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Sent: Thu, 16 Sep 2021 14:19:13 +1000
To: "Contact Us" <contactus@launceston.tas.gov.au>
Cc: "Steven Thurley" <chilla38@hotmail.com>
Subject: Representation to Launceston draft LPS
Attachments: CoL LPS representation against zoning - Illaroo - 345a St Leonards Road Final.pdf

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Good afternoon

Please see the attached representation to the draft LPS.

Thank you and regards

Mick Purves

Town Planning Solutions Pty Ltd

MPIA MTP

General Manager
City of Launceston

Email to: contactus@launceston.tas.gov.au

Dear Sir

REPRESENTATION TO LOCAL PROVISIONS SCHEDULE

Agriculture zoning for 345A St Leonards Road, St Leonards

Town Planning Solutions was engaged to make representation to the Launceston Local Provisions Schedule (LPS) on behalf of my client, Illaroo Nominees Pty Ltd, who owns land at 345A St Leonards Road, St Leonards (PID 9983775, CT's 34409/1 & 33409/2).

We submit the Agricultural zoning proposed under the *Local Provisions Schedule* (LPS) is not appropriate for lands identified as part of Council's future urban growth, based on the requirements of the *Northern Tasmanian Regional Land Use Strategy* (RLUS) and *Guideline No. 1 – Local Provisions Schedule: zone and code application* (Guideline No.1).

The subject lands as highlighted in blue on Figure 1 in relation to the greater Launceston area.



Figure 1 – Location plan and context (source: LISTmap)



Figure 2 – existing site conditions (source: LISTmap)

The subject lands as highlighted in red on Figure 2, which also shows the relationship to the existing St Leonards village to the north and west. The subject lands have the following characteristics:

- an approximate combined area of 48 hectares, not including road access points;
- three separate frontages to St Leonards Road, providing access into the lands;
- largely cleared pasture lands, with an intermittent waterway and some vegetation through 34409/2;
- known historical land use includes grazing; and
- the western boundary of the subject land adjoins the existing village of St Leonards.

LPS

The subject area is identified as within the Agriculture zone of the LPS and subject to a range of overlays under various Codes, as shown in Figure 3. The subject lands are bordered in black.

The LPS mapping identifies adjoining properties to the west and southwest are proposed for the General Residential or Low-Density Residential zone, while properties to the north and east are proposed for the Rural zone.

It is understood that the zoning was applied in translation of the zoning regime under the *Launceston Interim Planning Scheme 2015* and following the requirements of Guideline No.1 and the zone purpose statements of the *Tasmanian Planning Scheme* (TPS).

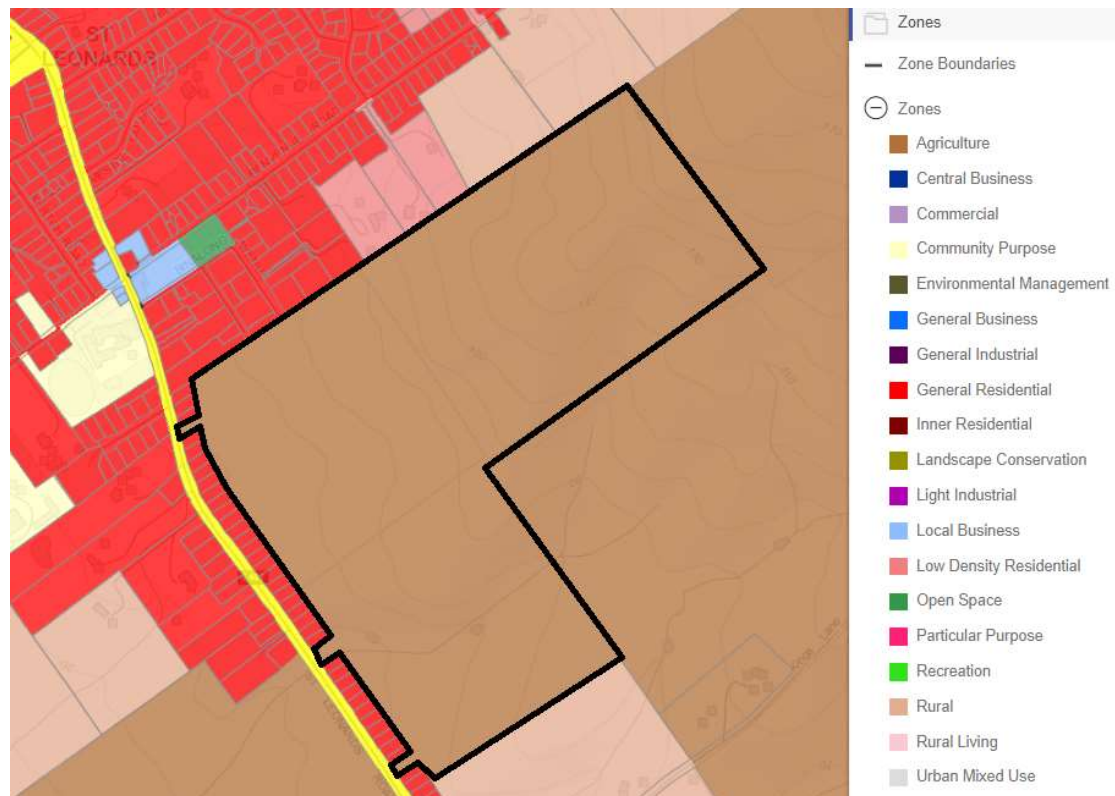


Figure 3 - Extract Launceston LPS zoning regime¹

Northern Tasmania Regional Land Use Strategy

The *Northern Tasmania Regional Land Use Strategy 2011* (RLUS) is the statutory land use plan that establishes the strategic and policy basis for the future development of northern Tasmania, most recently updated in 2021. The RLUS establishes a framework, directions for land use and regional planning policies to recognise the role of the Greater Launceston Plan within the region.

Sections D2.1.1 and D2.1.2 establish key principles and requirements for urban growth areas, with Map D1 identifying growth corridors and future growth areas under the RLUS, as shown in Figure 4.

The Regional Framework Plan of the RLUS identifies the subject land as a Priority Investigation Area – Residential, adjoining the St Leonards Growth Corridor. Section D2.1.2 identifies the following for Future Investigation Areas within the RLUS:

These areas are considered by the NTRLUS to be inside an Urban Growth Area and can be rezoned for urban development. It is expected that local strategy for each spatial area will be undertaken prior to any applications for rezoning to urban uses within a particular area to ensure coordinated and sustainable development responding to the Key Principles in D.2.1.1.²

¹ <https://planning.discovercommunities.com.au/connect/analyst/mobile/#!/main?mapcfg=launceston>

² P15 RLUS

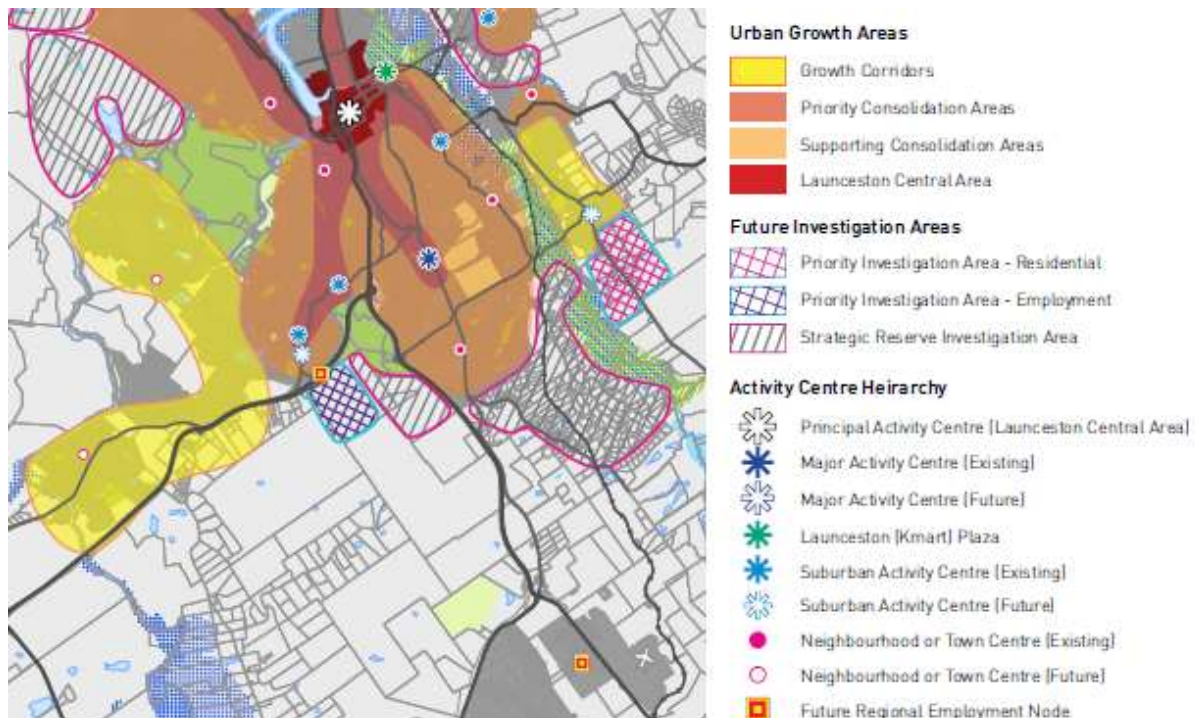


Figure 4 - RLUS Regional Framework Plan extract³

Future conversion of the subject land for residential development is supported by the following Policies and Actions under Regional Settlement Networks: RSN-P1, A1 & A2, RSN-P2, A4, A5, A6; RSN-P7, A12; RSN-P8, P9, P10, A14; RSN-P11, P13, A15 and A16.

The RLUS clearly identifies that the subject lands are intended for future residential development, consistent with a range of policies and actions.

Greater Launceston Plan

The Summary Report identifies that the *Greater Launceston Plan 2014* (GLP) was developed to provide a unified and holistic approach to coordinate the long-term planning and management of the City and broader greater urban area. The project was initiated by the City through the Commonwealth Livable Cities Program and embraces the City of Launceston and municipalities of George Town, Meander Valley, Northern Midlands and West Tamar⁴.

The GLP established a policy framework around Governance; Creativity and Innovation; Liveability and Amenity; Connected and Networked Region; Diversity; Social Inclusion and Equity; Environmental Sustainability; Land use, Transport and Infrastructure; Economic Development and 11 associated principles to guide this outcome.

Figure 5.2 Regional Framework Plan: Summary of the GLP identifies the subject land as within a New Growth Area – Growth Corridor. This is supported by identification of the land in Figure 5.8 – *Integrated Residential Development* as within the Waverley St Leonard's Corridor and as a Priority Investigation Area – Residential and reproduced at Figure 5.

³ P16 RLUS

⁴ P3, GLP Summary Report

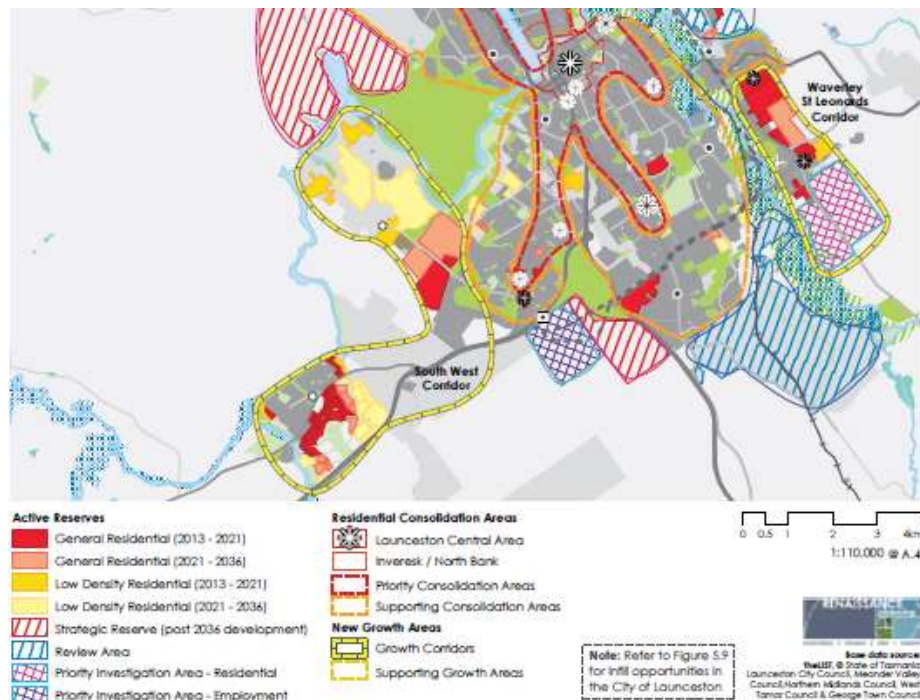


Figure 5 - GLP Extract Integrated Residential Development main map⁵

The GLP supports this through identification of *Corridor Project G3: St Leonards Waverley Corridor Strategy* at page 60, to reflect the integrated physical strategy for the long-term consolidation of the St Leonards area and progressive development of a major new growth area for the City of Launceston.

The GLP strategically identifies the subject land as suitable for future residential development within a document prepared through a partnership of Local, State and Federal government.

Launceston Residential Strategy 2009-2029

Launceston Residential Strategy 2009-2029 (Residential Strategy) establishes a framework for identification of suitable areas for urban and residential expansion over the life of the document. It was published in 2010.

The Residential Strategy identifies a range of criteria for assessment of candidate areas for future residential development. While new areas for greenfield residential expansion are not specifically identified, the criteria within this report were examined in additional detail through subsequent documents and specifically, the St Leonards Village Plan.

St Leonards Village Plan

The City commenced the *St Leonards Village Plan* (Village Plan) to address emerging needs for urban development within the Launceston Area, following identification of Corridor Project G3 within the GLP.

The main outcomes of the Village Plan for the subject lands are summarized as follows:

- they are within the area of the Plan;
- they are identified as of the Village Core and St Leonards Road Precincts;
- the subject lands are identified as priority for development opportunities;

⁵ P48 GLP Summary Report

- approximately 34 hectares of the lands are identified for priority Residential development;
- approximately 14 hectares are identified for priority Commercial development;
- the lands are bordered to the south and east by priority Residential development opportunities; and
- CT34409/1 is within the 400m centre buffer for the existing village, while almost all of CT34409/2 is within the 800m centre buffer.

Figure 6 reproduces the integrated development opportunities identified during consultation on the Village Plan, as follows:

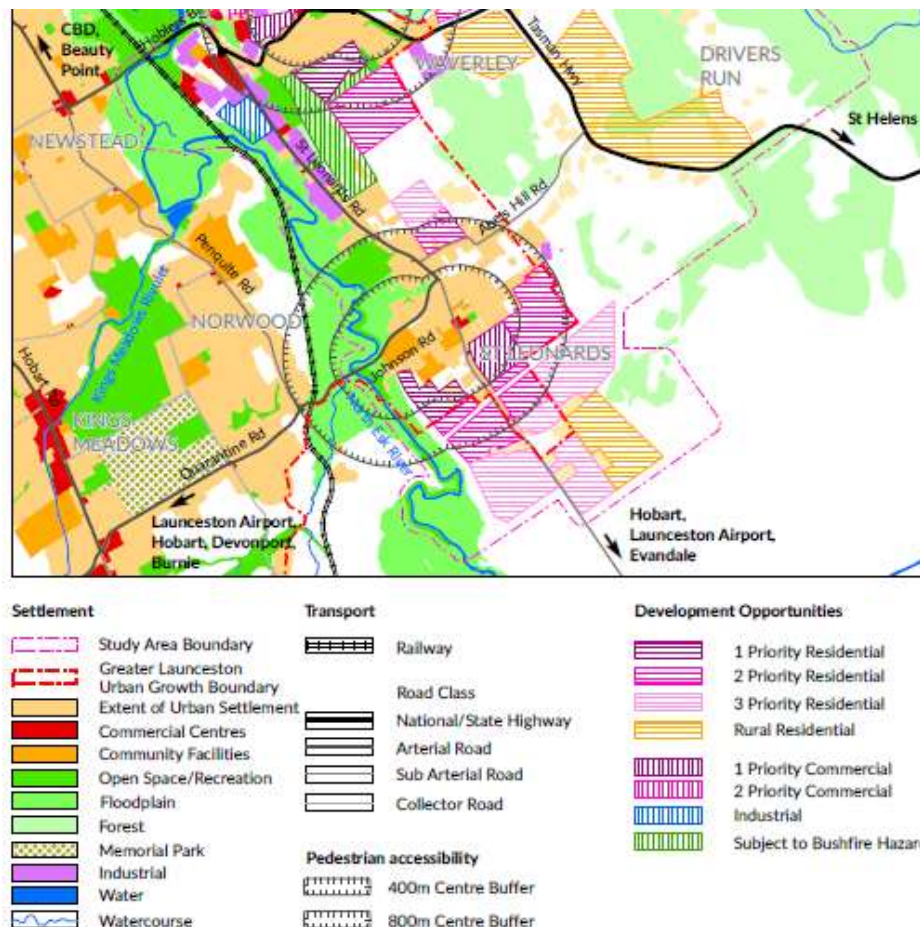


Figure 6 - St Leonards Village Plan extract - Development Opportunities Map U⁶

Consultation on draft Village Plan was completed in 2018. A revised version of the Village Plan has not been publicly released following the consultation process, nor adopted by the City.

Officers of the City provided an extensive briefing into the Village Plan, and it is understood that work to accommodate the future residential development within the Launceston urban area and at St Leonards are well developed and include the following:

- St Leonards will accommodate significant future urban residential development;
- population and dwelling growth have tracked at or above the high projections within the Plan since the consultation was completed;

⁶ P50 Village Plan

- a broad range of planning for services, open space, commercial land, staging of development and identification of future zoning requirements have been completed by the City; and
- the City has a wide range of supporting reports that address the technical requirements for the future development of the lands, including land capability.

While it is understood there is no short-term program for completion of this project, advice from officers of the City confirm the Village Plan remains significant component of their long-term strategy to accommodate future urban development.

The Village Plan provides detailed local strategy that completed the initial investigations identified under the RLUS and determined that the subject lands are within an Urban Growth Area and are suitable for conversion to residential uses.

While in draft form, The Village Plan largely satisfies the requirements of the RLUS for local strategy to define the future conversion of land use within Growth and Future Investigation Areas.

It is submitted that the assessment of these reports demonstrates a substantive strategic basis for the conversion of the subject lands for urban residential development under the RLUS, which does not support use of the Agriculture zone under the LPS.

Guideline No.1

Guidelines AZ1 and AZ6 provide the relevant instruction for use of the Agriculture zone as follows:

- AZ 1 The spatial application of the Agriculture Zone should be based on the land identified in the 'Land Potentially Suitable for Agriculture Zone' layer published on the LIST, while also having regard to:*
- (a) any agricultural land analysis or mapping undertaken at a local or regional level for part of the municipal area which:*
 - (i) incorporates more recent or detailed analysis or mapping;*
 - (ii) better aligns with on-ground features; or*
 - (iii) addresses any anomalies or inaccuracies in the 'Land Potentially Suitable for Agriculture Zone' layer, and*
- where appropriate, may be demonstrated in a report by a suitably qualified person, and is consistent with the relevant regional land use strategy, or supported by more detailed local strategic analysis consistent with the relevant regional land use strategy and endorsed by the relevant council;*
- ...
- AZ 6 Land identified in the 'Land Potentially Suitable for Agriculture Zone' layer may be considered for alternate zoning if:*
- (a) local or regional strategic analysis has identified or justifies the need for an alternate consistent with the relevant regional land use strategy, or supported by more detailed local strategic analysis consistent with the relevant regional land use strategy and endorsed by the relevant council; ...*
 - (d) for the identification, provision or protection of strategically important uses that require an alternate zone; or*
 - (e) it can be demonstrated that: ...*
 - (iii) the Agriculture Zone is otherwise not appropriate for the land.*

Application of the Agriculture zone to land that is recognised in the RLUS, Greater Launceston Plan and St Leonards Village Plan as a strategic reserve for future conversion to

residential and commercial uses is not consistent with the zone purpose statements, the intent of the Guidelines for long term protection of agricultural lands, the requirements of AZ6(a) and consequentially, the intent and requirements of Guideline AZ1 for application of the Agriculture zone under a LPS.

Designation of this land as a Strategic Reserve within regional and local strategies complies with the requirements of Guidelines AZ1 and AZ6 for an alternative zoning to be used.

The RLUS and Guideline No.1 support an alternative zoning of the lands. The online mapping tool identifies that urban areas are within the General Residential zone, with the existing village centre within the Local Business zone, as shown in Figure 1.

The Village Plan identifies CT34409/1 as *1 Priority Commercial*, while CT34409/2 is identified as *2 Priority Residential*, as shown in Figure 6. Within the TPS zoning regime and considering the zoning applied to lands under the draft LPS, likely zones for these designations include Local Business and General Residential.

It is possible the Inner Residential would be appropriate to enable more intensive residential development adjoining key transport and activity areas. This would likely be a desirable outcome for the future development of the area. We note that the lands cannot be zoned Inner Residential under Guideline IRZ2, as it is not a translation from an existing planning scheme.

Use of the General Residential and Local Business zones is considered to be premature at this point, as the concepts within the Village Plan require further development and formal adoption by the City to assist translation into the zoning regime under the TPS. The Village Plan is not yet complete. As a result, there is no formally adopted strategy of Council to inform the use of zones on the subject lands.

It is likely that multiple zones (Local Business, General Residential, Inner Residential and Open Space) should be applied to the subject lands.

The TPS provides for such situations through the Future Urban Zone. Guideline No.1 provides relevant instructions in such circumstances:

- FUZ 1 The Future Urban Zone should be applied to land identified for future urban development to protect the land from use or development that may compromise its future development, consistent with the relevant regional land use strategy, or supported by more detailed local strategic analysis consistent with the relevant regional land use strategy and endorsed by the relevant council.*
- FUZ 2 The Future Urban Zone should be applied to land within an interim planning scheme Particular Purpose Zone which provides for the identification of future urban land.*
- FUZ 3 The Future Urban Zone may be applied to land identified in an interim planning scheme code or specific area plan overlay which provides for future urban land.*
- FUZ 4 The Future Urban Zone may be applied to sites or areas that require further structure or master planning before its release for urban development.*

The subject lands are identified through regional and local strategies endorsed by the City. The draft nature of the Village Plan does not support zoning for the identified future uses at this time, as further master planning and investigations are required to determine the ultimate zoning of the lands.

Conclusion

This representation identified that the Agriculture zone proposed under the LPS is not consistent with the requirements of the RLUS, Greater Launceston Plan, St Leonards Village Plan and consequently, the requirements of Guideline No.1.

Review of alternative zones within the TPP's identified that the General Residential and Local Business zones were not (yet) appropriate.

As such, we request the Future Urban zone be applied to the land. We expect that a separate application would be lodged in future to reflect the subdivision layout and densities once additional research is completed, and a proposal developed.

We look forward to discussing this submission with you further informally or at the LPS hearings.

Thank you and regards



Mick Purves
Director
Town Planning Solutions Pty Ltd
16 September 2021