

Council Meeting - Agenda Item 9.4 - Attachment 3  
Representations - 81 Gleadow Street Invermay - 23 September 2021

**From:** [REDACTED]  
**Sent:** Mon, 30 Aug 2021 14:13:03 +1000  
**To:** "Contact Us" <contactus@launceston.tas.gov.au>; "Michael Stretton" <michael.stretton@launceston.tas.gov.au>  
**Subject:** Representation DA 0365/2021 Bulky Goods Sales 81 Gleadow Street INVERMAY 30 Aug 2021  
**Attachments:** NTNP&A Representation DA O365 2021 BULKY GOODS SALES AND STORAGE 81 Gleadow St Invermay.pdf

Please see attached representation  
Northern Tasmanian Network Partners & Associates.

30 August 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 0365/2021 Bulky Goods Sales – 81 Gleadow Street INVERMAY.  
Bulky Goods Sales and Storage – Construction of two warehouses and retail showrooms, associated car parking, landscaping and signage.**

The proponent cites at 2.1 that “The subject site is contained within Certificate of Title 117138/3”... and goes on to state that “*A copy of the titles is contained in APPENDIX A.*”

However, Appendix A is BLANK apart from the heading.

It is not incumbent for members of the public to undertake Title searches or to locate such missing information. The advertised documents say that the Title Plan is provided, but in fact it hasn't been included, and any restrictions or limitations concerning the land, is unknown.

In making this representation we refer to the advertisement in the Examiner Newspaper on August 14, 2021, which identifies and advertises the subject land as 81 Gleadow Street, not by any observer of The Examiner newspaper, alerting to New Road being the principle entrance to the second Showroom/Warehouse, and exit for heavy vehicles leaving the site from BOTH proposed warehouses.

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

SITING - At 23.4 the proponent refers to a ‘Doyme Street frontage’ but such a street is not positioned on any plan or noted as such. The proposed development is apparently deficient in setback from this Doyme Street.

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 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 multiple other showroom developments now being proposed and developed, 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 new road from Goderich Street; the proposed new private Right of Way from Gleadow Street, and traffic from Lindsay Street and Bunnings (is this Done Street or is it Jackson Street) includes trucks and these will also be accessing a number of evolving developments in the remainder of the subdivided lots and developments westward and afar. There has not been a detailed or competent assessment of such traffic impacts for the development precinct.

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 development Lots, is excluded from consideration.

**TRAFFIC IMPACT ASSESSMENT** - We submit that the Traffic Impact Assessment 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.

At 1.5, the traffic engineer states ***“The subject site and surrounding road network is shown in Figure 1.”***

Regrettably, Figure 1 does NOT show the road constructions existing from Goderich Street adjacent to Bunnings and several other big box developments, or make necessary and comprehensive assessments of the traffic impacts of all of these developments.

At 2.1, the Transport Network appears to be limited to just Gleadow Street and the (unidentified) Doyne Street. It ignores other streets and access from Goderich Street that presently exist and will also serve this development site.

The impacts on these other streets and roadways and intersection and traffic regulation features such as round-a-bouts and traffic light intersections, are ignored and the impacts on traffic congestion within the overall network and on the major Goderich Street/Northern Outlet Road thoroughfare, is completely disregarded.

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 (contrary to the assertion that it ought NOT be a '*marketing document*' that does not independently or faithfully expose or resolve all relevant traffic matters and cannot be relied upon.

**FLOOD RISK AND SEISMIC IMPACTS** - The land is also on a tidal flood plain (probably very close to the **lowest point of Inveresk below high tide level**) 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 for other related developments within the development precinct are, as previously alerted in other submissions and representations, all clearly marked DRAFT, and accordingly cannot be relied upon in the assessment of the other or this 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 at FL 1.900, 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 acknowledge in this instance, that the landscaping, tree planting and beautification of this development is a welcome improvement on the otherwise minimal and virtually non-existent landscaping and tree planting for other nearby developments.

Accordingly, we implore that this Development Application be refused, which furthermore cannot in any event be in the interests of State of Tasmania, its taxpayers, and the City of Launceston Council, and its ratepayers, in terms of the accruing significant compensation that will undoubtedly be payable, should this development be impacted upon by flood or seismic damage.

Yours faithfully,

Lionel Morrell

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.

30 August 2021

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

RE: Development Application 0365/2021

<b>Application ID</b>	DA0365/2021
<b>Application Description</b>	Bulky Goods Sales and Storage - Construction of two warehouses and retail showrooms, associated car parking, landscaping and signage
<b>Group</b>	Planning Development
<b>Category</b>	Discretionary Applications
<b>Applicant Name(s)</b>	Loop Architecture
<b>Status</b>	Current
<b>Closing Date</b>	30/08/2021

**Property Details**

<b>Property Address</b>	81 Gleadow Street INVERMAY TAS 7248
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This Representation is on behalf of Launceston Concerned Citizens and residents, 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.

Launceston Concerned Citizens and residents 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.

The Traffic and Parking report for this DA cannot be taken in isolation. It can only be seen in conjunction with all previous DAs for this area and in conjunction with the future intended Skyline Roofing development, all of which are adding even more to the over-saturated traffic congestion along Goderich St and beyond to Charles St bridge and Forster St intersections.

And so it goes on – more and more traffic without any due consideration of the long-term consequences. Projected increases in the number of vehicle movements, on top of the already saturated situation, are way beyond the capacity of the local area, irrespective of whether Randall Heating already operates at its current Invermay Road address.

**Note:** Travelling times for commuters, 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.

These big developments should never be 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]

**From:** "Basil Fitch" [REDACTED]  
**Sent:** Mon, 30 Aug 2021 15:22:47 +1000  
**To:** "Contact Us" <contactus@launceston.tas.gov.au>; [REDACTED]  
**Attachments:** DA 0365-2021 BulkyGoodsSalesStorage(Randalls) Basil Fitch 28 August 2021.docx, Representation DA 0365-2021 RandallsHeatingBulkyGoodsSalesStorage 30 August 2021 Launceston Concerned Citizens.docx

Dear Council Staff,

I hope you are well. I have attached my representation on DA 0365/2021. Could you please also attach the **PS to my representation**, as I would like it included with my representation, thanking you kindly.

I have also attached the representation of the Launceston Concerned Citizens association. .

Yours faithfully,  
Basil Fitch.

**PS to my attached representation:** As I said in representation on DA 0315/2021, surely it must be time for this flood plain-subtidal zone over-development nonsense to stop. When there is another flood emergency, it will be a huge strain on the resources of the SES and all evacuation activity.

I also asked if council staff members had seen this council flood survey that was sent out to people in Invermay and Boland St, under Mr Jamieson's name? It made many people very angry once they realised that it wasn't actually a joke. <https://yourvoicelyourlaunceston.com.au/levee-protected-areas> <https://survey123.arcgis.com/share/441d306d8d49415286d62af800884d09>

Basil Fitch, [REDACTED]

28 August 2021

TO: The Mayor Albert van Zetten, CEO Mr Michael Stretton and Launceston City Councillors,  
RE: DISCRETIONARY Development Application 0365/2021 for Randall Heating

<b>Application ID</b>	DA0365/2021
<b>Application Description</b>	Bulky Goods Sales and Storage - Construction of two warehouses and retail showrooms, associated car parking, landscaping and signage
<b>Group</b>	Planning Development
<b>Category</b>	Discretionary Applications
<b>Applicant Name(s)</b>	Loop Architecture
<b>Status</b>	Current
<b>Closing Date</b>	30/08/2021

#### Property Details

<b>Property Address</b>	81 Gleadow Street INVERMAY TAS 7248
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As this is a discretionary DA, the Council can use its discretion and the DA 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.

Although the business intending to use this building already exists on Invermay Road, the addition of yet another building and hard surfaces on the flood plain means that overall effect will be to add to the traffic congestion, and to the amount of stress on the combined sewerage-stormwater system, not to mention increase the potential flood risk damage and overstressing the evacuation and emergency services.

The Council seems to think that evacuations and the capacity of the emergency services are finite can be extended and added to ad infinitum.

Judging by the Council's continuing approvals of big box and other developments in Inveresk and Invermay, it seems that in relation to flood risk and evacuation, the Council had no understanding of or regard to what the actual situation was already in 2016.

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 so-called 'Flood Study' included with the DA, acknowledges that in a 1/100 year event of a levee break or overtopping the property would be under 3.4m of water. It doesn't mention even higher water levels in this age of rising sea levels and increasing severity of climate events.

Of more concern is that the DA's 'Flood Study' claims, "The flow velocities are likely to be low to medium and not a risk to life." That is a misreading of the BMT report that the Council itself commissioned.

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 or so-called 'Flood Studies', 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 discretionary DA. I hope the Councillors don't fall into either category, but instead use their discretion and vote to dismiss this DA in the public interest and on behalf of ratepayers.

Basil Fitch, 