

From: Ashley Brook
Sent: Tue, 23 Jun 2020 09:45:14 +1000
To: Contact Us
Subject: Draft Amendment 61 & DA0698/2019 - Representation
Attachments: Draft Amendment 61, 359-361 Hobart Road, Youngtown - Representation.pdf

Dear Council,

Please find attached representation in relation to the above application. Are you able to confirm this representation has been received?

Regards,



Ashley Brook

Planning Consultant
0400 945 776

Measured form and function

Tamar Suite 103, The Charles
287 Charles Street, Launceston
7250
PO Box 63 Riverside 7250
P 03 6332 3300
E abrook@6ty.com.au
W 6ty.com.au
ARCHITECTURE | SURVEYING |
ENGINEERING

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Our Ref: 19.070

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6ty Pty Ltd
ABN 27 014 609 900

23 June 2020

Chief Executive Officer
City of Launceston
By Email: contactus@launceston.tas.gov.au

Postal Address
PO Box 63
Riverside
Tasmania 7250
W 6ty.com.au
E admin@6ty.com.au

Tamar Suite 103
The Charles
287 Charles Street
Launceston 7250
P (03) 6332 3300

Dear Sir,

**DRAFT AMENDMENT 61 & DA0698/2019 – 357-361 HOBART ROAD,
YOUNGTOWN – REPRESENTATION**

57 Best Street
PO Box 1202
Devonport 7310
P (03) 6424 7161

6ty° Pty Ltd lodged the combined application for the proposal on behalf our client CatholicCare Tasmania and landowner Launceston City Mission Inc.

We support the draft planning scheme amendment as certified.

We make the following submission in response to Council's grounds for refusing to grant a permit for the proposed multiple dwelling development, including the provision of the following background information.

CatholicCare Tasmania and Launceston City Mission Inc.

Centacare Evolve Housing ("CEH") is one of four major Community Housing Providers that are registered in Tasmania. It is a Better Housing Futures participant in partnership with Housing Tasmania and owns or manages nearly 1,100 properties that are tenanted through a social housing model. CatholicCare Tasmania ("CCT") is an 85% stakeholder in CEH. The Catholic Archdiocese of Hobart is another stakeholder. CCT is a not-for-profit organisation that provides a range of community services throughout Tasmania. It owns approximately 400 housing properties across the state. These dwellings are managed through CEH and are rented to families on low incomes through affordable rental agreements that are considerably discounted to the market.

The State Government's *Affordable Housing Strategy 2015-2025* ("AHS") aims to reduce the proportion of low income households experiencing housing stress and persons experiencing homelessness. Its second stage is being implemented by the *Affordable Housing Action Plan 2019-2023*, which aims to provide 1,500 new affordable lots and homes including 607 social housing dwellings. CEH and CCT are well equipped to be a major supplier of these dwellings across the state. In 2019, CCT received planning approval to develop eight dwellings at a site owned by the Catholic Archdiocese of Hobart at St Leonards. The dwellings will provide transitional housing with the residents to be supported with a variety of programs to assist with their transition to permanent living accommodation.

The proposed dwellings at Youngtown will be developed by CCT in conjunction with, and on land owned by, Launceston City Mission Inc. The City Mission is a not-for-profit organisation that provides a wide range of services to the community in Northern Tasmania. This includes crisis accommodation in Newnham and a newly commissioned homeless facility in central Launceston. The proposed dwelling development will be on land adjoining the Mission Shop and an associated recycling centre at Youngtown, which are located to the north.

It is intended that the proximity of the housing development to the two uses owned and operated by City Mission will enable the organisation to engage with residents to offer ongoing support, opportunities to volunteer or even employment. Several existing workers have expressed an interest in renting a dwelling within the proposed development as part of their ongoing employment or volunteering.

The Northern Tasmania Regional Land Use Strategy seeks the provision of a variety of housing options to meet diverse community needs, and to achieve housing choice and affordability. The proposed dwellings will contribute to a variety of housing options within the Launceston urban area and are of a size and density that reflects their intended usage for social and affordable housing. The site is well positioned for this type of housing given its location in a well serviced area directly adjacent to a public transport corridor, employment opportunities, education opportunities including Youngtown Primary School and local services including a small supermarket.

Response to Council's grounds for refusal

(a) that, contrary to clause 10.4.1, the density of the development is not compatible with that of the surrounding area and the proposal has not demonstrated sufficient social or community housing benefit;

- The performance criteria in Clause 10.4.1 P1 requires that the density of development is to comply with either one of the following:
 - (a) *is compatible with the density of the surrounding area; or*
 - (b) *provides for a significant social or community housing benefit and is in accordance with at least one of the following:*
 - (i) *the site is wholly or partially within 400m walking distance of a public transport stop;*
 - (ii) *the site is wholly or partially within 400m walking distance of a business, commercial, urban mixed use, village or inner residential zone.*
- The application sought approval in relation to the second requirement, in Clause 10.4.1 P1 (b).
- The proposed development involves the provision of social and community housing. Social housing is defined in the AHS as:
"a broad term used to capture both housing provided by the government (public housing) and non-government organisations (community housing) with below-market rent prices".

Community housing is defined in the AHS as:

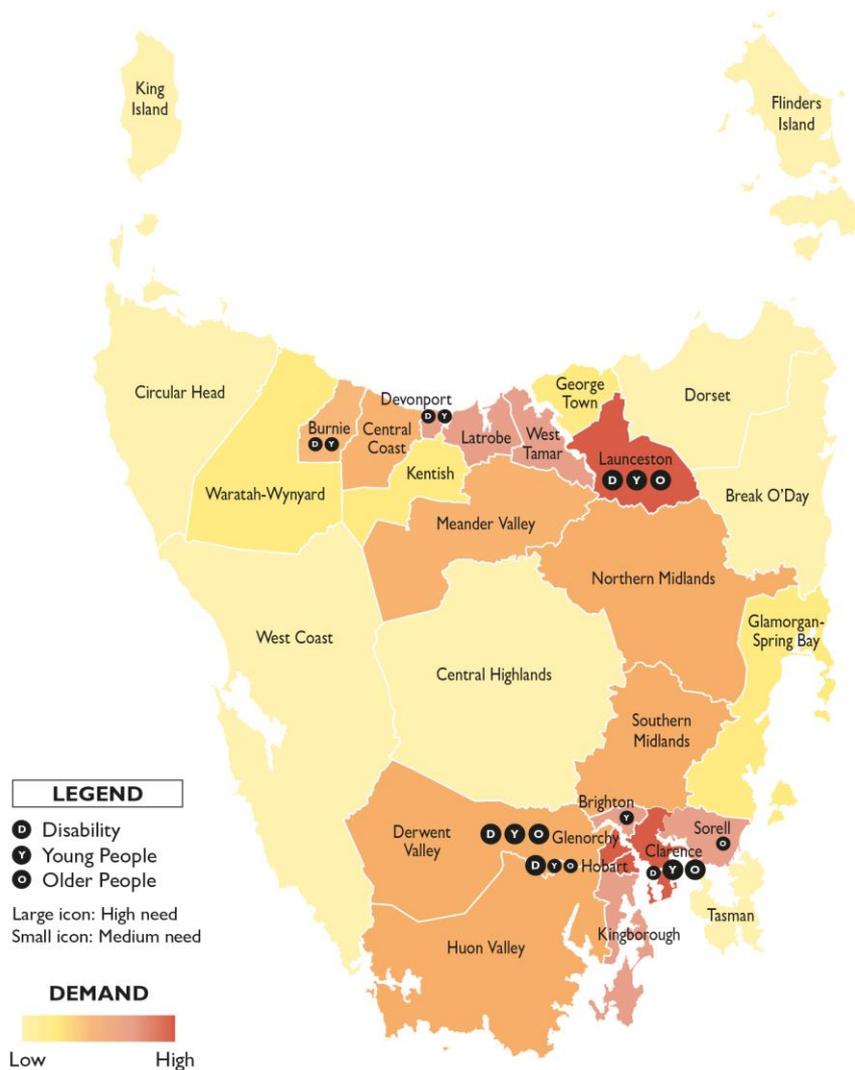
"to housing stock that is either owned by the government or non-government organisations, and is delivered/managed by nongovernment organisations".

Affordable housing is defined in the AHS as:

"rental homes or home purchases that are affordable to low income households, meaning that the housing costs are low enough that the household is not in housing stress or crisis".

The proposed housing will be delivered and managed by a registered non-government Community Housing Provider (CCT) and will be provided at subsidised (i.e. below-market) rents.

- The increasing need for the provision of social and affordable housing in Tasmania is well documented. This is reflected in the responses in the AHS and *Affordable Housing Action Plan 2019-2023*.
- The Department of Communities Tasmania has produced a map that shows the level of demand for social housing across each local government area in Tasmania. This is reproduced below. Launceston is shown as being an area where there is a high demand. The highest demand is for two-bedroom dwellings to address the occupancy needs of vulnerable cohorts.



Source: Department of Communities Tasmania, https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/key-projects/indicative-program-of-tenders/map-of-social-housing-demand, Accessed 19/06/2020.

- The proposed provision of social and affordable housing by a registered Community Housing Provider in an area of high demand and a location that is well serviced in close proximity of a public transport corridor, employment and education opportunities, in a manner that optimises the development potential of the site, ensures that the proposal provides for a significant social and community housing benefit.

- In relation to the requirements in Clause 10.4.1 P1 (b)(i) and (ii), it is noted that there are existing bus stops located immediately adjacent to the site in Hobart Road, well within a 400m walking distance. Additionally, the site is located within 400m walking distance of land within a Local Business Zone, Commercial Zone and Inner Residential Zone. This includes a small supermarket located within a Local Business Zone 85m to the south.

(b) that, contrary to clause 10.4.2, the siting and scale of units 1 - 6 will cause an unreasonable loss of amenity to the adjoining residence through their visual impact caused by their apparent scale and bulk;

- The dwelling that is located in proximity of Units 1-6 is located within the land owned by Launceston City Mission Inc. which contains a Mission Shop and an associated recycling centre. It is intended that the existing dwelling occupants will rent one of the dwellings within the proposed development, and the dwelling will then be demolished.
- The land containing the Mission Shop and associated recycling centre will be retained within a Commercial Zone. A Residential use and development is identified as being ordinarily Prohibited use in the zone, and the dwelling is therefore understood to be an existing non-conforming use. A planning application to demolish the dwelling is in the process of being prepared for lodgement with Council by Launceston City Mission Inc., which will also enable improvements to the movement of vehicles into and out of the site.

(c) that, contrary to clause 10.4.3, insufficient private open space is provided to serve as an extension of the dwellings for outdoor relaxation, dining or entertaining or to meet the reasonable needs of the occupants for outdoor recreation, storage or gardens;

- The size and dimensions of the designated private open space areas is commensurate with the floor area of the proposed dwellings, which are relatively small (105m² or 140m²) and will contain two bedrooms. Therefore, these areas will meet the reasonable needs of occupants. They will be directly accessible from living areas within each dwelling and therefore will be capable of serving as extension of the dwellings and will provide reasonable space for outdoor recreation space, storage and provision the of gardens. It is intended that storage of personal and household items will occur internally within each dwelling. However, as discussed further in the comments to Clause 10.4.9 below, the private open space areas would be capable of accommodating relatively small garden sheds commensurate with the size of the dwellings.
- Units 1-11 and 13-18 each include 30m² of living space at first-floor level, together with an adjacent 4m² balcony capable of providing outdoor recreation that will be directly accessible through an external sliding glass door. Units 1-10 will be supplemented with 10m² of ground level external space to the north which will provide for the provision of gardens and clothes drying. Unit 11 will be supplemented with 12m² of ground level external space for these purposes. Units 13-18 will have 30m² of ground level space directly to the west. The space for Units 13 and 18 will extend around the northern and southern sides of the dwellings respectively. The external space includes ground level alcoves below the balconies associated with Units 1-11 and 13-18 that would be capable of accommodating small garden sheds. There are products available with minimum dimensions of 1.4m width, 0.73m depth and 1.7m height that could be contained within each alcove clear of the Bed 2 windows.

- Unit 12 will include 28m² of living space at ground floor level, together with a designated 22m² of ground level external space that will be directly accessible through a sliding glass door. These spaces will be capable of providing for outdoor recreation, provision of gardens and storage in the form of small garden sheds.
- Units 19-22 will include 29m² of living space at ground floor level, together with at least 27m² and 38m² of ground level external space that will be directly accessible through a sliding glass door. These spaces will be capable of providing for outdoor recreation, provision of gardens and storage in the form of small garden sheds.
- Units 23 and 24 will include 38m² of living space at ground floor level, together with at least 70m² of ground level external space that will be directly accessible through a sliding glass door. These spaces will be capable of providing for outdoor recreation, provision of gardens and storage in the form of small garden sheds.
- Finally, it is noted that the proposed development also includes a small community garden between Units 6 and 7 and a public park 250m to the east of the site in Alma Street.

(d) that, contrary to clause 10.4.9, insufficient storage is provided to meet the reasonable needs of residents; and

- It is intended that storage of personal and household items will occur internally within each dwelling. In relation to gardening tools and equipment, it is noted that CCT will engage contractors to maintain garden and landscaping areas.
- However, the private open space areas associated with each dwelling would be capable of accommodating external storage. There are small storage shed products available, with minimum dimensions of 1.4m width, 0.73m depth and 1.7m height, which would be suitable for the storage of gardening tools and equipment or other household items commensurate with the size of the dwellings. Such sheds would be capable of being accommodated in the ground level alcoves, below the balconies, associated with Units 1-11 and 13-18. They would be capable of being accommodated in the other external space associated with Units 12 and 19-24.

(e) that, contrary to clause E6.5.1, insufficient car parking spaces are provided to meet the reasonable needs of the residents.

- The proposed car parking supply is considered to be sufficient to meet the reasonable needs of residents, noting that all of the proposed dwellings will contain two bedrooms.
- Data from the 2016 census has been obtained and filtered to identify car ownership rates for two bedroom dwellings within four different statistical areas relevant to the subject land. This is summarised in Table 1. This analysis has informed the provision of car parking for the proposed development.

Table 1: Car Ownership Rates Associated with Two-Bedroom Dwellings

Statistical Area	Proportion of two-bedroom dwellings with 0 or 1 cars	Average number of cars per two-bedroom dwelling
Youngtown State Suburb (SSC)	67.5%	1.24
Launceston Local Government Area (LGA)	70.6%	1.21
Launceston Urban Centre/Locality (UCL)	72.58%	1.18
Tasmania	67.9%	1.29

- The data shows that car ownership rates in Youngtown are greater than for Launceston generally, which is not unexpected given that it is an outer suburb, and slightly lower than for Tasmania as a whole.
- It is noted that the data is inclusive of all types of housing, including public, social, affordable and private housing. It is expected that car ownership for residents in public, social and affordable housing would be lower than for private housing. In this regard, sufficient data is not available for Youngtown. However, the data for Tasmania as a whole identifies that 88.9% of residents in two-bedroom dwellings provided by the State Government or other Community Housing Providers have 0 or 1 cars. The average number of cars per two-bedroom dwelling in this type of housing (in Tasmania) is 0.77. This confirms the assumption that the car ownership rates in public, social and affordable housing are lower than the figures in Table 1.
- Notwithstanding, application of the data for all housing types identified in Table 1 for Youngtown to the proposed development indicates that 16 dwellings (i.e. 67.5% of those proposed) should be provided with parking for up to 1 car. The total number of parking spaces which should be allocated to residents, based on an ownership rate of 1.24 cars per dwelling, is 30.
- The proposed development involves the provision of 32 car parking spaces that will be allocated to residents, and an additional 6 dedicated visitor parking spaces. Of the 32 resident parking spaces, 16 will be the only space allocated to a respective dwelling (i.e. Units 1-5, 7-11 and 13-18) and will be in the form of a garage. 8 dwellings will have a garage or carport together with a second external space, including a tandem space associated with Units 12 and 19-22, a space alongside the garage associated with Unit 6 and a space alongside the carports associated with Units 23 and 24.
- Given that the parking supply for the proposal is informed by an analysis of ownership rates for all housing types (including private housing), it is considered that it will be more than adequate for the proposed social and affordable housing development.
- The site is located along a public transport corridor and two bus stops are located immediately adjacent in Hobart Road. The availability of public transport will also assist in managing the parking demands associated with the proposal.

Conclusion

Background and other information has been provided in response to Council's grounds for refusing to grant a permit for the proposed development.

The proposed dwellings will be developed by CatholicCare Tasmania which is a registered Community Housing Provider and has a proven track record of delivering social and affordable housing. The development will be undertaken with, and on land owned by, Launceston City Mission Inc. It is intended that the proximity of the housing development to the adjoining Mission Shop and associated uses will enable the organisation to engage with residents to offer ongoing support, opportunities to volunteer or even employment. In fact, City Mission has already been approached by one paid employee and a volunteer seeking to rent a dwelling in the development to remove transport cost and time to attend their place of work, an existing barrier for some to participate in assisting charities.

As identified, Launceston is an area where there is a high demand for social housing. The proposal further responds to an identified demand for the two-bedroom dwellings. The site is well serviced by community services and utilities, and located is adjacent to a public transport corridor. The proposed development at the site will therefore provide a significant social and community housing benefit and, therefore, there is no requirement for it to be compatible with the density of the surrounding area in order to comply with Clause 10.4.1 P1.

It has been identified that the private open space areas associated with each dwelling would be capable of accommodating external storage. There are small storage shed products available, with minimum dimensions of 1.4m width, 0.73m depth and 1.7m height, which would be suitable for the storage of gardening tools and equipment or other household items commensurate with the size of the dwellings. The provision of such sheds is capable of being given effect by amending Condition 2 in the permit conditions that were originally recommended by Council officers to include a requirement for amended plans to show:

- External storage sheds with minimum dimensions of 1.4m width, 0.73m depth and 1.7m height within the outdoor space associated with each dwelling.

Having regard to the information provided in this representation, it is requested that Council reconsiders its original decision to refuse to grant the permit and recommends to the Tasmanian Planning Commission that a permit be issued on the terms which were originally recommended by Council officers together with the condition suggested above in relation to the provision external storage areas.

Please do not hesitate to contact me should you have any queries relating to this representation.

Yours faithfully

6ty° Pty Ltd



Ashley Brook
Planning Consultant