

## **SUBMISSION BY THE ROSEDALE ASSOCIATION INCORPORATED (RAI)**

### **STAGED 138 LOT SUB-DIVISION ROSEDALE FARM – DA 73/13**

#### **1. OVERVIEW**

The key objectives of the Rosedale Association Incorporated (RAI) are to:

- maintain the existing environmental character of the Rosedale area;
- represent the residents and ratepayers of the Rosedale area, who are members of the Association; and
- in consultation with the Eurobodalla Shire Council, and other appropriate bodies and individuals, assist in the orderly development and progress of the area.

RAI represents views expressed by its members in the following Submission, in response to DA 73/13.

#### **2. ROADS AND TRAFFIC**

2.1. We object to the proposal for vehicular access from the development to the George Bass Drive/Rosedale Parade intersection and see it as a safety risk for current and future residents and visitors to the Rosedale area.

We consider it to be critically important for Council to consider this proposal as part of a Rosedale Urban Expansion Zone (UEZ) integrated plan, even though development approval for various projects within the UEZ may be granted at different times. In particular, we request an explanation from Council as to how it ultimately sees the road network operating across the Rosedale UEZ, particularly at the Rosedale Farm and Marsim sites.

We note that the design of the road network in the Bevia Road Concept Application (MP05-0199) of 2008 encouraged pedestrians and cyclists, yet still provided efficient vehicle access through the site in the form of a central boulevard. This design helped ensure that the significantly increased traffic flows in the area could be accommodated, with minor impacts on the surrounding network and adjacent residential amenity, including the Rosedale hamlet. The plan had two vehicular access points, with one at the north and one at the south exiting on the western side of the Tomakin Sewerage Treatment Plant. There was also provision for additional pedestrian and bicycle connections to the east. This design enhanced walkability within and around the neighbourhood structure and maximised pedestrian and bicycle movements, within and to and from the site. We note that Senior ESC officers were “*supportive of the proposed provision of road access from George Bass Drive to the north and south of the site*” (Ref. *Response to Public Submissions and Referrals to Government Agencies: Rosedale: Bevia Rd Concept Application MP05-0199*). The RAI, therefore, questions why DA 73/13 proposes an additional vehicular access point at the George Bass Drive/Rosedale Parade intersection.

The Traffic Impact Assessment accompanying DA 73/13 estimates that 80% of the traffic generated by the new Rosedale Farm development will use the Bevia Road/George Bass Drive intersection and only 20% will use the proposed George Bass Drive/Rosedale Parade intersection for heading north. There is, therefore, no strong argument to support the proposal for a new vehicular access point at George Bass Drive/Rosedale Parade to cater for northbound traffic.

In terms of southbound traffic, the central boulevard arrangement through the Rosedale UEZ would provide safer and more efficient access to the south, with traffic exiting onto George Bass Drive via an access road adjacent to the western boundary of the Tomakin Sewerage Treatment Plant. This

represents a safer and more convenient option for southbound traffic generated by developments in this part of the Rosedale UEZ, as it exits onto a part of George Bass Drive that is straighter and provides significantly better visibility than is available at the George Bass Drive/Rosedale Parade intersection. It also provides a more efficient route to amenities to the south, such as schools.

We note that an alternative road design is presented in DA 73/13 planning documents for future access to adjoining land at the south west corner of the subject land, via proposed Road No.5. We ask that Council explore this option with the developer to connect Road No.5 through Marsim land to Bevian Road to the west, so that both the northern and southern areas of the development have safe and efficient vehicular access to and from the development. We understand that Marsim has been granted access through Rosedale Farm land to Bevian Road to provide the main northern entry and exit point for their 792 lot development. Council should, therefore, press for a reciprocal arrangement for access to Bevian Road via Marsim land from the south west corner of the subject land.

### 2.2. Safety concerns about the George Bass Drive/Rosedale Parade intersection, as proposed in DA 73/13.

RAI members have raised a number of concerns about the safety aspects of the proposed George Bass Drive/Rosedale Parade four-way cross intersection, which would create additional safety risks at what is already a dangerous section of George Bass Drive. The speed limit between Malua Bay and Rosedale has been dropped to a uniform 70 km/h, but this has not eliminated the safety risk posed by vehicles exiting north from Rosedale Parade onto George Bass Drive. Vehicles travelling north along George Bass Drive are often slow to reduce their speed from 100 km/h to the signposted 70 km/h, as they approach the bend preceding the Rosedale Parade intersection. This means that it is not uncommon for vehicles turning right out of Rosedale Parade to have to stop halfway across the intersection and reverse back, or proceed across the intersection and pull off to the shoulder on the western side of George Bass Drive, in order to let speeding vehicles pass safely.

We note that according to the RTA, a six second gap between vehicles is needed to allow vehicles turning north out of Rosedale Parade to do so safely. This equates to 120 metres visibility at 70 km/h and 170 metres at 100 km/h. There is currently inadequate vision for drivers to establish a six second gap. The creation of a four-way cross intersection would make this situation much worse, particularly when there is also limited vision to the north. Council is aware, of course, that Rosedale Parade is the only vehicular access into and out of South Rosedale, so residents and visitors have no alternative or safer choice.

Our assessment is, therefore, that the proposed four-way George Bass Drive/Rosedale Parade intersection is seriously inadequate, in terms of Council's responsibility to provide safe vehicular access to and from the Rosedale hamlet and to and from the proposed development. The proposed extension to Rosedale Parade and the four-way cross intersection further complicates an already difficult intersection to navigate, particularly for northbound traffic exiting Rosedale Parade.

### 2.3. We seek Council's commitment to reviewing the proposed design for the George Bass Drive/Bevian Road intersection to the north of the proposed development.

This intersection is the major northern access point for the much larger Marsim development of 792 lots. A suitably engineered intersection is required to cater for the volume of traffic that will need to exit these developments to both the north and south. As a minimum, a right turn bay should be provided on George Bass Drive for vehicles travelling south and turning right into Bevian Road. This is needed for safety reasons and to minimise congestion for traffic proceeding south and for vehicles turning into Yowani Road to North Rosedale.

### 2.4. The present Yowani Road exit into George Bass Drive is poorly engineered and RAI members are concerned about increased safety risks, as traffic volumes increase in the area.

This junction is badly sighted, with the view to the south obscured by a bend in George Bass Drive. This makes exiting to the right to head north particularly difficult. Vehicles also currently encroach onto the through road before turning either direction, as the verge is insufficiently wide. These dangerous practices must be addressed and the intersection be upgraded before an accident occurs. Council should, therefore, upgrade the present unsafe intersection at George Bass Drive and Yowani Road to a level of safety appropriate to the expected increase in through-traffic generated by all developments in the Rosedale UEZ. We remind Council that this intersection is the sole access to North Rosedale and is already unsafe at current traffic levels.

2.5 Rejection of data reporting in Traffic Impact Assessment.

We identified errors in the data relating to existing peak traffic flows in the Traffic Impact Assessment (see Table 3 of Brown Smart Consulting report No. X11164). In particular, the figure reported for the Friday morning ‘peak’ in Rosedale Parade of 139 vehicles per hour raised concerns, as this would be excessive for South Rosedale in the low season month of August 2011 when the traffic count was done. The figures are also reported to relate to the traffic volume on Rosedale Parade west of George Bass Drive, which is incorrect, as Rosedale Parade is east of George Bass Drive.

Brown Smart Consulting compared the 2011 traffic flows with previous data for 2005 and assessed that “2011 traffic flow counts have generally **decreased** on George Bass Drive **for both north and southbound traffic**”. So, the overall traffic flow for George Bass Drive from 2005 to 2011 was reported to have decreased, while the “traffic flows in Rosedale Parade were noted to have **increased markedly since 2005**”. This assessment is, of course, highly improbable.

We noted that Section 3.2.3 of the Traffic Impact Assessment stated that the traffic counts were undertaken between 4:15pm and 5:45pm on the Thursday and again on Friday morning between 7:15am and 9:00am, outside of the peak holiday season. The figures in Table 1 of their Assessment were then summarised and presented as ‘vehicles per hour’, not vehicles for a specific 1½ hour or 1¾ hour period. In contrast, we note that the 2005 traffic counts were done for one hour periods from 4:15pm to 5:15pm on a Thursday afternoon and from 7:30am to 8:30am on a Friday morning. We, therefore, undertook our own traffic counts at the same intersection on Thursday 6 September 2012 between 4:15pm and 5:15pm and again on Friday 7 September 2012 between 7:30am and 8:30am, in line with the 2005 traffic count. Our traffic counts are presented in **Table 1**.

**Table 1: Existing (6 & 7 September 2012) Peak Traffic Flows**

Road	Location	Fri Morning Peak (two way) Vph	Thurs Evening Peak (two way) Vph
George Bass Drive	North of Rosedale Pde	36 (173*)	88 (171*)
	South of Rosedale Pde	108 (70*)	52 (116*)
Rosedale Pde	East of George Bass Dr	30 (139*)	29 (79*)

\* Peak traffic flows in 2011, as they appear in the Brown Smart Consulting Assessment

As can be seen from the above data, none of our peak traffic flow data correlates to the reported traffic flows for 2011 in the Brown Smart Consulting Assessment and, in fact, raise significant concerns about the accuracy of their data. It may be that they incorrectly transposed their figures for George Bass Drive and Rosedale Parade. We seek an assurance from ESC that they will ask the developer to provide a new Traffic Impact Assessment, as the overall assessments presented by Brown Smart Consulting are based on incorrect data for the George Bass Drive/Rosedale Parade intersection.

Their Assessment also refers to Rosedale Masterplan Traffic and Transport Assessment of July 2005, which was presented as an attachment. We note that *Section 3* of that report incorrectly refers to the proposed development as the “*final stage of the Sunshine Bay Estate*”. We cannot, therefore, have confidence in the overall data collection and assessments made in this report either, as the entire report may actually relate to the Sunshine Bay Estate and not the Rosedale Masterplan development. Council should, therefore, dismiss both the 2012 and 2005 Traffic Assessments and request a new Traffic Assessment. The new Assessment should assess traffic data gathered over longer time intervals, at different days of the week and at different times of the year, including during peak holiday periods.

Recommendations:

- (i) *That Council consider an Integrated Plan for traffic management for the Rosedale UEZ, even though development applications may be approved at different times. Council must identify a safe and efficient road network for the combined Rosedale UEZ, which does not pose additional risk for vehicles entering and exiting North and South Rosedale.*
- (ii) *That the George Bass Drive/Rosedale Parade intersection be dismissed as an option for vehicular access to and from the proposed development, but incorporated into Council’s planning of pedestrian walkways and cycleways to connect the proposed development to local amenities and beaches.*
- (iii) *That vehicular access to the south be directed via the south-western corner of the Rosedale Farm development and exit via Bevia Road onto George Bass Drive, on the western side of the Tomakin Sewerage Treatment Plant.*
- (iv) *That Council review the proposed design of the George Bass Drive/Bevia Road intersection to the north of the development.*
- (v) *That Council upgrade the present unsafe intersection at George Bass Drive and Yowani Road.*
- (vi) *That Council request a new Traffic Impact Assessment, with overall assessments based on accurate data recorded at different times throughout the year, including during peak tourist periods.*

### **3. INCOMPATABILITY TO E4 ZONING OF THE ROSEDALE HAMLET**

3.1. The plan for the 138 lot development is not a plausible extension to the existing Rosedale Hamlet and should not be seen as such.

The zonings are not compatible, with the Rosedale hamlet being E4 zoning (Environmental Living) and the proposed development being R2 zoning (Low Density Residential). We note that the Department of Planning commented on the poor integration of the proposed Marsim Concept Plan (2006) with the hamlets of Rosedale and Guerilla Bay, stating that the proposal did not represent a “*logical expansion of these hamlets*” and did not connect well with either of them. The Department considered that the proposal represented a development of a new coastal “village”, with resulting social infrastructure and other needs. The Department’s assessment is also relevant to DA 73/13.

The Rosedale Farm development site lends itself to interconnected pedestrian pathways and cycleways to access internal facilities within the Rosedale UEZ, as well as George Bass Drive and local beaches. By far, the majority of people who currently visit local beaches do so on foot, which has helped protect the vulnerable environmental and aesthetic attributes of the Rosedale hamlet. These are formalised in the “Statement of Place”, which argues for their continued preservation when any development occurs. Increasing pedestrian access and cycleways [*see RAI Recommendation (ii)*], instead of directing vehicular traffic directly into the current Rosedale Parade from the new development, may go some

way to protecting the vulnerable environmental and aesthetic attributes of the Rosedale hamlet and help create a sense of a new and distinct coastal village, which lies within the Rosedale UEZ but is not an extension of the existing Rosedale hamlet.

The expected population increase resulting from the proposed development will bring additional usage to Rosedale's beaches and the carpark. Car parking is limited, with little room to expand to meet the increased demand from developments to the west. The main beach was severely eroded in major storms in the 1970s and has been slow to recover. Dune stabilisation has been hastened by Landcare efforts in recent years, with indigenous species plantings, but much remains to be done to render the system resilient to one or more major events. Existing usage of this small beach impacts on the sensitive dune vegetation and reduces stability, but an increase in usage of the magnitude expected from the proposed development, and other developments in the Rosedale UEZ, will likely destroy it.

### 3.2. Early revegetation is needed to ensure adequate visual separation from the Rosedale hamlet and from George Bass Drive.

We note that page 22 of the Statement of Environmental Effect describes the site as having a partial visual exposure to George Bass Drive and some areas of Rosedale. It is, therefore, highly desirable that early planting be prioritised as a way to maintain the existing character of the area, given that both North and South Rosedale have vegetation screening residential developments from George Bass Drive.

#### Recommendations:

- (vii) That Council enforce measures to minimise the visual impact of the development from George Bass Drive and the Rosedale hamlet.*

## **4. COMMUNITY SERVICES AND INFRASTRUCTURE**

The Association and its members continue to be concerned about the need for a quantum leap in medical services, as well as shops and other infrastructure needed to meet the needs of the additional houses and population growth within the Rosedale UEZ.

#### Recommendation:

- (viii) That Council keep the RAI and its members informed of its plans to ensure adequate infrastructure is available to meet the needs of the increased population and housing within the Rosedale UEZ.*

## **5. SEWERAGE**

RAI is concerned about discrepancies on pages 27 and 98 of the Statement of Environment Effects regarding sewer plans for the development. Section 3.5.1 on page 27 states that "reticulated sewer *could be* provided to the site" with the agreement of the ESC. Page 98, section 6.1, states that "it is proposed to provide reticulated sewer to all residential lots". There is no place for on-site sewage treatment in a sensitive catchment that feeds into an Intermittently Closed and Open Lake and Lagoon (ICOLL), which is part of a Marine Park. Council must ensure that sewer reticulation is mandatory for the proposed development.

#### Recommendation:

- (ix) That Council makes sewer reticulation mandatory for the proposed development.*

## **6. RIPARIAN BUFFER STRIPS AND ENDANGERED ECOLOGICAL COMMUNITIES (EEC)**

### 6.1 Riparian buffer vegetation at the site has been degraded by decades of grazing, cultivating, weeds and timber cutting.

At many locations along Saltwater Creek, there is no vegetated buffer strip at all, resulting in very poor water quality. Although the DA requires that the creek and its tributaries must be protected by buffer strips, the stipulated buffer widths are desk-top estimates, developed for a different context (forestry), and may be ineffective in providing the ecological and hydrological protection that they are meant for. Where the topography permits, buffer widths should be extended beyond the minimum requirements to maximise the ecological and hydrological benefits to Saltwater Creek and its tributaries, and to minimise any adverse impacts on the ICOLL that links directly into the Batemans Marine Park.

### 6.2. There is a remnant Chain of Ponds mostly in the lower, flatter reaches of Saltwater Creek.

Chains of Ponds are regarded as threatened geomorphic features and, being within the riparian zone, should enjoy protection. However, the standard buffer-width requirements are likely to be inadequate for these features, and should be given special consideration. The full extent of the remnant Chain of Ponds at the site should be identified, and extended buffer widths around them should be provided.

### 6.3. Two EECs have been identified on the site.

We suggest that the Vegetation Management Plan should aim at treating the EECs as distinct entities within the riparian zone, reunite the separate segments, and extend the EECs as far along the riparian zone in both directions as is ecologically and geomorphologically permissible. This will restore the bio-corridor function of the EECs. We ask that the proponent refrain from any activity that disturbs or detracts from these activities.

### Recommendations:

- (x) That the mandated riparian buffer strips be extended to widths greater than normally required, to protect the environment of Saltwater Creek and its link to Batemans Marine Park, and to preserve the integrity of the Chain of Ponds features in the upper reaches of Saltwater Creek.*
- (xi) That the Vegetation Management Plan specifically recognise the desirability of re-uniting the two identified EECs, to restore their bio-corridor function.*

## **8. SUMMARY OF RAI RECOMMENDATIONS:**

- (i) That Council consider an Integrated Plan for traffic management for the Rosedale UEZ, even though development applications may be approved at different times. Council must identify a safe and efficient road network for the combined Rosedale UEZ, which does not pose additional risk for vehicles entering and exiting North and South Rosedale.*
- (ii) That the George Bass Drive/Rosedale Parade intersection be dismissed as an option for vehicular access to and from the proposed development, but incorporated into Council's planning of pedestrian walkways and cycleways to connect the proposed development to local amenities and beaches.*
- (iii) That vehicular access to the south be directed via the south-western corner of the Rosedale Farm development and exit via Bevia Road onto George Bass Drive, on the western side of the Tomakin Sewerage Treatment Plant.*
- (iv) That Council review the proposed design of the George Bass Drive/Bevia Road intersection to the north of the development.*

- (v) *That Council upgrade the present unsafe intersection at George Bass Drive and Yowani Road.*
- (vi) *That Council request a new Traffic Impact Assessment, with overall assessments based on accurate data recorded at different times throughout the year, including peak tourist periods.*
- (vii) *That Council enforce measures to minimise the visual impact of the development from George Bass Drive and the Rosedale hamlet.*
- (viii) *That Council keep the RAI and its members informed of its plans to ensure adequate infrastructure is available to meet the needs of the increased population and housing within the Rosedale UEZ.*
- (ix) *That Council makes sewer reticulation mandatory for the proposed development.*
- (x) *That the mandated riparian buffer strips be extended to widths greater than normally required, to protect the environment of Saltwater Creek and its link to Batemans Marine Park, and to preserve the integrity of the Chain of Ponds features in the upper reaches of Saltwater Creek.*
- (xi) *That the Vegetation Management Plan specifically recognises the desirability of re-uniting the two identified EECs, to restore their bio-corridor function.*

**Additional Request:**

*RAI requests an opportunity to address the Council's Finance and Services Committee, if DA 73/13 is referred to the Committee for determination. RAI also requests an opportunity to address the Traffic Committee, when road and traffic matters for the proposed development are considered by this Committee.*

*Signed on behalf of the Committee and members of the Rosedale Association Inc.:*



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14 October 2012