

1 William St  
Longford 7301  
Tasmania

29/5/2020

Dear Mayor and Councillors,

**Re: Draft Amendment 01-2020 (Ref No: PLN-20-0001)**

I wish to make a representation regarding the proposed rezoning of land at 41-43 Wellington St Longford.

I have highlighted 5 aspects of the Report prepared by Rebecca Green and Associates to support this application on which I would like to comment. The report states:

**1. "3.3.1 Heritage and Scenic**

*The site is heritage listed on the Tasmanian Heritage Register and at Council level. The site is located within a Heritage Precinct under the Scheme. Preliminary comment from Heritage Tasmania in respect to the proposal is that they will consider the matter further after the development application has been submitted to Council and referred for assessment. "*

Heritage Tasmania requested to be involved in determining the discretionary permit (Council Agenda and Attachments for April Meeting). However, Council voted unanimously to approve the three-lot subdivision on this site if the application for rezoning is approved (Council Minutes, 27 April 2020) without reference to input from Heritage Tasmania. I am concerned that there has been no involvement with Heritage Tasmania to determine the permit because a permit has already been approved pending the success of this application. It is also concerning that Heritage Tasmania were only notified about this proposal on the 2<sup>nd</sup> April where as TasWater and other agencies involved supplied input in January. Why was Heritage Tasmania notified so late?

**2. "3.3.2 Flooding**

*The site is not known to be subject to flooding."*

This is a misleading statement. While the site is afforded some protection because of the levee, the site has been subjected to flooding in both 1929 and 1969 and is likely to be subjected to flooding in the future when flood waters breach the flood levee.

**3. "4.2 Proposed Zone**

*The site has ceased being used as a public place of assembly and is for sale and suited for future residential use and development. The application of the surrounding General Residential Zone would be appropriate."*

The owner's inability to sell the site should not be justification for Council to consider rezoning. Rezoning would also make it difficult for future owners to use

the buildings for the variety of purposes that the current zoning allows. Similarly, re-purposing such buildings for residential use has unique difficulties. Simply stating that the site is “suited to future residential use and development” does not make it so.

**4. “4.5 Objectives of Schedule 1, Part 2 of LUPAA**

*(a) To require sound strategic planning and coordinated action by State and local government; and*

*The amendment seeks to further this objective of the Act by furthering Council’s objectives as expressed through the Northern Regional Land Use Strategy. The proposed rezoning amendment represents a logical expansion of the General Residential Zone as the present use and zone of the site no longer suits the needs of a place of assembly. It is not appropriate to retain the Community Purpose Zone for a parcel of land that is privately held and to be sold to further private holdings. It therefore represents sound strategic planning. “*

There is nothing “logical” about the expansion of the General Residential Zone in this situation given the historical and cultural values involved. The purpose of zoning is to ensure appropriate use as determined by the Planning Scheme, not to enable people to more easily sell an asset. The owners decision to stop using the site does not mean that the “site no longer suits the needs of a place of assembly”. It would represent better “strategic planning” to retain the current zoning so as not to restrict permitted use under the General Residential Zone.

*5. “(g) To conserve those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value; and “*

While the owners of the site recognise the historic values of the site, its significant contribution to the history of Longford and to the streetscape of the town would be diminished if the vacant land is sub-divided and developed for housing. The necessity for historic buildings to stand-alone and be seen in context in the streetscape is an important aspect to consider. Subdividing and infill housing would be detrimental to the streetscape because the complex of buildings on this site is of aesthetic, architectural, historical and cultural interest, not only locally, but also within the wider municipality.

I therefore urge Council not to approve the application to rezone land at 41-43 Wellington Street because the only justification provided is the difficulty experienced by the owners selling their asset.

Yours sincerely,

Robert Henley