

12 July 2021

TO: The Mayor Albert van Zetten, Mr Michael Stretton, Councillors,  
Launceston City Council, St John St, Launceston 7250

RE: Development Application 0229/2021

<b>Application ID</b>	DA0229/2021
<b>Application Description</b>	Bulky Goods Sales - Demolish existing buildings and construction of three showroom buildings
<b>Group</b>	Planning Development
<b>Category</b>	Discretionary Applications

<b>Property Address</b>	65-77 Gleadow Street INVERMAY TAS 7248
<b>Status</b>	Discretionary Development Application
<b>Council Minute</b>	
<b>Use Class</b>	Bulky Goods Sales

This Representation is on behalf of Launceston Concerned Citizens who are extremely concerned about the over-development and over-generation of traffic on the Invermay-Inveresk Flood Inundation Area. There seems to be no consideration of the actual situation as these discretionary development applications continue to be put forward for approval.

There is no public benefit in this development. If approved it will further disadvantage CBD businesses and draw people away from the CBD. The number of large stores of this kind that are being approved is placing stress on the few remaining locally-owned businesses that sell the same or similar range of products, – electrical, white goods etc. The Council's first duty should be to its locally-owned businesses, where the business interests and profits remain in Launceston, as opposed to the interests and profits of national franchise chains and/or invisible company shareholders.

Launceston Concerned Citizens are also concerned at the rate that discretionary DAs for the Flood Inundation Area continue to appear.

It seems as though the Launceston Planning Scheme is irrelevant in the minds of developers and that the discretionary aspect is a loophole used by developers and their supporters as the means to circumvent the Planning Scheme in relation to the Flood Inundation Area.

Launceston Concerned Citizens would like to remind the Council of the reasons behind the establishment of the Invermay Flood Inundation Code and Area. Those reasons have not changed, and now with the additional effects of ever-increasing rapid sea-level rise, the Council should be more cautious and not allow this DA to proceed. You, the Council, have the discretionary authority to place the interests and amenity of the local community ahead of further environmentally poor developments such as this one.

**TRAFFIC:** The Traffic Impact Assessment provided as part of the development application draws its conclusion that the “proposed development is supported on traffic and parking grounds.” This is not so. The exact opposite is the case. It is impossible to support this development on traffic grounds. The streets, intersections and bridges within the area covered by the TIA are already at capacity and/or already over-saturated. Below is just part of what the TIA itself says, and it shows the already high saturation volumes of traffic as they were two to four years ago at best.

... ●East Tamar Highway is subject to consistently heavy traffic volumes throughout the day, with two-way traffic flows typically exceeding 2,000 vehicles per hour between the hours of 7:00 am and 6:00 pm weekdays. Key traffic statistics for the section of the highway south of Forster Street have been estimated based on Department of State Growth traffic data dated **May 2019 as follows:**  
– **Average daily traffic 28,407 veh/day** – Weekday AM peak (8:00 – 9:00 am) 2896 veh/h  
– Weekday PM peak (4:00 – 5:00 pm) 2415 veh/h – Saturday midday peak (11:00 am – 12:00 pm) 2225 veh/h

... ●Traffic data was collected by Council from Wednesday 12 July to Tuesday 18 July 2017 \*(**NB 12-18 July 2017! Four years ago to the day!**) on Lindsay Street, east of the Bunnings site access. The data shows that traffic volumes on Lindsay Street peak during the middle of the day, with a maximum of around 1200 vehicles per hour (two-way) during the Saturday midday peak. Traffic statistics for Lindsay Street are summarised as follows: – **Average daily traffic 7056 veh/day** – Weekday AM peak (8:00 – 9:00 am) 300 veh/h – Weekday midday peak (1:00 – 2:00 pm) 842 veh/h – Weekday PM peak (4:00 – 5:00 pm) 673 veh/h – Saturday midday peak (12:00 – 1:00 pm) 1196 veh/h...

... ●Traffic volumes for Gleadow Street were obtained from SCATS traffic signal data for the intersection with Goderich Street, dated November 2020. Key statistics are as follows: – **Average daily traffic 2399 veh/day** – Weekday midday peak (1:00 – 2:00 pm) 244 veh/h – Saturday midday peak (11:00 am – 12:00 pm) 343 veh/h...

Then add them all together and add the increases since 2017 and 2019. And so it goes on – more and more traffic without due consideration of the long-term consequences. The TIA statistics are based on now-outdated information. The projected increases in the number of vehicle movements,

on top of the already saturated situation, are way beyond the capacity of the local area. The numbers of additional vehicle movements are unacceptable, particularly for residents and small locally-owned businesses across Invermay-Inveresk, who now do not even get a break from the traffic, noise and pollution on Saturdays or Sundays.

**Take note:** Travelling times for residents and businesses in Invermay-Inveresk to other parts of Launceston have more than doubled and in many cases tripled and quadrupled over the past two years. This is a cost to business with even short trips taking longer. It is also a cost to the environment with greater carbon emissions as vehicles are on the road for longer even though the distances are the same, and idling at traffic lights more frequently and for longer.

Big developments like the ones that have been approved across the area Lindsay-Goderich-Gleadow Streets should have been located on the outskirts of Launceston, in specially designed retail parks, not placed in what amounts to an enclosed high flood risk area with very limited access points, and where the services and access roads and bridges are also in the high flood risk area.

It is time that the Council and Councillors of the City of Launceston stood up for the citizens and their interests and amenity over the interests of a single favoured developer.

B. Fitch on behalf of Launceston Concerned Citizens and ratepayers and residents of Inveresk and Invermay.

[REDACTED]

[REDACTED]

Appendix

### **The domino effect of traffic in Invermay-Inveresk-Boland St-Lindsay St -Charles St Bridge area etc:**

The following question about traffic volumes was asked by a concerned member of the public at the Council Meeting on 17 June 2021 and was taken on notice and later answered by Mr Shane Eberhardt (General Manager Infrastructure and Assets).

The Question was in relation to the addition to the traffic if the Veolia waste recycling plant was to go ahead in Churchill Park Drive at the eastern end of Forster St.

THE QUESTION: “ In 2019, according to Pitt and Sherry, who were contracted by the developer, the intersection of Forster Street and Invermay Road was at .9 saturation during peak times. This was based on limited data which was gathered before the University of Tasmania carpark had been finalised and is inadequate to properly assess the impact of the combined developments of the University of Tasmania carpark and Veolia in an already congested area. A thorough study, open to public scrutiny and input needs to be undertaken before any development takes place. Why has the Council not produced a thorough, updated and independent study that the public could have confidence was best practice?”

The answer from the Council officer was generally unsatisfactory, but it did acknowledge that the UTas relocation would affect the traffic.


Part of that answer was: The City of Launceston is satisfied that the traffic impacts of this development will not adversely impact on the performance of the road network. The City of Launceston understands that **additional pressure will be placed on the road network as a result of the UTAS relocation.**

...

12 July 2021

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

RE: Development Application 0229/2021

	
<b>Application ID</b>	DA0229/2021
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As this is a discretionary DA, it can be rejected by the Council on behalf of the ratepayers and residents of Launceston.

Launceston ratepayers and residents and homeowners of Invermay-Inveresk should not have to suffer more traffic congestion and increased flood risk because of another big box development in the area.

The Traffic Impact Assessment should be enough to make Councillors count cars in their sleep. There must be a point at which the Council says that enough is enough in this already over-developed area with its already saturated level of traffic congestion.

The Council used ratepayers' money to commission the 2018 BMT Flood study, (which the council did not release until the end of January 2019, and without ever telling the Planning Commission during the 2018 Planning Commission hearings for Amendment 43 to weaken the Flood Inundation Code to allow the relocation of the Motor Museum to be relocated to the tidal/flood zone). The BMT study includes the projected effects of climate change. Therefore, the Council should be taking more notice of its **own** Flood Report than of reports commissioned by a developer. If it is the Council's practice to take more notice of a developer's commissioned report, then the Council must explain why it is ignoring its own Study. If the Council intends to take more notice of a

developer's report then what was the point of spending so much time and ratepayers' money on having such a thorough study carried out?

When is the Council really going to pay attention to the people and the community it is meant to represent instead of favouring one developer bringing in big box stores that have the potential to ruin locally-owned retail businesses trying to sell similar products.

Only a mad man, or people who despise local residents and ratepayers would approve this DA. I hope the Councillors don't fall into either category, but instead vote to dismiss this DA in the public interest and on behalf of ratepayers.

Basil Fitch,



12 July 2021

Michael Stretton  
General Manager  
City of Launceston Council  
P.O. Box 396  
LAUNCESTON TAS 7250

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

Dear Sir,

**Re: DA 0229/2021 Bulky Goods Sales – 65-67 Gleadow Street INVERMAY.  
Demolish Existing Buildings and Construction of Three Showroom Buildings.**

In making this representation we refer to the advertisement in the Examiner Newspaper on June 26, 2021, which deceptively identifies and advertises the subject land as 65-67 Gleadow Street, not by any observer of The Examiner newspaper, alerting to Goderich Street being the principle entrance with the new Link Road formation. We also note that the proponent on the drawings, actually identifies the site as 65-91 Gleadow Street.

We submit that this application has not been correctly advertised, and accordingly the provisions of the LUPA Act have not been met.

In any event, the advertisement may not have gained the attention of the public due to its identification as Gleadow Street, not also Goderich Street via Link Road (or is this called Jackson Street?), and accordingly there has been a lack of appropriate transparency regarding important planning and traffic management issues.

We again remind you that when Goderich Street was reconstructed and upgraded to become the Northern Outlet Highway, it was widely advertised that direct access to the new limited-access roadway would be prohibited, and this has been strictly enforced, until now (Example when the adjacent Fairbrother offices and depot was constructed).

Also the avenue of mature trees along the roadway was said to be important, and these mature and new trees, now removed, was to be maintained as improvements to the aesthetic quality of this principle highway entrance to the city.

We again submit that this construction of a slip road from Goderich Street and to cause the removal of nine mature trees, is in breach of important undertakings by statutory authorities. The road access is now proven to be compromised and completely overloaded with just access being provided to the initial 'Good Guys' development, and with three other showroom developments now being proposed, the already extremely congested road system will become even worse.

The shared pathway along the western side of Goderich Street is heavily utilised, not only by pedestrians, but exercisers/dog walkers/serious and also recreational cyclists including family groups with small children/wheel chair and motorised disability equipment/skateboarders/roller skaters anon. It was built to keep such users off the busy highway, and is an important commuter pathway and principle bikeway to and from the city for the northern suburb residential enclaves, University, Australian Maritime College, Launceston Church Grammar School/ Brooks High School and many factory and industrial/manufacturing operation in the northern suburbs area.

The diversion of the shared pathway at the junction of the proposed access road and round-a-bout whereby users must alight from their contrivances to utilise the proposed pedestrian crossing there, will cause a major hazard by such a diversion, with poor visibility and delays/backing up of traffic to be anticipated. There will be a significant risk of injury and potential loss of life anticipated.

The Traffic Study submitted makes no recognition of the shared pathway or the validity of the traffic on the pathway that will clearly be impacted upon.

We submit that it is a critical and important omission in the Traffic Impact Study that embarrassingly, disregards the type of traffic using the shared pathway.

Vehicular traffic entering the proposed new road from Goderich Street and the proposed new private Right of Way from Gleadow Street includes trucks and these will also be accessing yet-to-be disclosed developments in the remainder of the subdivided lots and developments westward (Lot 5 and also Lots 2&3 Gleadow Street) and afar. There has not been a detailed or competent assessment of such traffic imposts.

Traffic will back up along the Goderich Street sliproad and potentially into the main traffic lanes, (contrary to past assertions to the contrary) and there is no method of preventing it from doing so and obstructing highway through-traffic.

This will in no small part be due to the give-way-to-the-right traffic rule for roundabouts, with traffic also approaching from the western end of the proposed new road, as well as traffic leaving the existing 'Good Guys' carpark itself. For reasons unexplained, traffic from the other proposed development Lots, is excluded from consideration.

We submit that the Traffic Impact Study is incomplete and doesn't recognise or satisfy the full range of traffic sequences or movements or types of vehicles, including bicycles and other devices that may be anticipated.

There are detailed covenants granting Taswater access over the new Link Road roadway entrance in order to maintain/replace pipes and services. This will cause inevitable obstruction /disruption to traffic flow and potentially cause considerable costs and congestion to traffic and pedestrian movements.

We submit that the TIA is a self-serving document that does not independently or faithfully expose or resolve all relevant traffic matters and cannot be relied upon.

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. This application continues to promote out-of-date flood risk modelling stating 1:200 years instead of the present 1:100 years. This is not low risk and only likely to occur at a time beyond the life cycle of the proposed building structures, to the contrary the expression 1:100 years DOES NOT mean that such a flood will only occur once in one hundred years, as has been publicly stated by several Councillors.

A **one-hundred-year flood** is a flood event that has a 1 in 100 chance (1% probability) of being equalled or exceeded in any given year.

The 100-year flood is also referred to as the 1% flood, since its annual exceedence probability is 1%. For coastal or lake flooding, the 100-year flood is generally expressed as a flood elevation or depth, and may include wave effects. For river systems, the 100-year flood is generally expressed as a flow rate. Based on the expected 100-year flood flow rate, the flood water level can be mapped as an area of inundation. The resulting floodplain map is referred to as the 100-year floodplain. The common misunderstanding is that a 100-year flood is likely to occur only once in a 100-year period is incorrect. In fact, there is approximately a 63.4% chance of one or more 100-year floods occurring in a 100-year period.

The Flood Emergency Plans by Pitt & Sherry are all clearly marked DRAFT, and accordingly cannot be relied upon in the assessment of the present Development Applications. We note that the advice by Pitt & Sherry is that floor levels for new buildings to be constructed on the subject land ought to be 5.9M AHD, however the proposed buildings fail to comply, and by our reading will only be **0.5M AHD**.

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, when prudent and feasible alternatives are available, if not elsewhere within the Central Launceston area, then on a site(s) that has already been established and contains substantial infrastructure and is surrounded by significant community resources, and does not suffer from an inability 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.

Similarly, we note that the memo from Pitt and Sherry dated 15 July 2010 regarding Seismic Risk, has never been produced to the public.

We submit that there is a significant and unacceptable future risk to public compensation should the Statutory Authorities allow further capital investments in the flood areas of Launceston.

We submit that the landscaping, tree planting and beautification of this development is minimal and virtually non-existent, and ought to be required to include some large mature trees.

Accordingly, we implore that this Development Application be refused, which furthermore cannot in any event be in the interests of present retailers operating in Launceston.

Yours faithfully,

|

[Redacted signature]

For and on behalf of

**NORTHERN TASMANIAN NETWORK PARTNERS & ASSOCIATES**

Enc. NOTE: Previous Local Government Association Publications provided by separate cover, and now this latest publication forming part of this representations concerning Retreating from sea level rises and flood plain developments.

## **AUSTRALIAN LOCAL GOVERNMENT ASSOCIATION**

### **Call for retreat on floodplain development in Sydney**

The NSW government should offer to buy back thousands of homes in flood-prone areas of Sydney's west to reduce disaster response and recovery costs, the Committee for Sydney has said.

The urban policy think tank said scaling back development in the floodplain would move people out of harm's way and reduce growing pressure on our emergency services agencies.

Insurance costs associated with last month's flooding in western Sydney are forecast to rise to as much as \$2 billion.

"As residents, businesses and governments face the stark reality of rebuilding and reestablishing homes, farms and businesses in this increasingly hazard-prone location, we have an opportunity to use that money differently to support [them] for the long term," the Committee said.

A voluntary purchasing scheme funded and set up by the state government would provide a mechanism for residents to sell flood-risk properties at market rates.

Any land bought back by the government would have its ownership transferred to Landcom or Western Sydney Parklands Authority to be managed consistent with designated land uses, the Committee said.

In a statement "Building back better may mean building back somewhere else", the committee said that after the **2011 Brisbane floods, the Brisbane City Council** had introduced a voluntary home purchase scheme to break the cycle of disaster and recovery.

Seventy-three flood-affected private properties across Brisbane had been bought for \$35 million and transformed into parklands, green space, conservation areas, or green links to bikeways.

"It's time for Sydney to look at a long-term plan to reduce the cycle of disaster, response and recovery that continues to test the safety and resilience of at-risk communities and stretch the resources of our emergency management agencies," the committee said.

**From:** "Leigh Murrell" [REDACTED]  
**Sent:** Mon, 12 Jul 2021 12:47:20 +1000  
**To:** "Council" <Council@launceston.tas.gov.au>  
**Subject:** DA 0229/2021  
**Attachments:** DA0229 2021.pdf

Hello,  
Please find attached my representation for the above DA and forward it to the General Manager and all Councillors.  
Thankyou  
Leigh Murrell

To: The General Manager,  
Michael Stretton and all Councillors,  
Launceston City Council  
Monday 12th July 2021

DA0229//2021

I wish to register my strong opposition to DA0229/2021 - Bulky Goods Sales - Demolish existing buildings and construction of three showroom buildings. 65-77 Gleadow Street INVERMAY TAS 7248 - Lot 1 RP 177138 Vol 177138 Fol 1 - Discretionary Applications.

As we have all become too quickly aware, there are serious, ongoing and unsolvable traffic issues impacting the whole of this area. Further misplaced and unnecessary development will have two major ongoing consequences which may have already been mismanaged so completely that they may never be able to be restored to any level of sanity for the community. Council's comprehensive mishandling of the traffic issue to date has further contributed to the chaos caused by an ever growing population. This is of course the age old mistake of wanting more and more ratepayers before workable infrastructure is in place.

The second outcome of the current and insatiable push for permits by a favoured developer, who is so confident that Council will approve whatever he wants, is that he regularly begins construction before any DAs have been lodged let alone approved. The ongoing construction of "Big Boxes" on this floodplain is perhaps an even greater failure by Council because it highlights a total incapacity to care and provide for existing businesses and for what should be the heart of the City, that being the Brisbane Street Mall which, if it was human, would be rushed off to emergency for an immediate organ transplant because it is dying, if not dead already. And yet, Council continues to approve developments on the periphery of town or support fanciful notions such as that marketed by UTAS when it was initially claimed that it would provide thousands of students who would march into the city in huge numbers and energise the heart like some massive pace maker. How much longer must you push down this path of failure before you become cognizant of the incompetence of these decisions? Have you heard of the Dunning-Kruger effect? You should look it up.

Finally, let's once again visit Council's declaration of a "Climate Emergency". Let's put to one side that this declaration smacks suspiciously of being more like being seen to be doing something rather than actually doing anything positive about this approaching crisis. Council cannot make a statement such as that without also meeting the inherent responsibilities or being aware that they have opened themselves up to all possible liabilities, which means a liability you have also dumped onto the community in terms of the cost. When the area does flood (and we all know it will), and the flood will be made worse by every square meter of hard surfaces you are approving in this area, it will be inaccessible potentially for weeks or months. It will be very interesting to see who will make claims and who will expect Council to pay for encouraging and approving numerous developments and for not taking adequate measures to protect against the foreseeable impacts of the Climate Change.

I therefore urge Council to totally reject DA0229//2021 because it is not in the best public interest, it will further add to the already detrimental effect of the poor traffic management plan. It will further impact on the viability of the centre of the City. It will expose Council (and possibly individuals) to potential and very costly litigation by site occupiers whose location has also been approved by Council (possibly under the notion of full protection afforded by what is in reality, a limited levee bank system). How these sites are covered by insurance is an interesting question in itself but you can guarantee that those Insurance Companies will be looking for a scapegoat and the LCC is wearing a sizable target on its chest.

Yours Sincerely  
Leigh Murrell

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