



27 August 2024

State Planning Office
Department of Premier and Cabinet
GPO Box 123
Hobart TAS 7001

By email to: yoursay.planning@dpac.tas.gov.au

Re: SPP Amendment 5/2024 – Agriculture Worker Accommodation and Land Use Planning and Approvals Amendment Regulations 2024

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank you for the opportunity to provide feedback on the *SPP Amendment 5/2024 – Agriculture Worker Accommodation and Land Use Planning and Approvals Amendment Regulations 2024*. The Institute's policy team has reviewed the materials, and provides the following comments, observations and questions.

From a planning perspective, the Institute has concerns about siting and access/egress in relation to bushfire risk, noting the following:

- There is increased risk of loss of life when there are to be up to 20 persons accommodated (plus any people in a main existing dwelling).
- The Institute questions what would happen in the event of a bushfire, and whether there is the easy ability to safely evacuate from the site given the requirement for access is only legal access (e.g. this might be right of way via a track across a neighbouring property).
- Some agricultural worker situations involve people on temporary work visas being transported in a minibus (not their own vehicles).
- The accommodation can simply be located on the same lot where an existing building or "facility" where the workers are employed. As a lot can be quite large, then the siting for the accommodation could be precarious. What are the requirements for a shelter in say BAL 19, 29, 40 or Flame Zone? There can be up to 20 people on a site and the one single mini-bus is out, or the vehicle access is blocked – where do people shelter? The risk is in the numbers – the more people, then the greater the catastrophic losses.

In addition to this, any buildings would still be required to meet building permit and plumbing provisions according to Council requirements. The fact sheet states that:

Building and plumbing requirements are separate, and in addition, to the planning requirements. You should check with your council whether a building or plumbing permit is needed.

The Institute would like to question whether there are councils who are exempting agricultural worker accommodation from building permit requirements and note:

- Some workers permanently live in this type of accommodation even if not at the one location. They may be rotating between locations on a seasonal basis to perform different work.
- Therefore, dwellings used for worker accommodation should not be exempt from requirements for protecting the health and safety of their occupants. This includes provisions for thermal comfort, condensation, natural light, structural integrity, fire safety, sanitation, hygiene and food preparation provisions.

Thank you for the opportunity to provide feedback on the amendments. Please contact us if you would like to discuss any of the points raised further.

Kind regards,



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