

PSA-17-3 Summary of representations and response

The following table summarises the issues raised in representations submitted to the Council in relation to the proposed amendment to clauses 22.1.3 Desired Future Character Statements and 22.4.1 Building Height in the Central Business Zone of the *Hobart Interim Planning Scheme 2015* and provides a response as to merit and recommendations. Any reference to the 'Woolley Report' is a reference to the report titled: *Hobart Interim Planning Scheme 2015 - Central Business Zone - Height Standards – Performance Criteria Review*, Leigh Woolley, (2016)

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Representation No.	Summary of Issues Raised	Response – Merit and impact of representation	Recommendation – Need for modification of amendment
Issue - 75m Height Limit			
4	The 75m height limit suggested in the amendment should be maintained or even reduced.	<p>The amendments do not propose to alter the current numerical standards in relation to height and do not have the effect of setting a maximum height limit of 75m.</p> <p>The amendments however do reference the Woolley Report which contains a footnote on page 49 suggesting that the maximum height of buildings in the potential zone of increased density is 75m.</p> <p>It was not the intention that this footnote be interpreted in the way suggested in a number of the representations and in order to remove any doubt it is recommended that the reference to the Woolley Report be deleted from the amendments.</p> <p>As discussed further in response to other representations below the reference to the Woolley Report can be replaced by defining some of the terminology used.</p>	<p>Recommendation:</p> <p>That the reference to the Woolley Report be deleted from the amendments.</p>
28, 32, 34, 59, 69, 74, 75, 80, 106, 111, 116, 126, 133, 139, 153, 168, 179#	The 75m height limit mentioned in the amendment is too high and not appropriate for the CBD.		
29, 108, 117	Concern that a maximum height limit of 75m will become the standard.		
29, 31, 56, 59, 80, 86, 90, 98, 100, 104, 111, 114, 114, 115, 124, 135, 137, 144, 147, 168, 170	The reference to a maximum height of 75m should be removed from the 'Woolley Report'.		
29, 33, 80, 135, 147, 163	The 75m height limit has no relevance or justification and appears to be an arbitrary number.		
76	The amendment should not include reference to any development over 70m		
156	The slope of the land would magnify the height of a 75m high building.		
9, 11, 13, 17, 17, 18, 19, 20, 23, 24, 25, 27, 36, 39, 42, 45, 48, 53, 54, 62, 63, 67, 70, 74, 84, 87, 92, 94, 96, 106, 107, 108, 110, 112, 119, 128, 129, 132, 133, 134, 139, 140, 146, 154, 159, 172, 174, 177, 180	The proposed amendment should not include a 75m height limit. This limit should either be removed from the 'Woolley Report' or the whole report removed from the amendment.		

Issue - Maximum Height Limits			
9, 11, 13, 18, 20, 23, 27, 31, 39, 45, 48, 54, 56, 59, 65, 67, 70, 74, 84, 92, 100, 106, 110, 111, 112, 116, 117, 119, 128, 129, 132, 134, 136, 137, 140, 141, 145, 153, 154, 164, 165, 168, 177, 180	Maximum building height limits should be set.	The HIPS Central Business Zone does not currently specify an absolute maximum height and the amendments do not propose to alter the current numerical standards in relation to height.	Recommendation: That the no change be made to the amendments in relation specifying maximum height limits.
173	There should be a maximum height limit of four storeys.	Based on the work already undertaken by Leigh Woolley in relation to the townscape values it would be difficult to justify a single maximum height across the Central Business Zone. The Woolley Report recommends that there should be a transition in height from the centre of the CBD to the fringes. Council has already agreed that further analysis and modelling is necessary in order to establish appropriate maximum heights and the designation of height control planes. Without detailed analysis and modelling of different buildings heights in the CBD and Sullivan Cove, it is difficult to justify an absolute maximum height limit and be consistent with the objectives of LUPAA, particularly in relation to facilitating economic development or be consistent with the activity centre policies in the Southern Tasmania Regional Land Use Strategy.	
47, 122	There should be a height limit of 15m (4.5 storeys)		
77	There should be a maximum building height of five to six storeys with no exceptions.		
102	There should be a maximum height of 30m/8 Storeys.		
2	There should be a height limit of 36m with no discretion.		
113	There should be a maximum height of 10 Storeys.		
76	Maximum building heights should be 13 storeys or 40m, whichever is less. With precincts within the city of less than this.		
40	The height limit should be 43m, with Trinity Church the highest point in the heritage area and discretion for only 2 storeys above the maximum.		
24, 31, 34, 36, 41, 42, 53, 56, 64, 72, 74, 75, 78, 80, 82, 85, 88, 93, 95, 96, 100, 104, 109, 112, 114, 120, 125, 133, 135, 138, , 147, 155, 159, 164, 167, 168, 170, 172, 174, 181	There should be a maximum height of 45m.		
62	A maximum height limit of 45m should be imposed for two years to allow for community consultation.		
35, 140	The existing height limits of 45m should remain with discretion to increase by only 10% where justified, not just to increase profits.		
133	Development over 45m should only be approved where there is explicit public benefit.		
171	Buildings should only be allowed over 45m if there is a majority vote by the Hobart rate payers.		

116	There should be a maximum building height of 45m, or if discretion is required, a maximum building height of 40m with discretion to increase the height by 10%.	To include a maximum height limit is beyond the scope of these amendments.	
12, 45, 123	45m is an appropriate height and there should be no more buildings over 45m in the CBD.		
95, 109	The 'street wall' should have a maximum height of 11.5m (3 storeys) not 20m and pedestrian amenity protected.		
95, 109	The Central Business Fringe Area should have absolute maximum heights of 11.5m and 15m		
102	There should be no approval of development above the permitted heights.		
44, 117	There should be height limits with limited flexibility for amenity reasons rather than convenience or profits. The rules governing this flexibility must be clear.		
90, 120	Development that exceed height limits should be open to community and heritage consultation.		
86	Buildings higher than 45m should be setback 5-10m from the front boundary.		
151	There should not be a maximum height limit and the planning scheme should maintain flexibility for discretionary applications.		
79	There should not be height restrictions. There is limited space in the CBD so an increase in height is required. A limit of 45m would hold back progress in Hobart.		
9, 11, 13, 18, 19, 20, 29, 31, 36, 39, 45, 48, 54, 56, 60, 63, 67, 70, 74, 92, 94, 106, 110, 112, 115, 119, 127, 128, 129, 132, 137, 139, 140, 150, 153, 154, 164, 169, 174, 177, 180	The current height limits should not be amended until the Council's study into maximum height limits is complete.		

Issue - Building Height generally			
1, 4, 6, 8, 16, 17, 22, 27, 30, 33, 43, 46, 59, 60, 69, 86, 87, 89, 97, 99, 106, 107, 112, 120, 124, 135, 153	The existing height limits should be retained.	The amendments do not propose to alter the current numerical standards in relation to height and do not have the effect of setting or increasing maximum height limits. The primary purpose of the amendments is to specify the townscape and streetscape considerations for buildings that do not meet the acceptable solutions in relation to height. No changes to the amendments are considered necessary in response to the representations in relation to height generally.	Recommendation: Recommendation: Recommendation: That the no change be made to the amendments in relation to the representations concerning height generally.
2, 77, 78, 100, 108, 130, 138, 152, 156, 164, 179#	There are existing and/or recently approved buildings in the city that area not appropriate.		
35, 58, 64, 69, 136	There have already been a number of unsuitably tall buildings constructed and this should not continue to happen.		
58, 141, 156	45m is too high.		
35, 44, 127	Support increased density but not by an increase in height.		
25, 30, 36, 45, 52, 53, 59, 60, 63, 67, 70, 75, 76, 89, 91, 94, 99, 133, 139, 141, 168, 174, 175, 177	The city should remain low or medium rise rather than becoming high rise.		
38, 46, 75, 83, 93, 98, 155, 156	A precedent will be set for hi-rise buildings.		
9, 11	An increase in height would make the city less attractive to locals and tourists.		
47	Concern that this will lead to an increase in heights in surrounding blocks.		
19, 26, 86, 154	Height limits should not be altered to benefit developers.		
Issue - Amenity			
1	The shadow length for a 45m building is 120m and for a 75m building is near 200m. Due to the NE/NW alignment of the streets every street will be affected.	The current development standards for buildings in the Central Business Zone in the HIPS2015 were formulated after a detailed review and analysis of land use and development patterns in the central city area. (These reports are available on the HCC web site.)	Recommendation: That the no change be made to the amendments in relation to the amenity issues raised.
21	Because of the grid pattern of the streets and the topography of Hobart, tall buildings intensify overshadowing and wind tunnels.		
1, 52, 62, 69 71, 95, 109, 152, 165 171, 177, 179#	Current building heights and/or some existing buildings have already been detrimental to amenity. For example by overshadowing, causing wind tunnels and/or blocking views.		

1, 33, 39, 58, 59, 64, 71, 74, 78, 98, 106, 139, 141, 150	Tall buildings reduce sunlight and cause wind tunnels.	<p>The development standards address building height, setbacks, design, passive surveillance, outdoor storage and pedestrian links.</p> <p>The building height standards in the Central Business Zone include an 'Amenity Building Envelope' which has been developed with regard to heritage, streetscape and sense of scale, wind effects and solar penetration.</p> <p>The performance criteria in clause 22.4.1 P1(b) provides that development outside the Amenity Building Envelope must only be approved if:</p> <ul style="list-style-type: none"> (i) it provides significant benefits in terms of civic amenities such as public space, pedestrian links, public art or public toilets, unless an extension to an existing building that already exceeds the Amenity Building Envelope; and (ii) the siting, bulk and design does not significantly negatively impact on the streetscape and townscape of the surrounding area; and (iii) the design demonstrates that it will minimise unacceptable wind conditions in adjacent streets; and (iv) for city blocks with frontage to a Solar Penetration
64	Tall buildings can also increase temperatures in summer by absorbing and releasing radiant heat.	
8, 38, 53, 61 73, 85, 97, 109, 111, 120, 123, 135, 143, 177	Concern regarding the impact on amenity. For example through loss of sunlight, overshadowing and/or changes in wind patterns.	
1, 171	People appreciate the city as low rise and that the presence of sunlight allows for some warmth even in winter.	
25, 69	The proposed amendment should include a requirement to setback taller parts of building from the street to allow sunlight at street level and/or wind modelling.	
47, 76, 113	There must be protection of winter sun to the street level.	
7, 40, 83, 84, 125, 130, 133, 172, 173	The proposed amendment does not address the environmental impact of an increase in height and density. For example, solar access and wind speed needs to be considered.	
80, 106, 118, 138, 139	High-rise buildings are not required for affordable housing and reduce liveability.	
95, 106	All development in the Central Business Zone and Central Business Fringe Area should be assessed for solar penetration and heritage.	
112, 114, 140	The performance criteria should include specific assessments for solar access and wind. Such as sun angles and wind speeds.	
28	An increase in height outside of the CBD will still block sun and create wind tunnels to major shopping centres.	
68, 152	The proposed amendment does not sufficiently address protection of amenity.	
1	Viewlines are important but liveability of the city and the pedestrian environment through access to sun and shelter from wind is more important.	
47	Concerned that heritage, access to sunlight and lifestyle must be maintained and protected.	

		<p>Priority Street in Figure 22.2, the overshadowing of the public footpath on the opposite side of the Solar Penetration Priority Street does not unreasonably impact on pedestrian amenity.</p> <p>A number of the representations raise valid issues in relation to amenity however these are already addressed in the Scheme standards and no further changes to these standards are considered necessary and are beyond the scope of these amendments.</p>	
Issue - Views			
9, 13, 17, 18, 23, 24, 25, 27, 31, 34, 35, 36, 39, 44, 45, 48, 54, 56, 59, 62, 67, 70, 74, 75, 80, 84, 92, 93, 95, 97, 109, 110, 112, 113, 127, 129, 132, 133, 139, 140, 147, 152, 154, 161, 164, 167, 174, 177, 180	The amendment does not sufficiently address views across the city because only three view lines were considered.	<p>The amendments include 3 important view lines identified on Figure 22.6. The identification of these view lines was based on analysis undertaken for earlier urban design studies.</p> <p>It is agreed that there are likely to be additional important view lines that warrant identification in the Scheme however the detailed analysis has not been undertaken to identify and justify these.</p> <p>Council has agreed to commission further work to identify additional important view lines and view protection planes</p>	<p>Recommendation:</p> <p>That the no change be made to the amendments in relation to issues related to views.</p>
9, 11, 13, 18, 24, 27, 36, 39, 48, 59, 67, 70, 84, 91, 94, 110, 112, 128, 129, 132, 140, 154, 174, 180	The additional view lines of West Hobart to the waterfront and Glebe to the mountain should be included.		
20, 22, 83	The proposed increase in height would block existing view lines.		
37, 109, 114, 124, 130, 171	Existing view lines across the city must be retained.		
38, 139	Viewlines have already been lost by existing, relatively recent developments.		
145	It is not clear how the view lines were chosen or how additional views would be protected.		

156	The amendment does not consider views into the city from surrounding areas.	in the central area of Hobart and Sullivans Cove for inclusion in the relevant Planning Scheme. No changes to the amendments in response to the representations in relation to views are recommended.	
Issue - Heritage			
6, 9, 11, 13, 17, 18, 20, 24, 25, 27, 34, 35, 36, 39, 41, 42, 44, 48, 53, 54, 57, 59, 62, 63, 67, 70, 74, 75, 83, 84, 88, 92, 94, 99, 100, 108, 109, 110, 112, 115, 120, 122, 125, 127, 128, 129, 132, 137, 139, 140, 144, 145, 154, 156, 159, 164, 168, 170, 172, 174, 177, 180	The amendment does not sufficiently address heritage issues because the proposed Desired Future Character Statement does not mention heritage buildings and maintenance of heritage character.	The protection of heritage values in the Central Business Zone are specifically addressed in clauses 22.4.1 A4/P4 and A5/P5 and in the Historic Heritage Code (E13.0). There are 255 heritage listed places in the central area of Hobart as well as 2 heritage precincts.	Recommendation: That the amendments be modified by the addition of statements in relation to heritage values as shown in Attachment B.
6	The proposed zone of intensification would allow for buildings that would dwarf heritage listed buildings, particularly the sandstone buildings on Murray and Macquarie Street.	Given these specific heritage provisions the review of the performance criteria leading to these amendments did not specifically address the need for additional heritage provisions.	
7, 42, 85, 95, 112, 120, 122, 135, 156, 162, 166, 167	The proposed amendment does not address conservation of the heritage streetscape.		
7, 20, 23, 47, 83, 133, 141, 156, 166, 169	The proposed amendment documents do not sufficiently address heritage issues.		
37, 82, 86, 88, 119, 135, 156	Heritage streetscapes must be recognised and considered.	It is acknowledged however that heritage is an important element of townscape and streetscape considerations and warrants specific mention in the proposed Desired Future Character Statement.	
38 and check all below, 179#	Taller buildings will be detrimental to the heritage characteristics of Hobart		
38, 108, 175	New developments should fit in with heritage and not dominate it and/or detract from it.		
40	The heritage area identified in the report should have been larger.		

42, 135, 172	The protection of heritage should be included in the Desired Future Character Statements and the performance criteria.	<p>The recommended modifications to the Desired Future Character Statement (DFCS) in relation to heritage values are provided in Attachment B.</p> <p>It should be noted that the townscape principles in the DFCS operate in addition to the heritage provisions in the scheme.</p> <p>It is beyond the scope of these amendments to include additional heritage precincts in the Scheme.</p>
11, 13, 18, 25, 7, 36, 52, 62, 65, 71, 72, 74, 76, 82, 90, 97, 99, 101, 106, 112, 113, 114, 121, 124, 132, 133, 137, 154, 155, 157, 164, 171, 174	The heritage streetscapes need to be protected.	
90	There will be a detrimental impact on heritage buildings by a loss of sunlight and creation of wind tunnels	
156	There should be an 'historic urban heritage precinct'.	
20	Internationally, heritage character has been recognised as having a significance far beyond monetary value.	
25	Agreement with and support for the topographic and morphological analysis that is the basis of the Woolley report but disagreement with the proposition that Hobart can assimilate high rise at all and especially in its historic and cultural centre. In particular the footprint of the 1811 Meehan plan cannot survive, as an intelligible historic origin that defines the city, with high rise development, and should be made a special precinct	
71, 88, 138, 156	New development should be required to blend in or complement surrounding architecture.	
112	Hobart should adopt UNESCO's Historic Urban Landscape principles and approach.	
112	Request confirmation that the amended townscape principles will not contradict existing heritage values.	
160	The performance criteria should include heritage values.	

Issue - Desired Future Character Statements			
3, 17, 37, 52, 57, 127	Support for the inclusion of Local Area Objectives and/or Desired Future Character Statements to guide decisions for developments that do not meet height guidelines.	Noted.	Recommendation: That the no change be made to the amendments in relation to this issue.
9, 10, 11, 13, 17, 18, 20, 23, 24, 25, 27, 31, 34, 35, 36, 38, 39, 45, 48, 53, 54, 56, 59, 60, 67, 69, 70, 74, 75, 84, 85, 91, 94, 95, 97, 103, 106, 108, 110, 111, 112, 114, 119, 124, 128, 129, 132, 133, 135, 137, 139, 144, 146, 147, 150, 153, 154, 157, 159, 164, 165, 167, 168, 170, 174, 175, 177, 180	The Desired Future Character Statements should not reference 'intensification' and/or a zone of 'built intensity' or a 'high rise zone'.	<p>The amendments do not designate a 'high rise zone'.</p> <p>The DFCS does allow for an intensification of development within the area bounded by Murray, Macquarie, Argyle and Melville Streets. This is subject to meeting the relevant streetscape, townscape and amenity considerations as well as the heritage provisions and other relevant standards.</p> <p>In relation to this issue the Woolley Report notes that the scale, form and height within the potential area of increased built density will be an outcome of the principles, and that further modelling of proposed development intensity in this location is however recommended before a definitive position is reached on the appropriate maximum height.</p> <p>Given the level of concern expressed in the representations about this area of intensification and the fact that further modelling</p>	Recommendation: That the reference to the area of intensification in the Desired Future Character Statement be deleted as shown in Attachment B.

		<p>of proposed development intensity has been proposed it is recommended that reference to the intensification area be deleted as shown in Attachment B.</p> <p>Council has already agreed that further analysis and modelling is necessary in order to establish appropriate maximum heights and it would be appropriate to consider the likely outcomes of development in the 'intensification area' as part of that analysis.</p>	
42, 120, 135	Clause (e) under the regional scale and clause (c) under the precinctual scale sections of the Desired Future Character Statement should be removed.	<p>Regional scale (e) states: <i>Development above the permitted height limits will not diminish the pattern of a compact city centre by adopting a lightness of form and graduated reductions in bulk and massing above their street edge, becoming slimmest at their peaks.</i></p> <p>This is a relevant and important consideration in relation to townscape values and should be retained.</p> <p>Precinctual scale (c) relates to the intensification area discussed above and should be retained subject to the recommended modification.</p>	<p>Recommendation:</p> <p>That the no change be made to the amendments in relation to DFCS Regional scale (e).</p>
127	The Desired Future Character Statement should include protection of solar access	It is considered that solar access issues are adequately addressed through the amenity building	<p>Recommendation:</p>

		envelope (clause 22.4.1 P1) and clause 22.4.1 P3.	That the no change be made to the amendments in relation to this issue.
148	There should be no change to clause 22.1.3 Desired Future Character Statement, it is appropriate as it stands	It is considered that some amendments to the DFCS are justified in response to the representations received, these are shown in Attachment B.	Recommendation: That the no change be made to the amendments in relation to this issue.
156	No matter how strong Desired Future Character Statements are, they will not stand up to an appeal at the Tribunal.	Concern noted.	Recommendation: That the no change be made to the amendments in relation to this issue.
160, 166	Without the context of the 'Woolley Report', the Desired Future Character Statements would be challenging to interpret.	The Woolley report does provide useful context and explanation of the concepts however many parts of the report are not necessarily be relevant to the assessment of applications against the performance criteria. It is considered that the implementation of the amendment can be simplified by defining some of the key terms used in the DFCS in the Scheme.	Recommendation: That the reference to the Woolley Report be deleted from the amendments and definitions added as shown in Attachment B.
160	There should be fewer Desired Future Character Statements with no overlap in the Zone Purpose Statement or performance criteria. They should also be more explicit about which provisions they relate to.	It is agreed that there is overlap between the performance criteria and the statements in the DFCS. The amendment can be simplified by removing the duplication and it is sufficient to rely on the DFCS.	Recommendation: That the performance criteria which duplicate the DFCS be deleted as shown in Attachment B.
160, 161, 166	The terms used in the proposed Desired Future Character Statements should be defined within the planning scheme.	Agreed, additional definitions are recommended to be included as shown in Attachment B.	Recommendation:

			That additional definitions be included as shown in Attachment B.
161, 166	The proposed Desired Future Character Statements are not clear and applications will require input from a streetscape 'expert'. This will add an extra cost to development.	<p>The clarity of the DFCS can be improved by the inclusion of definitions of the key term used in the statements.</p> <p>The Central Business Zone clauses 22.4.1 P1 and P3 already require consideration of streetscape and townscape impacts which are likely to require input from an urban design professional. The amendments do not change that situation and provide additional guidance to assists experts in their assessment.</p>	<p>Recommendation:</p> <p>That additional definitions be included as shown in Attachment B.</p>
Issue - Performance Criteria			
21, 31, 56, 69, 98, 136, 145, 166	The amended performance criteria should provide clear guidelines that everyone can understand.	The clarity of the DFCS can be improved by the inclusion of definitions of the key term used in the statements. Removal of duplication of performance criteria and DFCS is recommended as discussed above.	<p>Recommendation:</p> <p>That additional definitions be included as shown in Attachment B.</p>
37	Support for performance criteria for overshadowing, view lines and public amenity	Noted.	<p>Recommendation:</p> <p>That the no change be made to the amendments in relation to this issue.</p>
42, 172	The proposed Desired Future Character Statement undermine current height requirements by including precinctual and regional scale clauses.	The amendments do not propose to alter the current numerical standards in relation to height and do not have the effect of	<p>Recommendation:</p>

		undermining the current height standards.	That the no change be made to the amendments in relation to this issue.
42, 83, 120, 172	The existing amenity building envelope provides flexibility for developments whereas the amended performance criteria moves the focus towards buildings above 45m. Requirements to meet the existing amenity building envelope should be strengthened.	The amendments do not propose to alter the current numerical standards in relation to height and do not have the effect of encouraging buildings higher than 45m. The amendments specify the townscape and streetscape considerations for buildings that do not meet the acceptable solutions in relation to height.	Recommendation: That the no change be made to the amendments in relation to this issue.
42, 46, 57, 69, 99, 113, 117, 120, 135, 140, 141, 145, 147, 153, 161, 166	The proposed performance criteria is too broad, subjective and open to interpretation.	The Planning scheme is performance based as required by the format in Planning Directive No1. Performance criteria by their nature are subjective and open to interpretation. Additional definitions proposed will assist in interpretation.	Recommendation: That additional definitions be included as shown in Attachment B.
46	The term 'does not significantly adversely impact on' should not be replaced with 'makes a positive contribution'	A more positive statement is preferred as the former statement assumes some level of adverse impact.	Recommendation: That the no change be made to the amendments in relation to this issue.
57	Views of the mountain from Hunter Street/ Franklin Wharf should be part of the acceptable solution not the performance criteria.	Impact on views is a qualitative assessment which is difficult to in an acceptable solution.	Recommendation: That the no change be made to the amendments in relation to this issue.
76, 117, 158	The amended performance criteria should be measureable or include specific examples.	Performance criteria by their nature are subjective and open to interpretation. Additional	Recommendation:

		definitions proposed will assist in interpretation.	That additional definitions be included as shown in Attachment B.
117	Question the need for acceptable solutions when they don't have to be met.	The structure of the Scheme is in accordance with Planning Directive No1 which requires acceptable solutions and performance criteria to be provided in relation to each standard.	Recommendation: That the no change be made to the amendments in relation to this issue.
142	The performance criteria should not be changed to enable taller buildings to be constructed.	The amendments do not propose to alter the current numerical standards in relation to height and do not have the effect of encouraging taller buildings.	Recommendation: That the no change be made to the amendments in relation to this issue.
148	There should be no change to clause 22.4.1 Building height, it is appropriate as it stands	The amendments specify the townscape and streetscape considerations for buildings that do not meet the acceptable solutions in relation to height and provide greater direction in the assessment of those matters than presently contained in the Scheme.	Recommendation: That the no change be made to the amendments in relation to this issue.
160	The proposed performance criteria for building height standards under clause 22.4.1.P1(b) and P3(b) should use the phrase 'should have regard to' rather than 'must' and siting bulk and design provisions should be dealt with under the Statement of Desired Future Character.	In the interests of consistency with the State Planning Provisions it is agreed the introductory phrase should be amended to say 'have regard to'. Siting and bulk issues are dealt with in the DFCS.	Recommendation: That clause 22.4.1.P1(b) and P3(b) use the phrase 'should have regard to' as shown in Attachment B.
161	The proposed performance criteria are too onerous and applications will require input from a streetscape 'expert'. This will add extra cost to developments.	The clarity of the amendments can be improved by the inclusion of definitions of the key term used in the DFC statements.	Recommendation:

		The Central Business Zone clauses 22.4.1 P1 and P3 already require consideration of streetscape and townscape impacts which are likely to require input from an urban design professional. The amendments do not change that situation and provide additional guidance to assist experts in their assessment.	That additional definitions be included as shown in Attachment B.
147	The planning scheme should not be performance based and there should be clearly defined guidelines for interpretation.	The Planning scheme is performance based as required by the format in Planning Directive No1. Performance criteria by their nature are subjective and open to interpretation. Additional definitions proposed will assist in interpretation.	Recommendation: That additional definitions be included as shown in Attachment B.
Issue - Concerns about the amendment process			
20, 25, 113, 124	The amendment does not sufficiently address the increase in traffic and/or car parking demand from taller buildings.	The amendments do not propose to alter the current numerical standards in relation to height and do not have the effect of encouraging taller building and therefore have no implications for parking demand.	Recommendation: That the no change be made to the amendments in relation to this issue.
22, 36, 144, 153, 163, 167	The road infrastructure in the city and surrounding areas is not adequate to deal with the increase in traffic caused by taller buildings.	The amendments do not propose to alter the current numerical standards in relation to height and do not have the effect of encouraging taller building and therefore have no implications for parking demand.	Recommendation: That the no change be made to the amendments in relation to this issue.

84	A transport strategy for public and private transport needs to be development and applied to all future development applications.	Noted. Council is in the process of developing a Transport Strategy for the City.	Recommendation: That the no change be made to the amendments in relation to this issue.
7, 31, 36, 47, 83, 113, 141, 153, 169	The process has not included a clear vision for the future of the city.	The Woolley Report has clearly articulated the key townscape values of central Hobart, these are based on well considered and illustrated townscape principles. Council has commenced the Hobart City Vision Project which will lead to a vision for the city. Future amendments to the Planning Scheme can be considered if it is considered to be inconsistent with the new vision.	Recommendation: That the no change be made to the amendments in relation to this issue.
25, 36, 40, 112, 152, 153, 166	There needs to be full and holistic consideration of the future of Hobart with wide community consultation. This should have been undertaken prior to the initiating the amendment.	As above.	Recommendation: That the no change be made to the amendments in relation to this issue.
14	The proposed amendment has not done adequate due diligence. For example whether Hobart needs high-rise buildings, what people want the city to like and integration with other projects such as mac point and light rail.	The amendments strengthen the Scheme standards in relation to higher buildings. As mentioned above future amendments to the Planning Scheme can be considered if it is considered to be inconsistent with the new vision.	Recommendation: That the no change be made to the amendments in relation to this issue.
39, 40, 41, 46, 78, 83, 112, 124, 156, 159, 161, 164, 170, 181	The proposed amendment should not be based on only one consultant's report	The consultant has considerable knowledge and experience in the field of urban design and townscape analysis in Hobart and is more than qualified to provide advice in relation to this issue.	Recommendation: That the no change be made to the amendments in relation to this issue.

39, 41, 42, 71, 72, 83, 112, 120, 126, 135, 141, 152, 159, 161, 164 166, 167, 169, 170, 172, 179#	The amendment has not included appropriate thought and/or community consultation.	This amendments process has involved community consultation as is evidenced by attendance at 2 public forums and the number of representations.	Recommendation: That the no change be made to the amendments in relation to this issue.
42, 120, 135, 172	The amendment process should follow the City Vision process and utilise the community engagement of that process. or be included as part of the Specific Area Plan for the Statewide Planning Scheme.	As mentioned above future amendments to the Planning Scheme can be considered if it is considered to be inconsistent with the new vision. It is proposed that the outcomes of this amendment process be translated into the Tasmanian Planning Scheme.	Recommendation: That the no change be made to the amendments in relation to this issue.
7, 42, 47, 172	The amendments have an unnecessarily narrow/limited vision.	The amendments deliberately focussed on townscape and streetscape issues given the Planning Scheme already addressed amenity issues through the 'Amenity Building Envelope' which has been developed with regard to heritage, streetscape and sense of scale, wind effects and solar penetration.	Recommendation: That the no change be made to the amendments in relation to this issue.
29	Not opposed to increased height and recognition that long term planning must include increased density. However there must be logic to the planning.	The amendments do not act to increase building height and are based on a detailed assessment of townscape values.	Recommendation: That the no change be made to the amendments in relation to this issue.
152, 156	Concern that there are no state policies and/or land use strategies to guide amendments.	The concern about state policies is noted. The proposed amendment is consistent with the following activity centre policies in the STRLUS:	Recommendation: That the no change be made to the amendments in relation to this issue.

		<p><i>AC 1 Focus employment, retail and commercial uses, community services and opportunities for social interaction in well-planned, vibrant and accessible regional activity centres that are provided with a high level of amenity and with good transport links with residential areas;</i></p> <p><i>AC 1.5 Ensure high quality urban design and pedestrian amenity through the respective development standards;</i></p> <p><i>AC 1.8 Ensure that new development and redevelopment in established urban areas reinforce the strengths and individual character of the urban area in which the development occurs;</i></p> <p><i>AC 2.2 Achieve high quality design for all new prominent buildings and public spaces in the Primary and Principal Activity Centres.</i></p>	
7, 21, 25, 100, 105, 113, 161	The proposed amendment does not sufficiently address the broader impact of increased building heights. For example infrastructure, services, land values, liveability, the environment, economic and social analysis as well as transport and tourism strategies.	The amendments do not act to increase building heights and therefore have no implications for issues such as infrastructure, services and traffic.	Recommendation: That the no change be made to the amendments in relation to this issue.
15, 138	Although there may be economic benefits from allowing taller buildings, this will be exceeded by the loss of amenity and reputation.	The amendments do not act to increase building heights and provide greater protection for townscape and streetscape values.	Recommendation: That the no change be made to the amendments in relation to this issue.
152	The amendment is to an interim scheme that will never be finalised.	The Interim Scheme has been finalised and it is proposed that the outcome of these	Recommendation:

		amendments will be translated into the Local Provisions Schedule of the Tasmanian Planning Scheme.	That the no change be made to the amendments in relation to this issue.
14	Any changes to height restrictions must plan for the future beyond the current election period and must not just a response to foreign and national investments	The amendments do not change the current height restrictions.	Recommendation: That the no change be made to the amendments in relation to this issue.
137, 156	The report the amendment is based upon is not clear and does not have adequate justification or explanation.	The reasons for the amendment are explained in detail in the report to Council dated 26 June 2017.	Recommendation: That the no change be made to the amendments in relation to this issue.
158	The concepts the report is based upon would be more suitable for greenfield development than an existing city and there is too much ambiguity.	The townscape assessment is specific to central Hobart and it is difficult to see how it could be applied to a greenfield location.	Recommendation: That the no change be made to the amendments in relation to this issue.
160	The proposed amendment is not in accordance with the Southern Tasmanian Regional Land Use Strategy.	The proposed amendment is consistent with the following activity centre policies in the STRLUS: <i>AC 1 Focus employment, retail and commercial uses, community services and opportunities for social interaction in well-planned, vibrant and accessible regional activity centres that are provided with a high level of amenity and with good transport links with residential areas;</i> <i>AC 1.5 Ensure high quality urban design and pedestrian amenity through the respective development standards;</i> <i>AC 1.8 Ensure that new development and redevelopment</i>	Recommendation: That the no change be made to the amendments in relation to this issue.

		<i>in established urban areas reinforce the strengths and individual character of the urban area in which the development occurs;</i> <i>AC 2.2 Achieve high quality design for all new prominent buildings and public spaces in the Primary and Principal Activity Centres.</i>	
160	The proposed amendment does adequately address the availability of developable land and diminishes opportunities for sites within the Central Business Zone that are outside of the 'pear shaped zone'. The area within the 'Compact City Centre' is either already developed or not within the Central Business Zone.	As discussed above it is proposed that reference to the area of intensification be removed from the DFCS pending further modelling of the proposed development intensity.	Recommendation: That the reference to the area of intensification in the Desired Future Character Statement be deleted as shown in Attachment B.
161	The amendment ignores existing nodes of higher density development in the city.	The DFCS encourages higher density towards the centre of the CBD rather than around each existing node of higher density. This in accordance with the townscape principles identified in the Woolley Report.	Recommendation: That the no change be made to the amendments in relation to this issue.
166	Concern that if the details and diagrams in the report will become 'de facto standards' and there will be greater reliance on technical experts to make decisions.	As discussed above it is proposed that the amendment not specifically reference the Woolley Report.	Recommendation: That the reference to the Woolley Report be deleted from the amendments as shown in Attachment B.
166	It is not clear in the report how the 'pear shaped cone' will operate.	As discussed above it is proposed that reference to the area of intensification be removed from the DFCS pending further modelling of the proposed development intensity.	Recommendation: That the reference to the area of intensification in the Desired Future Character Statement be deleted as shown in Attachment B.

152, 166	The proposed amendment does not further the objectives under schedule 1 of the Land Use Planning and Approvals Act 1993.	It is considered that the proposed amendment meets the objectives of LUPAA, in particular it: Assists sound strategic planning by assisting in the achievement of the relevant Zone Objectives and the Southern Tasmania Regional Land Use Strategy (STRLUS) policies; Is consistent with the objective to establish a system of planning instruments to be the principal way of setting objectives, policies and controls for the use, development and protection of land; Assists in the provision of a pleasant living and working environment by protecting key townscape and streetscape values; and Assists in the conservation of places of special cultural value by helping to protect key townscape and streetscape values.	Recommendation: That the no change be made to the amendments in relation to this issue.
41, 42	The amendment should not include the 'Woolley Report' as an official attachment.	As discussed above it is proposed that reference to the Woolley Report be deleted from the amendments.	Recommendation: That the reference to the Woolley Report be deleted from the amendments as shown in Attachment B.

General			
11, 12, 61, 66, 75,77, 80, 84, 93, 96, 103, 106, 111, 114, 118, 131, 132, 150, 156, 164, 176	Other cities internationally retain their heritage character and remain tourist attractions and liveable cities by maintaining height restrictions.	The amendments do not act to increase building heights and provide greater protection for townscape and streetscape values.	Recommendation: That the no change be made to the amendments in relation to this issue.
2	The proposed amendment is too subjective and people will still find a way around it to develop buildings that are out of place.	Performance criteria by their nature are subjective and open to interpretation. Additional definitions proposed will assist in interpretation.	Recommendation: That additional definitions be included as shown in Attachment B.
12, 28, 38, 70, 73, 74, 124, 139	Hobart must retain its identity and not become generic.	The amendments provide greater protection for townscape and streetscape values.	Recommendation: That the no change be made to the amendments in relation to this issue.
15, 26, 38, 41, 46, 53, 54, 61, 76, 82, 84, 87, 91, 99, 100, 101, 106, 113, 114, 121, 126, 130, 132, 133, 138, 139, 141, 143, 146, 149, 150, 154, 155, 165, 166, 168, 169, 176, 178#	Hobart has a unique character that should be retained.	The amendments do not act to increase building heights and provide greater protection for townscape and streetscape values.	Recommendation: That the no change be made to the amendments in relation to this issue.
28, 32, 38, 39, 45, 75, 76, 81, 82, 83, 93, 103, 108, 114, 119, 120, 124, 125, 130, 131, 132, 134, 135, 138, 139, 146, 155, 171, 178#	Visitors and tourists do not come to Hobart for high-rise buildings.	The amendments do not act to increase building heights and provide greater protection for townscape and streetscape values.	Recommendation: That the no change be made to the amendments in relation to this issue.
21	The amendment should not be about how high Hobart should go, but where and how.	The amendments do not act to increase building heights and provide greater protection for townscape and streetscape values.	Recommendation: That the no change be made to the amendments in relation to this issue.
173	The proposed amendment does not take into consideration the economic impact.	The amendments specifically address townscape and streetscape issues. They do not change the permitted standards in relation to height.	Recommendation: That the no change be made to the amendments in relation to this issue.

38, 137, 138	The amendment will only benefit developers.	The amendments do not act to increase building heights and provide greater protection for townscape and streetscape values.	Recommendation: That the no change be made to the amendments in relation to this issue.
82, 152	Developers will take advantage of any weakness in the planning scheme.	The amendments are intended to strengthen consideration of townscape and streetscape issues.	Recommendation: That the no change be made to the amendments in relation to this issue.
152	Development standards should not be relaxed, all development in the CBD should be discretionary.	The amendments do not relax any development standards. They provide greater direction in relation to the assessment of townscape issues.	Recommendation: That the no change be made to the amendments in relation to this issue.
84	There must be greater policing of permits to ensure compliance.	Council acts when necessary to enforce the Planning Scheme.	Recommendation: That the no change be made to the amendments in relation to this issue.
30, 114, 120, 124, 135, 157, 161, 164, 166, 170	Future planning schemes should not reference the 'Woolley Report'.	As discussed above it is proposed that the amendment not specifically reference the Woolley Report.	Recommendation: That the reference to the Woolley Report be deleted from the amendments.
61, 66, 141, 154	There is no need for large office blocks with increased digitisation, online shopping and people working from home.	This is an issue for the market to determine and not related to these amendments.	Recommendation: That the no change be made to the amendments in relation to this issue.
3, 95, 109	The amendments should be retained in the state-wide planning scheme.	It is proposed that the outcome of the amendment process be translated into the Local Provisions Schedule of the Tasmanian Planning Scheme.	Recommendation: That the no change be made to the amendments in relation to this issue.
33	Council has a responsibility to protect the culture and nature of the city for residents whilst being vibrant and inviting for visitors.	The amendments provide greater protection for townscape and streetscape values.	Recommendation:

			That the no change be made to the amendments in relation to this issue.
83	Concern about there being discretion to approve buildings that are out of context or scale.	The amendments provide greater protection for townscape and streetscape values.	Recommendation: That the no change be made to the amendments in relation to this issue.
147	There should be stronger strategic planning within the council rather than relying on consultant's reports and more appropriate funding of the planning department.	It is entirely appropriate for consultants with specialist knowledge and expertise to be engaged by Council in relation to issues such as townscape and urban design.	Recommendation: That the no change be made to the amendments in relation to this issue.
Alternative suggestions			
8, 14, 20, 21, 22, 25, 75, 112, 146,	There are alternative areas outside of the CBD that would be more suitable for high-rise development and/or higher density.	The identification of these areas is beyond the scope of these amendments.	Recommendation: That the no change be made to the amendments in relation to this issue.
36, 53, 95, 109	Density could be increased in area outside of the CBD rather than increasing height limits.	The amendments do not increase the existing numerical height standards.	Recommendation: That the no change be made to the amendments in relation to this issue.
88	Taller buildings should not be restricted to a specific area.	The amendments do not restrict taller buildings to a specific area. As discussed above it is proposed that reference to the area of intensification be removed from the DFCS pending further modelling of the proposed development intensity.	Recommendation: That the no change be made to the amendments in relation to this issue.
35, 42, 46, 84, 97, 100, 124, 139	There should be development of car yards and/or better use of existing (including heritage) buildings.	The amendments do not preclude the redevelopment of car yards or better use of existing buildings.	Recommendation:

			That the no change be made to the amendments in relation to this issue.
40, 47, 95, 82, 109	The amendment does not address underutilised sites such as vacant lots and car parks.	The amendments do not preclude the redevelopment of car yards or use of vacant lots.	Recommendation: That the no change be made to the amendments in relation to this issue.
16	Development should occur over a wider area rather than just the CBD.	The identification of these areas is beyond the scope of these amendments	Recommendation: That the no change be made to the amendments in relation to this issue.
31, 56	The amendment should limit the height and bulk of buildings to 'community acceptable levels' everywhere, not just in the CBD.	The amendments provide for greater consideration of townscape and streetscape values. The height and bulk of buildings outside the Central Business Zone is beyond the scope of these amendments.	Recommendation: That the no change be made to the amendments in relation to this issue.
Support for the amendments			
29, 151	Support for the proposed amendment and/or the Height Standards Performance Review.	Noted.	Recommendation: That the no change be made to the amendments in relation to this issue.
35	Support the consideration of shadowing and offset near heritage buildings.	Noted.	Recommendation: That the no change be made to the amendments in relation to this issue.
35	Support the amendment including requirements for 'a positive contribution...' and to 'provide significant benefits...'	Noted.	Recommendation: That the no change be made to the amendments in relation to this issue.

122	Support the amendments relating to view lines, increasing height without bulk, maintaining solar access and avoidance of individually prominent buildings.	Noted.	Recommendation: That the no change be made to the amendments in relation to this issue.
140,158 160	Support the design principles and/or framework contained within the report.	Noted.	Recommendation: That the no change be made to the amendments in relation to this issue.
Other			
5, 49, 50, 51	These representations only mention the proposed Fragrance Group developments which are in the area covered by the Sullivans Cove Planning Scheme 1997.	Noted.	Recommendation: That the no change be made to the amendments in relation to these representations.
55	Indicates support for the representation submitted by Ald Reynolds.	Noted.	Recommendation: As per recommendations in relation to representation number 42

Representations 178 (received 2/9/2017) and 179 (received 5/9/2017) were received after the close of the exhibition period and are non-statutory.