

From: "Graham Dash" [REDACTED]
Sent: Wed, 2 Sep 2026 16:40:26 +1000
To: "Contact Us" <contactus@launceston.tas.gov.au>
Subject: Substitute Draft Planning Scheme Amendment PSA-LLP0011 – 10 Dolerite Drive, Kings Meadows 7249

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Chief Executive Officer
City of Launceston
PO Box 396
Launceston TAS 7250

Dear Sir,

I wish to lodge a formal representation objecting to Substitute Draft Planning Scheme Amendment PSA-LLP0011, which proposes to rezone 10 Dolerite Drive, Kings Meadows 7249, from the Light Industrial Zone to the Local Business Zone.

I make this representation as the owner and operator of BP Youngtown, an established local business servicing the Youngtown and Kings Meadows area. I also have a decades long history of operating businesses within this particular commercial corridor. As well as operating BP Youngtown, I was the Caltex franchisee at 90 Hobart Road, Kings Meadows 7249, for over 20 years, until Caltex decided to close that operation. That site has subsequently reopened as an OTR service station. In this time I have observed first hand the considerable changes in the commercial, retail, industrial and service-station environment in this part of Launceston.

My objection is not based on opposition to competition or to new businesses. Competition is a normal part of business. My concern is with the broader planning consequences of permanently changing the zoning of land within an established industrial precinct.

1. The current proposal is materially different from the proposal previously considered by the Commission.

The original PSA-LLP0011 proposal sought to insert a site specific condition into the Light Industrial Zone to allow a supermarket of up to 1,000m².

That proposal was considered by the Tasmanian Planning Commission (TPC), which rejected the draft amendment and refused the associated planning permit on 25 June 2026. The Commission subsequently directed the planning authority to prepare a substitute draft amendment.

The proposal now is materially different. Rather than retaining the Light Industrial zoning and introducing a site specific condition for a particular use, the substitute amendment proposes to rezone all of the

land itself to Local Business.

I believe this distinction is important.

A planning permit relates to a particular development proposal. A rezoning changes the statutory planning framework applying to the land and potentially enables a substantially wider range of future uses. The substitute amendment should be considered on its own merits and against the long-term consequences of the proposed Local Business zoning, rather than simply being regarded as a manoeuvre for achieving the development previously proposed.

2. The statutory planning framework is directly relevant.

The Tasmanian Planning Scheme is established under the Land Use Planning and Approvals Act 1993 (LUPAA) and consists of the State Planning Provisions together with Local Provisions Schedules. The Act therefore establishes a statewide statutory planning framework within which local zoning decisions are made.

An amendment to the Local Provisions Schedule is not simply a matter of whether a particular commercial development is considered desirable. It must be considered against the statutory requirements applying to amendments to Local Provisions Schedules, including the matters identified in section 34 of LUPAA with the relevant objectives, State Planning Provisions and regional planning framework.

The central question is not simply whether a commercial development could operate successfully at 10 Dolerite Drive, but whether there is a sufficient strategic and statutory planning basis for removing this land from the Light Industrial Zone and applying the Local Business Zone.

3. The change to the industrial zoning is particularly significant.

The original proposal considered by the Commission did not remove the site's Light Industrial zoning whereas the substitute amendment does.

That is an important change in planning circumstances.

In its consideration of the original proposal, the Commission considered issues concerning the availability of industrial land and accepted arguments that the original proposal would not compromise the municipal supply of industrial land, in part because the land would remain within the Light Industrial Zone.

That reasoning cannot be carried across to the substitute amendment without proper consideration.

The current proposal would permanently remove this 4,416m² parcel from the Light Industrial Zone and from the industrial land supply within Connector Park.

Connector Park is an established industrial precinct containing industrial lots and uses. I believe the strategic consequences of removing individual parcels from such a precinct deserve careful consideration, particularly where the replacement zoning is a broader

commercial zoning.

Industrial land and commercial land perform different functions in a planning system. Once industrial land is progressively converted to commercial use, it can be difficult to recreate appropriately located and serviced industrial land.

The amendment should demonstrate a sufficient strategic planning basis for the proposed change.

4. The regional activity centre hierarchy is relevant.

The Commission's June 2026 decision considered the regional planning framework concerning activity centres and out of centre developments.

The Northern Tasmanian Regional Land Use Strategy includes RAC-A2, which 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".

The strategy also contains RAC-P9, concerning out of centre development. The Commission considered those provisions in its assessment of the original proposal. The Commission reached the view that the particular supermarket proposal could be justified in the circumstances then before it, however, the issue before Council now is much broader.

The current proposal is not simply permission for a 1,000m² supermarket. It proposes to create a Local Business Zone on all the land.

That raises a legitimate planning question as to whether the new zoning could facilitate a broader range of commercial activity and, over time, establish a new commercial concentration outside the established activity centre hierarchy.

The Commission's June decision itself records concerns raised during the earlier proceedings about the potential for Local Business zoning to accommodate multiple retail tenancies, smaller lots and a broader range of commercial uses.

Those consequences should be considered as part of the assessment of the substitute amendment itself.

5. A rezoning has consequences beyond the present developer and proposal. This is my main concern with the substitute amendment.

If the present developer proceeds with a particular supermarket proposal, that proposal can be assessed on its particular merits. A Local Business rezoning is different.

Once the land is rezoned, the zoning remains regardless of whether the current development proceeds, whether the land is subsequently sold, or whether a different development is proposed in the future.

The planning consequences therefore extend beyond the current proposal.

Council and the Commission should consider what the Local Business zoning could facilitate over the longer term, including the possibility of multiple commercial uses or future developments that may not have been contemplated by the original supermarket proposal.

In my view, that is the important distinction between the original amendment and the substitute amendment now being advertised.

6. My experience of the local area.

My experience has been that the distinction between industrial areas, established commercial centres and highway oriented service businesses is important to the orderly functioning of the area.

I don't suggest that commercial development should be prevented simply because it creates competition for existing businesses. Rather, the planning system should determine where commercial development is appropriately located and should avoid the gradual erosion of industrial land through individual rezoning decisions unless there is a clear strategic justification for doing so.

7. The strategic question.

In light of the above, the critical question for PSA-LLP0011 is:

Has a sufficient strategic and statutory planning basis been demonstrated for permanently removing 10 Dolerite Drive from the Light Industrial Zone and introducing Local Business zoning into an established industrial precinct?

In particular, the assessment should address:

- the statutory requirements for an amendment to the Local Provisions Schedule under LUPAA;
- the Schedule 1 objectives of LUPAA;
- the consistency with the State Planning Provisions;
- the relevant regional land-use strategy;
- the effect of the amendment on the established Regional Activity Centres Network and the principle of minimising out of centre development;
- the permanent loss of industrially zoned land;
- the cumulative effect of progressively introducing commercial uses into an industrial precinct; and
- the broader range of future commercial uses that could be facilitated by the Local Business Zone, irrespective of the current developer's intentions.

I recognise that the TPC's June 2026 decision directed the planning authority to prepare a substitute amendment involving the Local Business Zone. I do not suggest that this direction should be disregarded, however, the substitute amendment now before the public represents a materially different planning outcome from the original proposal because it changes the underlying zoning of the land and permanently removes it from the Light Industrial Zone.

I request that the City of Launceston and the TPC reject Substitute

Draft Planning Scheme Amendment PSA-LLP0011 and retain 10 Dolerite Drive within the Light Industrial Zone.

Graham Dash



Youngtown 7249