

Re DA 0503/2020 86 Lindsay Street

There is a big question over this DA. In the Rare report, it says Lots 5 and 7: “The total storage capacity of the system has been designed to account for future development of Lots 5 and 7 with a predicted impervious area of 90%”.

Why is Lot 7 relevant to this DA? What it tells ratepayers and users of the Tamar River, is that it must be intended that there is more than just this one carpark or other development that will be covered in an impervious surface area of 90%. In this day and age, urbanisation like that with the addition of a large impervious surface into an area like Inveresk is extremely bad urban planning, goes against world best practice and should be rejected. It is actually worst practice urbanisation to add impervious surfaces to flood plains, let alone sub-tidal zones.

In relation to runoff and water storage and detention basins “the detention basin has been designed ...with gravity discharge via the existing stormwater connection through the flood levee and not through the combined sewer and stormwater system (which as we all know is a major problem), but rather directly to the North Esk River” – “DIRECTLY TO THE NORTH ESK RIVER’!.

So this carpark water runoff is to go into the river, a river already in trouble, a river in terrible need of rehabilitation, not **additional** urban stormwater runoff, of a piece of urban 90% impermeable surface with the dirty deed being hidden by the tide – that sounds like 19<sup>th</sup> century technology, and will further add to the woes of the Tamar River.

And with “the allocated space storage through flood levee” partial storage occurring within the carpark area, with discharge to occur at high tide levels’ it will be another 19<sup>th</sup> century stinky river solution – out of sight out of mind

This car park is new use for that site, so is subject to parts of the Launceston Interim Planning Scheme 2015 such as E11.0 Environmental Impacts and Attenuation Code , E11.1. Stormwater runoff as per the above-mentioned parts of the Rare document will be an environmental effect. The impervious surfaces of the car park will be adding stormwater from a car park where fuel leaks, rubbish etc will also gather and end up in the Tamar River via the stormwater.

**E11.1 Purpose of the Environmental Impacts and Attenuation Code**  
E11.1.1

The purpose of this provision is to:

- (a) ensure appropriate consideration of the potential for [environmental harm](#) or [environmental nuisance](#) in the location of sensitive uses; and
- (b) ensure the environmental impacts of new uses are eliminated, reduced or mitigated to avoid [environmental harm](#) or [environmental nuisance](#).

Obviously a car park of 115 vehicle spaces will involve traffic movement to and from the car park. The impact of this has not been included in the documentation.

The Traffic Impact Assessment for DA 0302/2020 for Willis St states “Land use developments generate traffic movements as people move to, from and within a development. Without a clear understanding of the type of traffic movements, (including cars, pedestrians, trucks, etc), the scale of their movements, timing, duration and location, there is a risk that this traffic movement may contribute to safety issues, unforeseen congestion or other problems where the development connects to the road system or elsewhere on the road network. A TIA attempts to forecast these movements and their impact on the surrounding transport network.

A TIA is not a promotional exercise undertaken on behalf of a developer; a Tia must provide an impartial and objective description of the impacts and traffic effects of a proposed development. A full and detailed assessment of how vehicle and person movements to and from a development site might affect existing road and pedestrian networks is required. An objective consideration of the traffic impact of a proposal is vital to enable planning decisions to be based upon the principles of sustainable development”

On the basis of sustainability, traffic flow, traffic management and the amenity of residents and businesses in the area, until such time as full supporting documents are provided to the Council – particularly in the interests of local amenity, transparency and accountability on the part of the applicant – the Council should not pass this DA

Jillian Koshin

Tasmanian Ratepayers' Association Inc.

COPY

EMAILED 28/09/20

*[Handwritten signature]*

28 September 2020

Mr. Michael Stretton  
General Manager  
Launceston City Council  
Town Hall  
St John Street  
LAUNCESTON TAS 7250

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By email to [contactus@launceston.tas.gov.au](mailto:contactus@launceston.tas.gov.au)

Dear Sir,

*E-COPY: D. PAYTON*

**Re: Representation DA0503/2020 86 Lindsay Street INVERMAY  
– Vehicle Parking – Construction and use of a carpark**

In making this representation we refer to the advertisement in the Examiner Newspaper on 12 September, 2020, which invites representations to be lodged by 5.00pm on Monday 28 September 2020.

The land upon which this application is proposed, is already partially developed before the determination of this Development is known. This causes ratepayers some concern as there appears to be a presumption that the approval of this discretionary planning matter is a fore-gone conclusion.

The land is also on a tidal flood plain and is subject to certain seismic activity risks. Not only does the seismic risk endanger the safety of any infrastructure that may exist or is proposed to be constructed there, but it also endangers the stability and durability of the Invermay Flood Levee system which allegedly is intended to make-safe the land area in question.

The objectives of the LUPA Act includes for sustainable development whereby in Part 1 **sustainable development** is defined as managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety while-

**2(c) avoiding, remedying or mitigating any adverse effects of activities on the environment.**

And in Part 2

**(f) to promote the health and wellbeing of all Tasmanians and visitors to Tasmania by ensuring a pleasant, efficient and safe environment for working, living and recreation, and**

**(i) to provide a planning framework which fully considers land capability.**

It is our general submission that CoL fails its ratepayers, citizens and visitors to Tasmania should it allow this unstable, flood prone and undesirable land to be further developed, and associated developments be supported by carparking, adding to the limited emergency resources when this flood plain area is forced to be evacuated in the event of flooding, inundation by sea level rises or climate change or such dangers and risks being compounded by seismic activity. The subject land area is often observed to be below river level, and that is without taking into account the impact of local weather/rain conditions prevailing.

The information that has been advertised in support of this application is inadequate and certainly less than Council has required for other developments.

The information does not contain any semblance of a Traffic Impact Statement, and yet the principle impact of this carparking proposal is carparking quantity and traffic flows to and from the site. The supplementary information provided to us upon our enquiry on this aspect by Council's planning staff, is confusing and doesn't justify why this information or an extract there-from, was not presented and advertised to the public. There will be an impact on traffic generation because of this development, and this will lead to a worsening of traffic congestion within the nearby street system and intersections that are already woefully overloaded.

It is not clear whether this will be a free carparking area, or whether there will be charges levied for parking. There is no information advertised as to operating hours, or night-time lighting levels, signage provisions et al.

The applicant suggests that the stormwater retention has been dealt with in the design, but we cannot agree that that is the case, particularly as it does not appear to be located within the boundaries of the advertised land.

In conclusion, we submit that this application should not be considered whilst the information we have queried her in our representation has not been publicly provided, and accordingly if a determination cannot be deferred, then it must be refused.

Yours faithfully,

*Lionel J. Morrell;*

President

For and on behalf of

**TASMANIAN RATEPAYERS ASSOCIATION INC.**

TO: The Mayor Albert van Zetten, Mr Michael Stretton, Councillors,  
Launceston City Council

RE: Development Application 0503/2020 Car park at 86 Lindsay St.

This DA is light on detail, especially for a “discretionary” application. There is only one supporting document and that is only two pages with a one page plan/diagram. There is no other information for the public or the Councillors to make an informed, transparent decision.

Because there is no traffic impact study for this carpark, does that mean that the carpark is for fly in fly out vehicles (in which case there would have to be an aerial flight path plan) No? So presumably the DA is for ordinary vehicles using Lindsay street and all access to the western end of Lindsay Street. This will mean even more traffic in the Lindsay-Goderich St areas.

So why has the Council accepted this DA up to this point without an accompanying Traffic Impact Study?

It looks like the application is for 115 spaces, but this actual number does not appear to be written anywhere. There is no mention of the actual number of carparking spaces, apart from some fuzzy numbers marked on the map. Why doesn't the DA mention the actual number of spaces, or is there something to hide? There is no mention of how many carpark users-pedestrians will be crossing the street to and from the car park,

What are the hours of operation? Will it be a fee-paying car park? Will it have a boom gate? Will it be closed to casual traffic at night so that there is no more 'hooning' than there already is in the area?

There are too many questions to be answered on this DA. The Council must not pass this deficient application.

A car park of that size will add to the already over-saturated traffic numbers. The council must stop adding more traffic to the Lindsay St – Charles St Bridge areas. It is time for the Council to wake up and stop adding more and more traffic to the Invermay-Inveresk areas.

Basil Fitch,

Former Alderman/Councillor,