



City of **HOBART**

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Our Ref: S32-013-07

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19 March 2020

Peter Fischer
Acting Executive Commissioner
Tasmanian Planning Commission
PO Box 1691
Hobart TAS 7001

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

Dear Mr Fischer

PLANNING DIRECTIVE 7 - PERMITS FOR TEMPORARY HOUSING

Thank you for the opportunity to provide feedback in relation to Planning Directive 7 – Permits for Temporary Housing.

The following comments are made at officer-level, and have not been considered or endorsed by Council:

- The application of this directive for an absolute maximum of 12 months appears to be short given the amount of investment required to develop a residential use. It would seem to be an inadequate amount of time to allow for the development of alternative long term accommodation. If the permit expires in 12 months and there is no alternative accommodation, where do the occupants go? 2 years would seem to be a more realistic option, with an option to extend this timeframe for a further nominated length of time.
- The beginning of 3.1 should be amended to '*A planning scheme to which this planning directive applies...*' to be more grammatically correct and clear.
- The planning directive should include the Potentially Contaminated Land Code as one of the Codes that must be considered under both 4.1 (a) (v) and (b) (vii). If a property has been identified as a potentially contaminated site, or is adjoining a contaminated site, the application should be discretionary, particularly if it includes excavation.

- Under 4.1 (a) (iv) and (b) (vi), if a code relating to heritage does apply then consideration should be given under sub clause a. to whether there are inappropriate internal alterations of a heritage listed place. Under the Heritage Code of the HIPS 2015, the demolition or removal of internal heritage elements such as skirting boards, fire mantles and ceiling roses, and the alteration of original plan form of a building, are not exempt (and therefore discretionary under the demolition standards). The corresponding standard under 4.2 (a) (iv) and (b) (v) should also reference removal of significant internal heritage elements.
- Under 4.1 and 4.2 (b) (vi) – the words '*site within a listed place or precinct of archaeological significance*' are ambiguous. This could be interpreted as meaning separately a 'listed place' or a 'precinct of archaeological potential' in the Hobart context, as there are no individual places of archaeological potential within the Hobart Interim Planning Scheme 2015 (HIPS 2015) scheme area. The intended meaning should be clarified if this wording is only intended to refer to archaeology and not to other types of heritage listed places.
- Under 4.1 and 4.2 (d) (i), how will locating the housing 'as close as possible' to social support services be determined? Is there any value in this sub clause?
- Under 4.1 and 4.2 (d), there should be reference to the protection of existing public infrastructure (such as water, stormwater, sewer, TasNetworks, NBN, roads).
- Under 4.1 and 4.2(d) there should be reference to the safety of the development and existing infrastructure (i.e. safe access, not located within a flood zone etc.)

Yours sincerely



(Neil Noye)

DIRECTOR CITY PLANNING