

**ATTACHMENTS**

- Letter from Tasmanian Planning Commission, 27 May 2021
- Low Density Residential zone provisions – Northern Midlands Interim Planning Scheme 2013
- Particular Purpose (Horse Training and Stables) zone provisions – Northern Midlands Planning Scheme 1995.
- Representation to the draft amendment.
- Letter from the Directors of the Longford and Northern Midlands Veterinary Services Pty Ltd

## TASMANIAN PLANNING COMMISSION

Our ref: DOC/21/56956  
Officer: Lauren O'Brien  
Phone: 6165 6813  
Email: tpc@planning.tas.gov.au

27 May 2021

Mr Des Jennings  
General Manager  
Northern Midlands Council

Attention: Mr Paul Godier  
By email: council@nmc.tas.gov.au

Dear Mr Jennings

**Northern Midlands Interim Planning Scheme 2013  
Draft amendment 04-2020**

**Insert Domestic Animal Breeding, Boarding and Training (if not animal pound, cattery or kennel) and Veterinary Centre as permitted uses in the Low Density Residential Zone for titles in southern Longford**

I refer to the above draft amendment and to a hearing held at the Commission's office in Hobart on 20 May 2021 which was adjourned.

During the hearing, the intent of the draft amendment was discussed to determine the purpose for the additional land uses proposed in the southern Longford area adjoining the Longford Racecourse. The submissions received contended that the racecourse represents important infrastructure for the Tasmanian thoroughbred racing industry and that the draft amendment, that intended to reinstate the provisions of the Particular Purpose (Horse Training and Stables) Zone of the Northern Midlands Planning Scheme 2015, would not achieve the intended purpose.

To gain a clearer understanding of the purpose and intent of the draft amendment the Commission invites the planning authority to review the planning scheme provisions relating to the equine activities for the land adjoining the Longford Racecourse.

The Commission requests that the outcomes of this discussion is provided by close of business on **2 July 2021**. Submissions are to be provided by email to tpc@planning.tas.gov.au.

All submissions will be made available on the Commission's website<sup>1</sup>.

Please note that submissions will be published in full, without redaction.

If the hearing is to be reconvened, the Commission will advise the parties and publish a notice.

If you require further information please contact Lauren O'Brien, Planning Adviser, on 6165 6813.

Yours sincerely



Peter Fischer  
**Delegate (Chair)**

<sup>1</sup> <https://www.planning.tas.gov.au/assessments-and-hearings/current-assessments-and-hearings/AM-NOR-04-2020>

## 12 Low Density Residential Zone

### 12.1 Zone Purpose

#### 12.1.1 Zone Purpose Statements

12.1.1.1 To provide for residential use or development on larger lots in residential areas where there are infrastructure or environmental constraints that limit development.

12.1.1.2 To provide for non-residential uses that are compatible with residential amenity.

12.1.1.3 To ensure that development respects the natural and conservation values of the land and is designed to mitigate any visual impacts of development on public views.

#### 12.1.2 Local Area Objectives

To make provision for any additional future needs in low-density residential development at Avoca, Campbell Town, Cressy, Devon Hills and Longford by the incremental expansion of those areas already established for the purpose.

#### 12.1.3 Desired Future Character Statements

There are no desired future character statements

### 12.2 Use Table

No Permit Required	
Use Class	Qualification
Natural and cultural values management	
Passive recreation	
Permitted	
Use Class	Qualification
Residential	If an ancillary dwelling, caretakers dwelling, home-based business, single dwelling
Utilities	If for minor utilities
Discretionary	
Use Class	Qualification
Food services	If a Restaurant on the land described in CT 200085/1 (part of 31-41 Grant Street, Campbell Town)
Business and professional services	If a medical centre
Emergency services	
General retail and hire	If for a local shop
Community meeting & entertainment	If not a cinema or function centre

## Northern Midlands Interim Planning Scheme 2013

Sports and recreation	Including horse training or veterinary establishments on land in South Longford described on CT 110574/1-2; 111673/1-2; southern part of 112949/3; 113908/1-2; 122095/3; 124312/1; 135118/1-3; 140326/1; 157278/1-2; 19327/2-3; 244840/1; 244841/1; 26599/1; 63989/1.
Visitor accommodation	
Utilities	If not for minor utilities
<b>Prohibited</b>	
All other uses	

## 12.3 Use Standards

## 12.3.1 Amenity

<b>Objective</b>	
To ensure that non-residential uses do not cause an unreasonable loss of amenity to adjoining and nearby residential uses.	
<b>Acceptable Solutions</b>	<b>Performance Criteria</b>
A1 If for permitted or no permit required uses.	P1 The use must not cause or be likely to cause an environmental nuisance through emissions including noise and traffic movement, smoke, odour, dust and illumination.
A2 Commercial vehicles for discretionary uses must only operate between 7.00am and 7.00pm Monday to Friday and 8.00am to 6.00pm Saturday and Sunday.	P2 Commercial vehicle movements for discretionary uses must not unreasonably impact on the amenity of occupants of adjoining and nearby dwellings.
A3 If for permitted or no permit required uses.	P3 External lighting must demonstrate that: <ul style="list-style-type: none"> <li>a) floodlighting or security lights used on the site will not unreasonably impact on the amenity of adjoining land; and</li> <li>b) all direct light will be contained within the boundaries of the site.</li> </ul>

## 12.3.2 Low Density Residential Character

Objective	
To ensure that discretionary uses support the:	
a) visual character of the area; and	
b) local area objectives, if any.	
Acceptable Solutions	Performance Criteria
A1 Commercial vehicles for discretionary uses must be parked within the boundary of the property.	P1 No performance criteria.
A2 Goods or material storage for discretionary uses must not be stored outside in locations visible from adjacent properties, the road or public land.	P2 No performance criteria.
A3 Waste material storage for discretionary uses must:	P3 No performance criteria.
a) not be visible from the road to which the lot has frontage ; and	
b) use self-contained receptacles designed to ensure waste does not escape to the environment.	

## 12.4 Development Standards

12.4.1 Clauses 12.4.1.1 – 12.4.1.6 only apply to development within the Residential Use Class.

## 12.4.1.1 Site Coverage

Objective	
<p>a) To ensure that the site coverage respects the existing or preferred neighbourhood character; and</p> <p>b) To reduce the impact of increased stormwater runoff on the drainage system; and</p> <p>c) To ensure sufficient area for landscaping and private open space.</p>	
Acceptable Solutions	Performance Criteria
A1 The site coverage must not exceed 10% of the site.	<p>P1 The site coverage must have regard to the:</p> <p>a) size and shape of the site; and</p> <p>b) existing buildings and any constraints imposed by existing development or the features of the site; and</p> <p>c) site coverage of adjacent properties; and</p> <p>d) effect of the visual bulk of the building and whether it respects the neighbourhood character; and</p> <p>e) capacity of the site to absorb runoff; and</p> <p>f) landscape character of the area and the need to remove vegetation to accommodate development.</p>

## 12.4.1.2 Building Height

Objective	
To ensure that the height of dwellings respects the existing or desired future character statements.	
Acceptable Solutions	Performance Criteria
A1 Building height must not exceed 8 metres.	<p>P1 Building height must be appropriate to the site and the streetscape having regard to the:</p> <p>a) effect of the slope of the site on the height of the building; and</p> <p>b) relationship between the proposed building height and the height of existing adjacent buildings; and</p> <p>c) visual impact of the building when viewed from a road.</p>

12.4.1.3 Frontage Setbacks

<p><b>Objective</b></p> <p>To ensure that the setbacks of dwellings from the road respect the existing or preferred neighbourhood character and make efficient use of the site.</p>	
<p><b>Acceptable Solutions</b></p> <p>A1.1 Primary frontage setbacks must be a minimum:</p> <p>a) of 15m; and</p> <p>b) for infill lots, within the range of the frontage setbacks of buildings on adjoining lots, indicated by the hatched section in Figure 12.4.1.3 below; and</p>	<p><b>Performance Criteria</b></p> <p>P1 Buildings are set back from the primary frontage an appropriate distance having regard to:</p> <p>a) the efficient use of the site; and</p> <p>b) the safety of road users; and</p> <p>c) the prevailing setbacks of existing buildings on nearby lots; and</p> <p>d) the visual impact of the building when viewed from the road; and</p> <p>e) retention of vegetation within the front setback.</p>
<p>The diagram illustrates a street layout with a road at the bottom. On either side of the road are existing buildings. In the middle, there is an 'Infill Lot'. A hatched rectangular area is shown in front of the infill lot, indicating the setback range for a new building on that lot. The hatched area is bounded by the setbacks of the existing buildings on the adjacent lots.</p>	
<p><b>Figure 12.4.1.3 – Primary Frontage Setback for Infill Lots</b></p>	
<p>A1.2 Buildings must be set back a minimum of 15m from any other frontage.</p>	

12.4.1.4 Rear and Side Setbacks

<p><b>Objective</b></p> <p>To ensure that the:</p> <p>a) height and setback of dwellings from a boundary respects the existing neighbourhood character and limits adverse impact on the amenity and solar access of adjoining dwellings; and</p> <p>b) separation of buildings is consistent with the preferred low density character and local area objectives, if any.</p>	
<p><b>Acceptable Solutions</b></p> <p>A1 Buildings must be set back 5m from the rear boundary.</p>	<p><b>Performance Criteria</b></p> <p>P1 Building setback to the rear boundary must be appropriate to the location, having regard to the:</p> <p>a) ability to provide adequate private open space for the dwelling; and</p> <p>b) character of the area and location of dwellings on lots in the surrounding area;</p>

	<p>and</p> <ul style="list-style-type: none"> <li>c) impact on the amenity and privacy of habitable room windows and private open space of existing and adjoining dwellings; and</li> <li>d) impact on the solar access of habitable room windows and private open space of adjoining dwellings; and</li> <li>e) locations of existing buildings and private open space areas; and</li> <li>f) size and proportions of the lot.</li> </ul>
<p>A2 Buildings must be set back 7.5m from side boundaries.</p>	<p>P2 Building setback to the side boundary must be appropriate to the location, having regard to the:</p> <ul style="list-style-type: none"> <li>a) ability to provide adequate private open space for the dwelling; and</li> <li>b) character of the area and location of dwellings on lots in the surrounding area; and</li> <li>c) impact on the amenity and privacy of habitable room windows and private open space of existing and adjoining dwellings; and</li> <li>d) impact on the solar access of habitable room windows and private open space of adjoining dwellings; and</li> <li>e) locations of existing buildings and private open space areas; and</li> <li>f) size and proportions of the lot; and</li> <li>g) extent to which the slope and retaining walls or fences reduce or increase the impact of the proposed variation.</li> </ul>



## 12.4.1.5 Location of Car Parking

Objective	
a) To provide convenient parking for resident and visitor vehicles; and	
b) To minimise the impacts of garage doors to the neighbourhood.	
Acceptable Solutions	Performance Criteria
A1 A garage or carport must be located:	P1 Car parking facilities must be:
a) within 10 metres of the dwelling it serves; and	a) close and convenient to dwellings and residential buildings; and
b) with a setback equal to or greater than the setback of the dwelling from the primary road frontage.	b) located to minimise visual impact to the streetscape; and
	c) provided in a form that is appropriate to the area and development.
A2 The total width of the door or doors on a garage facing a road frontage must:	P2 The width of garage doors should not be a visually dominant element in the streetscape and must be designed having regard to the:
a) be not more than 6m; or	a) existing streetscape and the design and locations of garages in the area; and
b) the garage must be located within the rear half of the lot when measured from the front boundary.	b) location of existing buildings on the site.

## 12.4.1.6 Outbuildings and Ancillary Structures

<p>Objective</p> <p>To ensure that:</p> <p>a) outbuildings do not detract from the amenity or established neighbourhood character; and</p> <p>b) dwellings remain the dominant built form within an area.</p>	
Acceptable Solutions	Performance Criteria
<p>A1 Outbuildings must not have a:</p> <p>a) combined gross floor area of greater than 80m<sup>2</sup>; and</p> <p>b) maximum wall height of greater than 3.5m; and</p> <p>c) maximum building height greater than 4.5m.</p>	<p>P1 Outbuildings must be designed and located having regard to:</p> <p>a) visual impact on the streetscape; and</p> <p>b) any adverse impacts on native vegetation; and</p> <p>c) overshadow adjoining properties; and</p> <p>d) compatibility with the size and location of outbuildings in the neighbourhood.</p>
<p>A2 A swimming pool or tennis court for private use must be located:</p> <p>a) behind the primary frontage setback; or</p> <p>b) in the rear yard.</p>	<p>P2 A swimming pool or tennis court for private use must be designed and located to:</p> <p>a) minimise any visual impact on the streetscape; and</p> <p>b) not unreasonably overlook or overshadow adjoining properties; and</p> <p>c) be compatible with the size and location of approved outbuildings in the neighbourhood.</p>

12.4.2 Clause 12.4.2.1 only applies to development other than the Residential Use Class.

12.4.2.1 Non Residential Buildings

Objective	
To ensure that all non-residential development undertaken in the Low Density Residential Zone is sympathetic to the form and scale of residential development and does not affect the amenity of nearby residential properties.	
Acceptable Solutions	Performance Criteria
A1 If for permitted or no permit required uses.	<p>P1 Development must be designed to protect the amenity of surrounding residential uses and:</p> <ul style="list-style-type: none"> <li>a) the proportion of the site covered by buildings must have regard to the:                             <ul style="list-style-type: none"> <li>i) size and shape of the site; and</li> <li>ii) site coverage of existing buildings and any constraints imposed by existing development or the features of the site; and</li> <li>iii) site coverage of adjacent properties; and</li> <li>iv) effect of the visual bulk of the building and whether it respects the neighbourhood character; and</li> <li>v) capacity of the site to absorb runoff; and</li> <li>vi) landscape character of the area and the need to remove vegetation to accommodate development; and</li> </ul> </li> <li>b) the building height must have regard to the:                             <ul style="list-style-type: none"> <li>i) effect of the slope of the site on the height of the building; and</li> <li>ii) relationship between the proposed building height and the height of existing adjacent buildings; and</li> <li>iii) visual impact of the building when viewed from the road and from adjoining properties; and</li> <li>iv) degree of overshadowing and overlooking of adjoining properties; and</li> </ul> </li> <li>c) the setback of the building to a road frontage must be appropriate to the location and the character of the area</li> </ul>

	<p>having regard to:</p> <ul style="list-style-type: none"> <li>i) the prevailing setbacks of existing buildings on nearby lots; and</li> <li>ii) the visual impact of the building when viewed from the road; and</li> <li>iii) treatment of development within front setback; and</li> </ul> <p>d) the setback of the building to side and rear boundaries must prevent unreasonable impacts on the solar access and privacy of habitable room windows and private open space of adjoining dwellings; and</p> <p>e) traffic circulation and parking areas must be located away from residential boundaries; and</p> <p>f) landscaping must integrate development having regard to:</p> <ul style="list-style-type: none"> <li>i) the level and effectiveness of physical screening by fences or vegetation; and</li> <li>ii) the location and impacts of illumination of the site; and</li> <li>iii) passive surveillance of the site.</li> </ul>
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12.4.3 Subdivision

12.4.3.1 Lot Area, Building Envelopes and Frontage

Objective	
To ensure:	
<ul style="list-style-type: none"> <li>a) the area and dimensions of lots are appropriate for the zone; and</li> <li>b) the conservation of natural values, vegetation and faunal habitats; and</li> <li>c) the design of subdivision protects adjoining subdivision from adverse impacts; and</li> <li>d) each lot has road, access, and utility services appropriate for the zone.</li> </ul>	
Acceptable Solutions	Performance Criteria
<p>A1.1 Each lot must:</p> <ul style="list-style-type: none"> <li>a) have a minimum area of 1ha; and</li> <li>b) have new boundaries aligned from buildings that satisfy the relevant acceptable solutions for setbacks; or</li> <li>c) be required for public use by the Crown, a an agency, or a corporation all the shares of which are held by Councils or a municipality; or</li> <li>d) be for the provision of public utilities; or</li> <li>e) for the consolidation of a lot with another lot with no additional titles created; or</li> <li>f) to align existing titles with zone boundaries and no additional lots are created.</li> </ul> <p>A1.2 Subdivision at Devon Hills will not result in any new lots.</p>	<p>P1.1 Each lot for residential use must provide sufficient useable area and dimensions to allow for:</p> <ul style="list-style-type: none"> <li>a) a dwelling to be erected in a convenient and hazard free location; and</li> <li>b) on-site parking and manoeuvrability; and</li> <li>c) adequate private open space; and</li> <li>d) reasonable vehicular access from the carriageway of the road to a building area on the lot, if any; and</li> <li>e) development that would not adversely affect the amenity of, or be out of character with, surrounding development and the streetscape.</li> </ul> <p>P1.2 Land in Devon Hills must not be further subdivided</p>
<p>A2 Each lot must have a frontage of at least 6m.</p>	<p>P2 No performance criteria.</p>
<p>A3 Each lot must be connected to a reticulated:</p> <ul style="list-style-type: none"> <li>a) water supply; and</li> <li>b) sewerage system.</li> </ul>	<p>P3 Lots that are not provided with reticulated water and sewerage services must be:</p> <ul style="list-style-type: none"> <li>a) in a locality for which reticulated services are not available or capable of being connected; and</li> <li>b) capable of accommodating an on-site wastewater management system.</li> </ul>

## Northern Midlands Interim Planning Scheme 2013

<p>A4 Each lot must be connected to a reticulated stormwater system.</p>	<p>P4 Stormwater may only be discharged from the site in a manner that will not cause an environmental nuisance, and that prevents erosion, siltation or pollution of any watercourses, coastal lagoons, coastal estuaries, wetlands or inshore marine areas, having regard to:</p> <ul style="list-style-type: none"> <li>a) the intensity of runoff that already occurs on the site before any development has occurred for a storm event of 1% Annual Exceedance Probability (pre-development levels); and</li> <li>b) how the additional runoff and intensity of runoff that will be created by the subdivision for a storm event of 1% Annual Exceedance Probability, will be released at levels that are the same as those identified at the pre-development levels of the subdivision; and</li> <li>c) whether any on-site storage devices, retention basins or other Water Sensitive Urban Design (WSUD) techniques are required within the subdivision and the appropriateness of their location; and</li> <li>d) overland flow paths for overflows during extreme events both internally and externally for the subdivision, so as to not cause a nuisance.</li> </ul>
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## **PART TWELVE - PARTICULAR PURPOSES (PP) ZONE PROVISIONS**

### **12.1 PARTICULAR PURPOSES (PP) LAND GOALS**

- (1) To make provision for specific activities which are not otherwise provided for in the Northern Midlands Planning Scheme 1995 due to the nature of their operation or other characteristics.
- (2) To make provision for integrated developments comprising of a mix of specific uses, which should be dealt with as a single development.

### **12.2 PARTICULAR PURPOSES (HORSE TRAINING AND STABLES) (PP1) ZONE**

#### **12.2.1 ZONE INTENT**

- (i) The intent of this zone is to identify the Longford Racetrack and existing stables as a focus of a major horse-training facility serving the Tasmanian Racing Industry.
- (ii) The zone identifies land to the south and west of the existing training establishments to accommodate future expansion of the Industry.
- (iii) Development standards will promote the integration of training facilities with attention given to a network of interlinking access strips for horse and rider and their separation from vehicles, the provision of communal training facilities, extensive landscaping and appropriate environmental controls.
- (iv) The subdivision of land within this zone is subject to satisfying environmental considerations for development however will allow further consideration being given to increasing the density of stables in the zone

**12.2.2 TABLE OF USES AND DEVELOPMENTS  
IN THE PARTICULAR PURPOSES  
(HORSE TRAINING AND STABLES) (PP1) ZONE**

1	2	3	4
PERMITTED (NO PERMIT REQUIRED)	PERMITTED (WITH PERMIT)	DISCRETIONARY (WITH PERMIT)	PROHIBITED
Utility Services - minor	Equestrian Facility Home Business Passive Recreation Recreation Active Veterinary Establishment	House House & Ancillary Apartment Car Park Subdivision Use or development in accordance with Clause 2.6.1(iii)	All other uses not listed.

**12.2.3 DEVELOPMENT STANDARDS  
IN THE PARTICULAR PURPOSES (HORSE TRAINING AND STABLES)  
(PP1) ZONE**

**(i) SUBDIVISION**

The subdivision of land in the Zone shall generally be in accordance with Council's Approved 'Outline Subdivision Plan - Longford Horse Training Facility' in Appendix 3 and shall meet the following minimum lot sizes:

- (a) 1.75ha average with a 1.6ha minimum lot where effluent disposal is based upon septic tank or other approved system; and
- (b) 0.8ha average with a 0.7ha minimum lot where effluent disposal is to Council's sewerage system or other approved Package Wastewater Treatment Plant.

**(ii) BUILDING DESIGN AND SITING**

Height

- (a) The maximum height of a building or structure in the Particular Purposes (Horse Training And Stables) Zone shall not exceed 10m.



- (b) Council may approve a greater height subject to the provisions of Clause 2.6 of the Northern Midlands Planning Scheme 1995 where satisfactory evidence is produced by the applicant that:
- (1) the appearance of the building will be in sympathy with surrounding buildings;
  - (2) the building will not adversely affect the streetscape, skyline or character of the area.

#### Siting and Setbacks

- (c) The siting and setbacks of buildings shall be as follows:

Front Boundary	Side Boundary	Rear Boundary
15 m	3m, or greater if required by Council.	3m, or greater if required by Council.

In determining the adequacy of the side and rear boundary shall have regard to:

- the intent of the Zone;
- the location and provision of services;
- the requirements for access, loading and unloading, and stowage;
- the requirements for employee and customer car parking;
- the need for and provision of landscaping; and
- the impact on adjacent residential properties or to a residential zone.

#### Lot Coverage

- (d) The maximum lot coverage of buildings shall be no more than 40% of the site.

### **(iii) UTILITY SERVICES**

- (a) The services of sewerage (or equivalent disposal by other means), drainage, water reticulation and electricity shall be provided to the satisfaction of Council and relevant legislation.
- (b) Electricity supply shall be underground.

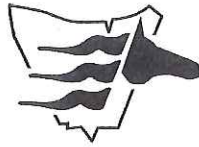
### **(iv) ACCESS AND PARKING**

- (a) Access and parking shall be provided in accordance with Parts 13 and 16 of the Northern Midlands Planning Scheme 1995.

**(v) ENVIRONMENTAL QUALITY**

- (a) Council shall ensure that the maximum allowable levels of noise, odour, dust and other emissions at the outer edge of the zone comply with the requirements of the *Environmental Management and Pollution Control Act 1994*, Regulations or its equivalent.
- (b) No sewage, sullage or trade effluent shall be permitted to flow into Council's stormwater system, or any waterway and arrangements satisfactory to the Council shall be made for the collection and disposal of all trade effluent or waste. Council may, as a condition of approval, limit the number of horses resident on the site to ensure compliance with the above requirements.

2-277



## LONGFORD EQUINE CLINIC

Phone: (03) 63911000 • Fax: (03) 63912258 • Anstey St, Longford TAS 7301  
A Ballymore Stables P/L Enterprise • ABN 12 612 795 939  
[www.longfordequine.com.au](http://www.longfordequine.com.au)

3.12.2020

**RE: 04/2020; PLN-20-0230**

I wish to object to the following planning application **04/2020; PLN-20-0230** on the following grounds.

Essentially the application wishes to change the permitted use of the land in the low residential zone. The land was initially set aside for uses that aid and support the adjacent Longford training centre and hence this was the permitted use of the land. It was clearly foreseen at the time that there was a need for this land in order for the training centre to prosper, and that the use of the land would need to be protected through its zoning, as there would come a time when others coveted the land for other uses. Well that time has come

The Longford Training Centre has as much need now of this land for its survival as it ever did. In fact as training centres around Tasmania become rationalized, and the opportunities to find land adjacent to training centres to train on becomes more limited, the need for this land is greater than ever. Now is the time for Council to defend the original zoning uses and not to be thinking of changing them. There is absolutely no compelling reason to change the permitted use of this land, beyond giving into developer pressure.

This objection needs to be read in conjunction with my objection to PLN-20-0174, wherein I go into more detail on the value to the town of the training centre. It is abundantly clear Council has a choice between acting in the best interests of its local Thoroughbred Training Centre and its attendant history, or facilitating its slow demise by approving this draft amendment which will allow residential and commercial interests unconnected with racing to threaten racings viability.

Yours Sincerely

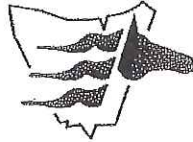
A handwritten signature in black ink, appearing to read 'Michael Morris', written in a cursive style.

**Dr Michael Morris B.V.Sc**  
Senior Veterinarian  
Longford Equine Clinic

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Michael Morris  
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## LONGFORD EQUINE CLINIC

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NORTHERN MIDLANDS COUNCIL					
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Property					
Attachments					
REC'D 16 NOV 2020					
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P&DM			BLO		
CSM			MYR		
WRM			EA		
RR					
HLT					

Received by  
 L. Davey  
 10:45am

16.11.2020  
 The General Manager  
 Northern Midlands Council

I wish to object to development application PLN-20-0174, on the following grounds.

1. This proposed subdivision is on land currently being used to spell racehorses. The land is part of a larger area around the Longford thoroughbred training centre, which was previously classified as Particular Purpose Racehorse Training and Stables. That is to say the land was set aside for that purpose in order to support the adjacent Longford Training Centre. The zoning was changed to low residential solely to comply with the statewide planning scheme template ( which contained no Particular Purpose Racehorse Training and Stables) and not because the Council had any desire at the time to change the intended use of the land. There is just as much need today to preserve the land for the support of racing as there was when Particular Purpose Racehorse Training and Stables was instituted, and the interim planning scheme still requires that to be the case.

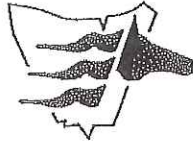
If Council is to now allow or facilitate subdivision and development of this land, not only will it be in breach of the planning scheme, it will have the following repercussions.

- A. It will be risking future conflict between existing trainers and horsemen and future residential owners unused to the implications of living in close proximity to racehorse stables, and driving on roads and streets frequently used by horses. This would clearly conflict with Section 32 of the Land Use Planning and Approvals Act 1993 which requires council to "as far as practicable avoid the potential for land use conflicts with use and development permissible under the planning scheme applying to the adjacent area"
- B. But most importantly it will be signing the slow death warrant of the Longford Training Centre. A training centre can only survive when it has the necessary support structures in place and an essential part of that is the space available for training and spelling, as well as an understanding and sympathetic immediate local community. Those residences presently within the area are almost all involved in and sympathetic to the racing industry. There can be no guarantee of that with this subdivision, which is a requirement of the current interim planning scheme.

Council would be aware that the Longford Training Centre has considerable cultural and colonial significance as the oldest continuously used racetrack in Australia. Sydney's prestigious Banjo Club recognises Australian country racetracks that it believes are an important part of our colonial heritage, in keeping with the spirit of Banjo Paterson, after whom the club was named. The Longford track received this recognition approximately a decade ago. Following the unfortunate and sad demise of the Deloraine track and its historic live steeple, the Longford track is the last remaining iconic country racetrack in Tasmania. The importance of the track and the Longford Cup is not sufficiently recognised by Council in my view. At a time when country tracks are

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## LONGFORD EQUINE CLINIC

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under siege it is imperative, we celebrate and highlight those things that add value to our towns, clubs and institutions, so that it becomes harder for regulators and opponents to shut them down.

If Council were to allow subdivision of land specifically set aside to aid and support training it would be a clear indication it has no regard for our racing history. The land and racetrack should in my view should be added to the historic precinct of which Brickendon and Woolmers are a part.

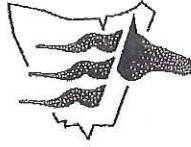
C. Approving this subdivision proposal would set a precedent for further subdivision of other land that sits within the referred to Particular Purpose Racehorse Training and Stables area. Mr Dixon has recently acquired much of this land, presumably with subdivision in mind. To allow this to proceed is a very real existential threat to the Longford Training Centre.

D. Any subdivided land must be used in accordance with the interim planning scheme, which means it must have a use associated with the racing industry and council has a duty and obligation to ensure this occurs.

2. The application has not adequately addressed the issue of stormwater.

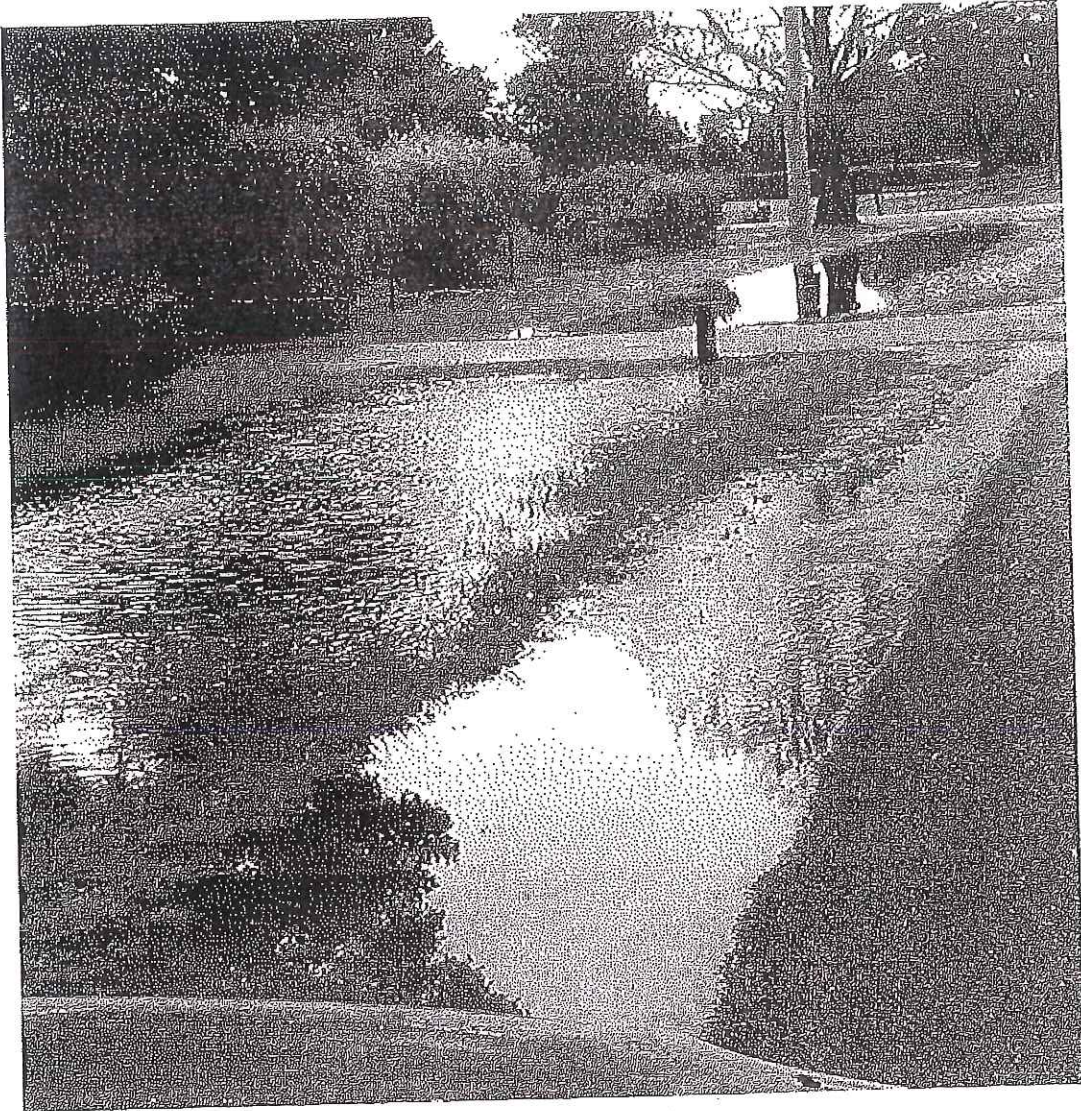
A. Council would be aware the problem this part of town faces with stormwater as I have complained about it previously with no action forthcoming at all. The area is extremely flat with little to no fall in any direction, which makes water run off almost impossible. Beyond a few poorly constructed roadside drains there is no stormwater infrastructure in this area and it would appear there is no intention to put any in. I live, and run an equine veterinary clinic, opposite the Longford Training Centre in Brickendon St, one block away from the proposed subdivision. Every winter in heavy rain events my house and clinic are cut off for days by the roadside drains holding water that cannot escape. The attached photos were taken 3 days after a rain event finished, and demonstrate the problem.

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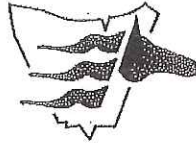


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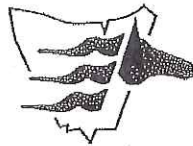


But at least there are shallow roadside drains outside my property. There are no drains at all adjacent to the proposed subdivision ( see photos).

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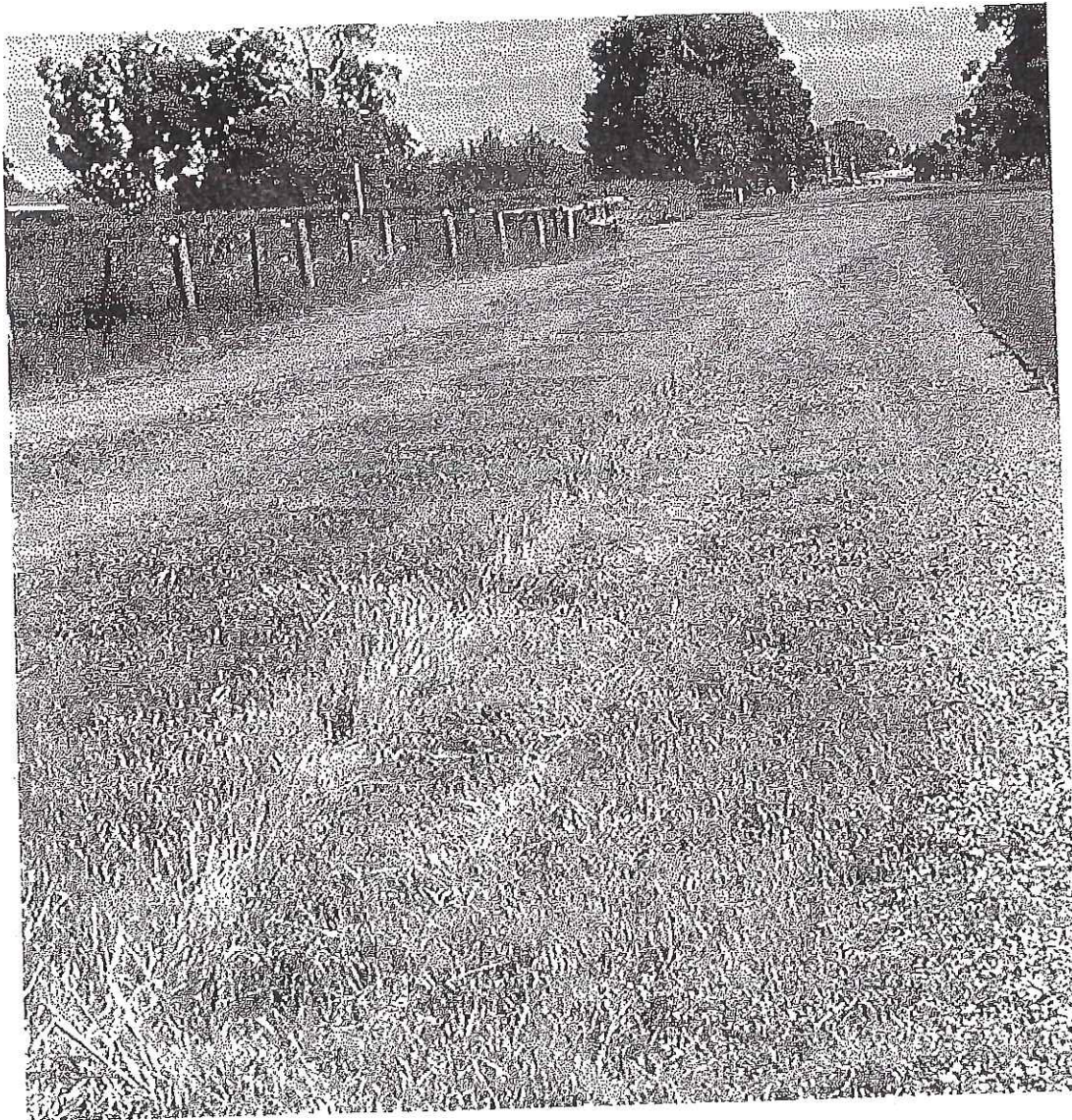
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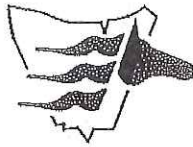
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It is quite evident the existing residents are already disadvantaged by the lack of water and sewerage infrastructure. The area relies on the ability of the land to absorb both stormwater and wastewater as it can't escape, and in winter that ability is already frequently exceeded on multiple occasions by the existing number of residents with attendant buildings and roofs.

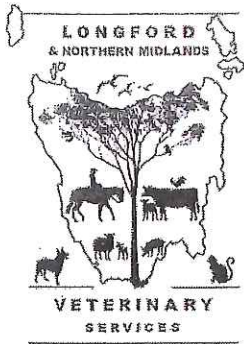
To suggest the area can cope with further building development and water runoff, without pumping stations is ludicrous.

- B. The stormwater assessment accompanying the application is at pains to point out it was conducted on the basis the proposed lots were to be residential lots with a typical 3 bedroom home. No mention was made of other buildings, sheds etc. The wastewater assessment on the other hand said there was sufficient scope for a typical 4 bedroom dwelling, so presumably there is NOT sufficient stormwater capacity for a 4 bedroom dwelling or for any sheds, or they would have said so. Given the report was commissioned by Mr Dixon you can be sure it presents the most favourable options available. It sounds like a very small margin for error on the stormwater assessment. In any case it is clear the stormwater assessment was done on the basis of a residential dwelling of limited size and no attendant outbuildings. It most definitely was not done with a view to a commercial property with a much larger roof footprint and runoff, as well as the increased wastewater production and reticulated water use. It is my understanding this is the intended use of one of the lots.

In conclusion, even if Council is to give no regard to its obligations for future use of land within this area, or to the effect this subdivision will have on the future of the Longford Training Centre, it is abundantly clear the topography of this part of town renders any subdivision wholly inappropriate, without the installation of stormwater pits and pumping stations.

Yours Sincerely

**Dr Michael Morris B.V.Sc**  
 Senior Veterinarian  
 Longford Equine Clinic



NORTHERN MIDLANDS COUNCIL					
File No.					
Property					
Attachments					
REC'D 15 JUN 2021					
GM			PLN		V
P&DM			BLD		
GSM			MYR		
WM			EA		
HR					
HLT					

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ABN: 43 691 404 004

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Dr. Peter Wishart, Dr. Sam Morgan & Associates

**Attention:** Mr Des Jennings (General Manager) & Mr Paul Godier (Planner)  
Northern Midlands Council  
13 Smith Street, Longford, Tasmania  
Date: 06/06/2021

Dear Mr Jennings and Mr Godier,

We are writing to you regarding the **Draft Amendment 04-2020** to the Northern Midlands Planning Scheme 2013, to insert *veterinary centre* as a permitted use in the low-density residential zone for titles in southern Longford.

Following the hearing held at the Tasmanian Planning Commission on 20/05/2021, the Commission requested information to gain a clearer understanding of the purpose and intent of the draft amendment. Thus, we thought it would be prudent to communicate the importance of an amendment to the Northern Midlands Planning Scheme for our locally owned and operated business.

Longford and Northern Midlands Veterinary Services Pty Ltd is a mixed veterinary practice (including dogs, cats, cattle, horses, small ruminants, pigs etc) presently servicing Longford and the northern midland communities. We provide the only veterinary services of this kind to the agricultural sector of the northern midlands, and are the only small animal veterinarians in Longford. We purchased the business in July 2018, and have expanded what was a single-vet (small animal only) clinic to a mixed practice employing five-vets and offering full emergency after-hours veterinary services to the local community. Including our veterinary nurses, we currently employ 11 people. Our business brings people into Longford from both within and outside the Northern Midlands Council region, who often shop at other businesses in town while their animals are being treated.

At present, our business is located at 24 Marlborough Street, Longford (these premises were purchased with the business in 2018). However, the size and location of this site is inadequate for the services we are now providing, and is significantly limiting the growth of our business as well as the range of services we can offer. For the last 2-3 years we have been actively searching for a new site for our business, but unfortunately suitable property that is appropriately zoned in Longford is extremely scarce. We believe building a larger, more well-equipped veterinary centre will secure the clinic's future in the town, be an asset for the region's companion animal owners and agricultural/racing sectors, as well as provide employment and wider economic benefits.

In December 2020, the opportunity arose to purchase 361 Cressy Road, Longford as a potential new site for our business. We consider this site a perfect future location for our business – it is a very large block with good existing infrastructure; plenty of room for off-street parking; situated very close to the dog park; bordering an existing industrial site; and located on the corner of two roads (allowing for separate staff and client entry/exit points). Despite it being zoned low-density residential, we proceeded with the purchase and settlement of this property in March 2021 with the knowledge that the Northern Midlands Council were already working towards the Draft Amendment 04-2020 (as advised by Mr Godier during a meeting on 11/03/2021). This draft amendment is essential for us to continue preparing our development application to relocate our business to this property.

We note that the property we have purchased (361 Cressy Road, Longford) is NOT either private or publicly owned Thoroughbred Racing or Racecourse infrastructure. Prior to us purchasing the site, it was a residential address supporting a private agricultural contracting business. Our proposal to develop this site as a veterinary centre will not detract or devalue the existing Thoroughbred Racing/Racecourse activities or infrastructure in this part of Longford in any way. Indeed, one would expect additional veterinary services in this area would be a favourable outcome for the racing industry.

In conclusion, an amendment such as proposed by the Draft Amendment 04-2020 to the Northern Midlands Planning Scheme 2013 is essential for the relocation and planned expansion of our local business. Longford has extremely limited opportunities for our business relocation; there are no sites currently available that are zoned appropriately for establishing a veterinary centre of the scale and quality that we hope to establish at 361 Cressy Road. We believe, given the very limited increase in use that this amendment would add to the existing permissible uses, that it would have very little impact on the Thoroughbred Training Centre. We hope our comments help to clarify the purpose and intent of amendment to the Northern Midlands Planning Scheme.

Yours sincerely,

Dr Sam Morgan and Dr Peter Wishart  
Directors, Longford and Northern Midlands Veterinary Services Pty Ltd