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**Your ref: DOC/23/113905 Tasmanina Planning Scheme – Glenorchy
Draft Amendment PLAM-22-04
Central Business Area**

At the Tasmanian Planning Commission Hearing on 21 September 2023, Council stated that this amendment did not include the re-zoning of all the Council-owned Car Parking in the CBD and that they were already zoned Central Business.

How is it possible to prove what the Council states is accurate and that this amendment does not include re-zoning of the Council-Owned Car Parks? I have enquired with GeoData Client Services who have stated they only keep information on current zoning and have requested I contact the Glenorchy City Council. It appears that the Council supplied zoning data to create Tasmanian Planning Scheme Zoning from 26th June 2020 and revised data could be provided by 17th May 2023. What probity process was undertaken to verify the accuracy of data provided by Councils? Could re-zoning errors have been made in the data provided? Zoning is closely connected to land values and property speculation and there can be serious implications if councils provide inaccurate information. It appears inconceivable that all this property could have been historically zoned Central Business in the recently defined boundaries of this zone.

Council's Disposal of Council Land Policy states:

"Council, through the development of property strategy, will identify surplus land no longer required for community use or future operational requirements and may consider disposing of those properties to raise revenue."

It is evident that all council owned car parking properties must be protected from in the Amendment-22-04. Why have the car parks been included in this Amendment and why won't council protect them from apartment development? The Greater Glenorchy Plan outlines actions that are in direct conflict with statements made by the Glenorchy Planning Authority including the need to rezone properties in the CBD to allow apartment development (refer Page 35-36)

The Greater Glenorchy Plan states it will seek to

- Review and **rationalise on-street parking where required to create additional traffic lanes.**

Changes in land use

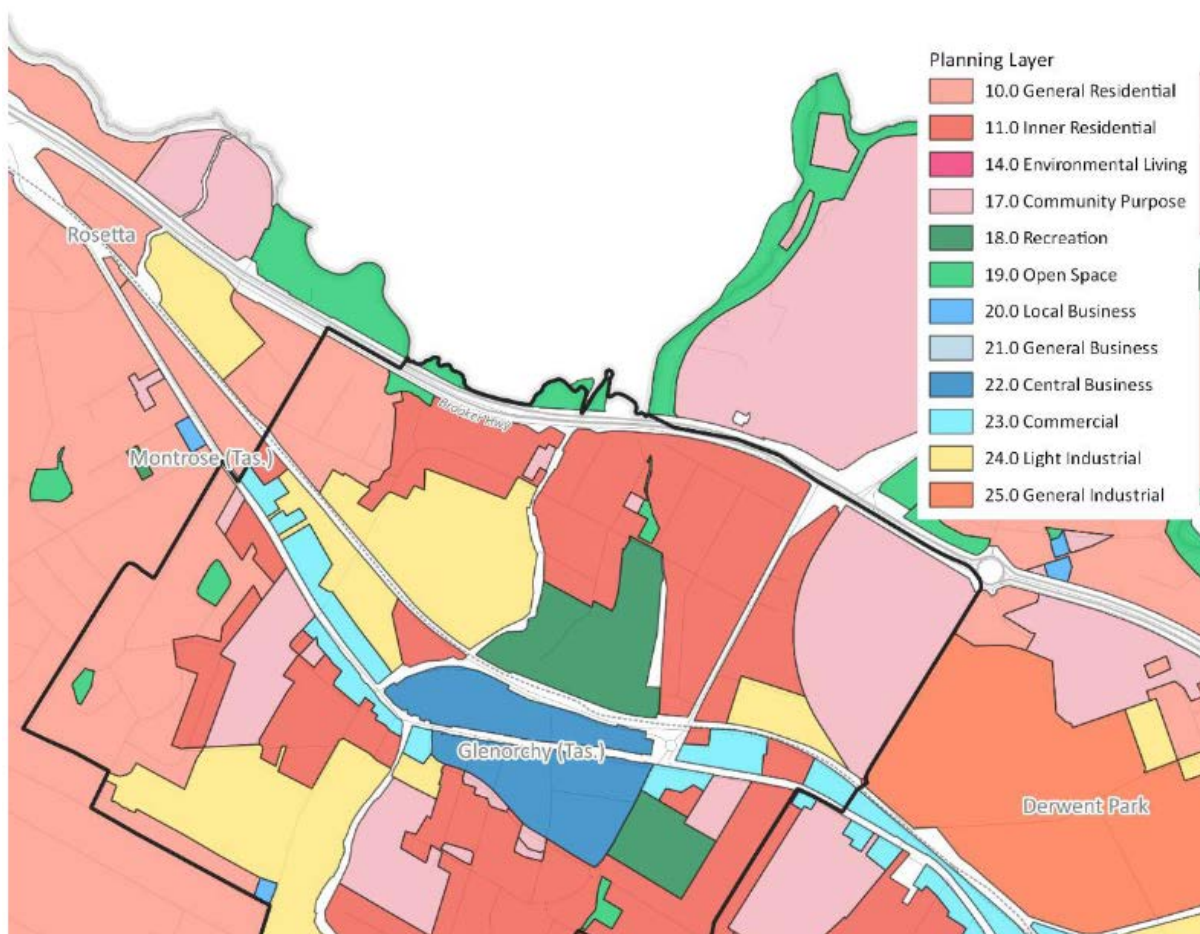
- Increase inner city residential densities
- Increase development along transit priority corridors and around transit hubs

Walking, cycling and connections to **public transport are prioritised where possible over cars and car parking.** (GGP Page 36)

Glenorchy CBD is expected to diversify away from being a traditional retail centre to a broader service centre aligned with its primary activity centre function. **Key employment industries emerging are in health, accommodation and food services, rental services, and professional services.** This shift in employment industries is happening at a faster rate than the Greater Hobart average. (GGP Page 40)

Where will all the employees, patients and customers and new apartment residents park when this broader service centre is created along with the loss of off-street car parks, and rationalisation of on-street parking?

The boundary for the Glenorchy CBD was determined through desktop review and considers the planning scheme, the location of businesses through Google data as well as the geometries of Hobart's Small Area Land Use Projections (SALUP) travel zones polygons.



Precinct plan actions: (Refer to page 60 for more info)

Deliver:

- Action 4:** New pocket parks to define 'green' entrances to CBD
- Action 5:** Consider rezoning to encourage infill residential development
- Action 9:** Encourage redevelopment of 'gateway' sites
- Action 18:** Planning Scheme amendments to assist delivery of GGP
- Action 21:** Analyse and rezone land to increase residential/job density

Advocate:

- Action 6:** Redevelop Glenorchy Central precinct
- Action 13:** Encourage 'high street' built form along Main Road

Partner:

- Action 10:** Ideal location for new integrated transit hub
- Action 20:** Explore options for better use of Council-owned land

Greater Glenorchy Plan(GGP) Page 60

Deliver	4	Consider removing car parking and creating new pocket parks on Council-owned land (10 & 11 Tolosa Street, Glenorchy) to soften transition between adjacent residential areas and the precinct while providing for traffic calming and a 'green' entrance from Tolosa Street.	Medium term	Glenorchy City Council
Deliver	5	Consider rezoning Council-owned land at 9-11 Mill Lane and 8 Terry Street to create opportunity for mixed-use / infill residential development.	Medium term	Glenorchy City Council

The GGP states "Consider removing car parking and creating new pocket parks on Council-owned land (10-11 Tolosa Street...)". It must be pointed out that these two tiny areas provide a small number of car spaces if you refer to the map. They are already fully utilised at present.

Greater Glenorchy Plan Page 61 states:

"A short-term plan: Investigate amending the planning scheme to include a specific precinct parking plan that reduces the requirements in relation to on-site parking."

The Glenorchy Planning Authority intends to reduce requirements for property developers to provide on-site parking for residential apartments.

Therefore, in addition to the maximum use of existing available car parking in the CBD at the present time, a disastrous situation will be created by this SAP provision.

Another Council Car Parking property at 345 Main Road PID (1826090) in the CBD precinct was previously rezoned from Utilities to Central Business Zone and property speculation related to this amendment is already occurring as it is identified as a gateway site for development.

The Council stated Amendment-22-04 does not include rezoning of any of the Car Parks but only a small amount of land in front of businesses on the Main Road. The Planning Authority stated at the Hearing that they could already build apartments on the Car Park if they wanted to. This does not

appear to be accurate unless the rezoning occurred without due process when the zoning data was uploaded into the Tasmanian Planning Scheme from June 2020 with the ability to be revised up until 17 May 2023. The probity surrounding this process requires further investigation before the Amendment-22-04 is passed by the Tasmanian Planning Commission. There is a need for verification of the information supplied by the Council for uploading into the Tasmanian Planning Scheme.

There is no proof to verify statements made about the current zoning of the council-owned Car Parks uploaded into the Tasmanian Planning Commission Zoning.

The documents related to the sale of the Mill Lane Car Park indicate this Car Park (aka Barry/Regina St Car Park) needed to be rezoned to allow apartment development as part of the sale conditions voted on by Council on 28th September 2020 (Refer attached documents). This appears contrary to the GPA statement.

As the Council documents indicate there was an intention to rezone the Barry/Regina Car Park prior to disposal (refer attached documents) to allow residential apartments but the statement by Council at the Hearing on 21st September indicated all car parks were already zoned Central Business. This appears contrary to the GPA statement made.

Another Council Car Parking property at 345 Main Road PID (1826090) in the CBD precinct was previously rezoned from Utilities to Central Business Zone and property speculation related to this amendment is already occurring as it is identified as a gateway site for development.

Also, as advised at the Hearing, it appears highly irresponsible of Council to dispose of car parking that is needed for the Glenorchy Health Centre medical practitioners, staff, sick and elderly patients as well as families and young children attending the Parenting Unit at the Centre. This is a highly used and essential primary health care facility servicing patients from as far as the Central Highlands. It appears the Council did not assess the current car parking needs and usage before proceeding vote to sell this particular Car Park. The Council by voting to sell this Car Park has not acted responsibly and has not acted in the best interests of the community. To add to this travesty, the only other car parking area directly beside the Glenorchy Health Centre is now being proposed for re-zoning to allow apartments. Despite Council statements saying they are not disposing of car parks the documentary evidence in the Greater Glenorchy Plan states the opposite and they have already set the precedent by voting to dispose of the first car park. (Refer Attached)

The real questions to be asked is about the Council's responsibility to support the delivery of Health Care at the Centre when they promised Council Car Parking would be made available to approve the Development Application. When I raised this issue at the Hearing, Council stated there was no legal contract to bind this decision. The issue is that there is documented proof that this occurred, and even verbal contracts are binding on responsible authorities. These actions appear to be highly irresponsible and against the provisions of the *Local Government Act 1993* and other Planning Legislation as well as the *Disability Discrimination Act 1992*, *Health Service Act 2018* etc.

Under the *Tasmanian Health Service Act 2018*, how does the Glenorchy City Council fulfill its obligation to support the provision of Health Services when it is renegeing on its documented promise to provide public car parking spaces due to the shortfall under the planning rules at the time when the Development Application was approved in 2014?

Below is the current proposal by the Glenorchy City Council to re-zone another area of critical car parking needed by the Health Centre and local businesses without providing any definite alternative

car parking plan to meet community needs. This proposal is detrimental to the existing activities in this zone also.

Mill Lane Precinct Review ‘The Mill Lane Precinct’ (*Figure 1* below) is being reviewed for a potential planning scheme change. The change would allow for a mix of uses, including housing, while keeping existing businesses. We would like to hear your views before we decide whether to progress the project to the next stage.

The Mill Lane Precinct could be a vibrant precinct with mixed-use opportunities, including housing, that would support the Glenorchy CBD.

The current zoning of the precinct is Light Industrial and Commercial. This is no longer suitable next to the Glenorchy CBD and Residential area due to the impacts of the types of uses allowed in the Light Industrial Zone. These zones do not allow Residential use, which is a lost opportunity for housing given the prime location next to the CBD area and nearby amenities.



Figure 1: Sites considered as the Mill Lane Precinct highlighted in red

“The Greater Glenorchy Plan(GGP), adopted by Council In February 2021, refers to reducing car movements and car parks and recommends considering converting the car parks at 9-11 Mill Lane and 8 Terry Street, Glenorchy to housing.....However the GGP vision document and while the GGP has been adopted, all the actions require full investigation.....” (Statement from Council document)

However, it can now be proven with the disposal of the Barry/Regina Street Car Park was unanimously voted to be sold at a number of meetings and Council ignored the submission of petitions from a total of 3000 users of the Car Park.

Community consultation and petitions appear to be just paper exercises to be ignored. There has been no due diligence shown or investigation undertaken regarding an alternative plan for car parking provisions for the community. There is no way for this community to stop what is occurring and the detrimental consequences of what is outlined in the Greater Glenorchy Plan if this Amendment is passed in its current form.

The Parking and Sustainable Transport Code LP 1.7 requires the LPS to have a parking precinct plan overlay within its municipal area. An up-to-date analysis of the consequences of the Planning Amendment-22-04 has not been undertaken and this was confirmed by the Glenorchy Planning Authority at the Hearing. This Planning Amendment cannot proceed to be passed without a CBD Precinct Parking Plan. The unacceptable risks to the welfare of the community are profound.

Alternatively, this Planning Amendment should not proceed unless council-owned Car Parks are re-zoned to protect the loss of amenity for people who need to frequent the CBD to access essential services and businesses and the Health Centre on a regular basis until a comprehensive and expertly developed Precinct Parking Plan is available and implemented.

Glenorchy is a growing city of 54,000 people and to think everyone can ride bikes including young children and the elderly is completely denying reality. Adequate off-street car parking is essential to ensure the safety and accessibility to services required for people to go about their busy, hurried and often stressful lives. Trying to get children and babies out of cars parked on busy narrow streets is highly dangerous on streets and off-street parking is essential for them and the safety of everyone opening doors onto the busy narrow roads. The provision of bike lanes on narrow streets not designed for them is also causing on-street parking to be even more dangerous with cars being parked closer to passing traffic. Adding to this stress by denying suitable parking is completely irresponsible of the Local Government Council by placing people at increased risk of harm. Housing should be provided elsewhere such as the McKay Timber Yard etc. This is an essential amenity and council does not appear to have regard for the welfare of the community and has not undertaken due diligence to provide an alternative plan after the loss of the public car parking amenity. Ignoring the safety issues associated with this is also completely unacceptable for a Local Government Authority. The 22/04 explanatory document states:

“A detailed analysis of the activity centre was recently undertaken as part of the Greater Glenorchy Plan (GGP). That work identified key features of the activity centre which has.....

- Large areas of underutilised land
- Extensive, underutilised parking and generally alienated pedestrian movement”

These statements are not based on factual evidence. If the Commission looks at maps of the CBD area there are no large areas of underutilised land. Stating there is extensive underutilised parking is also not based on factual evidence. The off-street car parks are used near to capacity. The Glenorchy City Council confirmed they had not assessed car parking requirements in the CBD and therefore these statements should not be made when presenting documents such as this. This demonstrates a serious failure to consider the welfare of the community.

Zoning to protect the CBD publicly-owned car parking should be introduced if the zoning claimed by the Council can be substantiated prior to the records being uploaded into the Tasmanian Planning

Scheme. Alternatively, this Planning Amendment should be rejected to protect the community from the proven irresponsible failure of the Glenorchy City Council to develop a Parking Strategy in conjunction with the Amendment-22-04. Council has failed to respect the needs and welfare of the thousands of residents of Glenorchy requiring to go about their daily lives and access essential services in this busy long established CBD area.

The provisions of a SAP are to be consistent with the purpose of the underlying zone and should not be detrimental to the existing activities occurring in accordance with the applicable zone. The applicable zone provided long established car parks and this SAP is highly detrimental to the existing activities that support the welfare and need for the community to access CBD Businesses, Services and Primary Health Care etc.

Yours sincerely

Janiece Bryan