

20 October 2026

John Ramsay
Executive Commissioner
Tasmanian Planning Commission
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By email: tpc@planning.tas.gov.au

Dear Mr Ramsay,

Draft Amendment PSA-LLP0018
Hearing Notes – 23 Racecourse Crescent, Launceston
Tasmanian Planning Commission – 20 October 2026

The following five points, in my opinion, go to the heart of the strategic question at hand and which, taken together, explain why the material and evidence provided with this proposed amendment does not establish a sound basis for permanently rezoning the land at 23 Racecourse Crescent, Launceston from Recreation to Commercial.

Point 1.

The starting point is the site's existing function and context. The subject land is neither vacant nor underutilised, nor is it disconnected from its surroundings. It sits at the south-western edge of the broader NTCA/Elphin/Tennis World recreation precinct, adjoining or closely associated with the NTCA Ground, Elphin Sports Centre and regional tennis facilities. In functional terms, the land is not merely complementary recreation land; there is a genuine interdependence between the site and the surrounding sporting facilities. It accommodates sport, fitness, strength and conditioning, rehabilitation and allied-health activities, and provides facilities and services that support the effective operation of the broader precinct. Importantly, it also provides change room and training facilities that are necessary to supporting major annual tournament events, including the Launceston International.

The significance of that relationship is not diminished because the land is privately owned. The Zone application guidelines provided under Guideline No. 1 (Local Provisions Schedule: zone and code application, 2018), as issued by the TPC under section 8A of the *Land Use Planning and Approvals Act 1993* (the LUPA Act), expressly states that the Recreation Zone may be applied to either public or privately owned land. The present zoning is therefore not anomalous merely because the site is in private ownership. Indeed, the Recreation Zone was applied through the Launceston Local Provisions Schedule process and remains entirely consistent with the zone-application guidance for land used for active and organised recreation.

Council's position upon the proposed amendment repeatedly relies upon two propositions: first, that the land is privately owned; and secondly, that the existing use can continue under existing-use rights after rezoning. Neither proposition answers the strategic issue. Existing-use rights protect the continuation of an existing use; they do not preserve the land for recreation after that use ceases, nor do they preserve the site's capacity to adapt, expand or accommodate future recreation-related functions. The strategic effect of the amendment is therefore not neutral. It removes the long-term

Recreation Zone protection and replaces it with a zone expressly directed to materially-different commercial purposes.

This is why the relevant inquiry must be precinct-based and forward-looking. The present recreation use is evidence that the Recreation Zone is doing what it is intended to do. Before that zoning is permanently removed, there should be clear evidence that the land is surplus to the current and foreseeable needs of the precinct, or that the commercial alternative produces a demonstrably superior strategic outcome. That evidence has not been provided.

Point 2.

The Northern Tasmania Sports Facility Plan 2023 is particularly important because it identifies a range of real operational, capacity and infrastructure constraints across the greater NTCA/Elphin/Tennis World precinct. It records – amongst other items – restricted and insufficient football access to grounds and seasonal competition for NTCA fields; inadequate cricket training facilities, insufficient practice nets and deficient change facilities; and ageing Tennis World infrastructure requiring, amongst other matters, clubhouse facility renewals. In short, the Plan depicts a precinct in which existing facilities, land and operating capacity are already under pressure and in which future configuration, rationalisation and renewal remain live strategic issues.

Taken together, those findings matter because they demonstrate that the surrounding recreation precinct is not a static or surplus environment. Rather, it is a precinct in which existing facilities are already subject to capacity constraints, competing demands between sporting codes, deficiencies in training and change facilities, ageing infrastructure, and unresolved questions about how finite recreation land should best be configured and used.

The Plan's recommendations make the significance of those constraints explicit. Recommendation 12.3 calls for the City of Launceston to complete the master planning process for the NTCA precinct. Recommendation 12.4 then goes further and calls for a master plan of the greater NTCA/Elphin Indoor Sports/Tennis World precinct to improve car parking, access and circulation, rationalise some uses and provide opportunities to expand uses where practical. Both are identified as high-priority actions and recorded as underway.

That produces a straightforward strategic tension. Council is, on the one hand, participating in a planning process intended to determine how a capacity-constrained precinct can operate more effectively; how parking, access and circulation can be improved; how competing and potentially incompatible uses can be rationalised; how ageing infrastructure should be renewed; and where additional recreation capacity might practically be accommodated. On the other hand, this amendment would permanently remove approximately one-tenth of the Recreation Zoned land comprised in the broader NTCA Recreation Zone cluster before that wider master-planning exercise has resolved those matters.

Council says the Sports Facility Plan does not assess the subject title because it is private land. That is true, but it cannot logically be used as evidence that the land is unnecessary. Indeed, the Plan itself explains that its core analysis is directed principally to Council-owned or managed facilities because those are the facilities over which councils have the greatest influence; privately owned facilities are therefore not part of its core analysis because of tenure, not because they lack recreation value or future strategic relevance. If the Plan excluded the subject title because of ownership, its silence about that title is not a finding that the land is surplus. There is a circularity in relying on a public-land-focused assessment to say that a private recreation site need not be assessed, and then using the absence of that site from the assessment as support for removing its Recreation zoning.

The prudent strategic sequence is the reverse: complete the precinct-level planning, understand the long-term spatial and operational requirements and the infrastructure renewal needs of the existing facilities, and only then determine whether any part of the existing Recreation Zone is genuinely unnecessary. Permanently contracting the recreation land base before undertaking the very master planning that is intended to test capacity, rationalisation, circulation and expansion risks foreclosing options before the strategic work has been done.

Point 3.

A central feature of Council's reasoning upon the amendment is the proposition that the subject site is already part of, or is strategically located within, the Launceston (Kmart) Plaza Activity Centre. The 3 September 2026 planning officer report states (i) that the site is strategically located in the area identified in the Northern Tasmania Regional Land Use Strategy (NTRLUS) as the 'Launceston (Kmart) Plaza' Activity Centre, (ii) acknowledges that the NTRLUS does not clearly define the role of that particular activity centre, and then (iii) relies upon the Tasmanian Planning Scheme definition of an 'activity centre' as a place that provides a focus for retail, commercial, services, employment and social interaction. That premise matters because, if accepted, it allows the proposed rezoning to be characterised as consolidation of an existing centre rather than as an outward expansion of it.

That premise should not be accepted without closer examination. The Tasmanian Planning Scheme definition describes the function of an activity centre; it does not provide that every parcel close to, adjoining or capable of supporting a centre automatically forms part of it. The relevant question is whether this land forms part of the place that presently provides the identified retail, commercial, service, employment and social focus. The subject land is Recreation Zoned, is presently used for recreation and sits functionally within the adjoining recreation precinct. Proximity to Launceston Plaza is relevant, but proximity alone is not a sufficient basis for treating the land as already being part of the existing activity centre.

The applicant's own material strongly reinforces that distinction. Its Retail Assessment (prepared by Urban Enterprise, 2023) describes the subject site as 'situated adjacent to' Launceston Plaza, the NTCA Ground recreation precinct and the Boland Street commercial precinct. It also expressly identifies the site as being in the south-west corner of the existing NTCA Ground recreation precinct and says that the western boundary is 'adjacent to' the Launceston Plaza precinct. Its conclusion then says the site would provide a logical and complementary 'extension' of the Activity Centre. Those are not descriptions of land already within the centre. They describe land at its edge which is proposed to be brought into, or used to extend, the centre.

The mapping relevant to the Launceston (Kmart) Plaza activity centre does not displace that conclusion. Council's 11 June 2026 report says the site is 'on the border' of the Launceston Central Area and treats it as being identified within Launceston (Kmart) Plaza within the activity-centre hierarchy mapping in the NTRLUS. Similarly, Figure 5.6 of the Greater Launceston Plan identifies Launceston (Kmart) Plaza by a point symbol within the Activity Centre Hierarchy and separately maps the surrounding land-use pattern, including commercial and recreation land. Read with the applicant's repeated references to "adjacency" and "extension", the more persuasive conclusion is that the land is outside the established Plaza centre and is proposed to become an extension of it.

That distinction materially changes the NTRLUS analysis. Policy RAC-P1 says the Regional Activity Centres Network is to be maintained and consolidated so that future urban development consolidates and reinforces the spatial hierarchy of existing centres. Importantly, the policy then explains how that consolidation is to occur: through the reuse and redevelopment of existing buildings and land to integrate the coordinated mix of activity-centre uses. Read in context, that is a direction toward making more effective use of the land and buildings of existing centres, not a general invitation to absorb

adjoining land whenever additional retail demand is identified. Action item RAC-A2 of that policy position reinforces the same spatial discipline by requiring zoning and land-use provisions to minimise decentralisation outside the network and reinforce the hierarchy, role and function of centres. Once 23 Racecourse Crescent is properly understood as adjoining land proposed to extend the Plaza centre, a higher level of strategic justification is required by the NTRLUS for that outward expansion. That justification has not been sought through a comparative centre-capacity or redevelopment analysis, let alone demonstrated.

Policy RAC-P9 of the NTRLUS is also relevant. It directs that out-of-centre development be discouraged and states that such development is only to be considered where community need, no adverse impact on existing centres, and synergy with existing employment hubs are adequately addressed, with overall community benefit demonstrated through social and economic assessment. Action item RAC-A12 of that policy position requires a detailed economic impact assessment addressing consistency with the strategic directions and policies of the NTRLUS. Action item RAC-A11, in turn, contemplates master planning of major centres including a detailed development-capacity audit, opportunities and constraints assessment and economic development strategy to encourage in-centre development.

Policy RAC-P9 is expressed in terms of development proposals and should not be overstated as a mechanical statutory test for every rezoning. But its strategic direction is directly relevant to the section 34 consistency exercise required under the LUPA Act. The important point is that the NTRLUS does not say that forecast retail demand is sufficient reason to extend an activity centre. Its policy architecture prefers consolidation, seeks to minimise decentralisation and expects a more demanding strategic justification where commercial activity moves beyond the existing centre.

Council relies on forecast supportable floor area of 4,200 square metres at year 5, 5,400 square metres at year 10 and 6,600 square metres at year 15. That is evidence of potential demand. It is not the same thing as evidence that this particular Recreation Zoned site should be permanently converted. The missing step is the comparative one: why should that demand be met by extending commercial zoning into the recreation precinct, rather than through capacity, redevelopment or intensification within the existing activity-centre and commercial land base?

Point 4.

As already noted, the TPCs Zone Application Guidelines for the Recreation Zone expressly contemplate its application to privately owned land. The existing zoning therefore accords with the guidance both in terms of the present use of the land and its ownership. The proposed Commercial Zone presents a different issue. The Guidelines contemplate that zone being applied to land intended for large-floor-area retailing, service industry, low-impact storage and warehousing, and other commercial uses requiring substantial floor or outdoor areas and high levels of vehicle access and customer parking. Importantly, however, the Guidelines also state that the Commercial Zone should not be applied where the primary purpose is to provide for General Retail and Hire uses such as supermarkets, department stores or other variety stores, directing those purposes instead toward the business zones. That is significant because the Retail Assessment was expressly prepared to support rezoning “with a view to establishing retail uses on the site”, and much of the demonstrated need relied upon in support of the amendment is expressed in terms of additional retail floorspace and supermarket capacity.

The answer cannot simply be that the adjoining Launceston Plaza is already Commercial Zoned. The task in this amendment is to demonstrate that the Commercial Zone is the appropriate strategic designation for this particular land. Replicating the zoning of adjoining land does not, of itself, establish that it is the appropriate zoning for an outward extension of the activity centre, particularly where the Commission’s own zone-application guidance cautions against use of the Commercial Zone where the primary purpose is General Retail and Hire of the kind relied upon in the supporting retail analysis.

The Commission's direction of 30 September 2026 brought that issue into sharper focus by requiring Council to consider whether the Launceston Plaza Retail Specific Area Plan (SAP) should also apply if the amendment is approved. The SAP is significant because it is the centre-specific planning instrument applying to Launceston Plaza. It substitutes its own use table for the ordinary Commercial Zone use table, makes uses within the General Retail and Hire use class Permitted uses and, through Standard LAU-S9.6.1 (*Retail impact for the General Retail and Hire use class*), establishes a specific retail-impact framework linked to the activity-centre hierarchy. Under the acceptable solution, additional General Retail and Hire floor area is limited to no more than 5,000 square metres above the gross floor area existing at 17 October 2012; beyond that threshold, the performance criterion requires consideration of matters including retail choice, urban design and amenity, pedestrian environment, investment and disinvestment, sustainable design and public transport accessibility.

Council's 6 October 2026 response is therefore important. Council does not suggest that the SAP should be omitted because the site could not satisfy those criteria. Rather, it says the SAP should not be extended because it would "unnecessarily restrict the range of land uses" by focusing predominantly on retail outcomes, and that the Commercial Zone is preferable because it provides greater flexibility for a broader mix of commercial activities. That response does not resolve the strategic inconsistency; it sharpens it. The case advanced for the amendment has, in no small measure, relied upon forecast demand for additional retail floorspace, including supermarket capacity, and the claimed need to facilitate retail growth associated with Launceston Plaza. There is an evident tension in relying upon retail demand to justify extending Commercial zoning into Recreation Zoned land, while resisting the centre-specific retail controls on the basis that they would place too much emphasis upon retail. If the intended planning outcome is instead to secure broader commercial flexibility, that moves the amendment away from the retail-led justification relied upon to support it and toward the substantially wider commercial use envelope I will be addressing at Point 5 shortly.

Either way, the underlying question remains unresolved. If the subject land is genuinely intended to become an extension of Launceston Plaza, there is an obvious question as to why the centre-specific controls applying to retail development at the Plaza should not extend with it. Conversely, if those controls are considered inappropriate because a broader range of commercial uses is intended, then the strategic case for converting this Recreation Zoned land becomes materially different from the retail-demand case upon which the amendment has substantially relied. What remains absent is a coherent explanation of the long-term planning role the land is intended to perform.

Point 5.

In its consideration of the proposed amendment, Council has repeatedly responded to concerns expressed in representations about future impacts by saying that no use or development is currently proposed and that any later proposal can be assessed against the State Planning Provisions. That response understates what a rezoning decision actually does. A zoning decision establishes the future use and development envelope. Once the land is Commercial Zoned, the strategic decision that those commercial use classes are appropriate on this land has already been made.

The Commercial Zone purpose itself anticipates a vehicle-oriented commercial environment: retailing, service industries, storage and warehousing requiring large floor or outdoor areas and high levels of vehicle access and customer parking. The use table then gives Permitted status to use classes including Bulky Goods Sales, Equipment and Machinery Sales and Hire, Service Industry and Storage. The Permitted use classes encompass activities such as motor repairs, car wash, panel beating, contractors' yards, warehouses, fuel depots, timber yards, trade or rural suppliers, landscaping-material suppliers and vehicle, boat or caravan sales.

Those examples are not advanced to suggest that any particular operator is proposed. Instead, they demonstrate the planning consequence of the zone itself. The future land-use environment could involve workshops, machinery, outdoor storage and display, commercial loading and unloading, substantially different vehicle movements and customer traffic. That is a materially different planning function from a site whose zone purpose is active and organised recreation with complementary uses that do not adversely affect recreational use of the land – or cause unreasonable impacts on adjacent sensitive uses.

Even if the Commission were to require the Launceston Plaza Retail Specific Area Plan to accompany the rezoning, that would not resolve the more fundamental strategic problem. The SAP would narrow some of the ordinary Commercial Zone use possibilities, but it would also make General Retail and Hire a Permitted use and provide a permitted pathway under LAU-S9.6.1 up to the applicable retail-floor-area threshold (i.e. 5000 sq/m gross floor area). That sits at-odds with the TPCs Zone Application Guidelines for the Commercial Zone, which say the Commercial Zone should not be applied where the primary purpose is General Retail and Hire of the supermarket, department-store or variety-store kind. More fundamentally, the SAP's stated purpose is to provide for retail development 'at Launceston Plaza' in accordance with the activity centre hierarchy. Extending that SAP to 23 Racecourse Crescent would regulate the consequences of an expanded centre; it would not answer the anterior strategic question of whether the activity centre should be expanded onto this Recreation Zoned land in the first place. It should therefore not be treated as an adequate substitute for the strategic justification for the rezoning itself.

The distinction is particularly important where a future proposal remains within the permitted pathway. Section 58 of LUPAA applies where the planning scheme makes the planning authority bound to grant a permit. If the proposal meets the requirements of the scheme and does not trigger another discretionary provision or code, the authority must grant the permit, subject to any lawful conditions. The point is therefore not that every future Commercial Zone proposal will be uncontrollable; many proposals will still engage development standards, codes or discretion. The point is that the rezoning materially broadens the class of outcomes for which the strategic acceptability of the use has already been determined.

Traffic and amenity controls at the development-application stage are therefore not a substitute for the present strategic inquiry. It is true that future intensification may need to satisfy the Road and Railway Assets Code, Parking and Sustainable Transport Code and the Commercial Zone amenity standards (i.e. hours of operation). Those provisions can mitigate the impacts of a particular proposal. They do not however answer the threshold question whether this land should be converted from a recreation role to a commercial role in the first place.

This is therefore the point at which the individual strands come together:

- The site is presently functioning as recreation land and fundamentally supports the surrounding recreation precinct.
- The regional Sports Facility Plan identifies capacity and operational pressures within the precinct and calls for precinct-wide master planning, including opportunities for expansion.
- The subject site is more accurately described as nearby, or in proximity to, the Launceston Kmart Plaza activity centre rather than as land already within it.
- The NTRLUS prefers consolidation of existing activity centres, including through the reuse and redevelopment of existing buildings and land, and therefore requires a more substantial strategic justification for outward commercial expansion.
- The TPCs Guidelines for zone and code identification in local provisions schedules expressly support private Recreation zoning and caution against use of the Commercial Zone where the primary purpose is general retail.

- Council's position that the Launceston Plaza Retail SAP should not extend to the site because it would unduly focus on retail outcomes is difficult to reconcile with the strategic case advanced for the amendment itself, which has relied heavily upon forecast retail demand and the need for additional retail floorspace as justification for rezoning the land.
- And the consequence of rezoning is a permanent expansion of a substantial, future commercial use envelope.

Closing statement

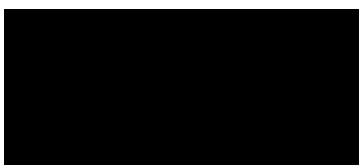
The amendment can only be supported if the Commission is satisfied that the strategic case has been made for permanently changing the role of this land. In my submission, the evidence does not reach that point. The material demonstrates a commercial opportunity and forecast retail demand. It does not demonstrate that the Recreation Zone is obsolete, that the land is surplus to the long-term needs of the NTCA/Elphin precinct, that the existing activity centre lacks reasonable capacity or redevelopment options, or that extending the Commercial Zone onto this particular site is the preferable strategic outcome.

The most important distinction is between commercial feasibility and strategic justification. The former has been addressed. The latter remains unresolved.

For that reason, the prudent planning outcome is to retain the Recreation Zone unless and until the wider precinct and activity-centre questions have been resolved through the strategic planning processes already contemplated by the relevant regional strategic planning documentation.

Yours faithfully,

Planning Ahead Tasmania



Rohan Willis

Principal Consultant