but the detail and obligation to implement those commitments can only, at this stage, be accepted in good faith. Prior to accepting any such commitments, I would like to see further detail of the CDS to demonstrate how those commitments will be specifically achieved. The detail of the CDS should be made available prior to the planning scheme amendment.

### **Impact of natural values and scenic landscape protection**

It is noted that the majority of the site is modified bushland with limited use and it appears a degree of weed infestation. As I haven't had access to the site I cannot comment effectively on the natural values of the area other than reviewing the report of the Consultant commissioned by the developer to prepare a natural values report.

This report raises concerns due to what appears to be a perfunctory assessment with limited effort to actually assess the natural values of the area. The report indicates that the Consultant only visited the site once, on an afternoon in the middle of winter, and conducted a desktop review of available data. It is not surprising that the Consultant could not identify any significant vegetation; as he notes in that he did not expect to view any flowering that would have aided detection. Similarly, it would be near impossible to identify the existence of quoll, bandicoot, devil or other nocturnal species during the day

without significant surveying to attempt to identify scat or other sign of these species. The area has a wide range of native wildlife present and further development of this nature will result in further pressure on these species.

A reliance on the Natural Values Atlas (NVA) is dangerous as this relies on reports primarily from people with access to the site. As this site has been in private hands it would rely on the developer to have had the interest and motivation to report sightings into the NVA.

The lack of proper and comprehensive surveying limits the value of the report and little weight should be placed upon it in identifying the impact on natural values.

The adjoining areas, including my property, are habitat for the Eastern barred bandicoot and Spotted Quolls and I have sighted these species in the area. The report notes the possibility of Tasmanian devil in the area but this does seem unlikely. The area

The application claims that the development will not have an impact on the scenic landscape from the Trevallyn NRA. This is contested as, despite a narrow corridor of retained vegetation along the rim of the gorge, much of the development will be clearly evident from the NRA and impact on the scenic landscape.

An issue not addressed is the terrain and slope of the site and the potential water quality impacts and erosion from urban developments with an increase in hard impervious surfaces increasing runoff volumes and velocity.

The inclusion of a 2200 tree olive grove raises additional concerns given the lack of detail of how the grove will be maintained. Olives are renowned for their ability to generate 'feral' or wildling trees and there is a risk of olive trees invading the adjacent bushland and Trevallyn Nature Reserve; especially given the proximity to the South Esk River.

### **Impact from traffic congestion**

The application notes the limited road connectivity and there is significant risk of significant road congestion from 600+ more families living in the suburb and using the Panorama / Blackstone Rd lane. There is also significant risk from an emergency management perspective if an urgent evacuation is required and an additional 600+ vehicles are attempting to leave via a single lane road that already poses a risk in a bushfire incident.

The traffic impact report is inadequate in terms of data collection and analysis to enable an appropriate consideration of the likely three-fold increase in residents in the area; all of whom will be channeled onto Panorama Rd and Blackstone Rd. It is noted that the survey involved a single survey period of 20 minutes on a day in the middle of school holidays where the traffic volumes would be significantly reduced.

Based on these figures however, the consultant models massive increases of additional traffic movements onto Panorama Rd from Glover Ave and Neptune Drive. This alone indicates the inappropriate nature of this development unless Council is making significant

investments in either increasing the capacity of the existing road network or identifying an alternative entry / exit point for this development such as via Mt Leslie Rd.

The flow on effects of this development will extend well beyond the Blackstone Heights area and cause disruption to residents in Prospect Vale and visitors to the Country Club.

### **Bushfire risk**

I am not in a position to assess the adequacy of the bushfire risk assessment however, given the standard of the natural values report, am concerned that this has been prepared at the same standard given the same Consultant was involved.

### **Summary**

The development of the area is supported however the nature and scale of this design is not.

It is requested that Council not approve the proposed amendment but to work with the developer to consider a Master Plan that meets the existing minimum lot size to avoid destroying the amenity of the area and turning Blackstone Heights into an urban sprawl with stressed infrastructure.

This would include further work to address the likely impact of the increased traffic volumes, proper assessment of the natural values of the area and specification of the CDS that would be in place for any such development requiring a CDS.

Submitted by:

**Craig Elliott**