

11 July 2022



Ms Anne Cunningham

Chair – Delegated Assessment Committee

Tasmanian Planning Commission

Email submission

Dear Mayor and Councillors

RESPONSE TO PLANNING AUTHORITY SUBMISSIONS

NORTHERN MIDLANDS LOCAL PROVISIONS SCHEDULE – REPRESENTATION 10

Longford House, 120 and CT 168940/1 Catherine St, Longford

Thank you for the opportunity to present at the recent hearings into the draft Northern Midlands Local Provisions Schedule. While much of my presentation reflected the content of our representation, some additional matters were raised during the course of the presentation. I provide this submission in response to the Council submissions, post hearings.

Land Use Change

I made statements that reflected my experience in the 'breaking up' of former agricultural holdings through the southern Longford area while working for Northern Midlands Council as planning officer from February 1999 to June 2001. During this time, I noticed an increasing trend for the release of individual lots that were contained on a common certificate of title, in common ownership and used as part of larger agricultural holdings into separate certificates for their sale to individual ownership. This was completed as an internal process by the Lands Titles office and without reference to the Council. It is also arguably when the conversion from agricultural use occurred through fragmentation of ownership and management of the individual parcels.

The Land District and Town Grant charts available through LISTmap provide verification that many of the early grants through the area surrounding my clients property were in common ownership. An extract of the Town Grant chart is provided following this letter that identifies my clients property, Longford House, by a blue dot. It also shows lands subject to representations 13 and 17.

I also stated that this area in southern Longford has undergone significant land use change over the last few decades, with houses now constructed on many of the existing titles. This is evident in any inspection of the area, which now displays a land use character largely described by single dwellings on large lots within a rural area or with a rural character (typically within the range of 3 to 5 hectares and east of Burleigh Street). We submit this character is consistent with the zone purpose statements of the Rural Living zone under the Tasmanian Planning Scheme.



We also note that the Commission has access to other expert evidence in support of our request.

Mr Jason Lynch of Pinion Advisory, provided a detailed assessment of the agricultural value of similar land adjoining and to the north of my clients within representation 17 from Woolcott Surveys. Mr Lynch concluded that the land was not appropriate to be included within the Agricultural zone under the Tasmanian Planning Scheme. We note that this representation seeks the General Residential zone, as an extension of the existing township and as identified in the Longford Development Plan. Representation 13 raises similar concerns to my representation.

The Council supported our request for the Rural Living zone C over the lands, while the Commission requested advice on the Rural Living zone B, with Rural Living zone A raised by the Commission within the hearings.

Following discussions with my clients, I confirm that our key concern is removal of this land from the agricultural estate following strategic studies and historical land use change. As a result, we support use of categories A, B or C within the Rural Living zone if the Commission considers this appropriate, or alternatively and following representation 17, zoning for further subdivision as either General or Low Density Residential for CT 168940/1 Catherine St.

We note the heritage values associated with Longford House and its gardens do not support further subdivision of this land and suggest that the Rural Living zone is the appropriate response for these values.

Attenuation Buffer

The second matter within our representation related to the expansion of the buffer for the Longford Brick Works from 200 metres under the Interim Planning Scheme to 500 metres under the draft Local Provisions Schedule.

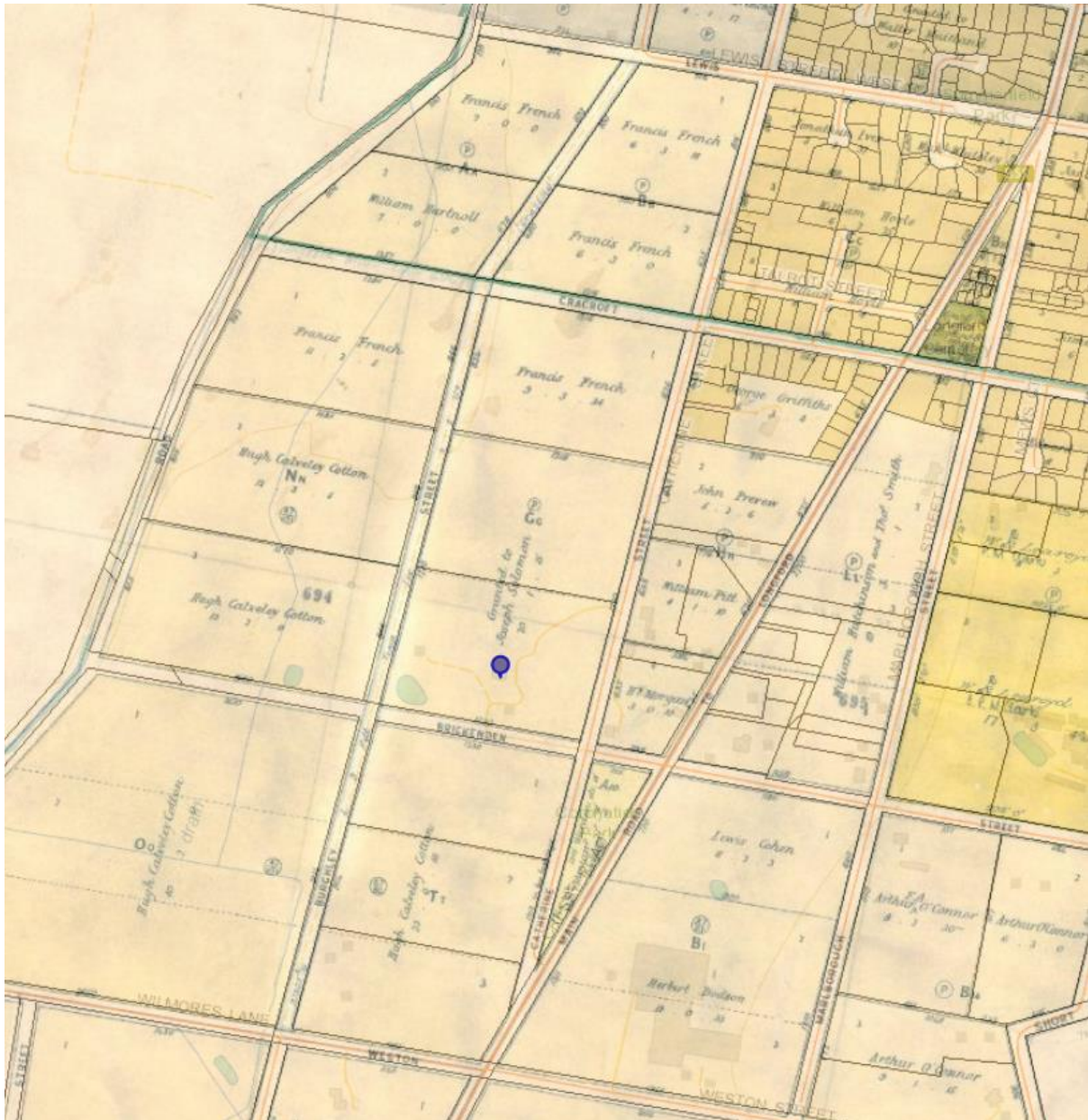
We identified the lack of justification from a suitably qualified person under Guideline AC2 in our representation. Acting for Council, Mr Clark also agreed that AC2 was not met and the buffer could be retained at 200m. We note an expert assessment on noise and dust within the vicinity of my clients lands is available from the Council website in response to a planning application for subdivision (PA-21-0082). While not prepared for this representation, this may provide the delegates with some comfort in their decision.

Thank you again for the opportunity to address our concerns within the hearing. Please contact me if you have any questions.

Regards

Mick Purves

Director / Principal



Extract – Town Grants Chart

Source: LISTmap, accessed 13 June 2022