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Sent: Mon, 21 Sep 2026 17:01:35 +1000
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Subject: Representation - PSA-LLP0011 - 10 Dolerite Drive Kings Meadows
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General Manager City of Launceston
Dear Sir,

Please see attached a representation lodged on behalf of our client Youngtown Pharmacy.

Regards,

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**S.40G & 40H LAND USE PLANNING AND APPROVALS ACT 1993 –
Substitute Draft Planning Scheme Amendment PSA-LLP001 to the
*Tasmanian Planning Scheme – Launceston Local Provisions Schedule –
10 Dolerite Drive Kings Meadows PSA LLP001***

**Proposal: Rezone 10 Dolerite Drive, Kings Meadows to Local Business
Zone**

Submission in representation

JDA Planning Pty Ltd *obo* Youngtown Pharmacy

21.Sep 2026

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1.0 REPRESENTATION ISSUES

The Launceston Activity Centre Hierarchy confirms that the key commercial precincts are:
Launceston city centre;
Kings Meadows; and
Northern suburbs.

The proposed location is not identified as a local, minor or neighbourhood centre as is not appropriate for the introduction of a commercial zone as it fails to meet the necessary tests of the LPS criteria and section 8A guidelines.

1. The proposal does not meet the criteria of section 34(2) of LUPAA.
2. Industrially zoned land is inherently valuable in terms of its potential as an employment zone and economic generator. The erosion of available industrial land significantly impacts the provision of land for this purpose and circumvents the strategic imperative to protect and develop the Connector Park for this purpose.
3. The proposal suggests that to rezone the site will facilitate a new type of service? What will this be other than another local scaled commercial offering.
4. Rezoning of the site as now proposed to introduce the Local Business Zone is not based upon demonstrable strategic planning.
5. The Connector Park development was never intended to provide for other than light industrial development, and the relationship to the adjacent residentially zoned land is no more than providing a more direct access to the Kings Meadows Connector and the existing commercial service offerings.
6. The argument advanced to support the rezoning suggests that it is particular in its relevance and application to the site and that it has a direct functional relationship to the adjacent residential precincts. In terms of need, this has not been established by the application which has suggested that a supermarket at scale will provide a supporting service for the industrial estate and the wider residential areas.
7. The proposal is inappropriate given the proximity of the existing commercial services available within the catchment. The Kings Meadows Centre and local commercial zones at Youngtown, which is minutes from the Connector Park industrial estate and developing residential precincts.
8. The decisions to introduce residential development at both Mount Pleasant Estate and the land to the south, did not identify the need for commercial zoning to provide a lower order neighbourhood service given the proximity to these services within the Kings Meadows and Hobart Road/ Youngtown commercial/shopping precincts.
9. An argument suggesting that the supermarket at this location relieves a dependency on vehicle access has no weight. Given the spatial configuration of lots within the industrial estate and context of the development, vehicle access will be necessary to enable a level of convenience for existing operations within the Connector Park estate.

10. The establishment of the Mount Pleasant residential estate benefited from direct vehicular access through the industrial estate (Kings Meadows Link) providing direct connection with the Kings Meadows connector. The reason for this was the concern of council at that time of the 'rat run' which would have to be relied upon for access to the commercial precincts within the catchment. Since that time traffic to and from the Mount Pleasant estate is the preferred alternative route.
11. Food Services is a discretionary use in the Light Industrial Zone and be considered as a supporting or allied use to support the precinct a preferred use to service business within that zone of which there are many examples. The need for the introduction of a LBZ is not made out by the applicant. The implications for the introduction of the LBZ is the opportunity to expand unqualified discretionary uses resulting in the potential future land use conflict.

The proposed rezoning is therefore fundamentally at odds with the Light Industrial Zone purpose and is flawed. Clause 18.0 describes the primary function as follows:

18.1.1 To provide for manufacturing, processing, repair, storage and distribution of goods and materials where off site impacts are minimal or can be managed to minimise conflict with, or unreasonable loss of amenity to, any other uses.

18.1.2 To provide for use or development that supports and does not adversely impact on industrial activity.

The intent of the zone is unambiguous and the introduction of the proposed change is likely to prejudice primacy of the estate's function.

12. Section 8A provides the criteria related to the application and amendment of LPS zones in the operation of the Tasmanian Planning Scheme. The application does not meet the prerequisite qualifying criteria outlined at LBZ1, LBZ2, or LBZ3,

2.0 LPS CRITERIA Section 34(2) LUPAA

Section 34(2) LPS Criteria		
Paragraph	Requirement	Response
(a)	<i>contains all the provisions that the SPPs specify must be contained in an LPS.</i>	The proposal inserts a provision which is consistent with the SPP's.
(b)	<i>is in accordance with section 32</i>	The proposal does not meet the qualifying criteria of s.32, in that the application seeks to introduce an out of centre commercial use.
(c)	<i>further the objectives set out in Schedule 1.</i>	The proposal does not further the objectives of Schedule 1, in terms of fair and orderly development based upon a strategic overview supporting the introduction of the LBZ at this location.
(d)	<i>is consistent with each state policy.</i>	.N/A
(da)	<i>satisfies the relevant criteria in relation to the TPPs.</i>	Comment at section 4.0.
(e)	<i>as far as practicable, is consistent with the regional land use strategy, if any, for the proposal area in which is situated the land to which the relevant planning instrument relates.</i>	The proposal is not consistent with the regional land use strategy. The consideration of a site specific qualification, section 32(4) of LUPAA as a vehicle to allow the proposed development has been rejected by the Commission and the proposal to now introduce a LBZ does not meet the imperatives of the Regional strategy.
(f)	<i>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.</i>	The Council Strategic plan does not support the introduction of the LBZ which is otherwise specifically applied to commercial development which has been established and supports a residential catchment. The proposal is not within nor it is argued would it provide a use which is necessary to service adjacent residential precincts.
(g)	<i>as far as practicable, is consistent with and coordinated with any LPSs that apply to municipal areas that are adjacent to the municipal area to which the relevant planning instrument relates.</i>	The site is not adjacent another municipal area.

2.1 s.8A LUPAA

Section 8A provides the criteria related to the application and amendment of LPS zones in the operation of the Tasmanian Planning Scheme. The key elements are:

LBZ1

The local Business Zone should be applied to land within the urban settlements which provides, or is intended to provide for the business, commercial and community functions within:

- (a) *Local shopping strips, or*
- (b) *Town centre for some smaller settlements.*

LBZ2

The Local Business Zone may be applied to:

- (d) *Local or minor Centres and the neighbourhood or Rural Town Centres in the Regional Activity Centre Hierarchy under the Regional Land use strategy of Northern Tasmania;'*

LBZ3

The Local Business Zone may be used for groups of local shops and business in existing residential areas where there is a strategic intention to maintain such uses, and the provisions of the surrounding residential zones is not appropriate.

RESPONSE: The site does not meet the criteria LBZ1-3 and does not qualify for the introduction of the LBZ

3.0 STRATEGIC ANALYSIS

STRATEGIC ANALYSIS - LAND USE STRATEGIES

3.1 Northern Tasmanian Regional Land Use Strategy

The Northern Tasmanian Regional Land Use Strategy ('NTRLUS') was established under section 5A of the *Land Use Planning and Approvals Act 1993*. The NTRLUS is the regional plan for Northern Tasmania setting out high level strategy and a policy framework to facilitate and manage change, growth and development within the region.

Strategic Direction G1.1 Capitalise on the region's sources of competitiveness by future opportunities for sustainable competitive advantage.

- a) Facilitate innovation and capitalise on co-location in industry in strengthened clusters of economic and employment activity.
- b) Add value, diversify the economy and generate jobs.
- c) Develop the preconditions for business competitiveness through merit-based planning and development assessment processes that:
 - Flexibly consider the location of economic development having regard for the changing economic environment; and
 - Focus upon community specific outcomes and environmental impacts, rather than a standard based approach.
- d) Facilitate the needs of small business, including working from home and other flexible/non-traditional locations.
- e) Support high value-adding and downstream activities to natural resources including small scale manufacturing and processing enterprises.

RESPONSE: A long-established principle of sound strategic planning recognises the need to appropriately allow for particular use within an area which supports and protects the overriding role of the applicable zone. This is particularly relevant in the case of Connector Park, which given its strategic position is adequately buffered from neighbouring residential use and unencumbered by incompatible use.

The estate is a key location for light industrial use which significantly value adds the local and regional economy.

In differentiating the commercial zones of Kings Meadows and Hobart Road/ Youngtown within the activity centre hierarchy, the balance between strategic planning precincts is reinforced and not eroded.

3.2 E Regional Planning Policies

Specific Policies and Actions

Policy	Action
Economic Development	
ED-A1 Develop economic development initiatives that support diversification of existing business, commercial and industrial sectors and reflect the directives of the State Government Population Growth Strategy (2015).	
ED-A2 Prepare and/or update municipal Economic Development Plans to strengthen the economic base of local governments and communities and support local strategies.	
RESPONSE: The proposal does not value add the existing zone hierarchy or provide to the residential precincts a service which is not currently provided at appropriate scale within the established Kings Meadows and Youngtown centres. The Connector Park Industrial park is strategically important in terms of local and regional initiatives providing employment and wealth generation both locally and to the region.	
Industrial Land	
ED-P2 Provide for land use planning and infrastructure networks to support the development of: • High value agriculture and food products; • Digital economy (including the NBN); • Vibrant, creative and innovative activity centres as places of employment and lifestyle; and • Diverse tourism opportunities ED-P3 Provide a 10-year supply of industrially zoned and serviced land in strategic locations	ED-A3 Identify suitably located land within planning schemes to be zoned for industrial and employment purposes, consistent with the Northern Tasmania Industrial Land Study (2014) and provide for the region to be well placed to capture economic opportunities. ED-A4 Analyse industrial land demand to 2040 and provide a sufficient supply of land zoned for industrial purposes, supported by adequate infrastructure and network requirements (transport, water, sewerage and energy).
RESPONSE: The Connector Park Industrial zone is a key element of the strategies for the necessary provision of industrial land opportunity, as evidenced by the extent of development since its establishment. The introduction of the LBZ has no relevance in this context to the function and role of the estate.	
E3.3 Key Activity Centre Network Strategies	

- Plan for the development of each activity centre relative to its identified function, role and anticipated catchment to:
Create economic Growth by co-locating a mix of land uses.

RESPONSE: The site is positioned within the established catchment in relation to which the introduction of the LBZ is contrary to the activity centre hierarchy.

Specific Policies and Actions

Policy	Action
RAC-P1 Maintain and consolidate the Regional Activity Centres Network so future urban development consolidates and reinforces the spatial hierarchy of existing centres. This will be achieved through the reuse and redevelopment of existing buildings and land to integrate a mix of land uses including the coordinated provision of residential development, retail, commercial, business, administration, social and community facilities, public and active transport provision and associated infrastructure.	RAC-A2 Zoning and land use planning provisions are to minimise potential for decentralisation of functions outside of the Regional Activity Centre Network and reinforce the spatial hierarchy, role and function of centres.
RESPONSE: The proposed rezoning does not meet the accepted principle for the introduction of the LBZ and simply supplants the existing zone introducing the potential to erode the function of the Regional Activity Centre Network as the spatial separation and qualities of the subject site do not qualify it as suitable for the proposed amendment.	
RAC-P4 Promote and support the role of lower order activity centres, particularly neighbourhood and rural town centres. This will support and strengthen communities and encourage a viable population base for regional and rural settlements, while promoting the development of new neighbourhood and local centres within <i>Urban Growth Areas</i> , where appropriate.	RAC-A5 Provide for lower order activity centres to be sustained through a local residential strategy or development plans to create vibrant and sustainable regional and rural communities. It should strengthen their role and function, maintaining and consolidating retail attractions, local employment opportunities, public amenities and services.
RESPONSE: The proposed amendment will not strengthen the role of the established hierarchy and is not appropriate. In this context the proposal is more appropriately described as a 'spot' rezoning.	

AC-P10 Provide for a range of land uses to be incorporated into activity centres appropriate to their role and function within the Activity Centres Hierarchy	RAC-A13 Focus higher density residential and mixed-use development in and around regional activity centres and public transport nodes and corridors.
RESPONSE: The area does not perform the function of a local activity centre and is supported by the commercial development within the established catchment and existing activity centre zoning.	
RAC-P12 Regional Activity Centres should encourage local employment. In most instances this will consist of small-scale businesses servicing the local or district areas.	

RESPONSE: The proposal is outside the Regional Activity Centre and has not been identified as a local, minor or neighbourhood centre. It is legitimately identified within the existing catchment.

RAC-A16 The planning authority shall have regard to the location of activity centres relative to existing or proposed principal public transport corridors in the consideration of planning scheme Amendments.

RESPONSE: As submitted the proposed site is well within the acceptable catchment of the established activity centre and cannot meet the criteria for rezoning to the LBZ classification.

4.0 TASMANIAN PLANNING POLICIES 2025

Sustainable Economic Development

Business and commercial

The objective of the policy *to promote business and commercial activities at a scale and intensity suited to the location to support diverse economic and employment opportunities and strengthen the State's economy* has direct relevance to the present application.

RESPONSE: The proposal to introduce the LBZ risk the unnecessary erosion of the role of Connector Park in the provision of an unencumbered employment and economic generator, identified as strategically important for the growth and prosperity of the region.

5.0 CONCLUSION

- 5.1 It is submitted that the proposed rezoning to LBZ is inappropriate failing to meet the criteria of section 34 of LUPAA or advance the objectives of Schedule 1 of the Act.
- 5.2 Relevantly, the area has not been identified as a local, minor or neighbourhood centre supporting the introduction of the LBZ in the context of s.8A of the Act *LBZ1*, *LBZ2* and *LBZ3*.
- 5.3 The essential purpose and role of the Connector Park industrial zone must be protected from the introduction of inappropriate land use which would otherwise serve no purpose in terms of the principal role of the current zone as an employment and economic wealth provider locally and to the region.
- 5.4 There is no identified strategic imperative for the introduction of the LBZ at this location which is adequately served by the existing centre.
- 5.5 For the reasons outlined it is considered appropriate to reject the proposed amendment.

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