

30 June 2023

representation@hobartcity.com.au

## To Whom it May Concern

Thank you very much for the opportunity to make a submission concerning the proposed amendments to the Hobart draft Local Provisions Schedule.

The API comprises a membership cohort of 7600 Australian property professionals and 4000 firms.

In Tasmania, we have 115 active members.

Our members are active across all sectors of the property profession – in private practice and the public sector, including those working in valuation, government, property management, facilities management, property law, property education, property development, funds and asset management, town planning, property consultancy and advisory.

At the outset, the API commends the Tasmanian government for implementing a state-wide planning scheme. It is our view that in doing so, Tasmania will be better served by a set of consistent planning rules across the state, replacing the 30 Interim planning schemes currently operating in Tasmania.

With respect to the Hobart draft Local Provisions Schedule, there are a number of points of clarification we are seeking on behalf of our members.

### **HOB-S5.0 Hobart Light Industrial Zone SAP**

It is not clear in the draft Schedule as to where this SAP will be or what it specifically includes. The concern is that this could negatively impact the underlying land value of this area if it limits the permitted and discretionary uses.

### **PSA-22-4 Amendment - Significant Trees**

There appear to be 66 additional listings for trees and hedges. Will these newly identified trees/hedges also be added to the local environmental plans LEP (Local Environmental Plan)?

#### **Sydney**

L3, 60 York St T 02 9299 1811  
SYDNEY E nsw@api.org.au  
NSW 2000 W api.org.au

In a related comment, the State Heritage List does not specify if the listing is a property, tree or fence. The inclusion of what is specifically listed on the LEP will serve as a joint resource for all interested parties (owners, agents, purchasers, and valuers). Does the amendment provide that the 66 additional listings must remain as is and cannot be removed?

### **Environmental Living Zones/Rural Conservation and Rural Zones**

There have been issues in the past (for example in Huon Valley) where the broad application of these zones did not comply with minimum lot sizes and/or set back requirements for existing properties. It is noted that the incorrect application of these zones rendered certain parcels of land incapable of being developed, thus significantly reducing value and exposing councils to risks of litigation and compensation.

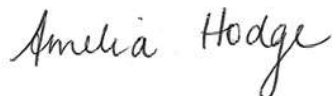
### **General Comment**

When undertaking valuations, the more information valuers can gain regarding a property's use, the more accurate the valuation. With this in mind, and given the changes in this area, will a list of properties approved for short-stay accommodation be made available or will interested parties be required to verbally confirm with planning staff if such approval is in place? This query is in relation to properties fully approved for a short stay (whole property). The value of such property could impact the value dependent on buyer demand if no further whole properties are approved in the Hobart Council area.

We look forward to educating our members about these new provisions once they have been finalised. Please forward any clarifications to the matters referred to above to [ifairweather@api.org.au](mailto:ifairweather@api.org.au).

Once again, thank you for the opportunity to provide feedback following your consultation. If you would like to discuss any of these matters further, please do not hesitate to contact me at the below details.

Yours sincerely



### **Amelia Hodge**

Chief Executive Officer  
Australian Property Institute Ltd  
0400 996 234  
[ahodge@api.org.au](mailto:ahodge@api.org.au)

### **Sydney**

L3, 60 York St T 02 9299 1811  
SYDNEY E [nsw@api.org.au](mailto:nsw@api.org.au)  
NSW 2000 W [api.org.au](http://api.org.au)