22 June 2023

Tasmanian Planning Commission
GPO Box 1691
HOBART   TAS   7001

Via Email: tpc@planning.tas.gov.au

Dear Sir/Madam

EXHIBITION OF DRAFT TASMANIAN PLANNING POLICIES CITY OF HOBART REPRESENTATION

The City of Hobart welcomes the opportunity to provide feedback on the draft Tasmanian Planning Policies (TPPs) currently on exhibition. The attached representation is the City of Hobart's draft feedback pending anticipated Council endorsement on 17 July 2023.

The City of Hobart is generally supportive of the scope of the content of the draft TPPs and commends the State Planning Office on its contributions that will ensure Tasmania's planning framework is fit for purpose.

The attached representation was developed by the City's strategic planning staff and highlights key issues on the implementation of the TPPs and suggested amendments to the TPPs.

The City of Hobart looks forward to providing further input into future stages of the Tasmanian Planning Reforms and Reviews.

Yours sincerely,

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Draft Tasmanian Planning Policies - Representation

Climate Change

- The following are general comments for a broader 'climate' framing:
  - The draft TPPs represent climate change as a future risk, however, climate change needs to be considered in an immediate/current context. Climate impacts are currently being experienced across natural and built landscapes as natural disasters and shifting ecological processes, including extinctions. Given this, climate should be framed in a current context throughout the TPPs rather than a future one.
  - Novel and emerging climates present significant challenges for settlements (legacy and new) and land use planning. These challenges, including the increase and intensification of natural hazards and associated behaviours (such in fire, rainfall, wind-load), exceed known occurrences and limits. Whilst it is appreciated that land use planning is inherently static; unique and flexible responses will be required for settlements to adapt, including retreat, and develop resilience to climate change. These may include the capacity for interim and intermittent uses within the land use planning framework.
  - Climate change needs to be considered more broadly than through an 'environmental' and natural hazards lens. For example, 1.0 Settlement 1.1 Growth should include concepts around gentrification, adaptation pathways, justice and the vulnerability of future land release to novel and emerging climates. New approaches that include interim flexible planning responses with the bolted-on capacity to identify triggers points at climate impact 'milestones' i.e. services such as road maintenance, waste removal will not be provided if there are more than X (based on a cost benefit analysis) impactful events in a financial year
  - 3.0 Environmental Hazards should include 'heat and extended heat waves' and 'drought.'
  - Climate impacts and hazards need to include consideration of compounding, concatenating, coincidental and cascading events and limitations of viability of locations. The consideration of siloed natural hazards increases vulnerability of settlements, and limits the identification of appropriate solutions.
  - Concepts such as promoting the protection of biodiversity values and ecological services to maximise opportunities for carbon storage are considered overreach and should be limited. Whilst these are considered critical concepts in their own right detailed analysis of carbon storage before and after settlement is required to support this statement. It is highly unlikely that the carbon storage post development will offset that which existed prior. Similarly green infrastructure whilst strongly encouraged has limits and should be considered alongside other approaches to enhance resilience and zero-carbon development.
  - Glossary should include terms: adaptation, adaptation pathway, retreat,

sequestration, net zero etc

- o Overall it is recognised that climate risk is an issue facing all organisations – no matter whether they are private or public, their location, circumstance, resourcing capacity. It has evolved from an 'environmental' issue to the mainstream with material financial risk across physical, economic transition and litigation dimensions. Regulatory and investor expectations for climate risk assessment and disclosure, by corporate and public sectors, are accelerating, posing risks and opportunities that need understanding, assessment and appropriate action. To this end climate considerations should be applied more forensically across the TPPs in their entirety to ensure that TPPs maximises the climate resilience and mitigates vulnerability.

Implementation

- It states on page 1 that 'The effectiveness of the TPPs will be monitored'.
  - o What are the indicators being measured/performance measures? Who will do the monitoring and will the feedback be shared with Local Government?
- **Structure Planning vis a vis the TPPs** - it is noted that the TPPs are to, eventually, be delivered through the RLUSs and the Tasmanian Planning Scheme (e.g. SPPs). However, there are a number of other strategic land use planning documents that are fundamental in providing guidance for the sustainable growth and evolution of our cities and town such as the structure plans (e.g. Central Hobart Plan).
  - Whilst structure plans are considered non-statutory the implementation of the strategic guidance contained in the TPPs would benefit these important strategic land use documents, which can 'localise' the TPPs. The more that all strategies, policies and guidelines are considered holistically the more likely they are to be effective.
  - For reference this apparent dichotomy between statutory and non-statutory strategic planning documents and how they work together happens in other jurisdictions. This has sometimes been bridged by referencing the non-statutory documents in the planning scheme, so they can be considered as part of the planning processes.
- Suggestion: whilst not singularly a TPPs matter consider how their implementation can work with non-statutory strategic planning documents. In particular the role of structure plans in relation to statutory documents in the TPPs General Application section, which could also inform the Structure Plan Guidelines that are under development (it is noted that structure plans guidance is included under 1.1.3, however this does not elucidate their role vis a vis statutory documents).

1.0 Settlement

- Developer Contributions

- o Strategies for developer contributions should also be included under 1.0 Settlement rather than just under 5.1 Provision of Services so the policy extends to public benefits beyond the provision of water and sewerage, stormwater management, electricity, gas, telecommunications and recycling and waste management. The policy should allow flexibility for Councils to facilitate potential developer contributions for a wide range of public benefits such as community infrastructure, open space, placemaking and public art.
- 1.0.1 Principles and Policy context
  - o 'Urban environments are highly susceptible to land use conflict due to the interaction of environmental, social and economic forces that create complex spatial relations.'

Noting that the general tone here is about land use planning, rural/non-urban environments are susceptible to land use conflict, as urban environments seek to expand. Note also that the definition 'settlement' includes:

'While predominantly referring to land developed as cities, towns and villages, it also includes land that has been modified from its natural state to provide for a mix of land uses which are not reliant upon natural resources, such as rural residential, utility and industrial uses.'

- 1.2.3 Liveability

Strategy 1

  - o '..secure and reliable employment sources.'

Suggestion: amend to 'established opportunities for employment'. How can employment be considered secure and reliable?

Strategy 2

  - o a) the provision of, and access to, safe and efficient public transport;

Noting that the provision of public transport is not within the remit of land use planning. Suggestion amend to:

'the provision of public transport infrastructure, enabling access to safe, efficient and frequent public transport'.

Strategy 4 – Suggested additions:

  - o Support measures to equally prioritise and co-locate urban forest and green space in the public realm with transport and infrastructure for improved social and health outcomes.
  - o Ensure there is sufficient space for greening in private developments including apartment/medium density housing developments
  - o Provide deep-soil guidelines in new developments to provide adequate space for trees to develop.
  - o 'provide for a network of accessible and inviting open and green spaces **that cater for a diversity of needs and age groups ....**'
  - o Provide guidelines to ensure that built structures allow setbacks for street tree growth – for example, balconies, signage and fixed awnings.

Strategy 9

- o 'Provide for a range of cultural, recreational and community facilities that support wellbeing, social cohesion and cultural identity and understanding."

Suggestion: Consider adding social inclusion to the list after social cohesion.

- 1.3.2 Social Infrastructure

Objective

- o 'To support the provision of adequate and accessible social infrastructure to promote the health, education, safety and wellbeing of the community.'

Why are social infrastructure and physical infrastructure separated, with social infrastructure part of the Settlement TPP and physical infrastructure a separate TPP? Social infrastructure can be in a physical form. Perhaps infrastructure should be in a combined TPP, and the individual infrastructure networks defined.

The combined TPP might be more specific about undertaking infrastructure planning and include another strategy that includes wording such as:

'Identify the local government's plans for trunk infrastructure that are necessary to service urban development at the desired standard in a coordinated, efficient, and financially sustainable manner.'

Another strategy should deal with developer contributions/infrastructure charging towards infrastructure establishment costs, cost apportionment, etc.

- 1.3.3 Social Infrastructure

Strategy 1

- o 'Provide for a sufficient supply of land to support the community's existing and forecast demand for social infrastructure, including, but not limited to, schools, health care, libraries, social services and child and aged care.'

Suggestion: Add 'community centres, recreation facilities, ' after or before 'libraries'.

As noted above, such infrastructure is also physical infrastructure that, with recreation facilities, should form part of an infrastructure network.

- **Landscape and its relationship with settlements** - significant thinking and work has been undertaken by Councils (e.g. City of Hobart and City of Launceston) that demonstrate the fundamental role of landscape in the formation and qualities of settlements, and the importance of providing built form and land use guidance for these places to remain connected with their landscape character.
    - This work is often translated into key sightlines that are to be protected from inappropriate development impacts, as is the case in the Hobart Interim Planning Scheme which incorporates Leigh Woolley's earlier work on the relationship of Hobart's built form to key landscape elements such as kunanyi / Mount Wellington.
- The TPPs currently focuses on the environmental values of landscape (i.e. section 2.4) or the cultural values of built heritage (i.e. section 6.0.1). These are important aspects, but they don't note the importance of key views and vistas in our towns and cities

- Suggestion: add a bullet point with text that captures the following meaning "Identify and protect key views and vistas that relate settlements with their landscape, to help maintain the distinctive character attributes of these places."
  - This bullet point could be placed under 1.4.3 to help guide the planning of settlements. Alternatively, it could be incorporated under 2.4 Landscape Values.
- 1.4.3 Settlement Types

Strategy 6

- 'h) it contributes to providing for a mix of housing choices that attracts or retains a diverse population.'

Suggestion: This is rather open to interpretation and instead could be more specific.

- 1.5.3 Housing

Strategy 4

- 'e) considering the needs of people with disabilities, including the level of support and care required for different levels of dependent and independent living options; and'

Suggestion: Here and elsewhere amend people with disabilities to people with disability – not all people with disability have more than one disability.

Why should support and care be required for independent living? Suggest that wording of e) be amended to

'e) consider the needs of people with disability, including independent living options, and the level of support and care required for assisted living options.

- Suggested addition

g) ensuring good residential amenity through the provision of solar access and quality private open space.

- 1.6 Design

Objective:

- The objective, or definition, provided for urban design is quite comprehensive and contains elements that are widely accepted, in spite of this it can be argued that urban design has been evolving to become more holistic in its aims. This should be reflected in the Objective clause.

Suggestion: Consider adding that urban design seeks to provide improved environmental, economic and socio-cultural settlement outcomes.

Strategies - overarching

- It is likely that the strategies are not meant to have an implicit urban design hierarchy but the sequential and numbered manner in which they are presented does lend itself to be understood as a hierarchy.
- Suggestion: In terms of how the strategies are presented it may be useful to emphasize the importance of the public realm by having strategies relating to the 'public places' before those relating to

buildings, as this is often what the community first experiences and cares about.

- A suggested alternative sequence could be:
  1. Currently strategy 5
  2. Currently strategy 4
  3. Currently strategy 6
  4. Currently strategy 2
  5. Currently strategy 3
  6. Currently strategy 7
  7. Currently strategy 8
  8. Currently strategy 1

- **Through-block links (laneways)** - Encouraging active transport, which is inherently more sustainable and beneficial for the health, is a strong aspect of the TPPs. One of the ways of achieving this is through creating a more permeable building form that allows for 'shortcuts' through larger blocks when walking and cycling.
  - In addition, such links can provide for secondary frontages for better building access, servicing and even opportunities for increased commercial frontage. This becomes particularly important as we seek to densify our towns and cities through infill.

- Currently 5.4.3 Strategies contains guidance in point b) about providing "direct site-through links", however this guidance should also be included under 1.6.3 Strategies number 7, as this is the most logical location in the TPPs to provide this guidance.

- Suggestion: add a bullet point to 1.6.3 Strategies number 7, after d), with text that captures the following meaning: "for larger blocks provides for site-through links, such as laneways, to encourage walking and cycling, and access and servicing away from main streets".

- **Street wall** - As Tasmania's larger cities and towns intensify and densify, in keeping with the aim of minimising less sustainable urban sprawl, there is a need to introduce more built form concepts that help deliver on higher density whilst minimising the amenity impacts. One key concept is that of the street wall, that seeks a lower street fronting building form, in keeping with the prevalent character, and allows for taller built form behind (e.g. the Central Hobart Plan proposes to introduce street wall controls, as an important element of desired future built form for the city).
  - It is noted that the Hobart Interim Planning Scheme defines what is a street wall in section 4.1 Planning Terms and Definitions, however it has minimal usage in the planning controls themselves.

- Suggestion: introduce a new bullet point under 1.6.3 Strategies number 8 (page 18), potentially following c), with text that captures the following meaning: "street amenity, including solar access and wind mitigation, by having a defined street edge or street wall that reinforces the built form

character and allows for the potential of additional height behind and above".

Strategy 1 – Suggested addition:

- o This section covers the design and siting of buildings but is missing any mention of the importance of providing private open space.

Suggestion: add 'g) provision of private open space that is functional, has good amenity and considers privacy'.

- o Add 'h) incorporation of areas of green space or provide access to green space to move towards greater environmental equity.'

Strategy 3

- o 'Encourage public places that are designed to promote:

a) equal access and opportunity and to cater for the various needs and abilities of the community; and

b) safety,'

Why is 'equal access and opportunity' and 'safety' only encouraged and not required to be provided (as detailed in Strategy 2)?

Strategy 5 – Suggested addition

- o 'Encourage the use of urban design principles that creates, or enhances, community identity, sense of place, liveability, social interaction, **environmental equity** and climate change resilience.'

Strategy 4 – '..supporting development that considers existing and desired future character of the place.'

Suggestion: Is there any character mechanism and/or way to determine and 'codify' in the planning scheme what is considered the character of a place? It would be desirable for the place character, both existing and desired future character, are to be implemented through character statements or similar instruments

Strategy 7 – the use of the term streets would seem to exclude other likely pedestrian and cycle connections that are very common such as trails and tracks.

Suggestion: Change the word 'street networks' to 'movement networks' with potentially some examples of what this covers (e.g. streets, trails and tracks)

Strategy 8 – the subdivision strategy and sub-strategies are very positive in their intent and provide good overall guidance, but some improvements will make them more effective and easier to translate into other planning tools:

Suggestion: Enhance the importance of sub-strategy h) (i.e. contextually responsive design) by placing it first, as it is a fundamental starting point for any subdivision design. In addition, add wording about the need 'to incorporate and integrate with the natural systems'.

Suggestion: Reorder the sub-strategies from higher level, initial design considerations, to more detailed matters. This would assist in its comprehension. An alternative order could be:

a) Currently h
b) Currently e
c) Currently f

d) Currently g

e) Currently b

f) Currently a

g) Currently i

h) Currently c

i) Currently d

Strategy 8 – Suggested additions or amendments

- o 'Promote subdivision design that provides a functional lot layout that:

c) promotes climatically responsive orientation of buildings **and choice of materials, with particular emphasis on non-heat absorbing roofs;'**

- o Sub-strategy i) (i.e. diverse lot sizes) reads like definite guidance when not every subdivision should have diverse lot sizes as these are only desirable when an analysis has been undertaken that confirms there is a need and demand.

Suggestion: 'provide diverse lot sizes for residential use, when the location, a housing market analysis and surrounding housing make it appropriate'

- o Insert a new j) allows for public and private street tree and green space planting to reduce the urban heat island effect; (note: avoiding poor outcomes such as some examples in Sydney northern suburbs with recent subdivisions with no street trees, and built to extent of building envelopes with all black roofs. Several of these new subdivisions are experiencing 40+ days per year over 36deg)

- o Insert a new k) maximises retention and absorption of surface drainage water on site.

- o Designing with Country – is an expanding area of design knowledge and application that seeks to provide design tools and understanding to incorporate the Tasmanian Aboriginal people perspectives in our built environment.

Suggestion: Add a strategy that encourages the application of Designing with Country principles and approaches.

It should also include references about the need to work with the need to work with Tasmanian Aboriginal people and culture, local provenance flora and fauna for biodiversity resilience.

- o Community participatory design – there has been a strong evolution in urban design to incorporate co-design and participatory methodologies to ensure a level of stakeholder input and ownership above the more conventional top-down masterplanning process.

Suggestion: Add a strategy that encourages the application of co-design and participatory engagement methodologies to improve the quality of the urban design outcomes and stakeholder ownership.

- o Time and adaptability – complementary to the previous point are the benefits of incorporating prototyping and placemaking approaches into urban design add the dimension of adaptability and responsiveness.

Suggestion: Add a strategy that encourages the use of methodologies, such as placemaking and prototyping, which allow for experimentation, learning and adaptability.

3.1 Bushfire

- There is an existing "first mover disadvantage" in relation to bushfire management with properties within undeveloped subdivisions often faced with difficulties in compliance particularly as it often is reliant on clearance on adjoining lots. The issue often does not extend to later development within a subdivision due to existing bushfire management.

Suggestion: Add or amend the strategy to support development in areas subject to bushfire risk so that there is no disadvantage to carrying out development which relies on third party land (including land owned by local councils) being cleared of bushfire hazard.

3.2 Landslip

- The regulation around landslip is too restrictive when dealing with change of use or minor development and should be acknowledged in the strategies.

Suggestion: Add or amend the strategy to ensure that minor development to or change of use for existing structures properly recognises the level of risk that the new activity would pose.

3.3 Flooding

- With regard to coastal inundation at Strategy 3.3.3, Council questions whether there is any option for planned retreat or acquisition of land by council where land is subject to exclusive and unavoidable hazard in flood conditions? Such as areas subject to flash flooding h5 hazard rating and above.

3.5 Contaminated Air and Land

- Developers spend time and money addressing risks for individual development when there could be more of a standardised analysis done. Examples are noise (construction and ongoing use) and specific situations like the black mould which can be generated by whisky distilleries. There is often the requirement for specific reports noise, black mould and other emission issues when there is room for standardisation which would create efficiencies.

Suggested strategies:

- Ensure that expectations are clear for noise generation from both the construction phase of development and the ongoing use of a property.
- Identify contaminating activities which may have impacts on third party property and establish an acceptable methodology for addressing and minimising the impacts of those activities.

4.2 Timber Production

- 4.2 Regarding downstream impacts for timber production, Council encourages the implementation of Environmental buffers around waterways to maintain ecological value and maintain downstream water quality. Additionally, environmental buffers for areas of ecological sensitivity and value are also supported.

4.4 Tourism

- Strategy 4.4.3
  - Council questions why this section is not similarly strongly worded like timber and resource industries? Such as investigate and protect strategic tourism sites. This section appears is weakly worded in comparison to protecting our interests in timber and mining when tourism has a higher potential for long term employment and ongoing sustainability.
- 4.4.3 Strategy 6
  - 4.4.6 Suggest change to wording of Strategy to read:

Identify and protect the attributes that attract and enhance tourism experience.

5.0 Physical Infrastructure

- 5.0.1 Principles and Policy context
  - 'Tasmania has extensive physical infrastructure networks, across transport, water and sewerage, energy and telecommunications. These networks underpin a wide range of **social**, environmental and economic outcomes for the State,'
  - 'Maximising the outcomes of these assets requires long-term planning and a sound evidence base.'

Suggestion: As mentioned previously why are social infrastructure and physical infrastructure separated, with social infrastructure part of the Settlement TPP and physical infrastructure a separate TPP? Social infrastructure can be in a physical form. Perhaps infrastructure should be in a combined TPP, and the individual infrastructure networks defined.

The combined TPP might be more specific about undertaking infrastructure planning and include another strategy that includes wording such as:

Identify the local government's plans for trunk infrastructure that are necessary to service urban development at the desired standard in a coordinated, efficient, and financially sustainable manner.

Another strategy should deal with developer contributions/infrastructure charging towards infrastructure establishment costs, cost apportionment, etc.

  - 'Physical infrastructure assets have a long-life span and are expensive to provide and maintain'

This is true for community centres, libraries, sports pitches, indoor sports, swimming pools, etc.

o 'Land use planning has a direct impact on infrastructure efficiency, safety and performance. It is important that use and development aligns with the function and capacity of existing infrastructure, protects key assets from encroachment by incompatible use and protects current and future infrastructure corridors.'

This is another reason why legislation should be introduced and local government resourced, to undertake proper infrastructure planning.

5.1 Provision of Services

o There is developer frustration of varying set of rules when it comes to stormwater between Councils. This relates to matters like runoff coefficients so they can calculate pre and post development stormwater runoff. Council supports a standardised approach to address this issue.

Suggested Strategy:

Provide a standardised approach to analysing the impact of development on stormwater, including impacts on third party land which are considered to be acceptable.

6.0 Cultural Heritage

- The following comments are made in the broader framework of heritage:
    o It is noted that the draft Historic Cultural Heritage policy content has a statewide policy application and yet it is specifically only applies to local historic heritage places excluding other levels of heritage value (eg. places on the Tasmanian Heritage Register - THR). This approach is too restrictive and blunt and therefore does not bind places of State or National heritage value to the policy.

If the TPPs are to apply more broadly than just the Tasmanian Planning Scheme and development control, then historic heritage should be considered holistically from a strategic land use perspective, such that an early understanding of historic heritage issues in the planning process will mitigate or manage impacts on heritage values.

The approach to separate local and State listed places such that in making a decision under the Act, the Heritage Council must consider, a range of factors, including the objectives of Tasmania's Resource Management and Planning System (RMPS) and the planning process set out in LUPAA 1993. This makes their considerations at odds with the *Historic Cultural Heritage Act 1995* which is specifically part of the RMPS.

To extend this idea, if it is agreed that Aboriginal heritage is to be included in the TPPs, then historic heritage should be considered holistically – State, local and national heritage values.

o There should be a Glossary to reflect all language used in the historic and Aboriginal TPPs and the glossary should reflect the current legislation.

o Wording used in the strategies must be consistent with wording in the current Local Provisions Schedule. For example, the TPPs use the word restore and restoration as opposed to Table C6.2 and C6.3 which

refer to Conservation Policy. Consistency is appropriate such that the words 'restore' and 'restoration' should be replaced with 'conserve' and 'conservation'. In addition Table C6.4 of the SPP only refers to Places or Precincts of Archaeological Potential. This is in conflict with the new term found in 6.2.3. strategy 1 which is 'potential archaeological local cultural heritage value'.

   o   There is no reference made within the TPPs to significant trees and yet the SPPs contains Table C6.5 Significant Trees with corresponding provisions at C6.9.

- Council maintains that the following wording changes should occur to 6.2.3 Strategies to ensure a consistency with heritage standards:

   o   Strategy 5 - the word 'curtilage' should replace 'surrounding settings and site context'.

   o   Strategy 6 – the word 'recognise' should replace 'articulate'.

   o   Strategy 7 – the words 'preparation and publishing' should be replaced with 'drafting and preparation' and 'management of these values' with 'management of identified values'.

- Council remains opposed to the approach of separating local and state heritage places and contends that the TPP should be inclusive of the breadth of heritage places, precincts and features found statewide, otherwise there will be gaps and differing approaches and inconsistencies in the protection of heritage values of a wide range of heritage places.

The cultural heritage policy is policy in reverse, cementing the current State Planning Provisions which excludes THR listed places by only considering local heritage places, local heritage precincts, local historic landscape precincts, and places of archaeological potential.

7.0 Planning Processes

- 7.0.1 Principles and Policy Context

   o   'In trying to address concerns and to ensure desired outcomes are achieved, planning has been criticised for over regulation and 'red tape'.'

Suggestion: If including this, why are you not include the counter claims that planning does not do enough to stop unfettered development?

- 7.2.3 Strategies

   o   Strategy 1

'Avoid allowing use and development where the implications of that use and development on the environment, now and into the future, is not fully known or understood.'

Suggestion: Remove this point. It is vague and potentially quite limiting on new

businesses and emerging uses such as various R&D technology uses.

- o Strategy 4

'Promote the integration and coordination of land use planning with population strategies and social and physical infrastructure planning.'

Suggestion: That this be referenced in the other related TPPs.

This strategy might be more specific about undertaking infrastructure planning and include another strategy that includes wording such as:

'Identify the local government's plans for trunk infrastructure that are necessary to service urban development at the desired standard in a coordinated, efficient, and financially sustainable manner.'

Another strategy should deal with developer contributions/infrastructure charging towards infrastructure establishment costs, cost apportionment, etc.

- o Strategy 6

'Facilitate coordinated approaches between public and private investment to achieve common planning goals."

Suggestion: Use established definition for affordable housing or at least include the 30/40 rule:

The standard test for affordable housing is that a household in the lower 40 per cent by income should not pay more than 30 per cent of their gross income on housing, known as the 30/40 rule. In a broader sense, housing is generally considered to be 'affordable' if the household members are not in housing stress after they have paid for their housing, whether renting of buying. Housing is unaffordable for a household when paying their housing cost leaves them in housing stress or living in poverty.

GLOSSARY (Suggested Amendments)

Aboriginal heritage – It is recommended that this term is included in the Glossary however it must reflect current legislation and/or reflect current Aboriginal language protocols and preferences. For example, currently, the City of Hobart has a Respectful Language Guide which recommends avoiding the term Indigenous in the Tasmanian context. This would therefore be inappropriate in the historic heritage context.

Adaptive reuse – mean the renovation and reuse of pre-existing structures (such as warehouses) for new purposes. (Webster dictionary)

Affordable housing – Suggest use established definition for affordable housing or at least include the 30/40 rule:

The standard test for affordable housing is that a household in the lower 40 per cent by income should not pay more than 30 per cent of their gross income on housing, known as the 30/40 rule. In a broader sense, housing is generally considered to be 'affordable' if the household members are not in housing stress after they have paid for their housing, whether renting of buying. Housing is unaffordable for a household when paying their housing cost leaves them in housing stress or living in poverty.

Assisted housing – means housing provided by an organisation for higher needs tenants or residents, including people with physical or intellectual disability, and may include associated support services.

Circular economy – (as per existing Glossary)

Conservation – includes preservation, maintenance, sustainable use and restoration of the natural and cultural environment and also means all the process of looking after a place so as to retain its cultural significance.

Cultural significance – means aesthetic, historic, scientific, social, or spiritual value for past, present, or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places have a range of values for difference individuals or groups.

Cultural significance is also determined by the criteria set out in s.16 of the *Historic Cultural Heritage Act 1995*.

Curtilage - the area of land (including land covered by water) surrounding an item or area of heritage significance which is essential for retaining and interpreting its heritage significance. It can apply to either:

- land which is integral to the heritage significance of it ems of the built heritage; or

- a precinct which includes buildings, works, relics, trees or places and their setting. (definition in *Heritage Curtilages* publication by the NSW Heritage Office)

Environmental Equity – Warrants a definition to avoid confusion.

Physical infrastructure – Suggest that the word economy be replacement with settlement or community.

Significant Risk – Glossary definition for significant risk is too loose when applied to flood risk. Suggested alternate or additional interpretation "means exposure to significant risk of serious injury, serious risk to life or livelihood." or "means a risk of harm that is determined to be significant in accordance with relevant risk assessment tools." Alternatively, in the context of flooding, serious risk means subject to flood hazard ratings of greater than H3 (H3 = unsafe for small cars, children and the elderly, H4 = unsafe for people and vehicles) that cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of engineered mitigation measure. Hazard ratings are based on modelled 1% AEP event.

Tolerable Risk – Glossary definition for tolerable risk in context of flooding the lowest level of risk is H1 (Generally safe for people, vehicles and buildings) – Council questions whether this means that anything above this is level needs to be mitigated? Arguably, tolerable risk should extend to H3 hazard rating (unsafe for small cars, children and the elderly). Hazard ratings are based on modelled 1%AEP event.