



15 July 2022

Ms A. Cunningham
Chair – Delegated Assessment Committee
Tasmanian Planning Commission

Email submission

Dear Mayor and Councilors

**RESPONSE TO PLANNING AUTHORITY SUBMISSION
REPRESENTATION 13, 18 Wilmores Lane, LONGFORD (CT: 116434/3)
NORTHERN MIDLANDS LOCAL PROVISIONS SCHEDULE**

POST HEARING SUBMISSION

Thank you for the Delegated Assessment Committee's time at the hearing on the 8th of June 2022, providing Plan Place Pty Ltd an opportunity to present on the matters raised in representation 13. Additional matters were raised during the hearing process to support the request for the application of the Rural Living Zone C to the above-mentioned property.

The Northern Midlands Council (the Council) provided a response to the Tasmanian Planning Commission directions on 30th of June and 8th of July 2022. I provide this submission in response to the Council's submissions made post hearing.

Historical Land Use Change

At the hearing on 8 of June, I referred to the fragmentation of agricultural lands in the band west of Longford, between Catherine Street and Back Creek, south of Bulwer Street. I noted, as did Town Planning Solutions Pty Ltd, representation 10, that the large agricultural land holdings in common ownership have gradually eroded in this area. Consequently, fragmentation of common ownership occurred through the sale of lands which has eventually diminished the commercial agricultural viability of these holdings and has driven change in the use and development pattern of this area.

I refer to the Town Grant Charts, which were working plans used within the Survey Office of the former Lands Department to record the granting and alienation of land. While these charts were withdrawn from operation around 1990, they formed the basis for the current digital cadastral boundaries. The charts are a historical record of land holdings and ownership and substantiates the fragmentation of common ownership around my client's property. The chart (refer to Figure 1) shows

The Council has supported the application of the Rural Living Zone C to the property at 18 Wilmores Lane and the properties immediately to the north.

The application of the Agriculture Zone to my client's property is inconsistent with *Guideline No. 1: Local Provisions Schedule: zone and code application* and s34 LPS Criteria, *Land Use Planning and Approvals Act 1993*.

Attenuation Buffer

Representation 13 raised the issue of the proposed attenuation buffer for the Longford Brick Works in the draft Local Provisions Schedule. The draft Local Provisions Schedule proposes to increase the buffer from 200m under the Interim Planning Scheme to 500m.

The supporting report to the draft Local Provisions Schedule lacks justification from a suitably qualified person under Guideline AC2 to support such a change. Town Planning Solutions also raised the matter.

At the hearing, the Council agreed that AC2 cannot be met, and the buffer should be retained at 200m. An expert assessment of noise and dust within the vicinity of my client's land is available from the Council website in response to the planning application for subdivision (PA-21-0082). This expert assessment may assist the Tasmanian Planning Commission in making its decision.

If you have any questions, please do not hesitate to call to discuss this submission further.

Yours sincerely



Director
Plan Place Pty Ltd