

TAS FITNESS PTY LTD

69 William Street, Launceston

PH: (03) 6331 3133

ABN: 913 005 229 02

Roger Howlett
Delegate (Chair)
Tasmanian Planning Commission
tpc@planning.tas.gov.au

22 July 2026

Dear Sir

Tasmanian Planning Scheme – Launceston Draft Amendment PSA-LLP0029

Thank you for your letter dated 10th July 2026 relative to the above.

You invite us as representors to make a submission as to whether the amendment satisfies the relevant criteria in relation to the TPP's. In particular you highlight Section 34(2)(da) of the Land Use Planning and Approvals Act 1993 (highlighted below).

(2) The LPS criteria to be met by a relevant planning instrument are that the instrument –
(a) contains all the provisions that the SPPs specify must be contained in an LPS; and
(b) is in accordance with [section 32](#) ; and
(c) furthers the objectives set out in [Schedule 1](#) ; and
(d) is consistent with each State policy; and
(da) satisfies the relevant criteria in relation to the TPPs; and
(e) as far as practicable, is consistent with the regional land use strategy, if any, for the regional area in which is situated the land to which the relevant planning instrument relates; and
(f) has regard to the strategic plan, prepared under [section 66 of the Local Government Act 1993](#) , that applies in relation to the land to which the relevant planning instrument relates; and
(g) as far as practicable, is consistent with and co-ordinated with any LPSs that apply to municipal areas that are adjacent to the municipal area to which the relevant planning instrument relates; and
(h) has regard to the safety requirements set out in the standards prescribed under the [Gas Safety Act 2019](#) .

This is an interesting and maybe conflicting clause.

So to be stating the amendment has to satisfy the relevant criteria in relation to the TPPs the clause is separating clauses from the whole. The TPP policy document states that no individual topic should be read in isolation – they are interlinked.

Even if we can get over that subject the next issue is that if the amendment does not satisfy all the relevant criteria then does the amendment fail?

The original proposal we believe failed the test of considering matters other than flooding. The revised submission from Jan 2026 amended this in part – by moving the following motion:

TAS FITNESS PTY LTD

69 William Street, Launceston

PH: (03) 6331 3133

ABN: 913 005 229 02

4. redraw Figure LAU-S17.1 (Flood Risk Overlay Map) to redefine the boundary between the low and medium risk flood risk precincts to incorporate hazard 1 and hazard 2 classification floods within the low flood risk precinct thereby increasing the proportion of the proposed overlay classified as low risk.

Does this change align all the relevant criteria under the TPP's? Possibly not. Should then the amendment be refused? That is a question only the Commission can answer.

The following is our take on the relevant criteria within the TPP's and how the amendment relates to those criteria.

CLIMATE CHANGE STATEMENT – one can easily argue that the amendment is brought about solely because of Climate Change predictions.

SETTLEMENT – The amendment certainly defines where and how growth will occur in Launceston. It does so by limiting new residential development in areas of the city. The amendment expands the area already under a flood control (Inveresk/Invermay)

GROWTH – The amendment stifles rather than encourages growth in the Inveresk/CBD area. This is justified due to predicted flood levels into the near future.

LIVEABILITY – If you are living in the area of the amendment not previously covered by the Inveresk/Invermay flood area then yes, the amendment will impact on your enjoyment and liveability of your home. You will have to follow a series of restrictive guidelines to extend or significantly alter your property – maybe even introducing stairs when maybe all you wanted was a ground level home.

SOCIAL INFRASTRUCTURE – the amendment will restrict the provision of social infrastructure in areas where flood levels are predicted to increase. The exception to this seems to be a university development. Bit strange – but council will justify that an expert report and a management plan indicated this type of use was appropriate in a flood plain.

SETTLEMENT TYPES – No impact. Not relevant.

HOUSING – The amendment will restrict housing in certain areas of the city. The revised plan following the Jan 2026 decision does address this in part by allowing housing to be considered in areas where the flood risk is low.

DESIGN – The amendment does restrict design of residential and other property. It sets floor levels well above the current floor levels in the areas of the city currently not covered by flood controls. The result will be properties which do not follow the design of the rest of the suburb.

DEVELOPMENT CONTRIBUTIONS – Not relevant in this instance

In summary the amendment does not align with many of the relevant criteria covered by the TPP's. The amended amendment of Jan 2026 does go some way to meeting these criteria.

The amendment is a single subject (flooding) amendment with little regard for other approved policies of Council:

- Finding new appropriate uses for heritage buildings
- Bringing life into the CBD by encouraging more residences

TAS FITNESS PTY LTD

69 William Street, Launceston

PH: (03) 6331 3133

ABN: 913 005 229 02

- To provide for a mix of residential, retail, community services and commercial activities in urban locations.
- To provide for a diverse range of uses or development that are of a type and scale that support and do not compromise or distort the role of surrounding activity centers in the activity center hierarchy.

The imminent closure of the Boags facility highlights the shortcomings of this amendment.

The amendment in its current form severely restricts any future use of this massive strategic site. The site is heritage listed.

So the flood amendment is based on things which may happen into the future. What is more certain is that if an economic use of the Boags site is not found there will be a massive public outcry about the decline of heritage buildings, the lack of uses for the site and the possible structural deterioration of the buildings should a new use not be found soon.

So which takes precedence – something which may happen in the future or something which will happen in the very near future?

If the Commission believe the amendment aligns with the relevant criteria in the TPP's then we would strongly suggest they support the extra condition as outlined in the decision of Jan 2026.

Thank you for the opportunity to make comment regarding this matter.

Yours faithfully

Karen rawlings

Director

Tas Fitness Pty Ltd

