

**SUBMISSION RELATING TO THE TRAFFIC IMPACT OF THE PROPOSED 50 LOT
SUBDIVISION OF LAND AT 2A AND 2B RIFLE RANGE ROAD MT LOFTY**

We have been residents of Windemere Terrace for 25 years and are submitters in this matter.

We wish to comment on the fact that no Traffic Impact Assessment has been conducted to determine the impact the additional traffic will have on the Mt Lofty road network, the connectivity between the subdivision and Windemere Terrace and the inadequacy of the current Mt Lofty road network to cope with the additional traffic generated by the subdivision.

TRAFFIC IMPACT ASSESSMENT REPORT

The Statement in the planning report that the 50 lot subdivision does not meet the threshold for a major development based on the Austroads Guidelines requiring a Traffic Impact Assessment is incorrect. As noted in the Planning Report this Application was preceded by two Applications which were lodged by the Applicant to subdivide the land into 48 lots. These Applications were withdrawn by the Applicant. In Council's assessment of those Applications Council requested the Applicant to provide a Traffic Impact Assessment Report despite the subdivision only being for 48 lots. The Applicant refused to do so arguing that a Traffic Impact Assessment was not required because it did not meet the 50 lot threshold for major development which would require a Traffic Impact Assessment. Council at that time obviously saw the need for a Traffic Impact Assessment to be undertaken.

The Applicant's current Application is for a 50 lot subdivision and is therefore classed as a major development under the Austroad guidelines which requires a Traffic Impact Assessment to be undertaken. The fact that the 50 lots have been created from two existing lots is irrelevant under the Austroad guidelines.

The Applicant's current Application did not include the construction of a road connecting the site through the road reserve in Windemere Terrace. The Applicant has agreed to do this at the request of the Council. The impact that the traffic generated by the subdivision will have on Windemere Terrace needs to be assessed and a Traffic Impact Assessment Report provided to Council.

Despite these matters the Council did not request the Applicant to provide a Traffic Impact Assessment Report.

We requested the Council to ask the Applicant to provide a Traffic Impact Assessment Report and to extend the decision date to allow the Applicant time to provide that report. The Council has not done either of these things.

Council should not make a decision on the Application until a Traffic Impact Assessment has been undertaken to determine the impact that the traffic generated by the subdivision will have on the existing Mt Lofty road network.

CONNECTIVITY

Council has requested the Applicant to connect proposed road 03 to Windemere Terrace by way of a road through the road reserve in Windemere Terrace. The Applicant has agreed to do this.

Two large mature native trees are located on the road reserve in Windemere Terrace. In the first version of the Applicant's Ecological Assessment Report these trees are shown as having to be retained because they are of Environmental significance. This Report was prepared prior to the Council requesting the Applicant to construct the road through the road reserve. An amended version of the Ecological Assessment Report was prepared after the Applicant agreed to Council's request and now shows that the trees are no longer regarded as being of environmental significance. We query how the status of those trees can change so quickly just because the road cannot be constructed without the trees being removed.

The use of the connecting road in the event of an emergency is not a viable option as proposed by the Council. Windmere Terrace, as noted by Council is narrow, winding and hilly and will quickly become congested as residents from the Windemere Estate will need to use this road to vacate the area. In the 2002 bushfire Windemere Estate was put on a 5 minute evacuation notice. Because of sightseers Windmere Terrace was closed to allow local traffic only for fast evacuation. MacKenzie Street side had already been evacuated. As there have been another two developments off MacKenzie Street since the 2002 bushfires, the traffic from another large development will further add to this congestion. MacKenzie Street and Rifle Range Road are the only evacuation routes. Emergency vehicles would be restricted in accessing both Windemere Estate and the proposed subdivision.

Registered Plan 856525, which creates the road reserve in Windemere Terrace, was registered on 11 July 1994. The plan whilst indicating the road reserve as a new road to connect Windemere Terrace to the site would not have anticipated the substantial amount of traffic from the scale of the proposed subdivision. As stated in the Planning Report, the zoning of the site was partly rural residential which requires minimum lot sizes of

4000m². It would not have been anticipated at that time the substantial increase in traffic generated by the subdivision.

The Planning Report states that “the improved activity is consistent with the benchmarks within the Planning Regulation 2017 schedule 12A and provides a broader community benefit. This has been given considerable weight in this assessment”. Schedule 12A does not apply to the subdivision because part of the lot being subdivided is zoned rural residential. This is referred to in part 1 section 1 (1) (c) (i) of the Schedule.

The Windemere Estate residents do not see the connecting road as a benefit to them! They see the connecting road as a major problem. This is clearly evident in the number of Submissions made by the residents of the Windemere Estate. Council cannot argue that the connecting road is of a net benefit to the Windemere Estate residents when none of the residents want the road.

MT LOFTY ROAD NETWORK

The roads in the Mt Lofty road network which will be affected by the increase of the traffic generated by the development are Windemere Terrace, Stuart St, North St, Rifle Range Rd, Benjamin Rd, Martini St, Kate St, Range St, Warana St and Mary St. The existing road network was constructed over 80 years ago and was not designed to accommodate the traffic that currently uses the network today let alone the traffic which will be generated by the subdivision. Sections of Rifle Range Road and Martini Street are not curbed and channelled and are not properly sealed. They are in very poor condition.

North St, Stuart St, Martini St, Warana St, Benjamin St and Rifle Range Rd

Council is aware that the intersection of North St and Stuart St is particularly dangerous. The intersection of these roads is very busy because of the local schools, nursing homes, Bridge Club and North Point Shopping Centre. The increase in traffic from the development will increase the danger to motorists, school children and pedestrians who use these intersections particularly at peak times. Nursing homes in both Stuart Street and Rifle Range Road frequently have vehicles parked on both sides of the road. This makes it extremely difficult and dangerous for vehicles to pass each other and is a major concern for ambulances to access nursing homes.

WINDEMERE TERRACE

The proposed road connecting the road from Windemere Terrace will substantially increase the traffic using this road. Council's assessment that only residents of 10 lots in the subdivision which will result in 41 additional road movements is unsubstantiated and not supported by any Traffic Impact Assessment Report. Windemere Terrace will not cope with this increase and will result in a number of safety and maintenance issues.

The road is narrow and can barely fit the width of two cars. Two vehicles travelling in opposite directions are unable to safely negotiate the sharp bends at the same time as vehicles tend to cut the corner of the sharp bends. The split roads on the southern section of Windemere Terrace are extremely narrow. If a vehicle is parked on the road this prevents access for other vehicles. This is particularly concerning for emergency vehicles such as ambulances and fire engines. Council's rubbish trucks are barely able to use the narrow roads and are unable to do so if a vehicle is parked on the road.

The road has a number of cobbled brick paved areas. These bricks loosen regularly, creating safety issues for people and vehicles and require continued maintenance by council. This maintenance will increase with the increase of vehicles from the subdivision using Windemere Terrace. The split roads require maintenance because of subsidence caused by earth movement and traffic usage. The intersection of Windemere Terrace and MacKenzie St is a dangerous intersection with accidents because of the blind spot from the crest of the hill in MacKenzie Street. This applies to the intersection of Warana St and MacKenzie St. These intersections are known to Council as dangerous because previously a speed bump was in place on the crest of MacKenzie St. This speed bump has been removed with the speed limit now reduced to 50Klms. Visibility in Windemere Terrace is extremely poor in times of fog and the afternoon sun. This also applies to Range St and its intersection with Mary Street.

The narrow winding design of Windemere Terrace does not operate as a traffic calming measure as stated in the Planning Report. Council should give strong weight to the considerations of residents who live on Windemere Terrace who witness vehicles that travel at excessive speed and use the road as a race track. Council are aware of these problems as they have reduced the speed limit in this area. The Planning Report does not appreciate the reality of how vehicles use Windemere Terrace. Streetlights and signs have been damaged and replaced because of vehicles which have collided with them when travelling at excessive speeds. Nearby bike trails attract a lot of utilities carrying bicycles which speed around Windemere Terrace and Mackenzie St. Residents have even requested speed bumps to be installed in Windemere Terrace to slow speeding vehicles.

Councilors should not be making a decision on the Subdivision until they fully appreciate how the increase in traffic will impact the Mt Lofty road network and in particular the traffic issues in Windemere Terrace as we have detailed. Councilors' must give a lot of weight to the concerns of residents who live in the Windemere Estate as they have detailed in their Submissions. A Traffic Impact Assessment Report must be provided by the Applicant before a decision on the Application is made.

Anthony & Jo Collins