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Sent: Mon, 21 Sep 2026 16:48:16 +1000
To: "Contact Us" <contactus@launceston.tas.gov.au>
Subject: Substitute draft planning scheme amendment PSA-LLP0011 – Rezone 10 Dolerite Drive, Kings Meadows
Attachments: Representation to LCC re 10 Dolerite Drive.pdf

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Good Afternoon,

Please find **attached** representation (and annexure) in respect of the above matter.

Regards,

Mea Quartararo
Senior Associate

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21 September 2026

Mr Sam Johnson
Chief Executive Officer
Launceston City Council
PO Box 396
LAUNCESTON TAS 7250
By Email only: contactus@launceston.tas.gov.au

Dear Sir,

**SUBSTITUTE DRAFT PLANNING SCHEME AMENDMENT PSA-LLP0011 – REZONE 10
DOLERITE DRIVE, KINGS MEADOWS TO LOCAL BUSINESS ZONE**

I refer to the abovementioned draft planning scheme amendment. This firm is instructed by Mr Michael French, and is instructed to lodge this representation on his behalf.

1. Introduction

- 1.1. 10 Dolerite Drive (**the Site**) is a currently vacant piece of land, located within the Connector Park industrial precinct.
- 1.2. The current substitute draft amendment arises out of an application to insert a new site-specific qualification into the Launceston Local Provisions Schedule (**LPS**), combined with an application for a planning permit to use and develop the Site for a supermarket, which application was heard and rejected by the Tasmanian Planning Commission (**TPC**) earlier this year.
- 1.3. In essence, our client submits that the current zoning of the Site within the Light Industrial Zone (**LIZ**) is entirely appropriate and ought not be disturbed. By contrast, applying the Local Business Zone (**LBZ**) to the Site as proposed will result in significant land use conflicts and traffic safety issues, is contrary to the LPS criteria in the *Land Use Planning and Approvals Act 1993* (**LUPAA**), and will result in poor planning outcomes.
- 1.4. As a result, our client submits that the planning authority ought to take steps to withdraw the draft amendment. If the draft amendment cannot be withdrawn, it is submitted that the Council cannot properly support the draft amendment in any subsequent steps before the TPC.
- 1.5. Considerable cost and time has already been spent canvassing these issues in submissions to both the planning authority and the TPC responding to the original application. Rather than repeat the extensive work which has already been done, our client relies on the materials previously filed, as the essential issues remain largely the same, save that references to s. 32(4) of LUPAA are no longer relevant.

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- 1.6. To that end, this representation incorporates the following documents, of which the planning authority would already be aware, and which are available on the TPC's website:¹
- (a) peer review by Michelle Schleiger, dated July 2025;
 - (b) statement of evidence of Michelle Schleiger, dated December 2025;
 - (c) further statement of evidence of Michelle Schleiger, dated March 2026;
 - (d) statement of evidence of Mark Petrusma, dated 25 November 2025;
 - (e) further statement of evidence of Mark Petrusma, dated 10 March 2026; and
 - (f) further statement of evidence of Mark Petrusma, dated 24 March 2026.
- 1.7. Apart from the sections of these reports which addressed the specific permit application which has now been refused by the TPC, or s. 32(4) of LUPAA which does not apply to rezoning, the opinions and assessments provided in these reports address elements of the LPS criteria which remain applicable to the present proposal.
- 1.8. In addition, annexed to this representation is a comparison table prepared by Michelle Schleiger and previously submitted to the TPC, summarising the differences between the LIZ and the LBZ.

2. The effect of rezoning the Site to the LBZ

- 2.1. Annexed to this representation is a comparison table prepared by Michelle Schleiger of Woolcott Surveyors, which compares the provisions of the LBZ and the LIZ with reference to this site. Based on that comparison, it is obvious that the LBZ is completely inappropriate for this site. Some key differences are highlighted below.

Residential & Visitor Accommodation uses

- 2.2. Residential use is currently prohibited in the LIZ, but is permitted in the LBZ if located either above ground floor level or to the rear of premises.² In fact, 'encouraging' Residential and Visitor Accommodation use to support the viability of activity centres is one of the zone purposes within the LBZ.³ This site is large enough to accommodate multiple residences, in addition to commercial uses.
- 2.3. The risk of land use conflict between Residential use on this site and industrial uses in the surrounding industrial precinct is high. Residential use is a sensitive use, and the introduction of a sensitive use into the existing industrial precinct is likely to significantly restrict the development of new industrial uses within the surrounding precinct.
- 2.4. By virtue of cl. C9.5.1 within the Attenuation Code, activities with the potential to cause emissions are not permissible in proximity to existing sensitive uses, unless they are able to demonstrate compliance with the performance criterion P1. New sensitive uses may be developed within an attenuation area if they do not "interfere with or constrain" an existing activity which triggers an attenuation area. There is no capacity for the planning authority to consider the

¹ At <https://www.planning.tas.gov.au/assessments-and-hearings/current-assessments-and-hearings/ap-lau-psa-llp0011>.

² If not located above ground floor level or to the rear of premises, Residential use is 'no permit required' if for a home-based business, and otherwise discretionary.

³ Per cl. 14.1.4 of the scheme.



potential of a new sensitive use to constrain or restrict *future* industrial uses within the surrounding industrial precinct when faced with an application for a new sensitive use. Therefore, the potential for this site to be developed for a sensitive use risks significantly constraining the utilisation of the industrial precinct for industrial uses in future.

- 2.5. Like Residential use, Visitor Accommodation uses are currently prohibited in the LIZ, but are permitted in the LBZ if located either above ground floor level or to the rear of premises. Visitor Accommodation may also be a sensitive use,⁴ and consequently trigger the provisions of the Attenuation Code.

Other permitted uses with high potential for land use conflict

- 2.6. Beyond Residential and Visitor Accommodation uses, there are several other types of use which are permitted or no permit required within the LBZ, and which are clearly unsuited to the area. Without attempting to be exhaustive, some notable examples include:

- (a) Educational and Occasional Care – this is currently discretionary in the LIZ *if* for an employment training centre or alterations or extensions to existing Educational and Occasional Care, and is otherwise prohibited. It is permitted, without qualification, in the LBZ. Examples of this type of use include a childcare centre, kindergarten, primary school, or secondary school, among others. The introduction of such a use to the subject site would be highly undesirable, given:
 - (i) the examples just mentioned are almost certain to be sensitive uses (childcare centre is specifically listed as an example of a sensitive use in Table 3.1 of the scheme), triggering the application of the Attenuation Code and thereby restricting new industrial uses within the industrial zone; and
 - (ii) such uses would inevitably draw more children into an industrial precinct where the Council has evidence before it that the road network around the subject site is **unsafe for pedestrians and cyclists**.⁵ Anything which risks increasing the presence of children in the area can only have negative – and potentially disastrous – consequences.
- (b) Hotel Industry – this is currently prohibited in the LIZ, but is permitted, without qualification, in the LBZ. This use class encompasses the use of land to sell liquor for consumption on or off the premises, and examples include a hotel, bar or nightclub (among others). Again, given the available evidence that the road network in the immediate vicinity of the Site is unsafe for pedestrians, the potential introduction of greater numbers of *intoxicated* pedestrians can only make that situation worse.
- (c) Community Meeting and Entertainment – this is currently discretionary in the LIZ, but is permitted in the LBZ. There is a high risk of land use conflict between Community Meeting and Entertainment and surrounding industrial uses due to potential vehicle numbers and numbers of pedestrians.

- 2.7. Because these uses would be permitted in the LBZ, the planning authority would have little ability to prevent the introduction of such uses, despite how undesirable they are on this site.

⁴ See *ACEN Robbins Island Pty Ltd v Circular Head Council* [2024] TASCAT 48 at [115]-[116].

⁵ This evidence was given by Mark Petrusma during the prior proceedings in relation to the SSQ, and remains relevant to this proposed rezoning. A copy of his assessment is **annexed** to this representation.



Subdivision/strata potential

- 2.8. Within the LBZ, subdivision is permissible (by way of acceptable solutions) down to a minimum lot size of only 200m². Based on land area alone, that means the subject site could be subdivided into 22 lots. Vehicle access and other considerations may reduce that number, but there is clearly potential for this lot to be subdivided into a *cluster* of LBZ lots, if the LBZ were applied to the subject site.
- 2.9. Even without that potential for subdivision, acceptable solutions within the LBZ allow General Retail and Hire uses (which are ‘no permit required’ within the LBZ), if the gross floor area *per tenancy* is not more than 250m². Thus, applying the LBZ to this site would open the door for the future development of a multi-tenancy retail complex on this site, significantly increasing vehicle, pedestrian and cyclist traffic within an industrial precinct.
- 2.10. As a result, applying the LBZ to the subject site has significant potential to turn it into a new activity centre in a short span of time, and without any strategic work having been done by the planning authority to plan for, or justify, such an outcome.

3. TPC’s zone application guidelines

- 3.1. The TPC has published guidelines, pursuant to s. 8A of LUPAA, for the appropriate zoning of land. Those guidelines clearly weigh against the proposed rezoning in this case, as follows:

LBZ 1 The Local Business Zone should be applied to land within urban settlements which provides, or is intended to provide, for the business, commercial and community functions within:

- (a) *local shopping strips; or*
- (b) *town centres for some smaller settlements.*

- 3.2. The Site is not intended to provide for the business, commercial and community functions within local shopping strips or town centres. No strategic planning work done by the Council has identified any intention to develop this Site in that way.

LBZ 2 The Local Business Zone may be applied to:...

- (b) *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; and...⁶*

- 3.3. The Site is not a local, minor, or neighbourhood centre. The planning authority has never indicated any intention for it to become such a centre, and no planning assessment has been done to support the merit or desirability of such an outcome.

LBZ 3 The Local Business Zone may be used for groups of local shops and businesses in existing residential areas where there is a strategic intention to maintain such uses, and the provisions of the surrounding residential zone are not appropriate.

- 3.4. As noted above, applying the LBZ to this site would pave the way for a group of local shops and businesses to be established, but neither the planning authority but there is no strategic planning

⁶ Paragraphs (a) and (c) omitted as they are not relevant for present purposes.



work which supports that outcome being either intended or desirable for this Site. This is not a Site within an existing residential area, and there is no known strategic intention to create such an outcome on this site.

LBZ 4 The Local Business Zone should not be used for individual, isolated local shops or businesses within residential areas, unless:

- (a) they are a use, or are of a scale, that is more appropriate for the Local Business Zone and there is an intention to maintain the use; or*
- (b) there is a strategic intention to expand the existing retail or business area in this locality consistent with the relevant regional land use strategy, or supported by more detailed local strategic analysis consistent with the relevant regional land use strategy and endorsed by the relevant council.*

- 3.5. The application which started this process was originally to develop a supermarket on this Site. That application has been refused by the TPC. Currently, therefore, there is no proposed use of this Site connected with this rezoning application. If there *was* any proposed use associated with this rezoning, it would seemingly be that proposal for a single, isolated supermarket within an industrial precinct. While this is not a residential area, the general intention evidenced by this guideline remains relevant.
- 3.6. There is no evidence indicating that the proposed supermarket (if pursued) would be a use, or of a scale, that is more appropriate for the LBZ – on the contrary, the proponent and the Council both gave evidence before the TPC in the previous proceedings that the LBZ would be an **inappropriate** way of enabling the proposed supermarket.
- 3.7. There is no mechanism which would ensure the proposed supermarket is actually developed even if a permit were granted, or to ensure that if it is developed, it is also maintained in the long term rather than the land being redeveloped for other purposes in future.
- 3.8. Additionally, there is no strategic intention to expand the existing retail or business area in this location, let alone any intention supported by more detailed local strategic analysis endorsed by the relevant council.
- 3.9. For those reasons, the s. 8A guidelines clearly weigh against approval of the proposed rezoning.

4. LPS criteria

- 4.1. The LPS criteria are set out in s. 34 of LUPAA. An amendment to an LPS cannot be granted unless all of the LPS criteria are met. The LPS criteria include, relevantly:
 - (a) that the LPS furthers the objectives in Schedule 1 of LUPAA;
 - (b) that the LPS satisfies the relevant criteria in relation to the TPPs; and
 - (c) that, as far as practicable, the LPS is consistent with any relevant regional land use strategy.
- 4.2. Each of the above weighs heavily against the proposed rezoning, for the following reasons.

Schedule 1 objectives

- 4.3. The Schedule 1 objectives are addressed by Ms Schleiger in her prior reports, and her comments apply equally to the present version of the amendment.



4.4. To this can be added the following comments:

- (a) The proposed rezoning is inconsistent with objective (a) in Part 2 of Schedule 1, in that it seeks to rezone land in an ad-hoc, opportunistic way and opens the door to an entirely new activity centre arising in an industrial precinct without any “*sound strategic planning and co-ordinated action by State and local government*”.
- (b) The proposed rezoning is inconsistent with objective (f) in Part 2 of Schedule 1, in that it exacerbates significant traffic safety issues and so does not “*promote the health and wellbeing of all Tasmanians and visitors to Tasmania by ensuring a pleasant, efficient and safe environment for working, living and recreation*”.
- (c) The proposed rezoning is inconsistent with objective (h) in Part 2 of Schedule 1, in that it opens the door to a new activity centre emerging, absent any strategic infrastructure planning, in an area with significant known traffic safety issues, and so does not “*enable the orderly provision and co-ordination of public utilities and other facilities for the benefit of the community*”.
- (d) Finally, the proposed rezoning is inconsistent with objective (i) in Part 2 of Schedule 1, in that it fails to fully consider land capability because it entirely ignores the suitability of this land for industrial uses, in accordance with its current zoning.

The TPPs

4.5. The TPPs were not in force at the time of the TPC’s consideration of this matter. The following provisions within the TPPs are relevant, and weigh strongly against the proposed rezoning:

4.6. Within section **4.6 – Industry**, the objective of which is to “*protect industrial land, facilitate sustainable industrial use and development and ensure there is sufficient availability of suitable industrial land to meet the existing and future needs of Tasmania*”:

- 4.6.3(1) “*Strategically identify and protect land that is suitable for industrial use and development to meet the needs of future generations.*”
- 4.6.3(2) “*Provide for at least a 15 year supply of industrial land, that is located within urban or settlement growth boundaries, or within close proximity to settlements, that is based on projected demand to meet the economic needs of Tasmania.*”
- 4.6.3(5) “*Promote the protection of existing and future industrial land by preventing encroachment from incompatible use and development.*”
- 4.6.3(7) “*Encourage the co-location of similar industrial uses within existing or future strategic industrial precincts.*”

4.7. Contrary to these policies, the proposed rezoning would take land which is ideally suited to, and currently zoned for, industrial use, and render it unavailable for that purpose. Worse, in doing so, the proposed rezoning would potentially sterilise *surrounding* industrial zoned land due to the provisions of the Attenuation Code discussed above.

4.8. This is particularly critical in light of the recent Department of State Growth Statewide Industrial Land Study, published in December 2025, which noted that Launceston is facing a shortfall in



industrial land of between 13.5 – 19.4 hectares.⁷ The Study also specifically notes the limited vacant land remaining in the Connector Park precinct,⁸ and advises that a key strategic principle for Launceston should be to “[p]reserve industrial land for appropriate uses and prevent commercial encroachment”.⁹

- 4.9. This is consistent also with Launceston City Council’s own Launceston Industrial Strategy 2009 – 2029, which notes that Connector Park specifically must “*be prioritised for new industrial development*”.¹⁰
- 4.10. Within section **4.7 – Business and commercial**, the objective of which is to “*promote business and commercial activities at a scale and intensity that is suited to the location to support diverse economic and employment opportunities and strengthen the State’s economy*”:
- 4.7.3(3) “*Support the activity centre hierarchy by promoting complimentary use and development to strengthen efficiencies within activity centres and, where possible, avoid unnecessary competition between activity centres.*”
- 4.7.3(5) “*Support the redevelopment of commercial and business use and development in existing activity centres prior to considering the establishment of new activity centres, unless it is part of a new greenfield development or a natural progression of an existing activity centre, and is highly accessible to its catchment of users.*”
- 4.11. Contrary to these policies, the proposed rezoning would divert commercial activity *away* from existing activity centres, by allowing the emergence of a new activity centre in an undesirable, isolated location, with no public transport access, and none of the efficiencies or strategic advantages which the activity centre network seeks to achieve.

NTRLUS

- 4.12. The relevant regional land use strategy, NTRLUS, has been addressed in both Mr Petrusma’s and Ms Schleiger’s prior reports, and their comments apply equally to the present version of the amendment.
- 4.13. To those comments can be added the following:
- (a) RAC-A2 provides that “*zoning and land use planning provisions are to minimise potential for decentralisation of functions outside of the Regional Activity Centres Network and reinforce the spatial hierarchy, role and function of centres*” – this proposed rezoning is directly contrary to RAC-A2, as it would decentralise functions outside the Regional Activity Centre Network;
- (b) RAC-A16 directs the planning authority to “*have regard to the location of activity centres relative to existing or proposed principal public transport corridors in the consideration of planning scheme amendments, including rezoning proposals, as appropriate*” – this proposed rezoning is directly contrary to RAC-A16, as it would locate a potential new activity centre in an area with no public transport available; and
- (c) RAC-P4 provides for the creation of new neighbourhood and local centres “*where appropriate*” – this proposed rezoning is directly contrary to RAC-P4, as no strategic

⁷ At page 8 of the Study.

⁸ At page 110.

⁹ At page 112.

¹⁰ At page 30.



planning work has been done to support this being an appropriate location for a new activity centre or to identify any need for such an activity centre.

5. Withdrawal of the proposed amendment

- 5.1. It is noted that neither the planning authority nor the applicant for the amendment originally wanted or supported the rezoning of this site to LBZ. The applicant's planning expert gave evidence before the TPC that:

Rezoning the site to Local Business is not considered to be sound strategic planning on the basis that, whilst the zone would allow for the supermarket use, it would also allow the (potential) introduction of sensitive (and other potentially conflicting) uses within the Connector Park industrial precinct including residential (unqualified Discretionary use), Visitor Accommodation (unqualified Discretionary use) and schools (unqualified Permitted use). The SSQ is therefore a superior amendment mechanism to address the need for a convenience supermarket in this location without adversely impacting on adjoining and adjacent industrial activity.¹¹

- 5.2. Similarly, Council's planner gave evidence to the TPC that:

In the TPS, the Local Business Zone, 14.2 Use Table, would facilitate uses that would preferably not be located within an established industrial precinct, including residential and visitor accommodation. Sensitive Uses in the precinct would not be appropriate, as discussed previously they could require assessment in response to the Attenuation Code.¹²

- 5.3. Later, Council's planner changed her opinion and supported the rezoning,¹³ noting that:

- (a) Applying the LBZ to the site would potentially facilitate sensitive uses (including residential, visitor accommodation, child care or a school) on a lot bound on two sides by LIZ, which creates the potential for conflict with uses meeting the zone purpose;
- (b) These concerns are "somewhat ameliorated" by the Road and Railway Assets Code and the Attenuation Code, and that the site would therefore be "constrained" for sensitive use due to its proximity to the Highway and an existing metal fabrication use; and
- (c) Development of the site for a sensitive use is "considered unlikely" because:
 - (i) the proximity of the site to the industrial estate diminishes its marketability and desirability for sensitive uses;
 - (ii) if a permit was granted to the applicant for a supermarket, it is likely that would actually be developed by the applicant; and
 - (iii) development for a commercial activity is likely to be the highest and best use of the Site.

- 5.4. These reasons are not a sound basis for rezoning the site to the LBZ, for the following reasons:

¹¹ George Walker 10 February 2026 statement of evidence, at [3.2.2].

¹² Jen Welch 1 December 2025 statement of evidence, at p. 10.

¹³ Submission to the TPC dated 15 June 2026.



- (a) The Attenuation Code restricts the development of new industrial uses with the potential to cause emissions near sites where there is already an established or approved sensitive use, and only restricts the development of new sensitive uses in proximity to existing emission-causing activities if the sensitive use would “*interfere with or constrain*” that existing activity – this does not prevent the development of sensitive uses on this site, but the development of any sensitive use on this site will constrain the development of the surrounding industrial land for industrial purposes.
 - (b) As for the road or railway assets code, this also restricts the development of new sensitive uses on this site, but those are still permissible if “*sited, designed or screened to minimise adverse effects of noise, vibration, light and air emissions from the... road or rail network*”. This goes some way towards protecting the amenity of new sensitive uses developed on this site, but once again it does not prevent the development of such uses on this site, and it does nothing to mitigate the fact that the development of a sensitive use on this site will constrain the development of the surrounding industrial land for industrial purposes.
 - (c) The suggestion that the site is not desirable for sensitive uses, and that this will prevent any attempt to develop such uses here, is merely speculation. In any event, sensitive uses are not the only concern that arises from zoning this site LBZ. As explained earlier in this submission, there are other uses of this site which should not be located in this area, such as hotel industry uses or community meeting and entertainment uses. There is nothing which prevents such uses from being established on this site, and the attenuation code and road and railway assets code have no impact on this as they are not sensitive uses.
 - (d) The supermarket permit has been refused and there is no longer any application for a permit for the actual use of this site. Therefore, the planning authority must assess this rezoning proposal on its own merits, noting that the owner of the land could apply for a permit for anything permissible in the LBZ if the rezoning is approved.
 - (e) The suggestion that development for a commercial activity is likely to be the highest and best use of the site is unsupported by the evidence. The reports previously prepared by Michelle Schleiger and annexed to this representation make clear that the site is in fact ideally suited for industrial use, and there is no reason at all why it cannot be developed for that purpose.
- 5.5. It is noted that while the TPC directed the planning authority to prepare this substitute amendment, the planning authority is not obliged to proceed with it if the overarching purpose is no longer pursued by the planning authority or original applicant.
- 5.6. Section 40P(4) of LUPAA provides that, upon the TPC certifying a substitute amendment and directing the planning authority to advertise the substitute amendment, the planning authority is to comply with sections 40G and 40H in relation to the draft amendment, and Division 3 of LUPAA applies in relation to the draft amendment “*as if the draft amendment were a draft amendment that had been given to the Commission by the planning authority under section 40F(4)*”.
- 5.7. Because Division 3 applies to this amendment as though it were a draft amendment given to the TPC by the planning authority under s. 40F(4), and s. 40E is located within Division 3 of LUPAA, s. 40E applies to this amendment.
- 5.8. By s. 40E, a planning authority may at any time decide to withdraw a draft amendment of an LPS with the agreement of the person who originally requested that the draft amendment be prepared.



- 5.9. Given that a rezoning was not sought by the applicant, nor supported by the planning authority, until it was raised by the TPC, it would be appropriate for the planning authority to seek the applicant's consent to the withdrawal of the draft amendment. To proceed with the draft amendment if even the applicant does not support it would be a waste of time at ratepayer expense.

For those reasons, our client submits that the proposed rezoning cannot properly be supported, as it simply cannot be considered to meet the LPS criteria.

Yours faithfully

ABETZ CURTIS

Per:



MEA QUARTARARO

email:

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