
To: Blyth, Louise
Subject: Launceston City Council Amendment PSA -LLP0029

Good afternoon,

I wish to put forward evidence that parts of the current amendment proposal by LCC are outdated, inaccurate and without sensible planning consideration.

The below comments were provided to me by the Planning manager for Launceston City Council when I enquired about the planned changes to the Invermay precinct.

The issues I have as follows:

The existing flood areas FRP's detailed by council below in colour are inaccurate and outdated by a good margin and if the authorities are to change planning controls on information that is considerably outdated fundamentally uses will be prohibited not because of planning controls but because maps have not been updated to reflect the risk.

The Boral site for example at 83-89 Gleadow Street on the map below was developed seven years ago and significant flood protection measures were called for so the land was lifted significantly similarly with 91 Gleadow street. Most of these areas are low risk not high risk but certainly fall into a lower category of risk. In the writers view all these area maps should updated and agreed upon before the commission decide as clearly the objective is related to preventing unacceptable risk. LAU-S17.6.1

Specifically in regard to planning LAU-S17.6.1 Intensity of uses highlighted in red below multiple dwellings will be permitted in a **medium** FRP zone but limited to 200m2 per dwelling. That assumes in Low FRP zones this would also be allowed.

So that would allow a development to be approved to build 20 multiples dwelling of 200m2 but not 10 dwellings at 300m2 . **This just makes no sense as it intensifies the use and limits saleability of dwellings.**

So, the crucial elements are

To accurately determine the FRP zones and outline why rather than just drawing a few lines on a map as this is commonplace.

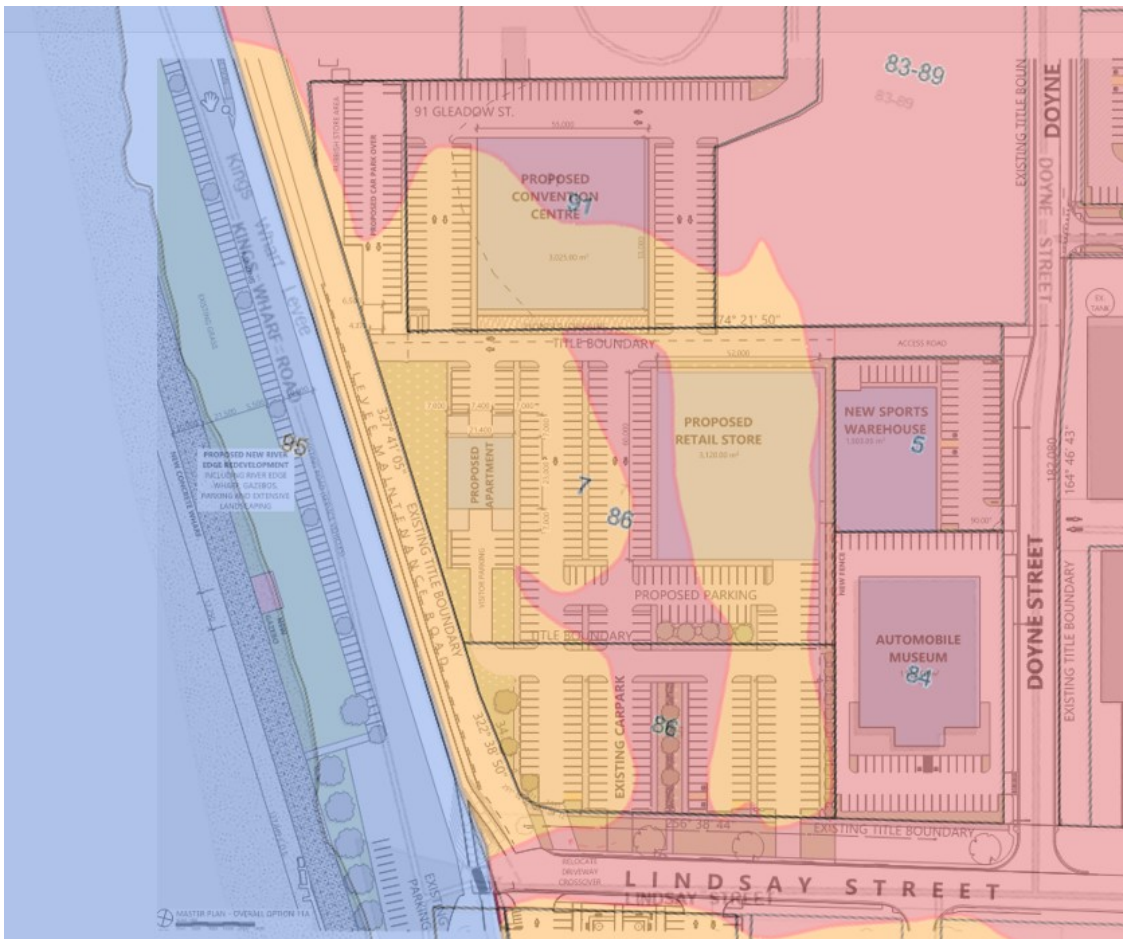
Remove the limitation on the build area of a dwelling if permitted .

Kind Regards

Errol Stewart

Information provided by Council below :

"The subject site is primarily located within the Medium (orange) and High (red) Flood Risk Precincts (FRPs)."



Regarding the Apartment tower.

Under **clause LAU-S17.6.1 – Unacceptable Uses** of the proposed Specific Area Plan (SAP), **multiple dwellings are permitted within the Medium FRP**. However, **clause LAU-S17.6.2 – Intensity of Uses** limits residential uses to a maximum gross floor area of **200m² per title**, regardless of whether the proposal is for a single or multiple dwellings. This is effectively a prohibition on uses larger than 200m2 on a single title.

LAU-S17.6.1 – Unacceptable Uses

Objective: To prevent the establishment of new land uses that present an unacceptable risk when subject to, or isolated by, flood inundation	
Acceptable Solution	Performance Criteria
A1 If for the establishment of new non-residential uses except for: (a) Custodial facility; (b) Storage (Liquid fuel depot), within the High or Medium FRP; (c) Significant community infrastructure within the high or Medium FRP.	P1 No Performance Criterion.
A2 If for the establishment of new residential uses except for: (a) Residential care facility; (b) Retirement village; (c) Respite centre (d) Assisted housing (e) residential uses in the high FRP (other than single dwellings).	

LAU-S17.6.2 – Intensity of Uses

Objective: To limit the intensity of uses subject to, or isolated by, flood inundation.	
Acceptable Solution	Performance Criteria
A1 a) if for residential use in the low FRP; or b) in the High or medium FRP: (i) Residential use up to 200m ² of gross floor area on a single title; or (ii) Extensions to existing residential use of no more than 10% of the gross floor area existing or approved on the 1st January 2008.	P1 No Performance Criterion.

It is also important to note that under the current **LAU-S10.0 Invermay/Inveresk Flood Inundation Area SAP, residential uses are prohibited in this location (Riveredge Industrial Precinct)**. So the approvability of the proposed apartment tower remains unchanged under the proposed SAP for this site, although it does offer slightly more flexibility for small scale residential developments in this location.

Please let me know if you need any further information.

Richard Jamieson

Senior Leader City Development

T 03 6323 3350 | M [REDACTED]
Richard.Jamieson@launceston.tas.gov.au
www.launceston.tas.gov.au

