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Dear Peter

TOWNSVILLE OCEAN TERMINAL

Section 2.3 of Council's Response to the Townsville Ocean Terminal Environmental Impact Statement quotes extensively from the report by C&G Horman dated 11th December 2007 entitled "Breakwater & Associated Developments". That report has therefore been reviewed.

THE HORMAN REPORT

The Horman report concludes (in Section 10) that without the FDA, the existing road network can accommodate development of the entire Breakwater area (except for the FDA) with only relatively minor upgrades.

All relevant parties agree that the intersection of Flinders Street and Denham Street is a key intersection within the Townsville CBD street network. In fact, the report by SKM dated October 2004, a copy of which forms part of Council's response, states in Section 2.4.2 that the Denham Street-Flinders Street East signals are currently operating close to their capacity It is likely that this intersection will be the major constraint on the capacity of the road network in this area.

The Horman report (in Section 7.1) effectively accepts the validity of that SKM finding: it states that there is little spare capacity in the Flinders Street - Denham Street intersection.

The Horman report, in dealing with morning peak hour flows, suggests the following traffic movements at the Flinders Street - Denham Street intersection:

APPROACH	Existing	Design (no Ross Creek bridge, no FDA)
Denham Street (north): Denham Street (south): Flinders Street East:	549 753 253	823 1254 319
TOTAL:	1555	2396

That is, the Horman report documents an expected increase in total peak hour traffic movements through the intersection, without the FDA, of 54%.

Section 7.1 of the report indicates that congestion at the Denham Street - Flinders Street intersection will cause traffic to divert to other routes: that is, the intersection will be operating at or above capacity. The Executive Summary is also clear in stating that even without the FDA:



there will be increased congestion in the CBD and reduced amenity in Melton Terrace, Cleveland Terrace and The Strand. If the mall were reopened to traffic and Flinders Street redeveloped then it is possible that the (existing) road network would be inadequate to accommodate traffic moving to and from the Breakwater Area.

The "redistribution of traffic from the Flinders Street - Denham Street intersection" implies a level of congestion which in relation to other investigations has been considered an anathema by either or both Main Roads or Townsville City Council.

The C&G Horman report also contains a number of matters which do not withstand detailed technical scrutiny:

- (i) It takes no account whatsoever of general growth in and around the Townsville CBD. It ignores known proposals to upgrade both the rail yards, to redevelop parts of Flinders Street and Ogden Street and to construct major retail developments in the immediate vicinity of the mall. That is, it makes no provision whatsoever for and takes no account of general traffic growth attributable to on-going growth of Townsville generally and of the CBD and its immediate environs in particular.
 - That current growth trends in Townsville are both high, and expected and desired to continue, is exemplified in the "Townsville Economic Gateway" document, which refers to a 9% per annum economic growth rate over the past decade and expresses the view that "it is important that development is managed to ensure the key drivers of prosperity are sustained." It points out that "revitalisation of the CBD is underway. Within the decade the CBD will be transformed with significant new residential, retail, hospitality and cultural development."
- (ii) the report relies on traffic generation rates for detached dwellings based on suburban data. When the obvious very high socio-economic standing of likely residents of the development is taken into account, that data is obviously irrelevant. It is disappointing that the report did not address the findings of surveys of similar residential developments contained in the report prepared by this practice.
- (iii) the directional distribution of traffic generated by the FDA as assumed by C&G Horman is set out in Section 7 of the report. It assumes 80% of the traffic flows generated by the development will have destinations in the Abbott Street, Charters Towers Road and Woolcock Street corridors. Again bearing in mind the very high socio-economic standing of likely residents of the development, this is a remarkable assumption. What forms of development are there which would encourage very wealthy, probably partially retired, empty-nester residents of the FDA to travel to those corridors? It is far more likely that trips from the FDA area would be made to bridge clubs, professional offices and retail opportunities within the CBD and to social events in the area served by The Strand.

When these matters and growth intentions are taken into account, the only possible interpretation of the analysis reported by C&G Horman is that some relief to the general CBD road system, and the critical Denham Street - Flinders Street intersection in particular, will be both warranted and desirable in the near future whether or not the City Pacific development proceeds.

In summary, the proposition contained in Section 2.3.1 of Council's response, namely that without the FDA, the Strand Bridge over Ross Creek is not required, is invalidated by the work undertaken by its own consultant.

THE VEITCH LISTER INVESTIGATIONS

In order to address the above matters, sophisticated traffic modelling by Veitch Lister Consulting (VLC) has now been undertaken. That work has led to the following predictions of traffic flows at the Flinders Street - Denham Street intersection:



APPROACH	APPROAC 2005	H TRAFFIC FLOWS (vehicles per day) 2025 (no Ross Creek bridge, no FDA)	2025 (Ross Creek bridge, FDA)
Denham Street (north):	6189	8925	8715
Denham Street (south):	8003	12517	8849
Flinders Street East:	5684	7322	5393

The traffic flows at that intersection associated with the FDA, with the Ross Creek bridge operational, are as follows:

APPROACH	APPROACH TRAFFIC FLOWS (vehicles per day)
Denham Street (north): Denham Street (south): Flinders Street East:	170 100 320

The requirements of the Queensland Department of Main Roads (the responsible authority for the Denham Street - Flinders Street intersection) in relation to the traffic impact of development proposals are set out in that Department's publication "Guidelines for Assessment of Road Impacts of Development Proposals". Section 1.2 of those guidelines state that a development's road impacts will be considered insignificant if the development generates an increase in traffic on State-controlled roads of less than 5% of existing levels.

The development is unlikely to be completed before 2015. By interpolation, traffic flows at the Flinders Street - Denham Street intersection, with no Ross Creek Bridge and no FDA, in 2015 will be as follows:

APPROACH	2015 APPROACH TRAFFIC FLOWS (vehicles per o	(yst
AFFROAGH	2013 AFFROACH TRAFFIC FLOVVS (Vehicles per C	ıa١

Denham Street (north): 7557
Denham Street (south): 10 260
Flinders Street East: 6503

It can be seen that when the development is first completed and operational in its entirety, along with The Strand creek crossing, traffic flows on all three legs of the intersection associated with the FDA will be less than 5% of the background traffic flows existing at that time, markedly so in the case of both the Denham Street approaches.

That is, according to Main Roads' own criteria, the impact of the development, when it is first completed and operational in its entirety, is insignificant.

Nonetheless, it is clear from the VLC work that even without the FDA, traffic flows at the Flinders Street - Denham Street intersection will increase substantially over time (according to VLC, an increase of 45% from 2005 to 2025, which is comparable with Horman's 54%). Further, the operational efficiency of the traffic signal system at the intersection will reduce as a result of reopening of the mall.

For these reasons, it is considered reasonable that the FDA contribute to the construction, by Council, of The Strand bridge.

COUNCIL'S BREAKWATER ROAD NETWORK HEADWORKS POLICY

Council's "Breakwater Road Network Headwork's" Policy is a policy which requires the City Pacific development to make financial contribution to the future construction, by Council, of a bascule bridge over Ross Creek. That Policy has been re-advertised by Council since the EIS was prepared: that is, Council has re-iterated its support for the Policy and therefore for the bridge itself.

On the basis of the work reported by Horman, and that of VLC, the approach adopted in the traffic-related component of the EIS regarding the FDA, that the development would and should make a contribution to



Council's scheme for a Ross Creek crossing, is therefore considered, in hindsight, to be correct and is supported.

It is relevant though that the work by VLC demonstrates that in 2025, the Ross Creek crossing would attract 13 000 vehicles per day, a flow easily accommodated by a conventional 2-lane 2-way bridge (by way of comparison, the Indooroopilly Bridge carries about 30 000 vehicles per day), Of that 13 000 vehicles per day, only 1720 vehicles per day (13.3%) are associated with the FDA.

Yours faithfully HOLLAND TRAFFIC CONSULTING PTY LTD

R C HOLLAND