

From: "Rohan Willis" [REDACTED]
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To: "Contact Us" <contactus@launceston.tas.gov.au>
Subject: Draft Amendment PSA-LLP0018 - Representation - Planning Ahead Tasmania
Attachments: Representation (Planning Ahead Tasmania) - Draft Amendment PSA-LLP0018.pdf

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Attn: Sam Johnson, Chief Executive Officer - City of Launceston

Dear Sir,

Please find attached representation pertaining to the above draft amendment of the Tasmanian Planning Scheme - Launceston.

Regards



Rohan Willis | Principal Consultant
[REDACTED]

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REPRESENTATION – DRAFT AMENDMENT PSA-LL0018

23 Racecourse Crescent, Launceston

16 July 2026

Table of Contents

1	Part A – Introduction and Legislative Framework	2
1.1	Purpose of the Submission	2
1.2	The Strategic Threshold	2
1.3	The Evidentiary Threshold	3
1.4	The Central Question	4
2	Part B – Existing Strategic Planning Context	5
2.1	Introduction	5
2.2	Spatial Analysis of the Existing Zoning Pattern	5
2.3	Purpose and Function of the Recreation Zone	7
2.4	Strategic Significance of the Elphin Recreation Precinct	7
2.5	Evolution of the Site	9
2.6	Summary	10
3	Part C – Assessment under the Strategic Planning Framework	11
3.1	Introduction	11
3.2	Schedule 1 Objectives of the <i>Land Use Planning and Approvals Act 1993</i>	11
3.3	Tasmanian Planning Policies	12
3.4	Northern Tasmania Regional Land Use Strategy (2021)	13
3.5	City of Launceston Strategic Plan 2025-2035	15
3.6	Greater Launceston Plan (2023 Revision)	16
3.7	Northern Tasmania Sports Facility Plan (2023)	17
3.8	City of Launceston Recreation and Open Space Strategy (Background Paper – 2023)	18
3.9	Tasmanian Planning Commission Guidance (Practice Note 12)	19
3.10	State Planning Provisions	20
3.11	Summary	21
4	Part D – Strategic Response to Applicant's Case	22
4.1	Introduction	22
4.2	Proposition 1: <i>Commercial Opportunity Does Not Establish Strategic Justification</i>	22
4.3	Proposition 2: <i>The Recreation Zone Continues to Perform an Important Strategic Function</i>	23
4.4	Proposition 3: <i>The Existing Urban Structure Should Not Be Altered Without Compelling Strategic Justification</i>	24
4.5	Proposition 4: <i>The Broader Strategic Planning Framework Does Not Support the Amendment</i>	25
4.6	Proposition 5: <i>The Public Interest Has Not Been Demonstrated</i>	26
5	Part E – Conclusions	27

1 Part A – Introduction and Legislative Framework

1.1 Purpose of the Submission

This submission has been prepared in opposition to draft amendment PSA-LLP0018, which proposes to amend the Local Provisions Schedule ('LPS') of the Tasmanian Planning Scheme – Launceston by rezoning approximately 9,836m² of land at 23 Racecourse Crescent, Launceston (Folio of the Register 176749/1) from the Recreation Zone to the Commercial Zone.

The purpose of this submission is not merely to express opposition to the proposed amendment, but to critically examine whether the amendment is capable of satisfying the statutory requirements imposed by the *Land Use Planning and Approvals Act 1993* ('the LUPA Act') and the broader strategic planning framework applicable to Northern Tasmania.

In doing so, this submission proceeds from the proposition that planning scheme amendments are fundamentally different from development applications. They are not concerned with whether a particular proposal can be designed to achieve acceptable planning outcomes, nor whether an individual parcel of land may be capable of accommodating an alternative use. Rather, they concern the long-term strategic planning framework within which future land use decisions will be made. Consequently, the decision before the Planning Authority is one of enduring significance, as it establishes the statutory planning context that will regulate the future use and development of the land for decades to come.

The proposed amendment therefore warrants careful scrutiny, not only because of its implications for the subject site and surrounds, but because of its broader consequences for the integrity of the City's strategic planning framework, the ongoing protection of recreation land as community infrastructure, and the precedent that approval may establish for future planning scheme amendments involving Recreation Zone land.

Accordingly, this submission examines the proposal against the statutory framework established by the LUPA Act, the Northern Tasmania Regional Land Use Strategy ('NTRLUS'), the City of Launceston's adopted strategic planning documents and accepted principles of strategic land use planning. It concludes that the amendment has not demonstrated an adequate strategic justification for the permanent removal of Recreation Zone land and that the proposal should therefore not proceed.

1.2 The Strategic Threshold

Section 34 of the LUPA Act establishes the matters that must be satisfied before an amendment to a Local Provisions Schedule can properly proceed. These matters include consistency with the objectives of Schedule 1 of the LUPA Act, consistency with applicable State Policies, consistency with the relevant Regional Land Use Strategy, satisfaction of criteria of the Tasmanian Planning Policies, regard to the strategic planning objectives of the planning authority, and the application of sound strategic planning principles. Collectively, these provisions establish a deliberate statutory threshold that is significantly higher than the assessment of an individual development application.

REPRESENTATION

Draft Amendment PSA-LLP0018

Importantly, section 34 does not ask whether an alternative zoning could facilitate investment, increase commercial opportunity or accommodate additional development. Instead, it requires the Planning Authority to determine whether the amendment itself represents good strategic planning. This distinction is of considerable importance throughout the assessment of PSA-LLP0018. The existence of a commercial development opportunity is not synonymous with strategic justification. Many parcels of land could physically accommodate more intensive forms of development if rezoned. The statutory question is whether such a rezoning advances the objectives of the planning system and represents a sound and strategically justified alteration to the planning framework.

In the present case, the Planning Authority must therefore ask not whether commercial development could occur on the land, but whether the permanent removal of Recreation zoning has been demonstrated to be in the broader public interest.

1.3 The Evidentiary Threshold

Draft amendment PSA-LLP0018 concerns land that is presently included within the Recreation Zone. That fact is significant. Unlike land that has been identified for future urban expansion, or land that has become demonstrably redundant for its existing strategic purpose, Recreation zoned land performs an ongoing public planning function. It forms part of the municipality's social infrastructure, contributes to community health and wellbeing, supports organised and informal recreation, and assists in achieving broader liveability outcomes recognised throughout the regional and municipal strategic planning framework.

Accordingly, the permanent removal of Recreation zoned land should not be regarded as an ordinary rezoning exercise. Rather, it represents the permanent contraction of the municipality's recreation land network. Such a decision should only occur where the Planning Authority can be satisfied, on the basis of compelling strategic evidence, that:

- the existing Recreation zoning no longer serves a legitimate strategic planning purpose;
- the land is surplus to present and future recreation requirements;
- the proposed alternative zoning better advances the objectives of the LUPA Act and the applicable strategic planning framework;
- the amendment will not undermine the integrity or long-term function of the broader recreation precinct;
- the public interest is demonstrably better served by the proposed rezoning than by retention of the existing zoning configuration; and
- the amendment will not establish an undesirable precedent for the incremental erosion of strategically important recreation land elsewhere within the municipality.

In the absence of such evidence, the Planning Authority should exercise considerable caution before approving the permanent loss of Recreation zoned land. This approach is entirely consistent with the precautionary nature of strategic planning. Unlike development assessment, where impacts may be mitigated through permit conditions or design changes, the consequences of rezoning are enduring. Once the strategic planning framework has been altered and redevelopment has occurred, the former

3 | Page

REPRESENTATION

Draft Amendment PSA-LL0018

recreation function cannot realistically be reinstated. For that reason, the evidentiary burden properly rests with the proponent to demonstrate, through a rigorous strategic planning case, why the existing zoning should be displaced.

1.4 The Central Question

When the statutory framework is properly contemplated, the essential question before the Planning Authority is neither complex nor confined to the commercial merits of the proposal. It is this:

“Has the proponent demonstrated, through a robust strategic planning process and by reference to the statutory planning framework, that the permanent removal of Recreation zoned land and its replacement with Commercial zoning is necessary, justified and in the long-term public interest?”

It is against that question that the remainder of this submission is directed. The following chapters demonstrate that the material accompanying draft amendment PSA-LLP0018 does not satisfactorily answer that question and that the proposed amendment has not discharged the strategic burden imposed by LUPA Act.

2 Part B – Existing Strategic Planning Context

2.1 Introduction

Before considering whether the Recreation Zone should be replaced with the Commercial Zone, it is necessary to understand the strategic planning context within which the existing zoning was established. Planning schemes are not assembled incrementally in response to individual landowners or isolated development opportunities. Rather, they express a coordinated long-term planning vision for the municipality by allocating land to those uses considered most appropriate having regard to existing development patterns, anticipated growth, community infrastructure, environmental constraints and broader public policy objectives.

Accordingly, the existing zoning of the subject land should not be regarded as arbitrary or incidental. It reflects a considered planning judgement that the subject land forms part of the municipality's recreation land network and should perform a strategic function consistent with the purposes of the Recreation Zone. Any proposal to alter that strategic planning outcome must therefore demonstrate not merely that an alternative zoning is possible, but that the strategic basis for retaining the Recreation Zone no longer exists, or has been displaced by more compelling planning considerations. The material accompanying PSA-LLP0018 does not satisfactorily establish that proposition.

2.2 Spatial Analysis of the Existing Zoning Pattern

The existing zoning pattern demonstrates a logical and deliberate land use hierarchy. Figure 1 illustrates the relationship between the principal zones surrounding the subject land. The annotated figure illustrates a coherent land use pattern in which each adjoining zone performs a distinct but complementary strategic planning function. Commercial zoning has been consolidated to the north and west around the established retail and bulky goods precinct. The Recreation Zone forms a continuous and coherent precinct extending centrally across the Northern Tasmanian Cricket Association Ground, the Launceston Tennis Centre, the Elphin Sports Centre and associated recreation infrastructure. The Light Industrial Zone is consolidated to the east, accommodating industrial and employment-generating activities that are appropriately separated from more sensitive land uses, while residential neighbourhoods are concentrated predominantly south of Racecourse Crescent.

The subject land occupies the point at which these four distinct urban environments converge. This configuration is not accidental. Rather, it reflects a deliberate planning response that:

- consolidates major commercial activity within an established commercial centre to the north and west;
- consolidates recreation and sporting activities within a dedicated recreation precinct at the heart of the locality;
- consolidates industrial and employment activities within the Light Industrial Zone to the east;
- maintains appropriate transitions between these differing land use intensities;

REPRESENTATION

Draft Amendment PSA-LL0018

- moderates the interface with adjoining residential neighbourhoods; and
- preserves a coherent, legible and well-structured pattern of urban development.

The proposed amendment would fundamentally alter that structure. Rather than the Commercial Zone terminating at the existing western edge of the Recreation Zone, it would extend into land presently performing an important strategic transition function between the commercial centre, the Elphin Recreation Precinct, the adjoining residential neighbourhood and the Light Industrial Zone beyond. While this expansion may appear modest when viewed in isolation, strategic planning requires consideration of its broader implications for the spatial integrity of the surrounding zoning framework.



Figure 1: Zoning configuration of F/R 176749/1 (blue outline) and surrounding areas (Source: LISTmap).

Incremental alterations to zoning boundaries frequently represent the first stage of broader precinct change. Accordingly, the proposal should not be assessed solely according to the size of the subject site, but by reference to the planning principle that zoning boundaries should remain stable unless compelling strategic evidence demonstrates that alteration is necessary. In the present case, no such evidence has been presented. On the contrary, the existing zoning configuration continues to exhibit a logical, coherent and strategically defensible urban structure in which each adjoining zone performs a distinct and complementary planning function. The existing zoning pattern therefore provides no strategic justification for extending the Commercial Zone into the Recreation Precinct.

REPRESENTATION

Draft Amendment PSA-LL0018

2.3 Purpose and Function of the Recreation Zone

The Recreation Zone performs a specialised strategic planning function within the Tasmanian Planning Scheme. Unlike zones directed primarily towards facilitating urban growth or commercial development, the Recreation Zone is concerned with the long-term protection and orderly provision of recreation land as an essential component of the municipality's social infrastructure. Its purpose is not simply to regulate the form of development that may occur upon individual parcels of land, but to ensure that strategically located land remains available to accommodate organised sport, active recreation, community facilities and complementary activities that contribute to public health, wellbeing and community participation. These objectives are reflected in the purpose statements of the Recreation Zone, which expressly recognise the need to provide for active and organised recreation while supporting complementary uses that reinforce, rather than detract from, the recreational function of the land.

The strategic role of the Recreation Zone extends well beyond the immediate activities occurring on any particular site. At a precinct scale, it protects existing recreation infrastructure, encourages the co-location of compatible recreation uses, preserves opportunities for future expansion and adaptation, safeguards substantial public and private investment in sporting facilities, and maintains the broader network of recreation land required to support healthy, liveable communities. Equally important, it provides a coherent land use framework that manages interfaces between recreation activities and surrounding commercial and residential areas, thereby promoting an orderly and enduring urban structure.

Importantly, none of these strategic functions depend upon public ownership of the land. The planning system allocates zones according to the strategic role that land performs within the municipality, not according to whether that land is owned by a public authority or a private landowner. Throughout Tasmania, privately owned land accommodates a wide range of activities that advance public planning objectives, including schools, hospitals, community facilities, environmental assets and recreation infrastructure. Recreation land is no different. Its planning significance derives from the function it performs, rather than the identity of its owner.

That distinction is particularly relevant in the present case. The subject land continues to accommodate recreation, fitness, rehabilitation and allied health services that contribute to the broader recreational function of the Elphin Recreation Precinct. Their provision through private enterprise does not diminish their strategic planning value. On the contrary, it demonstrates that privately operated recreation infrastructure can continue to advance the purpose and intent of the Recreation Zone. The continued private operation of recreation infrastructure on the site is therefore entirely consistent with the purpose and intent of the Recreation Zone.

2.4 Strategic Significance of the Elphin Recreation Precinct

The subject land derives much of its strategic planning significance from its location within the broader Elphin Recreation Precinct, one of Northern Tasmania's most significant concentrations of organised sport and recreation infrastructure. The precinct accommodates a diverse range of regionally significant facilities, including the Northern Tasmanian Cricket Association Ground, the Elphin Sports Centre, the Launceston Tennis Centre, associated recreation facilities, supporting parking areas and ancillary recreation infrastructure. Collectively, these facilities form an integrated recreation destination that

7 | Page

REPRESENTATION

Draft Amendment PSA-LL0018

serves not only the City of Launceston but the wider Northern Tasmania region. Contemporary strategic planning increasingly recognises that the long-term success of such precincts depends upon the coordinated planning and management of complementary recreation infrastructure rather than the isolated consideration of individual sites.



Figure 2: Spatial extent of the Elphin Recreation Precinct (Source: LISTmap).

Equally important is the subject land's location at the south-western gateway to the Elphin Recreation Precinct. It occupies the point at which the municipality's principal recreation area interfaces with the established commercial centre, adjoining residential neighbourhoods and the Light Industrial Zone beyond. In doing so, it performs an important transitional role that reinforces the spatial integrity of the precinct while providing an orderly interface between fundamentally different land use environments.

Within that broader context, the existing LIFT facility performs an important supporting function. Although privately operated, it provides fitness, strength and conditioning, rehabilitation and allied health services that complement the operation of the surrounding sporting venues. This reflects the evolution of contemporary recreation precincts, where organised sport is increasingly supported by specialist recreation and wellbeing infrastructure extending beyond the traditional sporting field or indoor court. The subject land therefore continues to contribute positively to the broader recreational function of the precinct.

The proposed amendment would alter that established urban structure by extending the Commercial Zone into land that presently forms part of the recreation precinct. While the amendment affects only

REPRESENTATION

Draft Amendment PSA-LL0018

a single parcel, its implications are not confined to that site. Rather, it represents a shift in the functional edge of the commercial centre and a corresponding contraction of the Recreation Zone at the principal entrance to the precinct. Strategic planning requires such changes to be assessed not only in terms of their immediate physical extent, but also their cumulative implications for the integrity, legibility and long-term planning of the precinct as a whole. Accordingly, the proposed amendment would diminish the integrity of an established regional recreation precinct without demonstrating any corresponding strategic planning benefit.

2.5 Evolution of the Site

The applicant's planning report appears to proceed on the basis that the existing recreation use represents an interim circumstance pending future commercial redevelopment. The evolution of the subject land, however, supports the opposite conclusion. Although privately owned, the land has for many years accommodated recreation-oriented activities centred upon organised sport, health and physical wellbeing. The existing development comprises the LIFT complex together with associated recreation, fitness, rehabilitation and allied health services, including personal training, sports coaching, physiotherapy, remedial massage, nutrition services and strength and conditioning facilities. These activities are not incidental to the site. Rather, they demonstrate the ongoing capacity of the land to accommodate recreation uses that reflect contemporary community expectations and changing patterns of participation.

Modern recreation planning increasingly recognises that successful recreation precincts comprise far more than traditional sporting fields and outdoor playing surfaces. Contemporary recreation infrastructure commonly incorporates indoor recreation centres, fitness facilities, rehabilitation services, sports medicine, strength and conditioning facilities and complementary health and wellbeing services that collectively support participation in organised sport and physical activity. The existing LIFT facility reflects this contemporary evolution by providing services that complement and support the surrounding sporting precinct. Rather than demonstrating that the Recreation Zone has become obsolete, the present use illustrates its capacity to accommodate changing forms of recreation while continuing to fulfil its underlying strategic purpose.

Against that background, nothing contained within the material supporting PSA-LLP0018 demonstrates that the strategic justification for the Recreation Zone has diminished. The applicant's planning report characterises the existing recreation use as a precursor to commercial redevelopment. A more compelling conclusion is that the site demonstrates the continuing relevance and adaptability of the Recreation Zone in accommodating viable contemporary recreation activities. Nor does the fact that commercially zoned land adjoins the site's western boundary provide a persuasive planning basis for altering the zoning. Zoning boundaries frequently separate fundamentally different land use functions and are intended to maintain an orderly urban structure. The juxtaposition of Commercial and Recreation Zones is therefore entirely consistent with the operation of a planning scheme and does not, without more, demonstrate that the Recreation Zone is misplaced or that its strategic purpose has been overtaken. The evolution of the site therefore reinforces, rather than undermines, the continuing strategic justification for retaining the existing Recreation Zone.

REPRESENTATION

Draft Amendment PSA-LL0018

2.6 Summary

The preceding analysis demonstrates that the existing Recreation Zone is neither anomalous nor the product of an historical planning oversight. Rather, it forms part of a coherent and enduring strategic planning framework that deliberately consolidates regionally significant recreation infrastructure within the Elphin Recreation Precinct while maintaining a logical relationship between commercial, recreation, industrial and residential land uses. The subject land occupies an important strategic position within that framework, functioning as both an integral component of the precinct and an appropriate transition between these differing urban environments. Its continuing occupation by recreation, fitness, rehabilitation and allied health services further demonstrates that the land remains capable of fulfilling the contemporary purpose of the Recreation Zone.

Equally, the preceding analysis identifies no persuasive evidence that the strategic rationale underpinning the existing zoning has materially changed. The spatial structure of the precinct remains coherent, the Recreation Zone continues to perform the role for which it was established, and the existing use of the site remains entirely consistent with that role. Neither the private ownership of the land, its proximity to commercially zoned land, nor the existence of a potential commercial redevelopment opportunity establishes that the strategic planning basis for the Recreation Zone has been displaced or exhausted. Rather, the evidence demonstrates that the strategic justification for retaining the existing zoning remains intact.

3 Part C – Assessment under the Strategic Planning Framework

3.1 Introduction

The preceding section established that the existing Recreation Zone is neither anomalous nor the product of an historical planning oversight. Rather, it forms part of a coherent strategic planning framework that recognises the subject land as an integral component of the Elphin Recreation Precinct and supports its ongoing role in providing recreation and recreation-related activities. That analysis also demonstrates that the current zoning continues to perform the strategic purpose for which it was applied. The next stage of the assessment is therefore to consider whether the broader statutory and strategic planning framework nevertheless provides a compelling basis for permanently replacing the Recreation Zone with the Commercial Zone.

Section 34 of the *Land Use Planning and Approvals Act 1993* requires amendments to a Local Provisions Schedule to be assessed against a comprehensive strategic planning framework that extends well beyond the merits of an individual proposal. That framework includes the objectives of the Act, the Tasmanian Planning Policies, the applicable Regional Land Use Strategy, the strategic planning objectives of the planning authority, the State Planning Provisions and accepted principles of strategic land use planning. Collectively, these documents establish the policy context against which the proposed amendment must be evaluated and provide the benchmark for determining whether it represents a sound, evidence-based and strategically justified alteration to the Planning Scheme.

The following assessment considers each of these components of the strategic planning framework in turn. Whilst each document addresses planning from a different perspective, they are intended to operate as an integrated and complementary framework. Accordingly, the assessment does not focus upon isolated statements that may support commercial development in a general sense, but instead evaluates the proposal against the broader objectives, strategic intent and planning philosophy underpinning each document. As demonstrated below, when the framework is considered as a whole, it consistently reinforces the importance of integrated planning, the long-term protection of strategically significant recreation infrastructure and the need for planning scheme amendments to be supported by compelling strategic justification and robust evidence. Collectively, these considerations weigh strongly against the proposed amendment.

3.2 Schedule 1 Objectives of the *Land Use Planning and Approvals Act 1993*

The objectives contained within Schedule 1 of the *Land Use Planning and Approvals Act 1993* establish the philosophical foundation upon which Tasmania's entire resource management and planning system is constructed. Those objectives require the planning system to promote the sustainable development¹ of natural and physical resources, facilitate the fair, orderly and sustainable use and development of

¹ *Sustainable development*, as defined at Schedule 1, Part 1 (Objectives of the Resource Managements and Planning System in Tasmania), means 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 –

- (a) sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations; and
- (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
- (c) avoiding, remedying or mitigating any adverse effects of activities on the environment.

REPRESENTATION

Draft Amendment PSA-LL0018

land, encourage public involvement in resource management decisions, coordinate the activities of public authorities, and secure a balance between economic, environmental and social considerations. They do not elevate economic development above all other planning outcomes, nor do they encourage planning authorities to maximise the development potential of individual parcels of land. Rather, they require planning decisions to be made in the broader public interest and with regard to the long-term consequences of altering the strategic planning framework.

The proposed amendment does not adequately satisfy those overarching statutory objectives. Whilst the amendment may facilitate additional commercial development opportunities, that outcome represents only one aspect of sustainable development. It has not been demonstrated that the permanent reduction of Recreation Zoned land will result in a superior balance between economic, environmental and social outcomes, nor that the broader public interest would be better served by replacing established recreation infrastructure with commercially orientated land uses. Indeed, the supporting material places disproportionate emphasis upon private commercial opportunity while providing comparatively little consideration to the enduring social value associated with retaining strategically located recreation land.

Importantly, Schedule 1 requires planning authorities to pursue orderly and sustainable planning outcomes rather than reactive or opportunistic land use changes. The proposed amendment appears to respond principally to the redevelopment aspirations of a single landowner rather than to any identified deficiency within the existing planning framework. No compelling evidence has been produced demonstrating that the existing Recreation Zone has failed to perform its intended strategic function or that the broader objectives of the planning system would be better achieved by permanently contracting supply of the Recreation Zone.

Accordingly, when assessed against the statutory objectives established by Schedule 1, the amendment is, in my opinion, inconsistent with the broader purpose of Tasmania's planning system because it prioritises a site-specific commercial outcome over the coordinated, balanced and sustainable management of strategically important community infrastructure.

3.3 Tasmanian Planning Policies

The Tasmanian Planning Policies establish the overarching statewide policy framework that guides the preparation of Regional Land Use Strategies, the State Planning Provisions and Local Provisions Schedules. Their purpose is not simply to facilitate economic development or urban growth, but to ensure that land use planning delivers balanced, integrated and sustainable planning outcomes that appropriately consider environmental, social and economic objectives. Importantly, the Policies recognise that planning objectives are not to be interpreted in isolation and that competing planning interests should be resolved through balanced, evidence-based judgement having regard to the broader strategic context. That integrated approach is fundamental to the assessment of the proposed amendment.

The material supporting PSA-LLP0018 relies principally upon those aspects of the Policies that encourage settlement consolidation, redevelopment of under-utilised urban land, efficient use of existing infrastructure and support for commercial activity. Whilst these are important strategic objectives, they represent only part of the broader planning framework established by the Tasmanian Planning Policies. The Policies also recognise the need to provide sufficient land to meet existing and future demand for recreation, open space and community facilities, improve the liveability of

REPRESENTATION

Draft Amendment PSA-LL0018

settlements, provide accessible social infrastructure, and create integrated urban environments that support community health, wellbeing and social cohesion. These objectives are intended to operate collectively rather than competitively and require planning authorities to balance economic opportunity with the long-term protection of essential community infrastructure.

That balance is particularly significant in the present case. The subject land forms part of an established regional recreation precinct that already contributes to the municipality's recreation network and accommodates contemporary recreation, fitness and allied health services. Whilst the site is clearly capable of supporting commercial development, the Tasmanian Planning Policies do not suggest that every serviced urban parcel should be converted to its highest commercial or economic use. Rather, they recognise that successful settlements require an appropriate distribution of commercial land, recreation infrastructure, community facilities, open space and social infrastructure to support growing populations over the long term. Urban consolidation is therefore not an end in itself. It must occur in a manner that retains the infrastructure necessary to support increasingly compact and intensive urban communities. Indeed, the Policies recognise that improving liveability depends upon providing convenient access to recreation, open space, community facilities, active transport networks and other forms of social infrastructure that support health and wellbeing. As urban populations increase and residential densities intensify, these community assets become progressively more important rather than diminishing in value. The long-term consequence of urban consolidation is therefore not a reduced need for strategically located recreation land, but an increased reliance upon well-planned recreation precincts capable of accommodating changing participation patterns, expanding populations and evolving community expectations. Permanently reducing that land base should therefore require clear strategic justification supported by robust evidence.

The Policies also promote the efficient use of existing social infrastructure through its continued use, adaptation and integration with surrounding land uses. That objective is reflected in the existing function of the Elphin Recreation Precinct, where the subject land contributes to an integrated network of sporting, recreation, fitness and community facilities. The proposal, however, gives little consideration to the contribution that the land presently makes to that broader recreation network or to the longer-term strategic implications of progressively reducing Recreation Zoned land within one of Northern Tasmania's principal sporting precincts. Instead, the assessment proceeds largely upon the basis that commercial redevelopment represents a desirable planning outcome because the land is urban, serviced and adjoins existing Commercial Zoned land. That reasoning does not undertake the balanced strategic assessment contemplated by the Tasmanian Planning Policies.

Accordingly, the proposed amendment is difficult to reconcile with the broader strategic intent of the Tasmanian Planning Policies. Whilst it may advance one aspect of the Policies by facilitating additional commercial development within the urban area, it does so without adequately demonstrating that the permanent contraction of the Recreation Zone represents a balanced planning outcome having regard to the Policies' equally important objectives relating to liveability, social infrastructure, recreation provision, integrated settlement planning and evidence-based strategic decision-making. In the absence of that broader strategic justification, it has not been demonstrated that the amendment gives proper effect to the holistic planning framework established by the Tasmanian Planning Policies.

3.4 Northern Tasmania Regional Land Use Strategy (2021)

The Northern Tasmania Regional Land Use Strategy ("NTRLUS") provides the principal regional strategic planning framework for Northern Tasmania and establishes the policy context within which Local Provisions Schedules are prepared and amended. Its purpose extends well beyond identifying locations for urban growth. Rather, it seeks to guide the long-term evolution of settlements through an integrated approach to economic development, liveability, sustainability and governance, recognising that these

13 | Page

REPRESENTATION

Draft Amendment PSA-LL0018

objectives are complementary and must be balanced in the public interest. The Strategy consistently promotes coordinated land use planning, the efficient use of infrastructure, the protection of community assets and evidence-based decision-making to achieve a resilient and coherent urban structure over time.

Against that broader strategic framework, the justification advanced in support of PSA-LLP0018 places considerable emphasis on the economic benefits associated with expanding commercial activity within an established urban area. Whilst the NTRLUS clearly supports investment, employment growth and urban consolidation, it does not promote these objectives in isolation. Equally important are its objectives relating to liveability, integrated settlement planning, protection of community infrastructure and the creation of healthy, resilient communities. The Strategy therefore requires planning decisions to balance economic opportunity with the long-term retention and coordinated planning of those community assets that support the social wellbeing of the region. This integrated planning philosophy is particularly evident within the NTRLUSs 'Social Infrastructure and Community Policy'. The Strategy expressly recognises recreation, sport and health facilities as essential components of regional social infrastructure and further acknowledges that such infrastructure is delivered not only by government, but also by private operators, community organisations and other service providers. Importantly, it emphasises that social infrastructure planning should be integrated with broader land use planning rather than occurring in isolation, and that planning decisions should support coordinated, accessible, flexible and adaptable community infrastructure capable of responding to changing community needs over time.

Those strategic directions are directly relevant to the present proposal. The subject land forms part of the broader Elphin Recreation Precinct and presently accommodates recreation, fitness, rehabilitation and allied health services that complement the operation of surrounding sporting facilities and contribute to the municipality's wider recreation and community infrastructure network. As demonstrated in Part B of this representation, the existing use of the land reflects the contemporary evolution of recreation infrastructure and remains entirely consistent with the strategic purpose of the Recreation Zone. Rather than representing surplus or redundant recreation land, the site continues to perform an important social infrastructure function within one of Northern Tasmania's principal recreation precincts.

Significantly, the NTRLUS also contemplates that planning for social infrastructure should be informed by an evidence-based understanding of existing levels of service, future community needs, infrastructure gaps and long-term implementation priorities. Those principles are difficult to reconcile with the strategic assessment supporting PSA-LLP0018. The amendment documentation does not include a recreation needs assessment, a social infrastructure assessment, an evaluation of whether the land is surplus to current or future recreation requirements, or a precinct-level assessment of the implications of removing land from the Elphin Recreation Precinct. Nor does it demonstrate how the permanent contraction of the Recreation Zone would affect the long-term provision of recreation infrastructure or the integrity of the municipality's broader recreation network.

Instead, the strategic justification for the amendment rests largely upon the site's location within an Urban Growth Area, its proximity to existing commercially zoned land and the commercial opportunities that rezoning may facilitate. While those matters are relevant considerations, they do not, of themselves, establish that the amendment advances the broader strategic outcomes sought by the NTRLUS. Urban consolidation is not an invitation to intensify every parcel of urban land irrespective of its strategic function. On the contrary, the success of urban consolidation depends upon retaining the recreation, health and community infrastructure necessary to support increasing population densities and maintain liveable communities. As urban areas become more intensive, strategically located recreation land becomes more valuable, not less.

REPRESENTATION

Draft Amendment PSA-LL0018

Accordingly, the proposed amendment cannot be assessed solely through the lens of facilitating additional commercial development. The relevant strategic query is whether the permanent contraction of the Recreation Zone and the corresponding extension of the Commercial Zone represent a demonstrably superior planning outcome when assessed against the NTRLUS as a whole. Having regard to the continuing strategic role of the subject land within the Elphin Recreation Precinct, the integrated planning objectives of the Strategy, and the absence of any evidence demonstrating that the land is surplus to present or future recreation needs, the material accompanying PSA-LLP0018 does not establish that the proposal is genuinely consistent with the broader intent of the Northern Tasmania Regional Land Use Strategy.

3.5 City of Launceston Strategic Plan 2025-2035

The City of Launceston Strategic Plan 2025–2035 presents a long-term vision of Launceston as a city of history, innovation and opportunity that is prosperous, connected and liveable. Importantly, the Strategic Plan is founded upon three integrated strategic pillars – Prosperity, Place and People – which are intended to operate collectively rather than in isolation. Throughout the Plan, economic growth is consistently linked with the creation of attractive public places, high-quality community infrastructure, accessible recreation opportunities, environmental sustainability and improved community wellbeing. Prosperity is therefore presented as an outcome that is reinforced by investment in place and people, rather than one achieved at their expense.

The proposed amendment places considerable emphasis upon the potential economic benefits associated with expanding commercially zoned land. Whilst economic development is clearly an important objective of the Strategic Plan, it represents only one element of a broader and carefully balanced strategic framework. Equally significant are the Plan's objectives to future-proof and enhance public open spaces, improve community access to recreation facilities that encourage active lifestyles, strengthen community wellbeing, and create connected neighbourhoods that are attractive places to live, work, play and visit. These strategic directions recognise that recreation land and associated community infrastructure are fundamental components of a successful and resilient regional city rather than residual land awaiting more intensive development.

The Strategic Plan also acknowledges that, as Launceston continues to grow, maintaining a high quality of life will depend upon the coordinated delivery of housing, infrastructure, transport, recreation and community facilities. Recreation opportunities, open space and accessible community infrastructure are identified as essential contributors to healthy lifestyles, social connection and the city's overall liveability. These outcomes are intended to complement economic growth, not compete with it. As urban consolidation and population growth occur, the strategic importance of well-located recreation infrastructure correspondingly increases.

Against that policy context, the proposed amendment adopts an unduly narrow interpretation of the Strategic Plan by focusing predominantly upon the opportunity for additional commercial development without demonstrating how the permanent contraction of the Recreation Zone advances the Plan's broader strategic objectives. No strategic assessment has been undertaken demonstrating that the subject land is surplus to present or future recreation needs, that the integrity of the Elphin Recreation Precinct would be maintained, or that the long-term liveability, recreation and community wellbeing outcomes sought by the Strategic Plan would be preserved following the proposed rezoning.

Properly construed, the Strategic Plan does not promote economic development in isolation. Rather, it envisages a coordinated planning framework in which prosperity, place and people are mutually reinforcing components of a single long-term vision for the municipality. Having regard to the continuing strategic role of the subject land within the Elphin Recreation Precinct, and the absence of any

REPRESENTATION

Draft Amendment PSA-LL0018

compelling evidence demonstrating that the permanent loss of Recreation Zone land would advance that integrated vision, it has not been established that the proposed amendment is consistent with the broader strategic intent of the City of Launceston Strategic Plan 2025-2035.

3.6 Greater Launceston Plan (2023 Revision)

The Greater Launceston Plan establishes a long-term, evidence-based framework for the sustainable growth and development of the greater Launceston metropolitan area. Rather than focusing solely on economic development or urban expansion, the Plan promotes a coordinated approach to land use planning that integrates housing, employment, transport, recreation, community infrastructure and environmental values within a coherent metropolitan structure. Central to that vision is the creation of a compact, highly accessible and liveable city comprising robust communities, high-quality public spaces, an interconnected network of parks and pathways, and well-planned activity centres supported by complementary community infrastructure.

Importantly, the Greater Launceston Plan consistently promotes integrated planning at both the regional and precinct scale. It recognises that successful urban environments are created by ensuring that different land uses perform complementary functions within a well-structured urban framework, rather than through incremental changes that respond to individual development opportunities in isolation. The metropolitan structure principles emphasise urban consolidation, accessible and robust communities, structured metropolitan development, open space and shared pathways, strategic foresight and the coordinated planning of future growth. These principles reflect a planning philosophy that seeks to balance economic development with the long-term protection and enhancement of those community assets that contribute to the city's liveability and resilience.

The subject land is entirely consistent with that planning framework. It forms part of the broader Elphin Recreation Precinct, one of Launceston's principal concentrations of recreation and sporting infrastructure, while simultaneously providing an important transition between the established commercial centre, surrounding residential neighbourhoods and the Light Industrial Zone. In doing so, the site contributes not only to the operation of the recreation precinct itself, but also to the coherent metropolitan structure envisaged by the Greater Launceston Plan. The proposal to extend the Commercial Zone into this strategically located recreation land would weaken that established spatial structure by incrementally eroding the defined recreation precinct in favour of a more expansive commercial edge.

Equally significant is the Greater Launceston Plan's emphasis on evidence-based planning and strategic foresight. The Plan was developed upon an extensive programme of regional analysis, community consultation and strategic assessment to guide land use decisions over the long term. Consistent with that approach, strategic planning decisions should be informed by a comprehensive understanding of future community needs, infrastructure requirements and the broader implications of change. In the present case, however, the material supporting PSA-LLP0018 does not include any strategic recreation needs assessment, social infrastructure assessment or precinct-level analysis demonstrating that the subject land is surplus to present or future recreation requirements or that the long-term integrity of the Elphin Recreation Precinct would be maintained following rezoning.

The proposed amendment cannot be assessed solely by reference to the commercial opportunities that rezoning may facilitate. The relevant strategic question is whether the permanent contraction of the Recreation Zone advances the integrated metropolitan planning framework established by the Greater Launceston Plan. Having regard to the continuing strategic role of the subject land within the Elphin Recreation Precinct, the importance the Plan places upon coordinated land use planning, robust communities, accessible recreation infrastructure and evidence-based strategic decision-making, the

REPRESENTATION

Draft Amendment PSA-LL0018

material accompanying PSA-LLP0018 does not demonstrate that the proposed amendment represents a superior long-term planning outcome or that it is genuinely consistent with the broader strategic intent of the Greater Launceston Plan.

3.7 Northern Tasmania Sports Facility Plan (2023)

The Northern Tasmania Sports Facility Plan provides an evidence-based strategic framework for the planning, development and management of sport and active recreation infrastructure across Northern Tasmania. Rather than considering individual sporting facilities in isolation, the Plan adopts a regional perspective that recognises sporting infrastructure as an interconnected network serving communities across the region. It is founded upon principles of collaboration, sustainability, adaptability, efficiency and diversity, recognising that recreation infrastructure must be planned with sufficient flexibility to respond to changing demographics, participation trends and evolving community expectations.

Consistent with that strategic approach, the Plan recognises that the value of recreation land extends well beyond its current physical use. The long-term effectiveness of the regional sporting network depends upon maintaining opportunities for future expansion, adaptation and redevelopment as community needs evolve. Accordingly, land forming part of an established recreation precinct performs an important strategic function, even where it is not presently occupied by major sporting infrastructure. Its location within the broader Elphin Recreation Precinct, its accessibility and its relationship with surrounding sporting and recreation facilities contribute to the flexibility, resilience and long-term capacity of the regional recreation network in a manner that cannot readily be replicated once the land is permanently committed to an alternative urban purpose.

Importantly, the Plan specifically identifies the broader NTCA/Elphin precinct as one of Northern Tasmania's principal regional sporting hubs and recommends the preparation of a master plan for the greater NTCA/Elphin Indoor Sports and Tennis World precinct. That recommendation recognises the need for a coordinated strategic approach to improving car parking, access and internal circulation, rationalising the arrangement of existing facilities and, significantly, identifying opportunities to expand recreation and sporting uses where practical. The recommendation is fundamentally premised upon the continued evolution and enhancement of the precinct as a major regional recreation destination, rather than its progressive reduction through the loss of Recreation Zoned land.

The significance of that recommendation extends beyond the individual projects it identifies. It represents a clear strategic acknowledgement that the precinct possesses ongoing capacity to accommodate future recreation investment and changing participation trends, provided sufficient land remains available to support coordinated long-term planning outcomes. The preparation of a comprehensive master plan necessarily requires flexibility to consider future facility requirements, access arrangements, parking demand, landscape improvements and opportunities for expansion across the precinct as a whole. The permanent removal of Recreation Zoned land before that strategic planning process has been undertaken has the potential to unnecessarily constrain those future opportunities and diminish the precinct's capacity to respond to changing community needs.

The subject land is entirely consistent with these strategic principles. It presently accommodates recreation, fitness, rehabilitation and allied health services that complement the operation of the surrounding sporting facilities while retaining the capacity to evolve alongside the broader precinct over time. Rather than existing as an isolated parcel of land, it forms part of an integrated recreation environment whose collective value is greater than the sum of its individual components. Its contribution therefore lies not only in its existing use, but also in the flexibility it provides to support the ongoing evolution of one of Northern Tasmania's most significant recreation precincts.

REPRESENTATION

Draft Amendment PSA-LL0018

By comparison, the material supporting PSA-LLP0018 gives little consideration to these broader strategic planning principles. Instead, the assessment proceeds largely on the basis that the land is capable of accommodating commercial development. While that proposition may be accepted, it does not address the more fundamental strategic question posed by the Northern Tasmania Sports Facility Plan—namely, whether the proposed rezoning represents an evidence-based improvement to the long-term planning and management of the regional sporting network. Nor does it demonstrate that the subject land is surplus to foreseeable recreation requirements or that its permanent removal from the Recreation Zone would not compromise the adaptability, integrity and long-term resilience of the Elphin Recreation Precinct.

Viewed in this context, the proposed amendment is difficult to reconcile with the strategic direction established by the Northern Tasmania Sports Facility Plan. Rather than preserving the land base necessary to implement the Plan's recommendations, including the future master planning and potential expansion of the NTCA/Elphin precinct, the proposal would permanently remove Recreation Zoned land from a precinct expressly identified for ongoing strategic enhancement. In the absence of any comprehensive strategic assessment demonstrating that the subject land is no longer capable of contributing to those long-term objectives, it has not been demonstrated that the amendment represents an evidence-based or strategically justified outcome consistent with the regional planning approach promoted by the Northern Tasmania Sports Facility Plan.

3.8 City of Launceston Recreation and Open Space Strategy (Background Paper – 2023)

The City of Launceston Recreation and Open Space Strategy (Background Paper) establishes a contemporary framework for the long-term planning, provision, management, and enhancement of recreation and open space across the municipality. It acknowledges that recreation and open space are critical to a healthy, connected, and liveable city. As Launceston grows, strategic planning must anticipate future needs, changing recreation patterns, and evolving community expectations. The Strategy promotes a dynamic, evidence-based approach, ensuring recreation infrastructure continues to meet both present and future needs.

The Strategy specifically guides Council's decisions around the planning, acquisition, management, and disposal of recreation assets. In this context, the subject land's location adjoining substantial Council-owned recreation land – including the NTCA Ground, the Tennis Centre, and the public car park adjacent the Racecourse Crescent and Dowling Street intersection – underscores that the Elphin Recreation Precinct functions as an integrated asset. While the precinct comprises both public and private land, Council's ownership of key recreation facilities reinforces the need for precinct-level planning. Decisions affecting one part of the precinct should be informed by their implications for the precinct as a whole, rather than viewed in isolation.

The proposed amendment, however, does not assess the broader precinct implications. Instead of strengthening or enhancing the municipality's recreation network, it proposes the permanent contraction of Recreation Zone land within one of Launceston's principal recreation precincts. Yet no recreation needs assessment, demand analysis, or precinct-level evaluation has been undertaken to demonstrate that the subject land is surplus to present or future recreation requirements. Nor has it been demonstrated that the precinct's long-term strategic function would be maintained.

The Strategy recognises that recreation planning must extend beyond current patterns of use and anticipate future community needs. Infrastructure that may appear underutilized today may become increasingly valuable as population growth and participation trends evolve. Consistent with that long-term planning philosophy, decisions affecting strategically located recreation precincts should occur through a coordinated, precinct-wide assessment rather than isolated site-specific rezoning. The fact

REPRESENTATION

Draft Amendment PSA-LL0018

that Council itself owns major recreation assets immediately adjoining the subject land, including the NTCA Ground, the Tennis Centre, and the public car park, reinforces that the Elphin Recreation Precinct functions as an integrated asset. This further underscores that any contraction of the Recreation Zone should be supported by a robust strategic assessment of the precinct's long-term recreation role.

As such, the proposed amendment is difficult to reconcile with the strategic intent of the Recreation and Open Space Strategy. By permanently reducing the extent of Recreation Zone land within the Elphin Recreation Precinct, without demonstrating that the land is surplus to future recreation needs or that equivalent strategic recreation outcomes can be achieved elsewhere, the proposal is inconsistent with the Strategy's emphasis on evidence-based planning, integrated recreation networks and the long-term protection and enhancement of the municipality's recreation infrastructure.

3.9 Tasmanian Planning Commission Guidance (Practice Note 12)

The Tasmanian Planning Commission's Practice Note 12 provides guidance on the preparation and assessment of amendments to Local Provisions Schedules under the *Land Use Planning and Approvals Act 1993*. While the Practice Note does not introduce additional statutory requirements, it reinforces that planning scheme amendments are fundamentally strategic planning exercises that must be supported by a robust evidentiary foundation demonstrating compliance with the statutory criteria contained within the Act. In particular, the Practice Note contemplates that amendment requests will be accompanied by adopted strategic planning documents, relevant background investigations, supporting analyses and a clear explanation of how and why the proposed amendment represents a superior strategic planning outcome that is consistent with the broader planning framework.

When considered against those expectations, the material supporting PSA-LLP0018 is difficult to reconcile with the strategic planning standard contemplated by the Commission's guidance. Whilst it demonstrates that commercial development may be feasible on the subject land, it does not establish that the existing Recreation Zone has become strategically inappropriate, that the land is surplus to present or future recreation requirements, or that the municipality's broader strategic planning framework would be improved by permanently replacing the Recreation Zone with the Commercial Zone. Rather, the strategic justification relies predominantly upon the site's proximity to existing commercially zoned land and the commercial opportunities that rezoning may facilitate, with comparatively little analysis explaining why the established zoning pattern should be altered.

Practice Note 12 also emphasises the importance of supporting amendment requests with relevant strategic studies, background investigations and adopted planning documents that explain the purpose and expected outcomes of the proposed amendment, including its consistency with the applicable Regional Land Use Strategy and broader strategic planning framework. As demonstrated throughout this representation, the supporting material does not include a recreation needs assessment, a social infrastructure assessment, a precinct-level strategic analysis or any equivalent evidence demonstrating that the permanent contraction of the Recreation Zone represents a strategically preferable planning outcome or is in the long-term public interest.

Accordingly, whilst the proposed amendment may identify a potential commercial redevelopment opportunity, it has not been supported by the comprehensive strategic analysis contemplated by the Commission's guidance for amendments of this nature. Having regard to the enduring consequences of permanently altering the municipality's strategic planning framework, the evidentiary basis supporting PSA-LLP0018 is insufficient to demonstrate that the proposed amendment represents a sound, evidence-based and strategically justified planning outcome. In those circumstances, the Planning Authority should exercise considerable caution before concluding that the statutory criteria for certification and progression of the amendment have been satisfactorily established.

REPRESENTATION

Draft Amendment PSA-LL0018

3.10 State Planning Provisions

The State Planning Provisions establish a consistent statewide framework for the allocation and management of land uses by assigning each planning zone a distinct strategic purpose. In that context, the Recreation Zone is intended to provide for active and organised recreation, ranging from local community facilities to major sporting infrastructure, while accommodating complementary activities that support recreation without detracting from its primary function. It also seeks to ensure that recreation facilities are appropriately integrated with surrounding land uses. By comparison, the Commercial Zone is directed towards accommodating retailing, service industries, storage, warehousing, bulky goods sales and a broader range of commercial activities requiring substantial floor areas, high levels of customer access, vehicle movement and parking, while supporting the established hierarchy of activity centres.

The distinction between these zones is both deliberate and fundamental. They are not interchangeable planning tools capable of being applied simply because an alternative form of development may be feasible. Rather, each zone gives effect to a different strategic planning objective within the broader urban structure. Accordingly, the central question before the Planning Authority is not whether commercial development could occur on the subject land, but whether the strategic purpose presently served by the Recreation Zone has ceased to be appropriate and whether its replacement with the Commercial Zone would demonstrably produce a superior long-term planning outcome.

In the present case, the existing Recreation Zone continues to perform an important strategic planning function. It recognises the subject land as forming part of the broader Elphin Recreation Precinct, supports the ongoing provision of recreation and recreation-related activities, and maintains an appropriate transition between the established Commercial Zone to the north and west, the Recreation Precinct, adjoining residential neighbourhoods to the south and the Light Industrial Zone beyond. Those are precisely the types of strategic land use relationships that the State Planning Provisions seek to establish and maintain through the application of appropriate zones.

The practical consequences of the proposed amendment extend well beyond facilitating a single commercial redevelopment opportunity. Replacing the Recreation Zone with the Commercial Zone would fundamentally alter the planning emphasis applying to the land. Rather than giving primacy to recreation and recreation-supporting activities, the site would become part of a statutory planning framework directed principally towards commercial development. The range of land uses anticipated by the planning scheme would broaden significantly, introducing opportunities for commercial activities that are materially different in character, scale and operational intensity from those presently encouraged within the Recreation Zone.

That change is also likely to influence the overall intensity of activity occurring on the site. Commercial activities typically generate higher levels of customer visitation, employee movements, service vehicle activity, deliveries and on-site circulation than recreation uses contemplated within the Recreation Zone. Many commercial uses also rely upon extended trading periods and more intensive patterns of operation to remain commercially viable. Collectively, those characteristics have the potential to increase traffic generation, parking demand, pedestrian activity and the frequency of vehicle movements at the interface with adjoining recreation facilities and nearby residential areas.

The planning framework also anticipates different operational expectations within each zone. Under the applicable standards, the Commercial Zone contemplates a broader range of activities operating over longer daily periods than those ordinarily anticipated within the Recreation Zone. Even where individual proposals remain subject to assessment against the planning scheme, the effect of rezoning is to establish a statutory expectation that a more intensive level of commercial activity is appropriate in this location. That expectation extends beyond trading hours alone and encompasses the ancillary activities commonly associated with commercial premises, including customer arrivals and departures, servicing,

REPRESENTATION

Draft Amendment PSA-LL0018

deliveries, waste collection, loading activities and associated vehicle movements. Those operational characteristics have the potential to alter the existing amenity of the locality in a manner that is fundamentally different from the recreation-oriented environment presently established within the Elphin Recreation Precinct.

The significance of those changes is heightened by the subject land's location at the south-western gateway to the Elphin Recreation Precinct and its proximity to established residential neighbourhoods. At present, the Recreation Zone performs an important transitional role between the established commercial centre and the recreation and residential environments beyond. Introducing the Commercial Zone would not simply alter the range of uses that may establish on the site; it would progressively relocate the commercial edge further into the precinct and invite a level of commercial intensity that is presently neither anticipated nor encouraged in this part of the municipality.

By comparison, the material accompanying PSA-LLP0018 is directed principally towards demonstrating that commercial development may be suitable on the subject land. Whilst that proposition may be accepted, it does not establish that the strategic purpose of the Recreation Zone has been exhausted or displaced by more compelling planning considerations. Nor does it meaningfully examine the broader land use implications arising from permanently extending the Commercial Zone into an established recreation precinct, including the cumulative effects on traffic generation, operational intensity, amenity and the long-term function of the precinct as a whole.

Accordingly, whilst the Commercial Zone is an appropriate statutory planning tool where land is required to accommodate commercial activities and reinforce the activity centre hierarchy, the applicant has not demonstrated why its application to this particular site would represent a superior strategic planning outcome to the existing Recreation Zone. In the absence of that justification, the proposed amendment has not established that it gives effect to the strategic intent of the State Planning Provisions or warrants the permanent removal of Recreation Zoned land from the Elphin Recreation Precinct.

3.11 Summary

The preceding assessment demonstrates a consistent theme throughout the statutory and strategic planning framework. Whilst each document addresses planning from a different perspective, collectively they promote integrated settlement planning, evidence-based decision-making, the protection of community infrastructure and the long-term planning of recreation assets as essential components of healthy, resilient and liveable communities. Equally, they recognise that planning scheme amendments require compelling strategic justification demonstrating not merely that an alternative land use is feasible, but that the amendment will produce a demonstrably superior long-term planning outcome. Considered as a whole, the strategic planning framework provides no substantive support for the incremental contraction of the Recreation Zone in favour of commercial expansion.

Against that strategic context, the material accompanying PSA-LLP0018 falls short of establishing the justification necessary to support the proposed amendment. Whilst it identifies a potential commercial redevelopment opportunity, it does not demonstrate that the subject land is surplus to present or future recreation needs, that the strategic purpose of the Recreation Zone has been exhausted, or that extending the Commercial Zone into the Elphin Recreation Precinct would better implement the objectives of the planning framework. Rather, the assessment consistently indicates that the existing planning framework remains coherent, strategically justified and capable of accommodating contemporary recreation needs. The following Part therefore examines the principal propositions advanced in support of the amendment and demonstrates why they do not displace that broader strategic conclusion.

4 Part D – Strategic Response to Applicant’s Case

4.1 Introduction

The preceding sections of this representation have examined the statutory and strategic planning framework applicable to PSA-LLP0018 and demonstrated that the proposed amendment is difficult to reconcile with that framework. Collectively, those documents establish a consistent strategic direction that supports evidence-based planning, integrated recreation precincts, orderly settlement patterns and the long-term protection of community infrastructure.

Notwithstanding that broader planning context, the material supporting PSA-LLP0018 ultimately relies upon a relatively small number of underlying strategic propositions to justify the proposed amendment. These include that the subject land is well suited to commercial development, that its location adjoining the existing Commercial Zone makes commercial expansion logical, that the current Recreation Zone no longer reflects the site's highest and best use, and that rezoning would produce a more appropriate long-term planning outcome.

Whilst those propositions may initially appear persuasive, they warrant closer examination. A planning scheme amendment is not concerned solely with whether an alternative form of development could occur on a particular parcel of land. Rather, it requires consideration of whether permanently altering the municipality's strategic planning framework is justified having regard to the broader public interest, the adopted strategic planning framework and the long-term function of the land within the urban structure.

The following section examines the principal propositions advanced in support of PSA-LLP0018. It demonstrates that, whilst the applicant has established that commercial redevelopment may be feasible, it has not demonstrated that permanently replacing the Recreation Zone with the Commercial Zone represents a superior strategic planning outcome or that the statutory burden required to justify such an amendment has been discharged.

4.2 Proposition 1: *Commercial Opportunity Does Not Establish Strategic Justification*

A central proposition underpinning PSA-LLP0018 is that the subject land presents an attractive opportunity for commercial redevelopment. Considerable emphasis is placed upon its exposure to Racecourse Crescent, accessibility, existing servicing, proximity to established commercial development and capacity to accommodate additional commercial activity. Those characteristics may reasonably support the proposition that commercial development is capable of occurring on the site. However, that is not the question before the Planning Authority.

The purpose of a planning scheme amendment is not to identify land capable of accommodating an alternative use, but to determine whether the existing planning framework continues to represent the most appropriate long-term strategic outcome for that land. Planning schemes allocate zones according to their intended strategic function within the broader urban structure, balancing economic development with recreation, residential amenity, infrastructure, environmental values and community wellbeing. Consequently, the fact that land is physically capable of supporting commercial development does not establish that its existing zoning has become inappropriate, redundant or strategically obsolete.

REPRESENTATION

Draft Amendment PSA-LL0018

That distinction is fundamental to the present amendment. The supporting material is directed primarily towards demonstrating why the site may be suitable for commercial development. Comparatively little attention is given to the more important strategic question of why the existing Recreation Zone should no longer apply. The assessment does not demonstrate that the subject land is surplus to present or future recreation needs, that it no longer contributes to the operation of the Elphin Recreation Precinct, or that permanently replacing the Recreation Zone with the Commercial Zone would better implement the municipality's adopted planning framework.

Nor does the material adequately consider the broader implications of altering the Planning Scheme. Rezoning the land would permanently change its strategic planning purpose, broaden the range and intensity of land uses anticipated by the planning framework, and extend the commercial edge further into an established recreation precinct. Those consequences extend well beyond the redevelopment potential of a single parcel of land and therefore require compelling strategic justification supported by robust evidence.

Ultimately, commercial opportunity and strategic justification are fundamentally different planning concepts. The former concerns what may be capable of occurring on the land; the latter concerns whether permanently altering the Planning Scheme produces a demonstrably superior long-term planning outcome in the public interest. Whilst the applicant has demonstrated that commercial redevelopment is possible, it has not demonstrated that the existing Recreation Zone has ceased to perform its intended strategic role or that replacing it with the Commercial Zone would better implement the municipality's long-term planning objectives.

4.3 Proposition 2: *The Recreation Zone Continues to Perform an Important Strategic Function*

The applicant's case proceeds largely on the assumption that the subject land would now be better utilised for commercial purposes than for recreation. That assumption, however, overlooks the continuing strategic role performed by the Recreation Zone and the contribution that the land presently makes to the broader Elphin Recreation Precinct. The subject land forms part of one of Northern Tasmania's most significant concentrations of sporting and recreation infrastructure, incorporating the Northern Tasmanian Cricket Association Ground, Tennis World, the Elphin Sports Centre, associated public parking and a range of complementary recreation facilities. Together, these assets function as an integrated regional recreation precinct serving communities well beyond the City of Launceston. The Recreation Zone applied to the subject land is therefore neither anomalous nor incidental. Rather, it forms part of a coherent planning framework that consolidates recreation activities within a dedicated precinct while maintaining an orderly transition between commercial, recreation and residential land uses.

Importantly, the strategic value of the land extends beyond its current physical use. The existing LIFT facility accommodates recreation, fitness, rehabilitation and allied health services that directly support organised sport, physical activity and community wellbeing. These activities reflect the contemporary evolution of recreation infrastructure, which increasingly encompasses indoor recreation centres, strength and conditioning facilities, sports rehabilitation, physiotherapy and associated health services. Far from demonstrating that the Recreation Zone has become obsolete, the existing use illustrates the flexibility of the zone to accommodate changing recreation patterns while continuing to fulfil its intended strategic purpose.

The subject land also performs an important precinct-wide function. Its location at the south-western gateway to the Elphin Recreation Precinct contributes to the accessibility, operation and future planning flexibility of the precinct as a whole. As recognised throughout the strategic planning framework, the

REPRESENTATION

Draft Amendment PSA-LL0018

effectiveness of major recreation precincts derives not only from individual sporting facilities, but from the way those facilities operate collectively as an integrated network capable of adapting to changing participation trends and evolving community needs. The strategic significance of the land therefore lies both in its existing recreation-related use and in the flexibility it provides to support the ongoing evolution of the precinct over time.

By comparison, PSA-LLP0018 gives relatively little consideration to these broader strategic functions. Whilst it identifies the site's commercial attributes, it does not demonstrate that the Recreation Zone has become redundant, that the land is surplus to foreseeable recreation requirements, or that it no longer contributes to the strategic integrity of the Elphin Recreation Precinct. Nor has any recreation needs assessment, precinct-level strategic assessment or equivalent analysis been undertaken to justify permanently removing the land from the municipality's recreation network.

The evidence instead demonstrates that the Recreation Zone continues to perform the strategic purpose for which it was applied. The land remains actively utilised for contemporary recreation purposes, forms an integral component of a significant regional recreation precinct and retains an important role in supporting the long-term adaptability and resilience of that precinct. In the absence of compelling strategic evidence demonstrating otherwise, there is no sound planning basis for displacing the existing Recreation Zone.

4.4 Proposition 3: *The Existing Urban Structure Should Not Be Altered Without Compelling Strategic Justification*

Planning schemes provide long-term certainty by establishing a coherent urban structure in which land uses are allocated according to their strategic function rather than short-term development opportunities. Zoning boundaries are therefore not arbitrary lines upon a planning map. They represent deliberate planning decisions concerning the appropriate distribution of commercial, residential, recreation and industrial activities, with each zone contributing to the orderly operation of the municipality as a whole. Consequently, proposals to alter established zoning patterns should be supported by compelling strategic evidence demonstrating that the existing urban structure no longer represents the most appropriate long-term planning outcome.

The existing zoning pattern surrounding the subject land reflects a logical and well-established land use hierarchy. Commercial activity has been consolidated to the north and west within the existing bulky goods and retail precinct, while recreation activities have been concentrated within the Elphin Recreation Precinct. Residential neighbourhoods occur predominantly to the south and the Light Industrial Zone is located beyond the eastern edge of the precinct. The subject land occupies the interface between these distinct urban environments, where the Recreation Zone performs an important transitional function by moderating the relationship between commercial, recreation and residential land uses.

The principal strategic justification advanced for the proposed amendment is that the subject land adjoins the existing Commercial Zone and therefore represents a logical opportunity for commercial expansion. Whilst adjacency may explain why commercial redevelopment could be contemplated, it does not explain why the existing zoning boundary should be relocated. Planning schemes necessarily contain interfaces between differing land use zones, and the existence of those interfaces is not evidence that the underlying planning framework has become inappropriate. If adjacency alone were sufficient justification for rezoning, the long-term stability and certainty that planning schemes are intended to provide would be progressively diminished.

REPRESENTATION

Draft Amendment PSA-LL0018

Nor should the proposal be viewed in isolation simply because it affects a single parcel of land. Strategic planning requires consideration of the cumulative consequences of incremental zoning changes over time. Extending the Commercial Zone into the south-western gateway of the Elphin Recreation Precinct would not merely facilitate redevelopment of an individual site. It would permanently reposition the commercial edge, reduce the extent of Recreation Zoned land and incrementally alter the spatial structure of one of Northern Tasmania's principal recreation precincts. Such changes warrant careful scrutiny because their implications extend well beyond the immediate boundaries of the subject site.

Importantly, there is no evidence that the existing urban structure has failed or that the established zoning pattern no longer achieves its intended planning outcomes. Rather, the existing arrangement continues to provide a coherent and complementary relationship between commercial activity, recreation infrastructure, residential neighbourhoods and employment land. In those circumstances, there is no compelling strategic justification for permanently altering a planning framework that continues to operate effectively.

4.5 Proposition 4: *The Broader Strategic Planning Framework Does Not Support the Amendment*

The strategic planning framework applicable to the subject land has been comprehensively examined throughout this representation. Whilst each document performs a different function within Tasmania's planning hierarchy, they collectively establish a clear and consistent strategic direction for the planning and management of urban growth, recreation infrastructure and community assets. Importantly, none identifies the subject land as surplus to recreation requirements, suitable for commercial expansion or appropriate for removal from the Recreation Zone. Rather, they consistently promote integrated planning, evidence-based decision-making, coordinated settlement patterns and the long-term protection of community infrastructure.

Viewed collectively, the Regional Land Use Strategy, the Greater Launceston Plan, the City of Launceston Strategic Plan, the Northern Tasmania Sports Facility Plan, the Recreation and Open Space Strategy, the Tasmanian Planning Policies, the State Planning Provisions and the Tasmanian Planning Commission's guidance all recognise that economic growth should occur alongside, rather than at the expense of, recreation infrastructure, community wellbeing and the long-term liveability of urban areas. Recreation precincts are consistently treated as strategic community assets requiring coordinated planning and sufficient flexibility to accommodate future growth, changing participation patterns and evolving community expectations.

The material supporting PSA-LLP0018 relies heavily upon those elements of the planning framework that encourage commercial investment and efficient use of serviced urban land. However, it gives comparatively little consideration to the equally important strategic objectives relating to recreation infrastructure, integrated precinct planning and the long-term resilience of established community assets. In doing so, it presents a selective interpretation of the planning framework rather than the balanced assessment contemplated by those documents.

Accordingly, the broader strategic planning framework does not support the proposition that commercial opportunity alone provides sufficient justification for permanently reducing the extent of the Recreation Zone. Read as a whole, the relevant planning documents consistently reinforce the ongoing strategic role of the Elphin Recreation Precinct and the need for any significant change affecting that precinct to be supported by comprehensive strategic analysis. That analysis has not been undertaken.

REPRESENTATION

Draft Amendment PSA-LL0018

4.6 Proposition 5: *The Public Interest Has Not Been Demonstrated*

Ultimately, the question before the Planning Authority is not whether commercial redevelopment of the subject land would be possible or commercially desirable. The question is whether permanently altering the Planning Scheme would produce a superior long-term planning outcome that serves the broader public interest. That assessment necessarily extends beyond the interests of an individual landowner and requires consideration of the enduring implications for the municipality's strategic planning framework, community infrastructure and future urban development.

The applicant has identified potential commercial benefits arising from the proposed amendment, including additional development opportunities and the expansion of commercial activity. Those outcomes may represent legitimate planning considerations. However, the public interest requires a broader assessment than economic benefit alone. It also encompasses the protection of strategically important recreation infrastructure, the maintenance of coherent urban structure, the long-term certainty of the Planning Scheme and the continued provision of community assets that contribute to the health, liveability and resilience of the municipality.

As demonstrated throughout this representation, the applicant has not established that the subject land is surplus to present or future recreation needs, that the Recreation Zone has ceased to perform its intended strategic function, or that the existing planning framework has become ineffective. Nor has it demonstrated that permanently extending the Commercial Zone into the Elphin Recreation Precinct would better implement the municipality's adopted strategic planning framework or produce superior long-term planning outcomes. Those omissions are significant because planning scheme amendments create enduring land use outcomes that should only proceed where supported by compelling strategic justification and robust evidence.

The broader implications of the amendment also warrant careful consideration. Incremental changes to established zoning boundaries may appear modest when viewed individually, yet collectively they have the capacity to alter the function, character and long-term planning of strategically important precincts. The public interest is therefore served not by facilitating every commercially attractive redevelopment opportunity, but by ensuring that permanent changes to the Planning Scheme occur only where they demonstrably improve the municipality's long-term planning framework.

Having regard to the evidence before the Planning Authority, that threshold has not been satisfied. The applicant has demonstrated that commercial redevelopment may be feasible, but it has not demonstrated that permanently replacing the Recreation Zone with the Commercial Zone represents a superior planning outcome when assessed against the statutory planning framework, the adopted strategic planning documents and the long-term interests of the municipality. In those circumstances, the existing Planning Scheme provisions should be retained.

REPRESENTATION

Draft Amendment PSA-LL0018

5 Part E – Conclusions

The assessment of PSA-LLP0018 ultimately requires the Planning Authority to determine whether the proposed amendment represents sound strategic planning and whether it has been demonstrated to satisfy the Local Provisions Schedule criteria. That question is fundamentally different from asking whether commercial development could occur on the subject land. The capability of the land to accommodate commercial activity is not, of itself, sufficient to justify permanently altering the municipality's strategic planning framework or to demonstrate that doing so would produce a superior long-term planning outcome. Rather, the relevant enquiry is whether the existing Recreation Zone has ceased to perform an appropriate strategic function and whether its replacement with the Commercial Zone is supported by compelling strategic justification, robust evidence and the broader public interest.

This representation has examined that question from a number of complementary perspectives. It has demonstrated that the existing Recreation Zone forms part of a coherent and deliberate urban structure centred upon the Elphin Recreation Precinct; that the subject land continues to accommodate recreation-oriented activities that are entirely consistent with the contemporary operation of the zone; that it performs an important transitional role between commercial, recreation, industrial and residential land uses; and that its strategic significance derives not only from its present use, but from its continuing contribution to the long-term integrity, adaptability and resilience of one of Northern Tasmania's principal recreation precincts.

The assessment has also demonstrated that the broader statutory and strategic planning framework provides little support for the proposed amendment. Collectively, the objectives of the *Land Use Planning and Approvals Act 1993*, the Tasmanian Planning Policies, the Northern Tasmania Regional Land Use Strategy, the Greater Launceston Plan, the City of Launceston Strategic Plan, the Northern Tasmania Sports Facility Plan, the City of Launceston Recreation and Open Space Strategy, the State Planning Provisions and the Tasmanian Planning Commission's guidance consistently promote integrated, evidence-based planning that balances economic development with the protection of community infrastructure, recreation opportunities and long-term urban liveability. None of these documents supports the proposition that strategically important recreation land should be relinquished simply because an alternative commercial use may be feasible or commercially attractive.

Equally significant is the absence of the strategic evidence ordinarily expected to accompany an amendment of this nature. The material supporting PSA-LLP0018 does not demonstrate that the subject land is surplus to present or future recreation needs, that the Recreation Zone has become strategically redundant, or that the long-established planning rationale underpinning the existing zoning has been displaced by more compelling planning considerations. Nor does it establish that the municipality's future commercial needs cannot be accommodated within existing Commercial Zone stock or that the permanent contraction of the Recreation Zone would better implement the adopted strategic planning framework. In essence, the applicant has established a case that commercial development may be appropriate on the site; it has not established a case that the Recreation Zone is no longer the most appropriate strategic planning outcome for the land.

That distinction is fundamental. Strategic planning is concerned not simply with identifying alternative development opportunities, but with providing certainty, consistency and long-term direction in the allocation of land uses across the municipality. Planning scheme amendments should therefore proceed only where the evidence demonstrates that the existing planning framework is no longer appropriate and that the proposed amendment will deliver a demonstrably superior planning outcome. Having regard to the matters examined throughout this representation, it has not been demonstrated that PSA-LLP0018 satisfies that threshold. The existing Recreation Zone continues to perform an important strategic planning function, the broader planning framework continues to support its retention, and the

REPRESENTATION

Draft Amendment PSA-LL0018

public interest has not been shown to be better served by its permanent replacement with the Commercial Zone.

For these reasons, the Planning Authority should not be persuaded that PSA-LLP0018 satisfies the Local Provisions Schedule criteria or that the material presented provides a sufficient strategic or evidentiary basis to conclude otherwise. The request has demonstrated commercial opportunity, but it has not demonstrated the strategic necessity required to justify permanently removing land from the Recreation Zone or altering the long-established planning framework applying to the Elphin Recreation Precinct.

Accordingly, it is respectfully submitted that the Planning Authority should conclude that the draft amendment does not satisfy the Local Provisions Schedule criteria, recommend that PSA-LLP0018 not proceed in its current form, and report that opinion to the Tasmanian Planning Commission in accordance with section 40K of the *Land Use Planning and Approvals Act 1993*. In doing so, the existing Recreation Zone should be retained as the most appropriate long-term strategic planning outcome for the subject land.

Yours faithfully

Planning Ahead Tasmania



Rohan Willis

Principal Consultant