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Sent: Tue, 7 Sep 2021 11:58:57 +1000
To: "Contact Us" <contactus@launceston.tas.gov.au>
Subject: Submission relating to Proposed State Planning Provisions
Attachments: Planning Questions.docx

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Good morning,

Please find attached a submission relating to the Proposed State Planning Provisions.

Thank you for your considerations.

Mick Eddleston

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M. Eddleston
27 Gascoyne Street
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7th September 2021

To Whom it may concern,

I have some grave concerns pertaining to the proposed State Planning Provisions (SPP) for which I seek clarification.

In relation to the proposed SPPs, in general, among the zones detailed are General Residential Zones (GRZ), Inner Residential Zones (IRZ) and Low Density Residential Zones (LDRZ).

- It would appear under the auspices of the proposed SPPs that blocks within GRZs can be subdivided at will and infill can occur without recourse from neighbouring residents.
- As it currently stands, the intent of the defined GRZs appear to also embrace what many would consider as Medium Density Residential, therefore the SPPs are misleading as they do not include adequate clarification.
- A consideration may be the creation of a new zone, Medium Density Residential, which would more clearly define that area as potentially available for subdivision or infill. Or, at the very least, clarification within the Zone definitions as to the intent of GRZs.

In relation to the proposed SPPs, Clauses 8 and 10;

Clause 8, GRZ, stated purpose is:

To provide for residential use or development that accommodates a range of dwelling types where full infrastructure services are available or can be provided;

To provide for the efficient utilisation of available social, transport and other service infrastructure;

To provide for non-residential use that:

- (a) primarily serves the local community; and
- (b) does not cause an unreasonable loss of amenity through scale, intensity, noise, activity outside of business hours, traffic generation and movement, or other off site impacts; and

To provide for Visitor Accommodation that is compatible with residential character.

- **Within the provision of Visitor Accommodation, how are the aesthetics and character of the area considered or defined?**
- **Please explain how planning approvals are deliberated, whether objectively utilising relevant criteria, or subjectively upon the judgements of the planning section or Launceston City Council? Is the criteria used by the Public Service available to the public for review by the public?**
- **What criteria is applied to building applications in relation to the quantity and style of accommodation suitable within the purposes of the GRZ?**
- **Why is there no defined cap on the number of subdivided dwellings permitted in any one street within a GRZ?**

Clause 10, Low Density Residential Zone (LDRZ), stated purpose is:

To provide for residential use and development in residential areas where there are infrastructure or environmental constraints that limit the density, location or form of development;

To provide for non-residential use that does not cause an unreasonable loss of amenity, through scale, intensity, noise, traffic generation and movement, or other off site impacts; and
To provide for Visitor Accommodation that is compatible with residential character.

- **What criteria is applied to building applications in relation to the quantity and style of accommodation suitable within the purposes of the LDRZ?**
- **Within the provision of Visitor Accommodation, how are the aesthetics and character of the area considered?**
- **Please explain how planning approvals are deliberated, whether objectively utilising relevant criteria, or subjectively upon the judgements of the planning section or Launceston City Council? Is the criteria used by the Public Service available to the public for review by the public?**
- **What criteria is applied to building applications in relation to the quantity and style of accommodation suitable within the purposes of the GRZ?**

Clause 8 frequently refers to adequate provision of Private Open Space for dwellings.

- **Where in the scheme is there a reference to ‘loss of private open space’ for neighbouring residents impacted by subdivision or construction?**
- **What criteria are used to determine if there is a loss of private open spaces of neighbouring properties that are to be overlooked by dwellings to be constructed, with respect for the potential loss of amenity, especially concerning subdivided properties?**

Clause 8.4.2 recommends that a dwelling must have a private open space of not less than 24 square metres, or 12 square metres if a multiple dwelling.

- **As the majority of potential dwellings may well accommodate families, what considerations are given towards the proximity of playgrounds or family-friendly recreational facilities?**
- **Where the construction of dwellings, (either replacement of current structures or dwellings on subdivided blocks), requires the removal of established vegetation and/or trees, within the criteria of Clause 8 are there any considerations given towards the replacement of vegetation, especially where mature trees are destroyed?**

In applying the provisions of Clause 8 and the construction of additional dwellings on subdivided blocks, what considerations are given towards the provisions of Code 2.0 - Parking and sustainable Transport Code, specifically:

To ensure that parking does not cause an unreasonable loss of amenity to the surrounding area; The availability, accessibility and safety of on-street parking, having regard to the nature of the roads, traffic management and other uses in the vicinity; and the effect on streetscape.

I thank you for your consideration and look forward to hearing from you prior to final deliberations on the proposed provisions.

Yours Sincerely,

M. Eddleston

