

**REPORT TITLE: CENTRAL HOBART BUILDING HEIGHT STANDARDS
REVIEW PROJECT - PROPOSED PLANNING
SCHEME AMENDMENTS**

REPORT PROVIDED BY: Manager Planning Policy and Heritage
Director City Planning

1. Report Purpose and Community Benefit

- 1.1. This report considers the outcomes of the community consultation on the Building Height Standards Review Project (Leigh Woolley June 2018) (**Attachment A**) and proposes amendments to the *Hobart Interim Planning Scheme 2015* (HIPS 2015) and the *Sullivans Cove Planning Scheme 1997* (SCPS 1997) to implement the outcomes of the review.
- 1.2. The proposal benefits the community by helping to ensure that the height of development in the central area of Hobart and Sullivans Cove makes a positive contribution to the streetscape and townscape values and meets community expectations.

2. Report Summary

- 2.1. This report considers the outcomes of the community consultation on the Building Height Standards Review Project (Leigh Woolley June 2018) (**Attachment A**) and proposes amendments to the HIPS 2015 and the SCPS 1997 to implement the outcomes of the review.
- 2.2. At its meeting on 3 September 2018, the Council endorsed the release of the Building Height Standards Review (L Woolley, 30 June 2018) report and the suggested planning scheme amendments to implement its recommendations, for public comment for a 6 week period, prior to consideration of formally endorsing the report and initiating any planning scheme amendments in response.
- 2.3. A total of 319 submissions were received at the end of the consultation period. A detailed analysis of the submissions is provided in **Attachment C**. The key conclusions are as follows:
 - 2.3.1. 275 (86%) respondents support the concept of including absolute maximum height limits in the planning schemes;
 - 2.3.2. 22 (7%) respondents did not support the concept of including maximum height limits in the planning schemes and in the remaining 21 (6.5%) it was unclear whether height limits were supported or not;

- 2.3.3. Of the respondents that supported maximum height limits; 83 (30%) supported the limits suggested in the draft planning scheme amendments, 69 (25%) did not support the limits suggested, 22 (8%) expressed partial support and in the other 101 (37%) submissions support for or against was not clear;
- 2.3.4. Of the respondents that did not agree with, or only partially agreed with, the limits suggested in the draft planning scheme amendments, 89 (98%) considered that the limits were too high;
- 2.3.5. 21 (7%) respondents specifically stated that a maximum building height of 60m was too high;
- 2.3.6. A number of suggestions were made as to what the maximum height limits should be; these ranged from a maximum of 15m for the whole city to a maximum of 75m. In Sullivans Cove suggested maximum heights ranged from 12m to 18m.
- 2.4. It is apparent from the submissions received during the community engagement process that the vast majority (86%) of respondents support the concept of including absolute maximum building height limits in the planning schemes. There are a wide variety of opinions however as to what the actual absolute maximum heights should be.
- 2.5. The proposed planning scheme amendments based on the outcomes of the Review are provided in **Attachment B** along with a summary and explanation of each amendment. In the Central Business Zone it is proposed that the height control planes be implemented by the designation of 5 Height Areas as shown on the map in **Attachment D**. The key amendments are outlined in section 5 of this report.
- 2.6. It is recommended that the Council endorse the Building Height Standards Review (L Woolley, 30 June 2018) report (**Attachment A**) and the amendments to the HIPS 2015 and SCPS 1997 provided in **Attachment B** be initiated.

3. Recommendation

That:

- 1. The outcomes of Building Height Standards Review (L Woolley, 30 June 2018) report (Attachment A) be endorsed.**
- 2. Pursuant to Section 34(1) (b) of the former provisions of the Land Use Planning and Approvals Act 1993, the Council resolve to initiate the amendments provided in Attachment B to the Hobart Interim Planning Scheme 2015 and the Sullivans Cove Planning Scheme 1997.**

3. ***Pursuant to Section 35 of the former provisions of the Land Use Planning and Approvals Act 1993, the Council certify that the PSA-18-4 Amendment to the Hobart Interim Planning Scheme 2015 and the PSA-18-1 Amendment to the Sullivans Cove Planning Scheme 1997 meets the requirements of Section 32 of the former provisions of the Land Use Planning and Approvals Act 1993 and authorise the General Manager and the Deputy General Manager to sign the Instruments of Certification (Attachment I).***
4. ***Pursuant to Section 38 of the former provisions of the Land Use Planning and Approvals Act 1993, the Council place the PSA-18-4 Amendment to the Hobart Interim Planning Scheme 2015 and the PSA-18-1 Amendment to the Sullivans Cove Planning Scheme 1997 on public exhibition for a 28 day period following certification.***

4. Background

- 4.1. 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. The development standards address building height, setbacks, design, passive surveillance, outdoor storage, pedestrian links, heritage, streetscape and sense of scale, wind effects and solar penetration.
- 4.2. At its meeting on 3 July 2017, the Council endorsed the recommendations of the Central Business Zone Height Standards – Performance Criteria Review report (Woolley 2016) and initiated the PSA-17-3 Amendments to the HIPS2015 to implement the recommendations of that report in relation to streetscape and townscape values. A modified version of those amendments were approved by the Tasmanian Planning Commission on 3 August 2018.
- 4.3. At its meeting on 3 July 2017, the Council also resolved that:
A further report to Council be prepared addressing the additional analysis required in relation to a number of issues including the preparation of design guidelines, modelling of buildings in certain locations, development of spatial principles to inform appreciation of the ‘urban amphitheatre’, designation of additional view protection planes, height control planes and specification of maximum height limits.
- 4.4. At its meeting on 9 October 2017, the Council endorsed the project brief for that work and subsequently Leigh Woolley - Architect and Urban Design Consultant was commissioned to undertake the project.

- 4.5. At its meeting on 3 September 2018, the Council endorsed the release of the Building Height Standards Review (L Woolley, 30 June 2018) report and the suggested planning scheme amendments to implement its recommendations, for public comment for a 6 week period, prior to consideration of formally endorsing the report and initiating any planning scheme amendments in response.

5. Proposal and Implementation

- 5.1. It is proposed that the Council endorse the Building Height Standards Review (L Woolley, 30 June 2018) report (**Attachment A**) and the draft amendments to the HIPS 2015 and the SCPS 1997 provided in **Attachment B** be initiated.

Building Height Standards Review (Woolley 2018)

- 5.2. The outcomes of the Building Height Standards Review (L Woolley, 30 June 2018) is a comprehensive response to the project brief and is a significant body of work that adds considerably to the appreciation of the urban context of Hobart. The work builds on that undertaken by Leigh Woolley in 2016 in relation to the townscape and streetscape values of central Hobart and these are now identified in the Central Business Zone Desired Future Character Statement in the *Hobart Interim Planning Scheme 2015*.
- 5.3. The key conclusions from the Building Height Standards Review are as follows:
- 5.3.1. To maintain the transition in scale from the low-rise residential precincts (on adjacent slopes) to a compact centre, development intensity should be located on the lower contours of the 'basin' of the Central Business Zone, rather than its higher contours.
- 5.3.2. Height control zones stepping back from the Cove and the inner hills assist in identifying an 'Inner Core' precinct within the 'basin'. Modelling suggests that development above the Amenity Building Envelope could be pursued within this precinct, without intruding into primary view cones.
- 5.3.3. Initial modelling of the 'inner core' urban blocks, the amenity building envelope, identified view cones, while acknowledging townscape provisions, indicates capacity for development above 45m, with limited opportunity on most urban blocks above 65m. In some locations height could rise to 75m without impacting primary view cones, subject to heritage and detailed townscape provisions.

- 5.3.4. In considering appropriate height control planes for Sullivans Cove and Central Hobart the following are recommended in the Review:
- An Escarpment Zone rising from 18m to 30m (+ natural rise);
 - A Cove Face Zone rising from 30m to 45m, (+ natural rise);
 - A Hill Face Zone rising from 18m to 45m (+ natural rise).
- 5.3.5. Within the inner core precinct; amenity, townscape and heritage provisions and identified view cones should determine height outcomes.
- 5.3.6. The combination of proposed height control planes with view protection planes will assist in maintaining Central Hobart as a 'compact' and 'contained' urban form.

Consultation Outcomes

- 5.4. The Building Height Standards Review report and the suggested planning scheme amendments to implement its recommendations, were made available for public comment for a 6 week period from 5 September until 17 October 2018. The community engagement process included extensive media coverage, a public forum and drop-in session and the Your Say Hobart web page which received a total of 751 visits. A total of 319 submissions were received at the end of the consultation period.
- 5.5. A detailed analysis of the submissions is provided in **Attachment C**. The key conclusions are as follows:
- 5.5.1. 275 (86%) respondents support the concept of including absolute maximum height limits in the planning schemes;
 - 5.5.2. 22 (7%) respondents did not support the concept of including maximum height limits in the planning schemes and in the remaining 21 (6.5%) it was unclear whether height limits were supported or not;
 - 5.5.3. Of the respondents that supported maximum height limits; 83 (30%) supported the limits suggested in the draft planning scheme amendments, 69 (25%) did not support the limits suggested, 22 (8%) expressed partial support and in the other 101 (37%) submissions support for or against was not clear;
 - 5.5.4. Of the respondents that did not agree with, or only partially agreed with, the limits suggested in the draft planning scheme amendments, 89 (98%) considered that the limits were too high;
 - 5.5.5. 21 (7%) respondents specifically stated that a maximum building height of 60m was too high;

- 5.5.6. A number of suggestions were made as to what the maximum height limits should be; these ranged from a maximum of 15m for the whole city to a maximum of 75m. In Sullivans Cove suggested maximum heights ranged from 12m to 18m;
- 5.5.7. Other suggestions or comments made related to issues such as; quality of design, building energy efficiency, development feasibility and impact on housing affordability.
- 5.6. Common arguments made in the submissions for and against maximum building height limits being included in the planning schemes are summarised in **Attachment C** along with summaries of submissions by groups and organisations such as the Property Council, Australian Institute of Architects and Hobart Not Highrise.
- 5.7. It is apparent from the submissions received during the community engagement process that the vast majority (86%) of respondents support the concept of including absolute maximum building height limits in the planning schemes.
- 5.8. In relation to what the actual absolute maximum heights should be, opinion is more diversified with a range of views expressed that the maximum height limits suggested in the draft planning scheme amendments were either acceptable or too high.
- 5.9. 37% of respondents who agreed with the concept of maximum height limits did not indicate whether the suggested height limits were supported or opposed. Only 1 respondent suggested that they were too low.
- 5.10. A number of responses were received through a website set up by Hobart not Highrise, which paid particular attention to the proposed maximum height limits in relation to developments proposed on land owned by the Fragrance Group. 20 of the responses that supported the suggested maximum height limits only specifically referenced support of heights in these areas.

Discussion

- 5.11. In determining appropriate maximum building height limits it is necessary to achieve a balance between protecting Hobart's townscape and streetscape values and providing for an appropriate level of economic development.
- 5.12. Under the Southern Tasmania Regional Land Use Strategy (STRLUS), Central Hobart is the Primary Activity Centre and is intended to be the densest and most compact development precinct in the state and the 'primary hub' for Tasmania where a significant proportion of all employment opportunities within the region should continue to be focussed.

- 5.13. Maximum building heights of up to 45m in proposed Height Areas 2 and 4 and up to 60m in Height Area 1 are not considered to be a significant constraint to economically viable building development in these areas given a number of development proposals approved in recent years have been below or only marginally above these heights.
- 5.14. Many of the submissions considered that Hobart should preserve a very low townscape in keeping with its heritage buildings, and some suggested moving high-rise structures outside of Hobart city to enable this. It is considered, however, that restricting almost all development in the city and decentralising development would contravene the STRLUS and exacerbate urban sprawl and transport issues in and around Hobart. These submissions deny the built reality of the CBD with numerous examples of buildings exceeding 45 metres in height. The CBD is not a homogenous low rise heritage precinct although it does have numerous important heritage buildings.
- 5.15. A reasonably common suggestion within the submissions was for the maximum height to be lowered to 45m in the inner core area (Height Area 1). It is considered, however, that a 45m absolute maximum for the intensification area of a capital city is overly restrictive.
- 5.16. It is noted that overall height is only one component of the proposed amendments, and development on many city blocks would not be capable of reaching the maximum height and still satisfy all other performance criteria. For those sites that are capable of achieving the maximum height while meeting all other criteria, 60m is not considered to be excessive.
- 5.17. It is considered that the outcomes of the Building Height Standards Review provides a sound basis for the designation of maximum height limits. These maximum height limits along with the other recommended planning scheme amendments will assist in maintaining the streetscape and townscape values of Central Hobart and Sullivans Cove and provide greater certainty and direction in the consideration of discretionary proposals while providing for appropriate levels of development.
- 5.18. A number of issues raised in submissions, such as those related to building energy efficiency are outside the scope of this review. The need for improved building design was mentioned in a number of submissions and this is addressed in the proposed requirement for an urban context report and design response. The need for additional pedestrian priority streets should be considered as part of any future review of the Inner City Action Plan.

Draft Planning Scheme Amendments

- 5.19. The recommended draft planning scheme amendments based on the outcomes of the Building Height Standards Review are provided in **Attachment B** along with a summary and explanation of each amendment. These amendments are substantially the same as those made available for public comment with the following exceptions:
- 5.19.1. The boundary between proposed Height Areas 1 and 4 has been adjusted 25m to the south west to follow Watchhorn Street in order to simplify implementation. This change is proposed in response to a submission received.
- 5.19.2. The boundary between Height Areas 2 and 3 has been amended to follow the mid-block lot boundaries between Harrington and Murray Streets rather than Macquarie Street. This change is proposed in response to a submission received noting there are already a number of higher buildings in this block and the topographic boundary identified in the Building Height Standards Review cut through the middle of the street block; and
- 5.19.3. In Height Area 4 the requirement for a transition in height from Height Area 5 or the Commercial Zone has also been applied to the Brooker Highway in response to a suggestion from the Urban Design Advisory Panel.
- 5.19.4. The performance criteria in clause 22.4.1 have been clarified in relation to consideration of view cones, view shafts and view fields and definitions of these terms have been added to clause 4.1.
- 5.20. The key amendments are outlined below:

Central Business Zone

- 5.21. In the Central Business Zone it is proposed that the height control planes be implemented by the designation of 5 Height Areas as shown on the map in **Attachment D**.
- 5.22. The boundaries of the height control planes have been modified in order to simplify implementation and take account of streets, property boundaries, zone boundaries, existing development, heritage constraints and the boundary of the *Sullivans Cove Planning Scheme 1997*. The overall intent of the recommended height control planes has however been maintained.

- 5.23. As indicated in the summary table in **Attachment D**, for each of Height Areas 1 to 5 an acceptable solution (permitted) maximum height is specified along with a suggested absolute maximum height that would be contained in the performance criteria. These range from 18m in Height Area 5 to 60m in Height Area 1. The Height Areas would be included in the Planning Scheme in a new Figure 22.2.
- 5.24. The performance criteria for the Height Areas are included in an amended clause 22.4.1 and require consideration of compatibility with existing buildings in the area, preventing unreasonable impacts on identified views, overshadowing of Pedestrian Priority Streets, overshadowing of public open space, adverse wind conditions and consistency with the Desired Future Character Statements in clause 22.1.3.
- 5.25. The performance criteria for Height Areas 1 to 4 also require that a design response must be provided that demonstrates the form, design, materials and detailing of the proposed development derives from and responds to characteristics identified in an urban context report in a way that makes a positive contribution to the streetscape and townscape. In addition development outside the amenity building envelope must provide significant civic amenities.
- 5.26. In Height Area 4 the performance criteria also requires a transition in the height of development within Height Area 4 between higher buildings in the inner core of the Central Business Zone (Height Area 1) and lower buildings in adjacent zones and Height Area 5. In Height Area 4 the absolute height limit proposed is 45m or 21m if within 50m of land within Height Area 5, the Commercial Zone or the Brooker Highway.
- 5.27. In the inner core of the Central Business Zone (Height Area 1) the suggested absolute maximum height is 60m. This is based on a detailed block by block analysis (see **Attachment E**) taking into account; topography, existing development, lot size and arrangement and heritage constraints. It is clear that in many circumstances, the maximum potential height as modelled in the Building Height Standards Review would not be able to be practically achieved.
- 5.28. The Central Business Zone clause 22.1.3 Desired Future Character Statements is proposed to be amended so that the statements reflect the Review outcomes and ensure the statements are considered for all developments discretionary for height, not just those outside the Amenity Building Envelope. A definition of 'urban context report' is also proposed to be included in clause 4.1.

- 5.29. The Central Business Zone Figure 22.6 is proposed to be amended to include the additional view lines and view cones identified in Section 4 of the Building Height Standards Review Report. Some submissions suggested that additional views should be included. The significant number of views already identified are considered to be a representative sample and it is not possible to identify every important viewing point. It may be possible for a future study to identify additional important views.
- 5.30. It is also proposed that the sites currently zoned Commercial between Melville and Brisbane Streets be rezoned to Central Business. The types of uses encouraged in the Commercial Zone such as bulky goods sales are not considered the most desirable for this location on the fringe of the CBD. The Central Business Zone will more accurately reflect the current uses on the blocks and will generally allow for increased development potential in a well located and well serviced area on the fringe of the CBD. A detailed assessment of the appropriate zoning of this area is provided in **Attachment F**.
- 5.31. The current HIPS2015 Central Business Zone provisions related to development standards for buildings are provided in **Attachment G**.

Commercial Zone

- 5.32. The proposed amendments to the Commercial Zone clause 23.4.1 Building Height are intended to make the height provisions of the Commercial Zone more consistent with the Central Business Zone and also set an absolute maximum height limit of 18m. The permitted height in this zone is 11.5m or 15m if the development provides at least 50% of the floor space above ground level for residential use.

Urban Mixed Use Zone

- 5.33. In the Urban Mixed Use Zone clause 15.4.1 Building Height P1 and P2 it is proposed to insert an absolute maximum building height of 15m for the whole of the Urban Mixed Use Zone in order to provide a transition in height from the Inner Residential Zone. The permitted height in this zone is 10m.

Sullivans Cove Planning Scheme 1997

- 5.34. The SCPS Wapping Local Area Plan clause 15.5.9 Height is proposed to be amended to introduce an absolute maximum height of 21m for Wapping which is currently the highest 'deemed to comply' (permitted) height under the Wapping Local Area Plan.

- 5.35. 8 of the submissions received suggested that the maximum height in Wapping should be 18m which is the same as suggested for the rest of Sullivans Cove. This is not consistent with the outcomes of the Building Height Standards Review which concluded that Wapping could accommodate higher buildings than the floor of Sullivans Cove. It is also noted that the 'deemed to comply' heights in Wapping were established following preparation of a detailed urban design study and 21m could only be achieved on sites with a lower 'deemed to comply' height if all of the other relevant Scheme standards are met.
- 5.36. It is proposed that Schedule 2 Urban Form clause 23.6.2 'Discretionary' Buildings be amended to include an absolute maximum height of 18m for the remainder of the SCPS. 18m is currently the highest 'deemed to comply' (permitted) height under clause 23.6.1 A and Figure 8 Deemed to Comply Heights (**Attachment H**). No change is proposed to the permitted heights.
- 5.37. Whether or not maximum building heights will be specified in the Macquarie Point Site Development Plan (SDP) is yet to be determined. The Master Plan is currently under review by the Macquarie Point Development Corporation. If the *Macquarie Point Development Corporation Amendment Bill 2018* is passed by Parliament amendments to the SDP will be made through the process established under the *Macquarie Point Development Corporation Act 2012*.

Urban Design Advisory Panel Consideration

- 5.38. The Urban Design Advisory Panel considered the Building Height Standards Review at its meeting on 27 July 2018 and advised that it supports the underlying approach taken by the Building Height Standards Review in determining appropriate maximum building heights for the Central Business Zone and adjacent Zones. In doing so the Panel strongly affirms the comments made in the report that the maximum heights nominated must be expected to be further moderated on a site by site basis after having taken into consideration local townscape, streetscape, heritage and other urban design matters.

6. Strategic Planning and Policy Considerations

- 6.1. The proposed planning scheme amendments will assist in the achievement of the strategic objectives of the Capital City Strategic Plan 2015-2025 particularly in relation to Goal 2 Urban Management - 2.3 "City and regional planning ensures quality design, meets community needs...."
- 6.2. The implementation of the outcomes of the Building Height Standards Review is consistent with; Hobart: A community vision for our island capital, particularly in relation to the statements in Pillar 1. Sense of Place and Pillar 7. Built Environment.

7. Financial Implications

7.1. Funding Source and Impact on Current Year Operating Result

7.1.1. None.

7.2. Impact on Future Years' Financial Result

7.2.1. None.

7.3. Asset Related Implications

7.3.1. None.

8. Legal, Risk and Legislative Considerations

8.1. The *Land Use Planning and Approvals Act 1993* (LUPAA) requires that planning scheme amendments must seek to further the objectives of Schedule 1 of the Act and be prepared in accordance with State Policies.

8.2. The objectives of the Act require use and development to occur in a fair, orderly and sustainable manner and for the planning process to facilitate economic development in accordance with the other Schedule 1 objectives.

8.3. It is considered that the proposed amendment meets the objectives of LUPAA, in particular it:

8.3.1. Assists sound strategic planning by assisting in the achievement of the relevant Zone Objectives and the Southern Tasmania Regional Land Use Strategy (STRLUS) policies;

8.3.2. 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;

8.3.3. Assists in the provision of a pleasant living and working environment by protecting key townscape and streetscape values; and

8.3.4. Assists in the conservation of places of special cultural value by helping to protect key townscape and streetscape values.

8.4. The amendment does not conflict with the State Policies - Coastal, Agricultural Land and Water Quality.

8.5. S32(e) of the former provisions of LUPAA requires that planning scheme amendments must avoid the potential for land use conflicts in adjacent planning scheme areas. The proposed amendment will not result in any land use conflict.

- 8.6. S32(f) of the former provisions of LUPAA requires that planning scheme amendments must have regard to the impact that the use and development permissible under the amendment will have on the use and development of the region as an entity in environmental, economic and social terms. The amendment is consistent with the STRLUS activity centre policies and provides for an appropriate level of development in the Primary Activity Centre.
- 8.7. Section 30O of LUPAA requires that an amendment to an interim planning scheme is as far as practicable, consistent with the regional land use strategy. The proposed amendment is consistent with the following activity centre policies in the STRLUS:
- 8.7.1. *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;*
- 8.7.2. *AC 1.5 Ensure high quality urban design and pedestrian amenity through the respective development standards;*
- 8.7.3. *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;*
- 8.7.4. *AC 2.2 Achieve high quality design for all new prominent buildings and public spaces in the Primary and Principal Activity Centres.*

9. Community and Stakeholder Engagement

- 9.1. The Council has requested that reports which recommend the initiation of planning scheme amendments address the need to conduct a public meeting or forum to explain the proposed amendments and also outline the explanatory information to be made available. These are addressed below:
- 9.2. It is considered that a public briefing is desirable to further explain the proposed amendments and the consultation outcomes to the public given the current community interest in the issue of building height in the Central Hobart.
- 9.3. The following information will be made available on the website: a copy of this report, the formal amendment documents, explanatory documents and the Building Height Standards Review (L Woolley, 30 June 2018) report.
- 9.4. If the Council endorses the recommendations, it is proposed that the 28 day public exhibition period and briefing(s) would occur after the Christmas/ New Year holiday period.

- 9.5. Council will have the opportunity to recommend to the Tasmanian Planning Commission modifications or refusal of the amendment after the 28 day public advertising period.

10. Delegation

- 10.1. This matter is delegated to the Council.

As signatory to this report, I certify that, pursuant to Section 55(1) of the Local Government Act 1993, I hold no interest, as referred to in Section 49 of the Local Government Act 1993, in matters contained in this report.



James McIlhenny
**MANAGER PLANNING POLICY AND
HERITAGE**



Neil Noye
DIRECTOR CITY PLANNING

Date: 5 December 2018
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Attachment A: Building Height Standards Review Woolley Report
Attachment B: Amendments and Summary
Attachment C: Summary of Submissions
Attachment D: Height Areas Map
Attachment E: Block Analysis for Height Limits
Attachment F: Central Business Zone Extension Assessment
Attachment G: HIPS2015 Central Business Zone Provisions
Attachment H: Sullivans Cove Planning Scheme Deemed to Comply Heights
Attachment I: Instruments of Certification