

Tasmanian Planning Policies – Scoping Paper Submissions

No	Name	Position	Organisation
1	Darren Beattie	General Manager	Engineers Australia Tasmania
2	Andrew Heard		
3	Kellie-Ann Jolly	Chief Executive Officer Vic/Tas	National Heart Foundation of Australia
4	Prof Keith Jacobs	Director Housing and Community Research Unit	Housing and Community Research Unit
5	Jiri Lev		Jiri Lev Atelier for Architecture and Urbanism
6	John Stuble	Chief Executive Officer	Hobart City Mission
7	James Norman	General Manager Housing Operations	Centacare Evolve Housing
8	Simon Overland APM	General Manager	Burnie City Council
9	Ian Robertson	Executive Manager	Bethlehem House
10	Jacqui Tyson	Senior Planning Officer	Southern Midlands Council
11	Michael Bishop	Chief Executive Officer	Neighbourhood House Tasmania Inc
12	Sandy Travers	Manager - Office of the CEO	Possability
13	Alison Hetherington	Public Affairs Manager Tasmania	Bicycle Network Tasmania
14	Garry Bailey	RACT Chief Advocacy Officer	The Royal Automobile Club of Tasmania Limited
15	Shane Leonard	Team Leader Accommodation Services	Youth, Family and Community Connections
16	Wendy Hayhurst	Chief Executive Officer	Community Housing Industry Association
17	Dr Cynthia Townley	Policy Officer	Shelter Tasmania
18	Lyndal Byrne	Senior Strategic Planner	Glenorchy City Council
19	Malcolm Wells	Chair	National Parks & Wildlife Advisory Council
20	Felicity Hargraves		



ENGINEERS
AUSTRALIA

Department of Justice
Office of the Secretary
GPO Box 825
HOBART TAS 7001

1 November 2021

Dear Secretary,

RE: Tasmanian Planning Policies Scoping Paper

On behalf of Engineers Australia and the Tasmanian Division Committee, we would like to thank you for the opportunity to respond and we have the following points we would like to make in reference:

- It must enable sustainable development under each of the pillars – economic, environmental, and social
- Any land use strategy must include consideration of infrastructure plans/strategies – sustainable infrastructure development through infill and densification before urban growth. We should be planning for what we see our cities in 50 - 100 years and how we may move toward it.
- Land use plans and transport plans should be integrated and consider what the nature of transport modes and vehicles will be in the future and plan for those now.
- Land use strategy must be based on cost/benefit considerations of physical (roads and utilities) and social (schools, sports & recreation facilities, etc) infrastructure development, etc.
- Consider the future nature of work in which we are seeing decentralisation around activity centres and more people working from home.
- Have a clear assessment of the population that can be sustained.
- Must have considerations for quality of life such as access to recreation facilities, arts and culture
- Consider Climate change effects, plan for and avoid building in floodway's, coastal vulnerability zones, etc.
- Consider intergenerational equity

If you would like to discuss anything feel free to contact us at tasmania@engineersaustralia.org.au

Yours sincerely,

Darren Beattie AffilIEAust
General Manager
Engineers Australia Tasmania

From: [Have Your Say](#)
To: [Planning Unit](#)
Subject: FW: scoping paper for options for new planning policy
Date: Tuesday, 28 September 2021 9:06:05 AM

From: Andrew Heard < >
Sent: Thursday, 23 September 2021 6:45 PM
To: Have Your Say <HaveYourSay@justice.tas.gov.au>
Subject: scoping paper for options for new planning policy

Hi there

It's great to read that options being considered for the Tasmanian Planning Policies (TPPs) include providing cycleways and buildings with accessible entry and parking for bicycles. I hope these common sense improvements will be incorporated.

my ref. <https://www.bicyclenetwork.com.au/newsroom/2021/09/17/planning-changes-could-boost-bike-infrastructure/>

cheers
Andrew Heard, New Town

1 October 2021

Planning Policy Unit
Department of Justice
Tasmanian Government

Sent by email to: haveyoursay@justice.tas.gov.au

To whom it may concern

RE: Submission to the Draft Tasmanian Planning Policies Scoping Paper consultation

We welcome the Tasmanian Government's commitment to planning reform to enhance the quality of life for all Tasmanians. The way we build cities, communities and neighbourhoods underpins people's ability to be active where they live, work, play and learn. Activity-promoting built environments are therefore central to a prosperous, healthy, productive and sustainable Tasmania.

The Tasmanian Planning Policies (TPPs) will shape the future for Tasmania through strategic land use planning. Healthy, active and thriving communities are created and supported with the vision and efficacy of strategic policies like the TPPs.

For 60 years the Heart Foundation has been fighting for Australian Hearts.

We have a vision of an Australia free of heart disease and our mission is to prevent heart disease and improve the heart health and quality of life of all Australians through our work in prevention, support and research.

As part of our work we are committed to seeing more Australians more active, more often.

The Heart Foundation is the leading national organisation advocating for environments that enable active and socially connected communities, and we have a broad range of evidence-based resources to support and inform the TPPs to facilitate these outcomes.

Innovative solutions are urgently required to improve Tasmanians' declining health. Aligning sectoral agendas with initiatives to promote population wellbeing and health equity offers considerable scope for achieving co-benefits in the different sectors. A healthier population produces a better workforce, a sustainable economy, and more resilient communities. Increased population wellbeing may also reduce government spending on health services, freeing up funds for expenditure elsewhere.

FEEDBACK

Our interest in the TPPs centres on the *Liveable Settlements* and *Infrastructure* (roads, car parking, cycleways and walkways; public transport) themes.

Our recommendations are to:

Consult our leading evidence-based resources to support and inform the *Liveable Settlements* and *Infrastructure* (roads, car parking, cycleways and walkways; public transport) TPPs (see Appendix 1). These include:

- *Healthy Active by Design* healthyactivebydesign.com.au
- *Blueprint for an Active Australia* (3rd ed.)
- *What Australia Wants: Living locally in walkable neighbourhoods*
- *Active Travel to School*
- *Good for Busine\$\$*
- *Active Streets: The new normal for public space*

Prioritise physical activity through built environment infrastructure enablers to support healthy and socially connected communities. This includes quality walkways; attractive and amenable destinations; active transport (walking, cycling, scooting, e-mobility); public open space; parks; playgrounds; connected, convenient, accessible and timely public transport options; opportunities to meet and interact in community places that build a sense of place and forge vibrant and active neighbourhoods.

CONTEXT

Creating healthy built environments

Cardiovascular disease (CVD) is a major cause of death in Australia, with 41,849 deaths attributed to CVD in Australia in 2018.² If adults meet the physical activity guidelines, they can reduce their risk of heart disease by as much as 35%.^{3,4}

Where we live, work, play and learn are all key parts of our built environment and can positively or negatively impact how active we are. We know it's easier to be active in your local area if:

- your home is close to shops, schools and services so you can walk or cycle, instead of driving
- there is supportive infrastructure such as footpaths, safe road crossings and cycle paths¹
- a variety of quality spaces are within easy walking distance, such as green areas, plazas, open space and recreational facilities
- there is access to structured and informal activities within public spaces.

The design of the built environment can support us all to be more active and interact with others.

A brisk walk for 30 minutes on most days of the week provides important health benefits, including a reduction in risk of heart disease by up to 35%.

¹ National Heart Foundation of Australia. *Position statement: The built environment and walking*. 2009.

² Australian Bureau of Statistics. *Cause of Death 2018*. 2019, ABS: Canberra.

³ Australian Institute of Health and Welfare. *Australia's health 2016*. 2016, AIHW: Canberra.

⁴ UK Chief Medical Officers. *UK Chief Medical Officer's Physical Activity Guidelines*. 2019. Department of Health and Social Care: London

⁵ National Heart Foundation of Australia. *Blueprint for an Active Australia*. 3rd ed. 2019.

⁶ Australian Bureau of Statistics, *National Health Survey 2017-18*. 2018.

<https://www.abs.gov.au/statistics/health/health-conditions-and-risks/national-health-survey-first-results/latest-release>

We suggest that this high-level overview of the rationale for creating healthy built environments be kept in mind when considering the development of the Tasmanian Planning Policies.

We also suggest that the TPPs make reference to the [Tasmania Statement](#) as an important Tasmanian Government commitment (see Appendix 2).

The need for action to improve health and wellbeing outcomes for all Tasmanians is clear:

- Cardiovascular disease (CVD) is a major cause of death in Australia, responsible for causing one in four (26%) of all deaths
- This means that on average, 118 Australians die from CVD each day, or one person every 12 minutes.
- Physical inactivity contributes over 20% of the burden of heart and blood vessel disease in Australia and so investing in solutions to Australia's rising inactivity levels should be a national priority. Nearly six in 10 adults, three-quarters of seniors and over eight in 10 children and young people are not active enough for good heart health. This ranks Australia among the world's most inactive nations.⁵
- Over four-fifths of the Tasmanian population aged 18 and over is classified as physically inactive (83.2% in Tasmania, 82.7% nationally).⁶
- Sedentary behaviour and insufficient activity are risk factors for poor health conditions including heart disease.

The good news is that physical activity can significantly reduce heart disease risk and the burden of a range of other chronic diseases, as well as improve mental health.⁷

Physical activity, including walking and cycling, plays an important role in reducing the risk of cardiovascular and other chronic diseases⁸ and brings with it a wide variety of benefits for physical and mental health, as well as social and community health.^{9,10}

I look forward to the next iteration of the draft Tasmanian Planning Policies.

Kind regards

Kellie-Ann Jolly
CEO, Vic/Tas
National Heart Foundation of Australia

⁷ National Heart Foundation of Australia. *Blueprint for an Active Australia*. 3rd ed. 2019.

<https://www.heartfoundation.org.au/Activities-finding-or-opinion/physical-activity-blueprint>

⁸ Turrell G. et al. Do active modes of transport cause lower body mass index? Findings from the HABITAT longitudinal study. *J Epidemiol Community Health*. 2018;72:294-301.

⁹ Armstrong T, Bauman AE and Davies J. Physical activity patterns of Australian adults: results of the 1999 National Physical Activity Survey. 2000. Australian Institute of Health and Welfare.

¹⁰ US Department of Health. *Physical activity and health: A report of the Surgeon General*. 1996.

APPENDIX 1

1. Healthy Active by Design (Heart Foundation)

healthyactivebydesign.com.au/

Healthy Active by Design (HAbD) is the leading national design guidance for healthy built environments. It details eight design features and associated guidance that can be incorporated into cities, towns and suburbs to make them healthier and more supportive of active transport. HAbD provides the best-available evidence, practical advice, checklists and case studies to help with the development of healthy neighbourhoods and communities that promote walking, bike riding and an active public life.

2. Blueprint for an Active Australia (Heart Foundation, 3rd edition, 2019)

heartfoundation.org.au/getmedia/6c33122b-475c-4531-8c26-7e7a7b0eb7c1/Blueprint-For-An-Active-Australia.pdf [PDF]

The Blueprint is the result of a collaboration between the Heart Foundation and over 50 of Australia's leading experts on physical activity, health, the built environment, transport and planning. It presents an irrefutable and urgent case for change and evidence-based actions for government and the community that can form the basis of a systems approach to addressing the major public health problem of physical inactivity.

3. What Australia Wants: Living locally in walkable neighbourhoods (Heart Foundation, 2020)

irp.cdn-website.com/541aa469/files/uploaded/What_Australia_Wants_Report_.pdf [PDF]

Overwhelmingly, Australians want to live locally in walkable neighbourhoods, with easy access to fresh, healthy food, and other everyday destinations, according to a survey of 2,895 Australians. Key findings include:

- Just over eight in 10 value having natural elements such as trees and plants.
- Eight in 10 people surveyed feel that having quality public open space close to them is very / somewhat important to them when deciding where to live.
- Nearly eight in 10 people surveyed said it's very / somewhat important to them that they can be active in their local area.

4. Active Travel to School, Urban Design Study (Heart Foundation and Architectus, 2019)

irp.cdn-website.com/541aa469/files/uploaded/Active_Travel_to_School.pdf [PDF]

Active Travel to School is an urban design study report prepared by the Heart Foundation and consultants Architectus. The report outlines how active travel to school benefits communities – and how it can be done. It examines potential street design interventions to improve access for walking and bike riding in three locations (inner urban, urban and suburban).

5. Good for Busine\$\$, The benefits of making streets more walking and cycling friendly (Dr Rodney Tolley & Heart Foundation, 2011)

irp.cdn-website.com/541aa469/files/uploaded/Heart_Foundation_Good_for_Business_2011.pdf

Written by Dr Rodney Tolley, commissioned by Heart Foundation South Australia, *Good for Busine\$\$* outlines economic and other benefits of making streets more walking and cycling friendly.

*'... a well-designed, quality street environment that promotes walking, cycling and public transport is good for business.'*¹⁹

6. Active Streets – The new normal for public space (Heart Foundation, 2020)

https://irp.cdn-website.com/541aa469/files/uploaded/PositionSnapshot_ActiveStreets-the_new_normal_for_public_space_FINAL.pdf

The Heart Foundation has published a position snapshot document calling on local government to ensure all Australians have safe streets for walking and cycling by:

- allocating extra street and footpath space for people walking and cycling to support social distancing
- reducing vehicle speeds on local neighbourhood streets
- automating street crossings to eliminate the need to touch the push buttons.

With increased numbers of people reported to be exercising in their local area, it is important to ensure sufficient space is provided to maintain social distancing (1.5 m in Australia).

Now is the time to rethink how we respond to the 'new mobility' for a healthier and more equitable future.

Read our [Active Streets – the new normal for public space position snapshot](#).

TASMANIA STATEMENT:

Working Together for the Health and Wellbeing of Tasmanians

We acknowledge the ancient history of the Tasmanian Aboriginal people as the First People of lutruwita/Tasmania. For over 2,000 generations, Tasmanian Aboriginal peoples' health and wellbeing has been, and continues to be, based on a deep and continuous connection to family, community and the land, sea and waterways.

We, the Premier's Health and Wellbeing Advisory Council, the Tasmanian Government and the Signatories to this document, will work together to improve the health and wellbeing of Tasmanians.

We recognise the history of leadership, support and work by the community and business sectors and all political parties.

We recognise that:

- The health and wellbeing of all Tasmanians is enhanced by our natural open spaces, fresh food and clean air and water.
- Our economy, our culture and our communities are strong and diverse. We can all reach our potential and have better health and wellbeing if we can participate fully in society.
- We have an opportunity as Tasmania grows, to plan our communities in a way that creates healthy, liveable and connected spaces.

- We need to continue to take practical action on climate change and poverty because they impact the health and wellbeing of current and future generations of Tasmanians.
- Our relationships are our strength. We are already doing a lot but we can achieve more by working together across government and with communities.
- Health and wellbeing is the foundation of a successful and bright future for all Tasmanians.

We commit to:

Involving Tasmanians in our decisions.

Working together across government and with our communities and the business sector on shared priorities.


Making decisions that benefit Tasmanians now and in the future.

Measuring if we are making a difference.

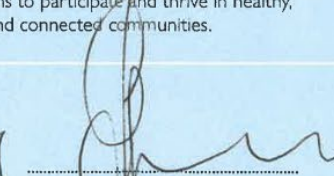
By making this commitment, it will support Tasmanians to participate and thrive in healthy, liveable and connected communities.



Hon Peter Gutwein MP
Premier of Tasmania



Hon Jeremy Rockliff MP
Deputy Premier, Minister for Health,
Minister for Mental Health and
Wellbeing



Mr Graeme Lynch AM
Chair, Premier's Health & Wellbeing
Advisory Council

Signed on 11 August 2021



By email to haveyoursay@justice.tas.gov.au

4th October 2021

Submission from University of Tasmania's Housing and Community Research Unit to the Tasmanian Planning Policies consultation paper

The University of Tasmania's housing and community research unit provides independent research on issues relating to housing and urban policy.

A crucial purpose of Tasmania's planning system is that all Tasmanians will have adequate and appropriate housing that meets their needs. The existing framework of generic planning for residential settlements does not provide for the category of social and affordable housing, which is an essential piece of our diverse housing mix. If social and affordable housing is included in the *Tasmanian Planning Policies*, then Tasmania will have the vital planning mechanisms to ensure everyone can have the home they need.

Social and affordable housing is vital, because it provides safe and stable homes for our clients.

The *Tasmanian Planning Policies Scoping Paper* does not mention social and affordable housing.

We recommend that:

- social and affordable housing is recognised in the *Tasmanian Planning Policies* as a **topic** in its own right under the **Liveable Settlements** heading
- short stay accommodation is added as an **issue** in the **Economic Development** section

Social and affordable housing are described in the *Tasmanian Affordable Housing Strategy 2015-25*:

Social housing: is a broad term used to capture both housing provided by the government (public housing) and non-government organisations (community housing) with below-market rent prices.
Affordable housing: refers to rental homes or home purchases

that are affordable to low income households, meaning that the housing costs are low enough that the household is not in housing stress or crisis.¹

Social and affordable housing is delivered by not-for-profit organisations and the State Government, who provide affordable rental homes for people on lower incomes, using an income-based rent model (no more than 30% of income). This housing remains as an asset in the social housing system in the long term. To improve the delivery of quality affordable homes on an economic model that is different from mainstream residential development, the *Tasmanian Planning Policies* need to include a specific category for social and affordable housing.

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As at August 2021, there are 4 367 applications for social housing, and this number keeps going up.²

When securely housed in homes appropriate to their needs, Tasmanians have a greater opportunity for increased economic and social participation. Land use planning is critical to the development and delivery of a diverse range of housing, consistent with the changing needs the Tasmanian community.³

When social and affordable housing is named in the *Tasmanian Planning Policies*, decision-makers and planners will be able to plan appropriately for the housing needs of the whole community, especially people on lower incomes who need affordable rental homes.

While the inclusion of social and affordable housing in the *Tasmanian Planning Policies* is our main priority, we also note the growth in short stay accommodation is one of the factors contributing to the housing crisis in Tasmania. More and more residential properties are converted to short stay accommodation in all regions of Tasmania.⁴ The growth in short stay accommodation means that it will continue to impact current and future housing and community needs. We suggest that it is appropriate to include short stay accommodation in the scope of the *Tasmanian Planning Policies*.

Thank you for the opportunity to contribute to the consultation on the *Tasmanian Planning Policies Scoping Paper*. We urge you to include social and affordable housing in the *Tasmanian Planning Policies* as an essential step towards ensuring that our clients, and all

¹ https://www.communities.tas.gov.au/_data/assets/pdf_file/0014/30254/AHS_Strategy_Final.pdf

² https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/reporting

³ https://planningreform.tas.gov.au/_data/assets/pdf_file/0003/628239/Tasmanian-Planning-Policies-and-Overview-Consultation-Draft-April-2017.pdf

⁴ <https://cbos.tas.gov.au/topics/housing/short-stay-accommodation-act>

Tasmanians have the homes they need. It will bring a vital planning focus to this essential housing sector.

The *Tasmanian Planning Policies Scoping paper* does not mention social and affordable housing or short stay accommodation. This needs to change. We urge you to update the draft *Tasmanian Planning Policies* to include social and affordable housing and short stay accommodation.

For further information, please contact

Prof. Keith Jacobs
Director Housing and Community Research Unit.
Email

Department of Justice
Office of the Secretary
GPO Box 825
HOBART TAS 7001

Submissions on Scoping Paper for the draft Tasmanian Planning Policies
by **Jiri Lev Atelier for Architecture and Urbanism**

4 October 2021

Dear Sirs and Madams,

Atelier Jiri Lev is a private architecture practice in Tasmania spearheading change for sustainability and resilience in the built environment. We're the founders of *Archicamp* — an architecture festival and field school, the founders of *Architects Assist* — an initiative of 600 architecture firms providing disaster recovery assistance pro bono, the founders of *Cohousing Architecture Australia* — sustainable housing consultancy, the founders of the *Forty Wall House* — a rapid prototyping and testing facility for sustainable materials.

I myself am a registered architect in Tasmania and New South Wales, urbanist and heritage advisor, also acting as expert witness in legal proceedings.

In general, we agree with the scope of proposed TPP topics and issues, however would recommend the addition of the topic and issues of *Cultural Continuity* and the issue of *Ecovillages* under the Liveable Settlements topic.

Cultural Continuity

Why tourists flock to those magical, picturesque European towns and villages and never to the Australian suburbs?

Local economies flourish in places with strong local character and cultural identity, with consistent, highly contextual design language that has been retained across ages and architectural periods.

Until the beginning of the 20th century, construction materials were limited to those available locally. By their physical properties those materials informed highly localised architectural styles. In one region, stone construction enabled only narrow doors and windows and for larger spans required complex arches. Elsewhere, abundant timber resulted in wide spanning but not very tall buildings.

Since the beginning of the 20 century, the increasing palette of readily available, expedient, industrially produced materials and technology saw localised architectural styles and character gradually disappear. This, together with other contributing factors, lead to the near-total loss of visually evident local identity, as may be readily observed in contemporary Australian towns and suburbs.

A 1960 book *The Australian Ugliness* looks critically at attempts to mitigate the anonymity and lack of beauty in modern architecture by the addition of meaningless features and visual distractions.

Now, 60 years later, little has changed for better: Surrounded by soulless, anonymous architecture that copies global trends, we continue simulating cultural identity and beauty by the insertion of so-called public art of dubious merit: these typically super-sized, brightly coloured, expedient objects can often only be distinguished from a construction error, ruin or vandalism by an explanatory plaque.

Australian building industry was recently taken by surprise with widespread material shortages. Most of the construction timber comes from the Baltic region of Europe. Other materials are produced in China and even Australian-made products rely on overseas supply chains.

Our architectural practice experienced minimum disruptions as we deliberately limit our design choices to materials produced in the region where we are building. Local materials are also usually cheaper. Instead of increasing the complexity of our designs, we simplify them, often reinventing and interpreting traditional local materials and methods.

This approach usually results in more regionally and climatically appropriate, sustainable, resilient and naturally beautiful buildings and built environment.

Tasmania is blessed with a rich tapestry of historic buildings. Naturally, our best preserved old suburbs and towns also perform best in the socioeconomic metrics. Those are the places where we want to visit, work, study and live.

In our opinion Tasmania must not only protect its heritage, but build upon it, continuing that, which is best about it. This will result in the gradual return of distinctly Tasmanian built environment and the culture which emanates from it.

Confusingly, cultural diversity as a positive value is also best enjoyed upon the backdrop of cultural continuity: even children know, that when all colours are evenly mixed together, the result is plain grey.

Cultural continuity in the built environment represents a secure path towards sustainability, resilience, diversity and cultural wealth.

The topic and issues we propose for addition follow:

TPP Topic	Issues
Cultural Continuity	Local character and endemic design language continuity
	Preferred local construction materials, methods and technology
	Public art procurement principles and review

Ecovillages

In the midst of the catastrophic 2019-20 Australian bushfires we started Architects Assist, an initiative of 600 architecture firms providing pro bono disaster recovery assistance to the victims. As part of the initiative we undertook a two-month tour across the affected regions in six states.

We noticed, that most of the land that burned down last year was ex-pastoral or ex-forestry monocultural regrowth or badly neglected native forest.

While back-burning and understory clearing are useful tools at our disposal, Aboriginal cultural burning or occasional lighting-induced fires alone can not sufficiently address a problem that has fundamentally shifted over the past two centuries: the climate has changed as well as the mode of our land occupancy.

From our comparison of the Australian outback with regions of similar climatic and geomorphologic conditions in Europe and Asia, one key difference stands out: what other nations refer to lovingly as the *countryside*, we think of as the *outback* or *bush*.

The word outback is undoubtedly a relic from the colonial period, a time when everything outside the European settlements was deemed remote and unimportant. Quick fix solutions have been thrown at the largely misunderstood and under-appreciated country one after another: invasive plant species, prolific rodents, predators, chemical herbicides and fertilisers. Each of these resolved one issue by introducing others.

Meanwhile, what little we used to have of a well-cared-for countryside in the 19th century we mostly lost in the 20th century due to the rise of motorised transport. Many of our villages now exist by locality names only and once cultural landscapes crafted for permanent occupation and resilience have fallen into disarray.

We believe that we should reinstate and introduce many new, compact, sustainable small settlements, villages and hamlets across the land. These urban forms would be surrounded by bands of productive, cultural land and the country between would be preserved in its natural state, though painstakingly maintained, utilising the best of traditional and contemporary knowledge available.

Such mode of land occupancy may have been difficult in the past, but with currently available technology, these urban forms are entirely practical and economical possibility. This would also address many current issues such as the urban sprawl, housing affordability, traffic congestion and social alienation.

We propose a planning reform that would enable and encourage shared rural land occupancy in the form of compact, sustainable, resilient, vibrant ecovillages with local food production, business and non-polluting small-scale industry.

TPP Topic	Issues
Liveable Settlements	Ecovillages and rural land shared occupancy

Summary

We generally support the scope of proposed TPP topics and issues but call for the the addition of the topic and issues of *Cultural Continuity* and the issue of *Ecovillages*.

We support wholeheartedly the integration of climate change into all relevant TPPs.

We consider the proposed TPP template appropriate and a useful in providing guidance but suggest that **compliance is mandatory and monitored** throughout the planning process and all its individual points.

Sincerely yours

Jiri Lev, architect, for Jiri Lev Atelier of Architecture and Urbanism

5 October 2021

Hobart City Mission Inc.

Submission: Tasmanian Planning Policies consultation paper

Via email: haveyoursay@justice.tas.gov.au

Hobart City Mission is a not-for-profit organisation and charity providing a range of services to people in need in Southern Tasmania. Some of the services we offer is specialist homelessness services, a number of self-funded supported accommodation facilities (SAF's) and we manage a number of community tenancies, both owned by HCM and by other organisations, including government.

We believe it is vital that the Tasmanian planning system contemplates the needs of all Tasmanians to ensure they have adequate and appropriate housing, that is suitable to meet their needs. We feel the existing framework does not adequately allow for the needs of people who rely on social and affordable housing as part of the diverse housing mix that is necessary to meet the needs of all in our community. We would like to see this taken into consideration as part of the Tasmanian Planning Policies.

In the current real estate market, the reality is that more and more people are unable to afford a "fair market rent" when considering the level of income they are trying to live on. In most instances the rent they would look to pay in the private rental market would be more than their entire pension/income. The flow on effects of people not being able to afford rent only puts increased pressure on programs such as Safe Space and Emergency Relief as people try to make ends meet.

It concerns us that the Tasmanian Planning Policies Scoping Paper makes no mention of social and affordable housing.

We would like to request that:

- Social and affordable housing is acknowledged in the Tasmanian Planning Policies as a "topic" in its own right, under the "Liveable Settlements" heading; and
- Short stay, or AirBNB accommodation is added as an "issue" in the "Economic Development" section.

When securely housed, Tasmanians have a greater opportunity for increased economic and social participation in their community.

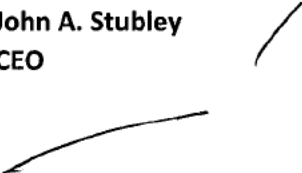
How land is used, and allowed to be used, is critical to the development and delivery of a diverse range of housing, consistent with changing needs of the Tasmanian community and impacts their ability to engage with community.

Whilst we see reference to social and affordable housing in the Policies as critical, we are also concerned about the growth in short stay accommodation. Conversion of "homes" to short stay accommodation directly impacts the availability of long-term housing for Tasmanians. We are making people homeless, to make way for tourists! This is not a fair or equitable situation.

We appreciate the opportunity to contribute to this process, and we strongly request social and affordable housing is taken into consideration when drafting the Tasmanian Planning Policies.

Yours Sincerely,
HOBART CITY MISSION

John A. Stubley
CEO



4th October 2021

Submission from Centacare Evolve Housing to the Tasmanian Planning Policies consultation paper

Centacare Evolve Housing is a nationally registered Tier One Community Housing Provider that owns or manages over 2,500 properties throughout Tasmania. Many tenancies are classified as social housing and are allocated from the Housing Register. We are also building many new homes through an extensive building program that will add over 700 new properties to the social and affordable housing markets over the next few years. In addition, we support a number of government initiatives that prioritise additional housing access – e.g. through Rapid Rehousing and Private Rental Incentive Scheme.

A crucial purpose of Tasmania's planning system is that all Tasmanians will have adequate and appropriate housing that meets their needs. The existing framework of generic planning for residential settlements does not provide for the category of social and affordable housing, which is an essential piece of our diverse housing mix. If social and affordable housing is included in the *Tasmanian Planning Policies*, then Tasmania will have the vital planning mechanisms to ensure everyone can have the home they need.

Social and affordable housing is vital, because it provides safe and stable homes for all Tasmanians. Centacare Evolve Housing's extensive building program will result in over 700 new homes for Tasmanian families in coming years, and our maintenance team are continually overseeing major upgrades and refurbishments to existing homes. By increasing both the quality and supply of available housing options, our property development work is having a positive impact on the lives of many Tasmanians.

As well as providing a comprehensive and responsive tenancy management service, Centacare Evolve Housing has a strong commitment to enhancing the wellbeing of its tenants and the communities in which we work. Underpinned by a social impact approach, we engage tenants and the community to build positive partnerships and support capacity building Initiatives like our Build up Tassie and Neighbourhood Leadership Programs.

The *Tasmanian Planning Policies Scoping Paper* does not mention social and affordable housing. We recommend that:

- social and affordable housing is recognised in the *Tasmanian Planning Policies* as a **topic** in its own right under the **Livable Settlements** heading
- short stay accommodation is added as an **issue** in the **Economic Development** section

Social and affordable housing are described in the *Tasmanian Affordable Housing Strategy 2015-25*:
Social housing: is a broad term used to capture both housing provided by the government (public housing) and non-government organisations (community housing) with below-market rent prices.
Affordable housing: refers to rental homes or home purchases that are affordable to low income households, meaning that the housing costs are low enough that the household is not in housing stress or crisis.¹

¹ https://www.communities.tas.gov.au/data/assets/pdf_file/0014/30254/AHS_Strategy_Final.pdf

Social and affordable housing is delivered by not-for-profit organisations and the State Government, who provide affordable rental homes for people on lower incomes, using an income-based rent model (no more than 30% of income). This housing remains as an asset in the social housing system in the long term. To improve the delivery of quality affordable homes on an economic model that is different from mainstream residential development, the *Tasmanian Planning Policies* need to include a specific category for social and affordable housing.

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As at August 2021, there are 4 367 applications for social housing, and this number keeps going up.²

When securely housed in homes appropriate to their needs, Tasmanians have a greater opportunity for increased economic and social participation. Land use planning is critical to the development and delivery of a diverse range of housing, consistent with the changing needs the Tasmanian community.³

When social and affordable housing is named in the *Tasmanian Planning Policies*, decision-makers and planners will be able to plan appropriately for the housing needs of the whole community, especially people on lower incomes who need affordable rental homes.

While the inclusion of social and affordable housing in the *Tasmanian Planning Policies* is our main priority, we also note the growth in short stay accommodation is one of the factors contributing to the housing crisis in Tasmania. More and more residential properties are converted to short stay accommodation in all regions of Tasmania.⁴ The growth in short stay accommodation means that it will continue to impact current and future housing and community needs. We suggest that it is appropriate to include short stay accommodation in the scope of the *Tasmanian Planning Policies*.

Thank you for the opportunity to contribute to the consultation on the *Tasmanian Planning Policies Scoping Paper*. We urge you to include social and affordable housing in the *Tasmanian Planning Policies* as an essential step towards ensuring that all Tasmanians have the homes they need. It will bring a vital planning focus to this essential housing sector.

For further information, please contact

James Normán

General Manager Housing Operations

² https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/reporting

³ https://planningreform.tas.gov.au/_data/assets/pdf_file/0003/628239/Tasmanian-Planning-Policies-and-Overview-Consultation-Draft-April-2017.pdf

⁴ <https://cbos.tas.gov.au/topics/housing/short-stay-accommodation-act>

PLEASE QUOTE

Your Ref:

Our Ref: 16/9/1-06

Enquiries: SO:PE

80 Wilson Street, Burnie Tasmania
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We value your feedback on our service.
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5 October 2021

Department of Justice
Office of the Secretary
GPO Box 825
HOBART TAS 7001

Email: haveyoursay@justice.tas.gov.au

A hard copy will not be sent unless requested

Dear Secretary

Tasmanian Planning Policies – Scoping Paper

Thank you for the opportunity to provide comment on the scope and structure of the proposed Tasmanian Planning Policies

The Tasmanian resource management and planning system came into full effect from 1994 with an intention to establish a shared responsibility, a consultative and inclusive approach, and an integrated policy and regulatory arrangement to provide for the fair, orderly and sustainable use and development of air, land and water resources and facilitate economic development in a manner that maintains their life supporting properties.

The RMPS introduced the land use planning processes of Tasmania as set out in the *Land Use Planning and Approvals Act 1993*.

By definition and statutory inclusion, Tasmanian Planning Policy is an element of land use planning process.

The objectives for the process are set out in the Act. There is a requirement for sound strategic planning and coordinated action by State and local government to set objective, policy and control instruments for the use, development and protection of land. Such instruments are to consider the social, economic and environmental effects of land use and development, and are to be easily integrated with environmental, social, economic, conservation and resource management policies and approvals requirements at State, regional and municipal levels.

To date, the best and only comprehensive expression of land use policy external to that of individual municipal areas exists in the three regional land use strategies. However, each strategy was independently prepared in the absence of informing State policy and instruction on purpose, form and content. Forgivably, these instruments have not meet popular and statutory expectation.

There has been a long and sustained silence from successive State governments on the key strategic considerations and universal policy outcomes intended for the land use planning processes.

The Tasmanian Planning Policies provide opportunity to fill that silence with clear, certain and simple statements of intent on the strategic considerations for which land use planning processes have a statutory purpose.

The TPPs are bound in purpose and content to the objectives in Schedule 1 Part 1 and Part 2 of the Act, and by any specification contained within its provisions. In this regard they should be instrumental in sound strategic planning.

The purpose of strategy is to provide direction for how the land use planning processes are to be employed in order to achieve the statutory objectives.

The progression of any review of regional land use strategy must be deferred pending agreement and implementation on Tasmanian Planning Policy. To do otherwise will be to compound the existing disconnect between State interests and the application of State Planning Provisions within each municipal area.

The creation of Tasmanian Planning Policy will also necessitate review of the State Planning Provisions to ensure regulatory requirements align with and are appropriate to delivery of strategic outcomes.

The Scoping Paper seeks response on a number of matters.

Council provides the following in response.

a) Scope of the proposed TPP Topics

It is difficult to identify a definitive list of subject areas for content of the TPPs.

The statutory objectives for the land use planning process and the particular requirements in section 12(2) of the *Land Use Planning and Approvals Act 1993* each invoke a broad field of environmental, social and economic protection and promotion.

The range of topics and issues potentially addressed by the TPPs is both sizeable and capable of diverse description.

The endeavour should be to provide high level strategic principles on a manageable and digestible number of topics rather than attempt an exhaustive coverage of the subject areas typically associated with land use planning.

It may be more appropriate to depart from the conventional terminology of planning as is suggested in the Table at page 9, and to instead define TPP topics by strategic purpose aligned to the objectives for the planning process.

In this regard the TPPs could provide for –

- **Fair, orderly and sustainable use and development of land** - sound strategic planning and knowledge based decision making

- **Environmental responsibility** – considering the effects of use and development on the environment, and safeguarding the life supporting properties of air, land and water
- **Health, safety and convenience** – pleasant, efficient and safe places in which to live, work and visit
- **Economic activity** – facilitate opportunity for business, commerce and industry
- **The things that matter** – protection and conservation of places of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value
- **Public infrastructure** - orderly provision, co-ordination and protection of public utilities and other facilities for the benefit of the community
- **Land capability** – balancing what is possible with what is required

In response to the list at page 9.

Structure and presentation of the TPPs

It is essential that the TPPs are not structured, presented, and applied as discrete instruments.

The entirety of the strategy and a balance between its parts is more important than its individual elements. It is essential that the relationship between each TPP topic is clearly established and delivered.

Use of the plural “Policies” in reference to Tasmanian Planning Policy may be a disservice in that it suggests distinction rather than cohesion.

In this regard there is need to include a topic which deals with the purpose and structural arrangements of the TPPs, and the manner in which they are to be integrated and considered in the preparation of regional land use strategy, State Planning Provisions, and Local Provision Schedules (in that order of temporal importance).

There must be an obvious and necessary nexus between the rules contained in the SPPs and the TPPs. The SPPs must follow the TPPs, and not inform them.

There is limited value in strategy and policy unless there is also a confidence in the process for preparation and review, and a commitment to promote and protect implementation.

Such a proposition is entirely consistent with Section 12B(3) of the Act; and is not adequately captured under the ‘Public engagement in the planning process’ topic in the table at page 9 of the Scoping Paper.

Economic Development

Council does not agree there should be an “Economic Development’ topic.

Land use planning cannot achieve economic development; but it can assist to create the environment within which economic development is possible.

Policies and provisions for economic development validly exist external to the land use planning process. It is the role of land use planning to respond to such policies and facilitate opportunity to use land in a manner consistent with the desired outcomes for economic development.

Land use planning may identify land appropriate in scale and location to provide opportunity for use and development in a range of business, commercial and industrial activity. It may also intentionally prevent business, commercial and industrial activity in locations with a higher capability for other use, where natural or cultural values warrant protection, and where risk for exposure to natural and man-made hazard is unacceptable.

Multiple factors influence economic development outcomes, including many of the considerations which are identified within other proposed TPP topics.

Council prefers the term “Economic Activity” to provide particular focus on activity; and to avoid suggestion the TPPs are an instrument for economic development.

Land Supply and Demand

Land use planning has the capacity to assist supply through the zoning of land and the regulations which apply for the nature and intensity of use and development.

However, while it cannot create demand, it must be responsive to demand.

The TPPs should address the strategic considerations relevant to the pace and timing of actions which provide opportunity to use and develop land.

Natural Values

A distinction can be made between environmental protection strategies necessary to avoid threat and harm to the life supporting properties of air, land and water; and strategies to recognise the ability of natural settings and landscapes to contribute to the attraction and enjoyment of place.

b) Scope of proposed TPP Issues

Again, the scope and number of issues is potentially broad.

The nature of the issues to be addressed under TPP should add detail to the topic and set up the intentions which are to be spatially addressed by regional land use strategy and which are to inform the rules contained in the SPPs and by an LPS.

c) Inclusion of Climate Change and COVID

Climate change is a factor influencing the manner in which land may be used and developed.

Land use planning has a capacity to assist to both mitigation and adaptation in response to known and reasonably predictable cause and consequence.

Planning considerations for matters such as health, safety and wellbeing, protection of natural systems and values, identification and provision of land for agriculture, location of infrastructure, and management of natural hazards are all influenced by climate change.

The planning response to such considerations cannot be separately identified. Rather, they must be acknowledged as factors which influence land use strategy and inform regulatory response.

COVID 19 is a public health crisis with economic, social and environmental impact, not all of which may be considered as negative.

The PESRAC recommendations in response to COVID 19 are not public health measures. Rather, they advocate significant shift in how the State does business, and include matters for which land use planning may assist delivery.

As with climate change, responses to COVID 19 are best embedded within the strategies and actions for a responsible and reasoned future.

d) Proposed TPP Template

The discussion paper suggests the TPP are to provide the 'what', 'where' and 'how' of the land use planning process.

Critically, the discussion paper does not suggest the TPP are to disclose 'why'.

The TPPs are to be the first in a hierarchy of policy and prescription culminating in the rules implemented and enforced through a planning scheme.

Much of the criticism directed at land use regulation stems for the absence of clear and defensible reason for such rules.

It is essential that each TPP document contain sufficient information and references to clearly and certainly explain both the need and the foundation for each strategy and for each of the objectives for delivery.

The example document for Hazards and Risks in Appendix 1 does not adequately explain or express its purpose.

There is no explanation for the nature and origin of the risks to be managed, and for why management is necessary.

The objective is misdirected. The proper purpose of the strategy is to protect the health and safety of people, property and the environment against exposure to harm from hazardous use and legacy contamination.

The strategy should be to manage land and development to avoid an unacceptable level of risk for harm.

The strategy should also identify the role of land use planning in the context of other policy and regulatory mechanisms for managing hazardous use and contaminated land.

The implementation measures in the example are narrowly focused and prescriptive.

The role of RLUS is to–

- identify land where there is an existing level of contamination on land or water or the risk of exposure to contamination or harmful emissions; and
- identify land where it may be appropriate to cluster hazardous use without likely risk of harm to natural and human systems
- identify the measures which may be appropriate to avoid, mitigate and manage likely risk of harm from hazardous use and contaminated land, including spatial application of SPP zones and codes

The role of statutory planning is to –

- define hazardous use and development as any activity which is likely to emit harmful or nuisance emissions
- define contaminated land
- provide use and development standards to avoid, mitigate or manage likely risk of harm from hazardous use or from exposure to contaminated land
- identify the information which is necessary in order to satisfy the standards

Council appreciates the opportunity to comment on the Scoping Paper and trusts its submissions will assist an early and constructive completion of Tasmanian Planning Policy.

Please do not hesitate to contact us should you require further comment or clarification.

Yours faithfully

Simon Overland APM
GENERAL MANAGER

TASMANIAN PLANNING POLICIES SUBMISSION

I am the Executive Manager of Bethlehem House, Hobart, which is run by Saint Vincent de Paul as a not-for-profit crisis centre for homeless men in Tasmania. We provide accommodation and support to homeless men in crisis, as well as those on Court Mandated Diversion sentences and/or parole.

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As of August 2021, there are 4 367 applications for social housing, and this number keeps going up.¹

When securely housed in homes appropriate to their needs, Tasmanians have a greater opportunity for increased economic and social participation. Access to adequate housing, is essential to prevent the revolving door scenario for so many in crisis; every time they move forward, they are knocked back by having nowhere to go. In some cases, this means back into the justice system, i.e., prison. There are a vast number of studies showing how much more expensive placing someone in custody is than providing housing support, not just in simple terms, but in the ripple effect to those closest to the individual and reaching out to society at large. Land use planning is critical to the development and delivery of a diverse range of housing, consistent with the changing needs the Tasmanian community.²

When social and affordable housing is named in the *Tasmanian Planning Policies*, decision-makers and planners will be able to plan appropriately for the housing needs of the whole community, especially people on lower incomes who need affordable rental homes.

While the inclusion of social and affordable housing in the *Tasmanian Planning Policies* is our main priority, we also note the growth in short stay accommodation is one of the factors contributing to the housing crisis in Tasmania. More and more residential properties are converted to short stay accommodation in all regions of Tasmania.³ The growth in short stay accommodation means that it will continue to impact current and future housing and community needs. We suggest that it is appropriate to include short stay accommodation in the scope of the *Tasmanian Planning Policies*.

I believe that **The *Tasmanian Planning Policies Scoping Paper* SHOULD/MUST mention social and affordable housing.**

- social and affordable housing should be recognised in the *Tasmanian Planning Policies* as a topic in its own right under the **Livable Settlements** heading. And that **every** future development plan should include considerations for all levels of affordability.

¹ https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/reporting

² https://planningreform.tas.gov.au/_data/assets/pdf_file/0003/628239/Tasmanian-Planning-Policies-and-Overview-Consultation-Draft-April-2017.pdf

³ <https://cbos.tas.gov.au/topics/housing/short-stay-accommodation-act>

- short stay accommodation is added as an issue in the **Economic Development** section. Although short stay accommodation may, on paper, bring economic benefit to the areas it is in, the benefit is frequently transient as owners are often out of state investors, with no intention of using their investment to the benefit of the local community. Privately owned second or holiday homes by out of state owners are increasingly making certain areas completely unaffordable for locals.
- Without a continuum of housing choices available people are increasingly forced to live in crisis with no hope of ever improving their chances of becoming economically or socially engaged. We have the classic example of this at Bethlehem House where one of our residents was with us for 8 years before we were able to access a suitable move for him.

The *Tasmanian Planning Policies Scoping paper* does not mention social and affordable housing or short stay accommodation. This needs to change. We urge you to update the draft *Tasmanian Planning Policies* to include social and affordable housing and short stay accommodation.

From: [Have Your Say](#)
To: [Planning Unit](#)
Subject: FW: Tasmanian Planning Policies - Scoping Paper
Date: Thursday, 14 October 2021 2:41:51 PM

From: Jacqueline Tyson < >
Sent: Thursday, 14 October 2021 2:28 PM
To: Have Your Say <HaveYourSay@justice.tas.gov.au>
Cc

Subject: Tasmanian Planning Policies - Scoping Paper

Good afternoon,

Thank you for providing the opportunity to respond to the Scoping Paper for the draft Tasmanian Planning Policies.

This response is on behalf of Southern Midlands Council.

Firstly, Council is very pleased to see progress on the development of state wide planning specific policies to guide the future development of our State. The effectiveness of planning reform over the past several years has been hindered by the lack of such overarching policy to guide the regions and Councils in their efforts.

Council is largely supportive of the range of TPP Topics appearing in the scoping paper.

One thing that Council would like to see across the policies is to ensure that the objectives/standards set are realistic and achievable in rural and regional locations. For example small communities still need quality opportunities for recreation and open space or access to public transport - however that will look different than it does in the city. When the objectives/standards are out of alignment with what is realistic in a regional/rural location it can hinder development and/or mean that the type of opportunities and solutions that are appropriate are missed.

There is an opportunity to use the TPP's to achieve a standard level of development amenity for things like multiple dwelling and subdivision developments. This can apply to things like landscaping, road construction, underground servicing etc. While many Council's adopt technical standards addressing these things I think it would be beneficial to include with the Liveable Settlements area.

We look forward to further opportunity to comment as the draft policies are progressed,

Regards

Jacqui Tyson
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Southern Midlands Council
85 Main Street

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By email to haveyoursay@justice.tas.gov.au

October 2021

Submission from Neighbourhood Houses Tasmania Inc regarding the Tasmanian Planning Policies (TPPs) consultation paper

Neighbourhood Houses Tasmania Inc. is the Peak body representing the 35 Tasmanian Neighbourhood Houses. Neighbourhood Houses are places where people come together and find support, belonging and purpose as they work together to support their local community and make a real difference in people's lives. Many people seek support to find accommodation through their Neighbourhood House where every complexity is supported by advocacy and referral to the most suitable agency or local service.

Houses are run by the community, for the community.

Neighbourhood Houses Tasmania applauds the improvement of the Tasmanian Planning Policies and believes that the system may prevent local and state government tensions in years to come.

Climate Change should be central to any development of Tasmanian Planning Policy as it directly impacts on every community. Neighbourhood Houses have played and continue to play an integral role in community recovery after natural disasters. Planning Policies must reflect insight into the impact of increased extreme weather and natural events. Food security is impacted upon by climate and is a current and continuing issue in Tasmania which was also highlighted the PESRAC report. Neighbourhood Houses play a significant role in both emergency relief and building local food producing capacity through their leadership in the community garden sectors. The TPPs need to consider high-level impact on Tasmanians' access to healthy and locally grown food at an affordable price.

As Neighbourhood Houses are tenants of either local or state governments yet rely on State Government funding the inherent tensions of having different landlords apply. Most Neighbourhood Houses in Tasmania are in areas where there is a higher density of publicly funded or supported Housing, so it is important that the Planning Policies reflect the need for place-based community participation.

Neighbourhood Houses are also concerned that there appears to be a lack of emphasis on social and affordable housing, and they believe that the TPPs could reflect this. Planning for ongoing supply of affordable housing for vulnerable people is complex and dependant upon land availability, capital funding and many other variables.

The *Tasmanian Planning Policies Scoping Paper* does not mention social and affordable housing and nor do they reflect the ongoing critical nature of community participation in place-based approaches.

We recommend that:

- social and affordable housing is recognised in the *Tasmanian Planning Policies* as a **topic** in its own right under the **Liveable Settlements** heading
- short stay accommodation is added as an **issue** in the **Economic Development** section

Social and affordable housing are described in the *Tasmanian Affordable Housing Strategy 2015-25*:

Social housing: is a broad term used to capture both housing provided by the government (public housing) and non-government organisations (community housing) with below-market rent prices.

Affordable housing: refers to rental homes or home purchases that are affordable to low-income households, meaning that the housing costs are low enough that the household is not in housing stress or crisis.¹

Social and affordable housing is delivered by not-for-profit organisations and the State Government, who provide affordable rental homes for people on lower incomes, using an income-based rent model (no more than 30% of income). This housing remains as an asset in the social housing system in the long term. To improve the delivery of quality affordable homes on an economic model that is different from mainstream residential development, the *Tasmanian Planning Policies* need to include a specific category for social and affordable housing.

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As at August 2021, there are 4 367 applications for social housing, and this number keeps going up.²

When securely housed in homes appropriate to their needs, Tasmanians have a greater opportunity for increased economic and social participation. Land use planning is critical to the development and delivery of a diverse range of housing, consistent with the changing needs, the Tasmanian community.³

¹ https://www.communities.tas.gov.au/_data/assets/pdf_file/0014/30254/AHS_Strategy_Final.pdf

² https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/reporting

When social and affordable housing is named in the *Tasmanian Planning Policies*, decision-makers and planners will be able to plan appropriately for the housing needs of the whole community, especially people on lower incomes who need affordable rental homes.

There has been an exponential increase in demand for affordable housing as more people on middle incomes are also challenged by increasing rental costs.

While the inclusion of social and affordable housing in the *Tasmanian Planning Policies* is our main priority, we also note the growth in short stay accommodation is one of the factors contributing to the housing crisis in Tasmania. More and more residential properties are converted to short stay accommodation in all regions of Tasmania.⁴ The growth in short stay accommodation means that it will continue to impact current and future housing and community needs. We suggest that it is appropriate to include short stay accommodation in the scope of the *Tasmanian Planning Policies*.

Thank you for the opportunity to contribute to the consultation on the *Tasmanian Planning Policies Scoping Paper*. We urge you to include

- social and affordable housing in the *Tasmanian Planning Policies* as an essential step towards ensuring that our clients, and all Tasmanians have the homes they need.
- clearly reflected of need for place-based and community participation
- consideration of food security in any developments
- climate change impacts

For further information, please contact

Michael Bishop

Chief Executive Officer

ceo@nht.org.au

³https://planningreform.tas.gov.au/_data/assets/pdf_file/0003/628239/Tasmanian-Planning-Policies-and-Overview-Consultation-Draft-April-2017.pdf

⁴<https://cbos.tas.gov.au/topics/housing/short-stay-accommodation-act>

Possability

By email to haveyoursay@justice.tas.gov.au

15 October 2021

Submission from Possability Group to the Tasmanian Planning Policies consultation paper.

Possability Group is the largest provider of disability services in Tasmania, supporting approximately 1100 Australians with disability. Possability is a not-for-profit organisation, and our vision is of a world where everyone has the opportunity to pursue their potential.

We're passionate about Australia's commitment to the United Nations Convention on the Rights of Persons with Disabilities (CRPD) and believe freedom and independence are fundamental human rights. People with disability have a right to make decisions about and have access to safe and appropriate housing—as this forms part of Australia's commitment to the UN CRPD (United Nations, 2006).

Social and affordable housing as a topic in its own right under the Tasmanian Planning Policies is particularly critical for people with disability for the following reasons.

- People with disability are more often classed as vulnerable and marginalised, and many find themselves further disabled by poor housing conditions. They are much more likely to be living on a low income (47.9%) compared with those without disability (29.2%), with the highest proportion on low income being people with intellectual (77.3%) and psychosocial (60.9%) impairments (Aiken, et al., 2019).
- The proportion of people with disability in unaffordable housing is greater than those without disability, and they are more likely to be dissatisfied with their homes and the neighbourhoods in which they live (Aiken, et al., 2019).
- Many people with disability cannot be generalised into the overall population as they can have very different needs and require differentiated responses.
- People with intellectual and psychological disabilities are especially vulnerable to homelessness. One in five are classified as having an extreme level of homelessness risk (Beer, Baker, Lester and Daniel, 2019). This has been further supported by Aitken et. al (2019), who found that people with an intellectual disability were more than 10 times likely to be in public rented accommodation than those without disability, while the incidence was six times greater for all people with disability.
- The NDIS provides funding for Specialist Disability Accommodation (SDA) for a very small proportion of NDIS participants. This means the vast majority still rely on mainstream housing options. In fact, the NDIS has increased the demand for affordable and accessible housing as participants over the age of 25 and living with

Possability

parents, in group homes, in housing affordability stress or homelessness have sought alternatives. This means participants are reliant on their Disability Support Pension with rent assistance; this often means they need to live with people they would not otherwise choose and in areas where they would rather not live. This limits their family and social connections, impacting on well-being and limiting potential.

- Many people with disability (including psychosocial disability) require differentiated, tailored responses. Housing pathways are not generally understood or appropriate for a variety of reasons, including low literacy levels, cognitive capacity and the ability to understand the processes, the need for supported decision-making and access to buildings for those with limited mobility.
- People with disability experience higher rates of social exclusion and loneliness. Loneliness is a significant driver of poor well-being. Compared to the population without disability, people with disability have fewer friends, less social support and are more socially isolated.
- Some cohorts of people with disability, such as those with Autism Spectrum Disorder or psychosocial disability, require consideration of sensory needs when developing design principles. This might affect the size and positioning of the dwelling, neighbourhood environment and access to recreational facilities and proximity to noise.

The Tasmanian Planning Policies unfortunately do not adequately address these unique challenges faced by people with disability.

We recommend that:

- Social and affordable housing is recognised in the Tasmanian Planning Policies as a topic in its own right, under the Liveable Settlements heading.
- People with disability be mentioned specifically within this topic to ensure their unique needs are considered and their input gained.

Social and affordable housing are described in the *Tasmanian Affordable Housing Strategy 2015-25*:

Social housing: is a broad term used to capture both housing provided by the government (public housing) and non-government organisations (community housing) with below-market rent prices.

Affordable housing: refers to rental homes or home purchases that are affordable to low-income households, meaning that the housing costs are low enough that the household is not in housing stress or crisis (Department of Health and Human Services Housing Tasmania, 2015).

Possability

Social and affordable housing is delivered by not-for-profit organisations and the State Government, who provide affordable rental homes for people on lower incomes, using an income-based rent model (no more than 30 per cent of income).

The need for social and affordable homes is increasing across Tasmania, and the waiting list is growing. As of August 2021, there were 4,367 applications for social housing, and this number continues to rise (Department of Communities Tasmania, 2021).

When securely housed in homes appropriate to their needs, Tasmanians have a greater opportunity for increased economic and social participation. Land use planning is critical to the development and delivery of a diverse range of housing, consistent with the changing needs of the Tasmanian community (Department of Justice Tasmania, n.d.).

When social and affordable housing is named in the *Tasmanian Planning Policies*, decision-makers and planners will be able to plan appropriately for the housing needs of the whole community, especially people with disability on lower incomes who need affordable rental homes.

For further information, please contact
Sandy Travers
Manager – Office of CEO

Sincerely,

Drew Beswick
Chief Executive Officer

Possability

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20 October 2021

Tasmanian Planning Policies Scoping Paper
haveyoursay@justice.tas.gov.au

Thank you for the opportunity to comment on the Tasmanian Planning Policies Scoping Paper.

Bicycle Network

With over 48,000 members, Bicycle Network is one of the top five member-based bike riding organisations in the world.

With a proud history reaching back more than 40 years, we are committed to improving the health and wellbeing of all Australians by making it easier for people to ride a bike.

Operating nationally, we have a measurable and large-scale impact in community participation and the promotion of healthy lifestyles through bike riding.

We achieve this in Tasmania through:

- improving the bike riding environment by working with government at all levels to provide better infrastructure, data, policies, legislation and regulations
- delivering Ride2School, Ride2Uni and Back on your Bike programs to get more people riding
- providing services that support bike riders through membership
- encouraging more people to ride by providing free social rides, bicycle valet parking and tailored riding education.
- being a key spokesperson on issues related to cycling and physical activity.

Planning scheme background

Bicycle Network would like to see a planning system that encourages street and building design that makes it easy and safe for people of all ages and abilities to ride a bicycle for transport. The sort of cycling infrastructure that is seen as safe and encouraging for all users is commonly known as All Ages and Abilities (AAA) infrastructure and is that which separates riders from moving vehicles via off-road or on-road separated lanes/paths or uses quiet, very low speed (30 km/h), low traffic volume (less than 1000 cars a day) street routes.

While the state and federal governments have invested heavily in Tasmania in mountain biking facilities, there has been much less investment in transport riding infrastructure or recreational paths that could double as transport routes. This is despite the increase in sales and usage of electric bicycles which have

been shown to get people of all ages out of cars and onto bikes for work commutes, errands and shorter trips.ⁱ As these bikes continue to decrease in price it's likely more people are going to want to use a bicycle for transport in the coming years.

Currently, new residential and commercial developments are being built without dedicated cycling paths or wide enough shared paths, residential apartment buildings are being built without adequate bicycle parking facilities or maintenance areas, and commercial buildings are being built without adequate end-of-trip facilities for staff.

In terms of land use planning in general we query the preferential treatment given to on-street car parking, especially in residential areas with off-street parking, when some of that road space could be used to provide safe cycleways separated from moving vehicles.

We see the TPPs as the mechanism to set the direction for the statewide planning scheme so that riding a bicycle becomes one of the easiest transport options for all Tasmanians.

The benefits of bicycle riding cut across the three legislated goals of our planning system: the sustainable use, development, protection or conservation of land; environmental protection; liveability, health and wellbeing of the community.

Riding a bicycle improves people's mentalⁱⁱ and physical healthⁱⁱⁱ, it reduces air pollution, it does not produce greenhouse gas emissions, it is an efficient use of space compared to motor vehicle infrastructure,^{iv} it causes less damage to surfaces than motor vehicle traffic, and provides a cheap means of transport for those who can't afford to own a car or unable to get a driver's licence.

Scope of proposed topics

The Scoping Paper suggests two policy topics which could cover the main elements mentioned in terms of cycleways and bike parking: Liveable Settlements, and Infrastructure to Support the Economy and Create Liveable Communities. The division between the two policies seems a bit clunky and confusing as to what sits in either policy.

The original draft TPPs included a Transport and Infrastructure Policy and included a section on active transport, which was an obvious structure and inclusion.

We understand the desire to minimise the number of TPPs for clarity, but transport planning is a wide ranging and complex area and deserves its own policy. Having a dedicated transport and mobility policy is a more direct and obvious approach. You could then just have a Liveable Communities Policy rather than Liveable Community goals spread across two policies.

A sustainable transport and mobility policy can make it clear that one of the transport goals to be implemented through the planning system and land use strategies is to create safe networks that encourage people to walk, ride or catch public transport as their first transport choices within urban centres. Private vehicle use is space inefficient, polluting, noisy, expensive, can lead to people not getting enough daily physical activity, and contributes to hundreds of serious injuries and some 30 deaths every year. While there will always be a need for private vehicle use, especially between major centres and on some routes across urban centres, it shouldn't be prioritised over other forms of healthier, more sustainable transport choices within urban centres.

A sustainable transport and mobility policy could ensure integrated transport planning is developed for all new developments. So, if an industrial park is developed that requires frequent freight movement there are still cycling and walking networks in place for staff to get to work and for lunchtime recreation and adequate space for bus stops or other public transport stations, such as ferries or light rail.

Other countries and Australian states have seamless networks and structures which allow people to easily switch between transport modes, e.g. cycling to a train station, parking the bike or taking it on board, alighting at the other end to walk or pickup a shared bike. In Tasmania we still operate as though people only use one transport mode to get places. Having cycling and walking networks that are direct to bus, ferry and potentially light rail/rapid bus hubs with secure bike parking or ability to carry bikes on board would help people extend their transport choices.

We'd also like to see a sustainable transport and mobility TPP reserve cycling corridors in the same way that has been done for rail and road corridors, and cycling network plans so any new development bordering or connecting to a designated cycling corridor is responsible for building the new cycleway/path in that section or upgrading a cycle lane/path that is not up to the AAA standard. And current state government positive cycling provision policy could be included in a transport TPP and also applied to local roads.

Issues in other TPP topics

However, as already mentioned, the benefits of bicycle transport cut across most of the topic areas listed and should be acknowledged in each of those topic areas.

- **Economic Development**

Building the economy relies on the efficient and safe transport of customers and the people who work in various industries. Employees who travel to work by bicycle are generally healthier^v, happier with their daily commutes.^{vi}

There are also direct flow-on business benefits from widespread bicycle use: bicycle shops, bicycle mechanics, infrastructure design, infrastructure construction, bicycle parking services, bicycle education, bicycle tourism operators, hire bikes, lease bikes, accommodation and hospitality for touring bicycle riders, bicycle events and potentially manufacturing of bicycles, parts and clothing.

Providing the safe infrastructure we need for more people to ride will help us develop a more sustainable economy and workforce.

- **Environmental Protection**

Providing bicycle transport infrastructure helps to protect our clean air and reduce our greenhouse gas emissions. If this is where climate change reduction and mitigation goals are going to be housed, then it makes sense to promote sustainable transport options as part of climate change action.

Providing adequate sized street trees can help cool urban centres but they also provide shade for people walking and riding and as such should be used where possible as separation between people walking and riding or between pathways and motor vehicle traffic.

- **Liveable Settlements**

Even if bicycle infrastructure is put into an infrastructure and transport policy, it still needs to be specifically mentioned within the Liveable Settlements policy, just as the need for public transport connections are mentioned.

Increasing the density of existing urban settlements and activity centres relies on better utilising available land and improving the cycling, walking and public transport connections in these areas so low-value land uses like car parking are less necessary. Increasing density also necessitates building design that makes it easy to ride a bicycle for transport so some of the much needed changes to residential and commercial buildings could sit under this policy.

What we'd like to see in the new TPPs

While the next stage of consultation will focus on the detail of the policies, we'd like to see the following broad elements be able to fit in to the TPP topics and structure settled upon to be enacted through strategic and statutory planning:

A requirement that all new:

- residential and commercial developments include cycleways separated from moving vehicles. In low to medium density residential developments there may be a place for shared pathways of at least 3 metres width.
- residential and commercial development intersections be designed to protect and prioritise people walking and riding.
- residential and commercial development cycleways/paths to provide frequent access points to existing and planned cycleways/paths.
- commercial buildings provide secure, undercover bicycle parking easily accessible from street level, lockers, showers and bathrooms for staff, aiming for facilities that cater to a much greater percentage of staff than is the case under current planning regulations.
- Apartment buildings provide at least one floor-mounted secure, undercover bicycle parking space at street level per apartment.
- Apartment buildings provide shared space next to the bike parking for residents to clean and maintain bicycles.
- Driveways and kerb ramps be built with "no-lip" as the standard to ensure easy access to and from paths and homes unless there is a stormwater issue.

Climate Change TPP

The scoping paper asks whether there should be a stand-alone Climate Change TPP or climate change implications be factored in to the other relevant TPP issues. We would like to see a Climate Change TPP to ensure the need to reduce greenhouse gas emissions and mitigate the effects of climate change are an overriding driver across all the TPPs and give us the best chance of a sustainable future.

If you look at bicycle riding, the reason you'd want to ensure all TPPs make it easier to ride a bicycle is because of the overwhelming health and climate benefits from doing so. There are also other climate actions tied up with bicycle riding, for example, providing street trees will be important for bringing down city temperatures but will also provide shade needed to make bicycle riding more comfortable.

Climate Change would ideally be a state policy, just as physical and mental health should be, so it can influence every TPP. If it is just another TPP, there's always a danger that the climate change goals would not have enough influence over other TPP goals. It should be entered as a TPP now, but with the goal of making it a state policy.

TPP template

This looks like a clear way to set out the policies but it's difficult to say with finality without seeing the extent of the policy detail and seeing the whole family of TPPs.

Yours sincerely

Alison Hetherington

Public Affairs Manager Tasmania

TAS: 210 Collins St Hobart 7000.

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^{i i} Washington, Heesch and Ng, *E-bike Experience: Survey Study of Australian E-bike Users*, Queensland University of Technology for the Queensland Government, 3 March 2020.

ⁱⁱ Avila-Palencia, I. et al. The effects of transport mode use on self-perceived health, mental health, and social contact measures: A cross-sectional and longitudinal study. *Environment International* 120, 199-206, doi:<https://doi.org/10.1016/j.envint.2018.08.002> (2018).

ⁱⁱⁱ Andersen, L. B. et al. Trends in cycling and cycle related injuries and a calculation of prevented morbidity and mortality. *Journal of Transport and Health* 9, 217-225, doi:10.1016/j.jth.2018.02.009 (2018).

^{iv} Transport for Victoria, *Victorian Cycling Strategy 2018–28*, 14, (2017).

^v Andersen, LB et al. "Trends in cycling and cycle related injuries and a calculation of prevented morbidity and mortality". *Journal of Transport and Health*. 9, 217–225, doi:10.1016/j.jth.2018.02.009 (2018).

^{vi} Wild, K. & Woodward, A. "Why are cyclists the happiest commuters? Health, pleasure and the e-bike". *Journal of Transport and Health*, 14, doi:10.1016/j.jth.2019.05.008 (2019).

Tasmanian Planning Policies: submission on consultation draft

The RACT has broadened its focus from the motor vehicle and those who own and operate one, to the wider challenges, benefits and consequences that flow from their use.

It addresses a much deeper interest and understanding by our members of the evolving nature of transport in all its forms and their concerns about the health and wellbeing of Tasmanians and of the Tasmanian environment.

Good land-use planning is pivotal in delivering on those ambitions by ensuring the Tasmanian quality of life is not only maintained but enhanced.

Today the RACT's suite of policies reflect that wider focus and the concerns of our 210,000 members.

Those policies embrace private, public and active transport, the heavy vehicle sector, the environment, land use planning, and emerging technologies.

The overarching principle behind them is that they are fully integrated into a long-term vision to deliver a safer, sustainable environment in which to live, work and travel.

Unless all our policies and all their moving parts work seamlessly together, we will not deliver on that vision.

It is that tightly integrated policy approach that is the foundation of our Greater Hobart and Greater Launceston Mobility Visions, which are strategies we believe will create more liveable cities over the next 30 years.

The vision considers infrastructure, land-use planning, public transport, active transport, social and community cohesion and future technologies.

The same principles of an integrated approach should apply to the suite of Tasmanian Planning Policies outlined in the consultation draft.

The policies outlined in the consultation draft would enable the key deliverables enunciated in our suite of policies.

- We want to see Tasmania's planning system used to help reduce congestion.
- We want to see governments focus on how major development can impact traffic congestion.
- We support the development of settlement strategies for our cities that encourage people to live closer to work, school, public and active transport as well as community spaces.

The RACT wants to see all levels of government develop a settlement strategy for key urban centres. They must consider mixed-use hubs in urban areas that include infill residential development and densification in proximity to active transport, high frequency/rapid public transit, as well as employment, education, retail, services, recreation and community spaces.

Government should take account of future economic and social opportunities, including development, as well as minimise impacts to the road network by ensuring the community has universal access to a range of transport options.

The RACT supports the development of higher density hubs in existing outlying suburbs. These areas can also cater for the decentralisation of industries, services and attractions.

Government should also consider behaviour change programs that encourage the use of more sustainable modes of transport and make more efficient use of existing infrastructure. Those mode shifts will directly impact future land-use planning in the provision of transport options.

It therefore follows that the impact on road networks should be adequately considered during the assessment of residential or commercial development, particularly if there are mode shifts to public transport or shorter travel times because of the development of higher density residential and commercial hubs on city fringes.

The RACT has also advocated for limiting the size of urban growth boundaries to reduce the continued development of greenfield sites in outer Tasmanian suburbs and on urban fringes.

We also want to see local government and the State Government grant road authorities more control during the approval process for any development, to consider the impacts on road networks.

Planning policies should also consider the impact of emerging technologies such as electric vehicles and their associated charging-station networks, fuel cell (hydrogen) vehicles, and autonomous vehicles.

Autonomous vehicles, by virtue of the technology required on-road as well as in-vehicle, will have a significant impact on road infrastructure planning and costs and, as a result, on land-use planning generally.

This emerging technology is well within the scope of this land-use policy development. Federal and State Ministers for transport and infrastructure agreed at their May meeting to have national regulatory arrangements for autonomous vehicles in place by 2026.

The ministers also agreed to review Australia's readiness for the commercial deployment of automated vehicles with the scope of work coming before them in May 2022. That work will inform future transport, infrastructure and land-use policy.

One example of emerging technology is co-operative intelligent transport systems, which allow vehicles to communicate with each other and the road environment. These technologies are located both on the road and inside cars.

Regional land use planning will be critical to the successful implementation of this technology, particularly how regional transport corridors—vital to regional economies and the health of regional businesses -- are upgraded to deal with autonomous vehicles as they are introduced into the heavy vehicle sector for freight.

The location of transport hubs close to roads that are technologically enabled for autonomous vehicle use will be a vital planning consideration in the decades ahead.

Land use planning is also vital in encouraging mode shift from the private vehicle to public transport as a means of easing city congestion.

The autonomous vehicle technology will also extend to public transport, where the RACT wants to see:

- High-frequency, fast, reliable and affordable public transport in our cities.
- Easy and safe access for people walking or riding to public transport.
- Other public transport options, such as ferries, light rail, electric buses and trackless trams.

These emerging technologies will usher in a revolution in regional transport and in infrastructure strategies in the decades ahead. That means Tasmania's planning policies will need to inform those strategies, the action plans that flow from them, and how they integrate into planning regimes.



Integration is the key to the policy framework as outlined in the consultation paper. In that regard transport and infrastructure is a vital component across economic development, settlement and liveable communities.

In particular, the impact of emerging technologies outlined above needs to be considered across the suite of policies.

In transport and infrastructure alone, emerging technologies will have a significant impact on transport efficiency, safety and the environmental outcomes.

As they will be the driver of strategic decisions by all levels of government, the planning policies need to reflect the growing influence of emerging technologies on how we move about, where we work, and where we live.

Our full policies on land use and emerging technologies can be found here:

<https://www.datocms-assets.com/49357/1626740671-ract-land-use-planning-and-mobility-policy.pdf>

<https://www.datocms-assets.com/49357/1626740666-ract-emerging-mobility-technologies-policy.pdf>

October 14, 2021

Garry Bailey, RACT Chief Advocacy Officer

Mobile:

By email to haveyoursay@justice.tas.gov.au

October 2021

Submission from Youth, Family and Community Connections to the Tasmanian Planning Policies consultation paper

Youth, Family and Community Connections is a not-for-profit organisation in the North and North West of Tasmania. We provide accommodation and support to young people between 13 and 20 years of age.

A crucial purpose of Tasmania's planning system is that all Tasmanians will have adequate and appropriate housing that meets their needs. The existing framework of generic planning for residential settlements does not provide for the category of social and affordable housing, which is an essential piece of our diverse housing mix. If social and affordable housing is included in the *Tasmanian Planning Policies*, then Tasmania will have the vital planning mechanisms to ensure everyone can have the home they need.

Social and affordable housing is vital, because it provides safe and stable homes for our clients. Having sustainable and affordable housing outcomes for the young people that utilise our service is of the utmost priority. If there aren't these options available our young people are forced to find other options that aren't always safe or appropriate. This makes Social Housing vital to their long term future and to their well-being.

For example, we have seen the support periods at our services increase exponentially due to the lack of Social Housing options in our catchment areas.

The *Tasmanian Planning Policies Scoping Paper* does not mention social and affordable housing.

We recommend that:

- social and affordable housing is recognised in the *Tasmanian Planning Policies* as a **topic** in its own right under the **Liveable Settlements** heading
- short stay accommodation is added as an **issue** in the **Economic Development** section

Social and affordable housing are described in the *Tasmanian Affordable Housing Strategy 2015-25*:

Social housing: is a broad term used to capture both housing provided by the government (public housing) and non-government

organisations (community housing) with below-market rent prices.

Affordable housing: refers to rental homes or home purchases that are affordable to low income households, meaning that the housing costs are low enough that the household is not in housing stress or crisis.¹

Social and affordable housing is delivered by not-for-profit organisations and the State Government, who provide affordable rental homes for people on lower incomes, using an income-based rent model (no more than 30% of income). This housing remains as an asset in the social housing system in the long term. To improve the delivery of quality affordable homes on an economic model that is different from mainstream residential development, the *Tasmanian Planning Policies* need to include a specific category for social and affordable housing.

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As at August 2021, there are 4 367 applications for social housing, and this number keeps going up.²

When securely housed in homes appropriate to their needs, Tasmanians have a greater opportunity for increased economic and social participation. Land use planning is critical to the development and delivery of a diverse range of housing, consistent with the changing needs the Tasmanian community.³

When social and affordable housing is named in the *Tasmanian Planning Policies*, decision-makers and planners will be able to plan appropriately for the housing needs of the whole community, especially people on lower incomes who need affordable rental homes.

While the inclusion of social and affordable housing in the *Tasmanian Planning Policies* is our main priority, we also note the growth in short stay accommodation is one of the factors contributing to the housing crisis in Tasmania. More and more residential properties are converted to short stay accommodation in all regions of Tasmania.⁴ The growth in short stay accommodation means that it will continue to impact current and future housing and community needs. We suggest that it is appropriate to include short stay accommodation in the scope of the *Tasmanian Planning Policies*.

¹ https://www.communities.tas.gov.au/_data/assets/pdf_file/0014/30254/AHS_Strategy_Final.pdf

² https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/reporting

³ https://planningreform.tas.gov.au/_data/assets/pdf_file/0003/628239/Tasmanian-Planning-Policies-and-Overview-Consultation-Draft-April-2017.pdf

⁴ <https://cbos.tas.gov.au/topics/housing/short-stay-accommodation-act>

Thank you for the opportunity to contribute to the consultation on the *Tasmanian Planning Policies Scoping Paper*. We urge you to include social and affordable housing in the *Tasmanian Planning Policies* as an essential step towards ensuring that our clients, and all Tasmanians have the homes they need. It will bring a vital planning focus to this essential housing sector.

The *Tasmanian Planning Policies Scoping paper* does not mention social and affordable housing or short stay accommodation. This needs to change. We urge you to update the draft *Tasmanian Planning Policies* to include social and affordable housing and short stay accommodation.

For further information, please contact

Shane Leonard
Team Leader Accommodation Services
Youth, Family and Community Connections

Tasmanian Planning Policies – Scoping Paper

About CHIA and Our Response

The Community Housing Industry Association (CHIA) is the peak body representing not for profit community housing organisations (CHOs) across Australia. Our 150 members manage a \$40 billion-plus portfolio of more than 100,000 homes, housing people on low and moderate incomes who find it hard to access affordable and appropriate housing in the private market.

CHIA operates under a memorandum of understanding with Shelter TAS who represent CHIA National's Tasmanian members at the state level. Shelter TAS and CHIA routinely engage on State and Commonwealth housing issues. We both share a commitment to addressing shortfalls in social and affordable housing by encouraging the adoption of appropriate housing policy approaches, funding and planning policy. The Tasmanian Planning Policy (TPP) consultation is an important opportunity to ensure that strategic and statutory planning supports the delivery of social and affordable housing.

CHIA endorses the submission by Shelter TAS and in our response draw out a number of themes to support social and affordable housing being included as a distinct category in the Tasmanian Planning Policies. We also support their recommendation that Short Stay accommodation be named as an issue in the Tourism section of the TPP.

Our Response

The Minister in his foreword to the Tasmanian Planning Policies TPP explains that *'this is a rare opportunity to make an important difference to the planning principles that will shape the future for Tasmania through strategic land use planning'*.

Infrastructure Australia in the 2021 Australian Infrastructure Plan recognises that *'well-maintained and designed social housing provides many community benefits, supporting individual and societal wellbeing and productivity, and reducing costs in health and justice services'* and recommends that all levels of government commit to policy that increases supply.

The TPP is one important mechanism available to the Tasmanian Government to enable more social and affordable housing. The absence of explicit reference in the Scoping Paper to social and affordable housing, will constrain opportunities to use strategic and statutory planning mechanisms to facilitate additional new supply.

CHIA recommends that social and affordable housing is included as a topic in its own right.

The Need for Social and Affordable Housing in Tasmania

There are currently no comprehensive published assessments of housing needs at a state or Commonwealth level. In two of the most reliable research projects examining housing need across Australia, the first established, that in 2016, a 20-year program of 900 social and affordable homes was required to both address current shortfalls and meet projected household growth to 2036¹.

The second examined both the amount and availability of homes in the private rental market that were affordable to households in the bottom two income quintiles in 2006, 2011, and 2016. It found that while the market has supplied some homes at rates affordable to households in these two quintiles the homes are increasingly unavailable to these households; being occupied by higher income earners. In Hobart, they estimated that by 2016 there was a shortfall of 3,700 homes affordable and available to households in the lowest income quintile.

However, both these estimates are likely to be underestimates as *'house prices and rents have risen substantially because of an influx of tourists and conversion to short-term rentals (Tasmanian Department of Treasury and Finance 2018), with a negative effect on affordability outcomes for Q1 and even Q2 households'*.²

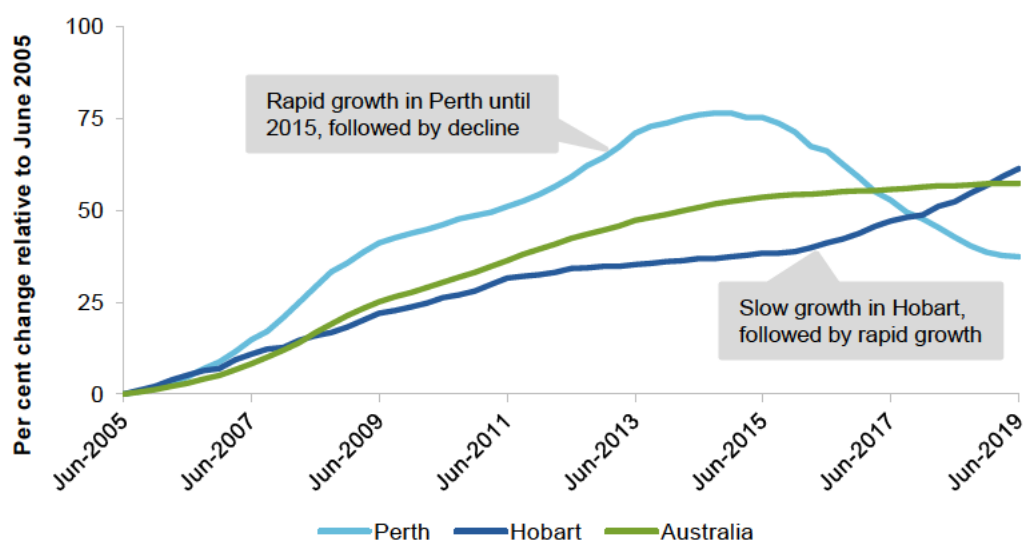
The Productivity Commission in its 2019 report 'Vulnerable Private Renters: Evidence and Options' noted that *'rents in Hobart have increased rapidly, with the CPI rent price index increasing 14 per cent between June 2016 and June 2019. In the same period, the Australian rent price index increased by 2 per cent'*.³ Table 3.2 taken from the report, clearly demonstrates how rents have increased in Hobart.

¹ Troy L, van den Nouwelant R, Randolph W (2018) Filling the Gap - Estimating need and costs of social and affordable housing delivery http://communityhousing.org.au/wp-content/uploads/2019/03/Modelling_costs_of_housing_provision_FINAL.pdf

² <https://www.ahuri.edu.au/sites/default/files/migration/documents/AHURI-Final-Report-323-The-supply-of-affordable-private-rental-housing-in-Australian-cities-short-term-and-longer-term-changes.pdf>

³ <https://www.pc.gov.au/research/completed/renters>

Figure 3.2 Some markets have experienced substantially faster or slower growth in rents than the Australia-wide average Rent price index, June 2005 to June 2019



Source: Rents Expenditure Class in ABS (*Consumer Price Index, Australia, June 2019*, Cat. no. 6401.0).

Table reproduced from: *Vulnerable Private Renters: Evidence and Options* p65

While the COVID-19 outbreak had a moderating impact on Hobart's rents during 2020, Corelogic's Rental Review for the June 2021 quarter indicates that after a 'decline of -5.0% through 2020' the rental market 'has now recovered to record highs.'⁴

The Benefits from Focusing on Social and Affordable Housing

There are major opportunities that flow from social and affordable housing. Research evidence has demonstrated that the provision of social housing (and, where necessary, floating support services) can produce net financial gains in terms of overall cost to government. The report quantifies the cash, public sector savings and monetary wellbeing equivalents of the wider social and economic impacts that can be unlocked through investment in social and affordable housing, and expresses these as a proportion of the cost involved⁵.

Increasingly, the broader economic outcomes that result from social and affordable housing are also being recognised, notably the positive impact on human capital and hence economic productivity. In addition to the social benefits, we now have evidence that over-expensive housing also incurs negative impact on urban productivity. There is a growing body of research to demonstrate the ways that such impacts can be generated. These include an AHURI commissioned scoping study 'Making connections: housing, productivity and economic development' (MacLennan et al. 2015)⁶ and Strengthening economic cases for

⁴ <https://www.corelogic.com.au/news/national-rents-record-highest-annual-growth-over-decade>

⁵ Nygaard, C (2019) Social and Affordable Housing as Infrastructure <https://www.communityhousing.com.au/wp-content/uploads/2019/11/Social-and-affordable-housing-as-social-infrastructure-FINAL.pdf?x33467>

⁶ <https://www.ahuri.edu.au/research/final-reports/251>

housing: the productivity gains from better housing outcomes (MacLennan et al 2018) ⁷. The scale of potential productivity gains from well-located (planned) affordable housing suggests an economic performance impact that compares very favourably to most other infrastructure investments, including transport projects.

Inclusion in the TPP

By its actions, CHIA recognises the Tasmanian government has already demonstrated a commitment to social and affordable housing through its ten-year affordable housing strategy⁸ and subsequent funding announcements. However, important as these initiatives are, the shortfalls in supply exceed what is currently planned for development. By creating a specific category in the TPP for social and affordable housing, the Tasmanian Government will (1) signal the importance it attaches to its provision and expectation that strategic plans will include targets alongside broader housing supply totals and (2) facilitate the introduction of planning mechanisms that could enable more social and affordable housing such as mandatory inclusionary zoning in areas such as Hobart, where land values are high.

CHIA supports the proposed example for a social and affordable housing category in the Shelter TAS submission which we have agreement to reproduce below

Tasmanian Planning Policy: Liveable Settlements	
Topic: Social and Affordable Housing	
Objective: To enable the development of accessible, safe, appropriate social and affordable housing that will meet current and future community needs	
Strategy: Promote and facilitate the development and increased supply of affordable and social housing (public and community housing) options, that are designed to meet the health, safety and occupancy needs of households, and are located close to services and existing and committed public transport networks. Promote and facilitate a diversity of housing types and densities, including social and affordable housing, in and around activity centres, and any designated integrated transport corridors and densification areas. Ensure sufficient serviced land is available for social and affordable housing within or near to existing employment and well serviced activity centres and existing public transport networks. Encourage flexible, adaptable, sustainable and innovative housing design and configuration that meets the current and future community needs.	
Implementation into strategic planning	Implementation into statutory planning
RLUS Enabling legislation or regulation – if needed	SPPs LPS Enabling legislation or regulation – if needed

⁷ <https://cityfutures.adu.unsw.edu.au/research/projects/strengthening-economic-cases-housing-productivity-gains-better-housing-outcomes/>

⁸ https://www.communities.tas.gov.au/_data/assets/pdf_file/0014/30254/AHS_Strategy_Final.pdf

Short Stay Accommodation

We noted earlier that CHIA also supports the recommendation made by Shelter TAS that the TPP should acknowledge short stay accommodation by naming it as an issue in the Tourism section of the TPP so that planners balance the need for visitor accommodation with the needs of long-term residents.

While there is no in-depth research of the impact of short stay lettings in Hobart, specifically the authors of the authoritative research into the topic note that the phenomenon 'is now widespread both in smaller cities like Hobart'⁹ and the issues in terms of affordability they identified likely to be similar.

Thank you for the opportunity to contribute to the consultation on the Tasmanian Planning Policies Scoping Paper. We urge you to include social and affordable housing in the Tasmanian Planning Policies as an essential step towards ensuring that its supply is a central component of the state's planning system

For further information on this submission please contact
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CEO CHIA

<https://www.ahuri.edu.au/sites/default/files/migration/documents/AHURI-Final-Report-305-Technological-disruption-in-private-housing-the-case-of-airbnb.pdf>



SHELTER TAS SUBMISSION TO THE SCOPING PAPER FOR DRAFT TASMANIAN PLANNING POLICIES OCT 2021



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Shelter Tas is supported by the Department of Communities Tasmania.



Shelter Tasmania acknowledges the Traditional Owners of country throughout Tasmania and their continuing connection to the land, sea and community. We pay our respects to them and their cultures, and to elders past and present.



Shelter Tas welcomes and supports people of diverse genders and sexual orientations.

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October 2021

By email to haveyoursay@justice.tas.gov.au

About Shelter Tas

Shelter Tas is Tasmania's peak body for housing and homelessness services. We are an independent not-for-profit peak organisation representing the interests of low to moderate income housing consumers, community housing providers and Specialist Homelessness Services across Tasmania. We provide an independent voice on housing rights and a link between governments and the community through consultation, research and policy advice. We work towards a fairer and more just housing system. Our vision is affordable, appropriate, safe and secure housing for all Tasmanians and an end to homelessness.

Our submission

Shelter Tas welcomes the opportunity to respond to the *Scoping Paper for draft Tasmanian Planning Policies*. This is a rare opportunity to make an important difference to the planning principles that will "shape the future for Tasmania through strategic land use planning" (Minister's foreword to the *Scoping Paper*).

Our Submission recommends that:

- *Social and affordable housing* is added as a **topic** in its own right, and
- *Short Stay Accommodation* is added as an **issue** in the Economic Development section.

At present, the *Scoping Paper* does not include social and affordable housing, or short stay accommodation. Including these items in the *Tasmanian Planning Policies* is vital and timely to ensure that the Tasmanian Planning System can address Tasmania's chronic shortage of social and affordable rental housing in the future.

Social and affordable housing

Social and affordable housing are described in the *Tasmanian Affordable Housing Strategy 2015-25*:

Social housing: is a broad term used to capture both housing provided by the government (public housing) and non-government organisations (community housing) with below-market rent prices.

Affordable housing: refers to rental homes or home purchases that are affordable to low income households, meaning that the housing costs are low enough that the household is not in housing stress or crisis.¹

¹ https://www.communities.tas.gov.au/_data/assets/pdf_file/0014/30254/AHS_Strategy_Final.pdf

The *Tasmanian Planning Policies* scoping paper needs to include social and affordable housing. Shelter Tas recommends that the *Tasmanian Planning Policies* refer directly to social and affordable rental housing, specifically by naming social and affordable housing as a topic in its own right, alongside the Liveable Settlements topic.

Ensuring that all Tasmanians are safely and appropriately housed is an appropriate and necessary purpose for the first high-level policy framework for the Tasmanian Planning System, which “articulates a vision for our future – what we want our society, our settlements, our infrastructure and our landscapes to look like” (Minister’s Foreword to the *Scoping Paper for draft TPPs*). The entire community benefits when everyone has the home they need, and social and affordable housing is needed to achieve that goal, especially for lower income Tasmanians who rent their homes.

In Tasmania, as in other parts of Australia, there is a chronic shortage of affordable rental options for people on low and moderate incomes. Tasmania has seen unprecedented growth in both purchase prices and rental prices. Hobart has been Australia’s least affordable capital city since 2018, on the standard measure that compares income to rental cost.² Hobart has been in the top two capitals for unaffordable rentals since the National Rental Affordability Index began in 2015. This chronic lack of affordable rental housing leads to increasing numbers of people experiencing housing stress and homelessness across the state. Our planning system needs to play its part in reversing this trend.

Tasmania’s housing crisis is not being solved by the current planning approach. The latest report on housing market trends from the University of Tasmania’s Housing and Community Research Unit (HACRU) shows that Tasmania’s housing market continues to be under extreme pressure.³ House prices and rents remain high, while the private rental vacancy rate remains very low. Increasing the supply of affordable and social rental housing is essential to meet the housing needs of all Tasmanians and meet the State Government’s economic and social objectives. The Planning System needs to provide a pathway for planners, decision-makers and developers to enable social and affordable housing to be built in all areas, through naming it as an issue within the *Tasmanian Planning Policies*.

The cost of housing, including both purchase and rental, is rising much faster than people’s incomes, leaving more and more Tasmanians facing rental stress and the risk of homelessness. In 2021, the Anglicare Rental Affordability Snapshot found only 729 properties advertised for rent across Tasmania, in contrast to 2 677 properties in 2013. In

² <https://www.sgsep.com.au/projects/rental-affordability-index>

³ https://www.utas.edu.au/_data/assets/pdf_file/0005/1475465/UOTBR210619-Tasmanian-Housing-Update_vFinal.pdf

Tasmania's southern region, which includes Hobart, there were only 433 properties advertised as available to rent in 2021, compared with 1 304 in 2013.⁴

As Tasmania's population increases, there is increased demand for both rental and purchase properties. House prices are surging while home ownership rates are declining.⁵ This means people are renting for longer before being able to purchase a home, and higher proportions and greater numbers of people will be life-long renters. More than one in four Tasmanians rent their home.⁶ The private rental market is increasingly unaffordable for people on the lowest incomes. Tasmania's planning system needs to account for these trends by encouraging effective and strategic planning for social and affordable housing.

The waiting list for social housing in Tasmania is growing, reflecting increased need. As at August 2021, there are over 4 367 applications, and this number is higher every year. Shelter Tas supports the *Tasmanian Affordable Housing Strategy*, and calls for an increase to the supply of social housing, beyond current commitments. Over 120 000 Tasmanians live in poverty.⁷ Good planning is needed to ensure that all Tasmanians in need can find the homes they need, including social and affordable homes.

Tasmania needs to deliver social rentals that stay affordable in the long term, from the current level of 6.2% to a level of at least 10% of all dwellings. Shelter Tas has advocated for this target in Tasmania since 2018.

All levels of government – national, state and local – have a part to play in ensuring that all Australians have a safe, secure, appropriate and affordable place to call home. [The 2021 Australian Infrastructure Plan](#) called for all levels of government to invest in social and affordable rental housing, recognising that well-maintained and designed social housing provides many community benefits, supporting individual and societal wellbeing and productivity, and reducing costs in health and justice services. The Tasmanian Planning System provides the high level framework that will enable all levels of government to play their part in delivering social and affordable housing. It also provides a direct way of implementing this through regional land use strategies and the Tasmanian Planning Scheme.

Shelter Tas calls for the wording from the 2017 Consultation draft to be reinstated in the *Tasmanian Planning Policies*:

3.6 Promote and facilitate the development and increased supply of affordable housing options, both public and private, that are designed to meet the health, safety and occupancy needs of households, and are located close to services and existing and

⁴ <https://www.anglicare-tas.org.au/research/anglicare-tasmania-rental-affordability-snapshot-2021/>

⁵ <https://www.corelogic.com.au/reports>

⁶ <https://www.abs.gov.au/statistics/people/housing/housing-occupancy-and-costs/2017-18>

⁷ <https://www.tascoss.org.au/120000-tasmanians-live-in-poverty/>

committed public transport networks; and

3.7 Facilitate the realignment and redevelopment of existing social housing stock to better meet the current and future demand.⁸

Good policies to relieve the housing crisis need to operate on multiple levels and at all levels of government, including the planning system. Adding social and affordable housing as a topic within the *Tasmanian Planning Policies* is an essential step towards delivering an adequate supply of affordable homes for people who are renting. In the table below, we have used the proposed template to suggest how social and affordable housing could be included within the *Tasmanian Planning Policies*, drawing on the 2017 Consultation draft.⁹

Tasmanian Planning Policy: Liveable Settlements	
Topic: Social and Affordable Housing	
Objective: To enable the development of accessible, safe, appropriate social and affordable housing that will meet current and future community needs	
Strategy: Promote and facilitate the development and increased supply of affordable and social housing (public and community housing) options, that are designed to meet the health, safety and occupancy needs of households, and are located close to services and existing and committed public transport networks. Promote and facilitate a diversity of housing types and densities, including social and affordable housing, in and around activity centres, and any designated integrated transport corridors and densification areas. Ensure sufficient serviced land is available for social and affordable housing within or near to existing employment and well serviced activity centres and existing public transport networks. Encourage flexible, adaptable, sustainable and innovative housing design and configuration that meets the current and future community needs	
Implementation into strategic planning	Implementation into statutory planning
RLUS Enabling legislation or regulation – if needed	SPPs LPS Enabling legislation or regulation – if needed

⁸ https://planningreform.tas.gov.au/_data/assets/pdf_file/0003/628239/Tasmanian-Planning-Policies-and-Overview-Consultation-Draft-April-2017.pdf

⁹ https://planningreform.tas.gov.au/_data/assets/pdf_file/0003/628239/Tasmanian-Planning-Policies-and-Overview-Consultation-Draft-April-2017.pdf

Short Stay Accommodation

While our main recommendation in this submission is that social and affordable housing appears in its own right in the *Tasmanian Planning Policies*, we know that the increase of short stay accommodation is one of the factors affecting the shortage of affordable rentals in all regions of Tasmania. There are approximately 5 000 short stay properties in Tasmania, with significant concentration in some areas. Residential properties continue to be converted to short stay accommodation.¹⁰ In Tasmania's tight housing market, any impacts from future growth in short stay accommodation will need to be carefully managed. The growth in short stay accommodation means that it will continue to impact current and future housing and community needs. We suggest that it is appropriate to include short stay accommodation in the scope of the *Tasmanian Planning Policies*.

Including short stay accommodation in the *Tasmanian Planning Policies* will give future planners and decision-makers the resources they need to manage any local impacts on residential accommodation. When so many Tasmanians are in rental crisis and facing homelessness, all elements of the housing system need to be considered by planners. Tasmania has an opportunity to include short stay accommodation within the planning system so that decision-makers can recognise both the benefits of the tourism economy and the housing crisis faced by many members of the local community.

Shelter Tas recommends that short stay accommodation be named as an issue in the Tourism section of the TPPs to provide a clear pathway for planners to balance the need for long term rentals and visitor accommodation.

Thank you for the opportunity to contribute to the consultation on the *Tasmanian Planning Policies Scoping Paper*. We recommend social and affordable housing in the *Tasmanian Planning Policies* as an essential step towards ensuring that all Tasmanians have the homes they need. It will bring a vital planning focus to this essential housing sector.

We urge you to update the draft *Tasmanian Planning Policies* to include social and affordable housing and short stay accommodation.

For any further information on this submission, please contact:

Pattie Chugg
Chief Executive Officer, Shelter Tas
ceo@sheltertass.org.au

¹⁰ <https://cbos.tas.gov.au/topics/housing/short-stay-accommodation-act>

Our ref:
Enquiries Shane Wells, Strategic Planner
Direct phone:

20 October 2021

Department of Justice
Office of the Secretary
GPO Box 825
HOBART TAS 7001
haveyoursay@justice.tas.gov.au

Dear Sir/Madam

TASMANIAN PLANNING POLICIES SCOPING PAPER

Thank you for providing the opportunity to comment on the scoping paper on Tasmanian Planning Policies (TPPs). Officer comments are provided below for consideration on matters of:

- Scope of TPPs
- Level of prescription in example TPPs
- Regional Governance and future role of regional planning
- Inclusion of Planning Principles in the TPPs framework.

Scope of TPPs

Glenorchy City Council is committed to promoting increased densification and medium density housing options and facilitating access to a diversity of safe, liveable, accessible and affordable housing options for our residents – which is promoted through our Statement of Commitment on Housing. In this regard, Council is keen to see these aspects addressed in the TPPs.

The list of potential TPPs topics in the scoping paper is broad indicating a preference for them to extend across all land use issues. On that basis, additional policy issues that should be addressed include:

- Housing affordability and social housing issues relevant to land use planning,
- Accessibility and universal design in housing,
- Urban design as it relates to subdivision, activity centres, infill development and urban renewal and detached dwellings,

- Township character,
- Air quality,
- Infrastructure contributions, as part of the infrastructure policy, and
- Agency engagement in the planning process and relationship to related legislation.

Industry specific policies such as tourism, agricultural or mining could be appropriately addressed in more general policies. In this way, policies positions could be established across manufacturing, resource, logistics, creative industries and the like. Industry specific policies may appear to pick winners and may unnecessarily constrain sound policy positions to the specific sectors subject to a TPPs. An alternative approach would be a narrower set of TPPs that addressed matters of State significance. Any further detail required to give effect to the TPPs could be considered in the regional land use strategies once reviewed.

Level of prescription in example Draft TPPs

The example policy for hazard and risks would require a RLUS to identify areas that can accommodate a clustering of land uses that may give rise to nuisance emissions.

The example policy for sea level rise would require the local response to be set regionally via guiding principles or directions.

The examples raise the following concerns:

- (1) The extent of work required within a region to give effect to a TPP, and the potential delay to LPS revisions,
- (2) The potential to unnecessarily constrain local level planning.

The TPPs should set direction whilst avoiding prescription so that regional, sub-regional and local planning can be both consistent with TPPs and responsive to emerging issues. In the sea level rise example, a TPP should provide principles for local planning that are supported by appropriate State Planning Provisions. However, innovative or place-based responses that deliver good planning outcomes should not be constrained.

Regional Governance and future role of regional planning

It is noted that the Phase 2 planning reforms will, in 2022, provide a RLUS framework discussion paper and associated legislative amendments. Regional planning will have an important role in implementing the TPPs, and it is important to note at this time the need to establish clear governance and budget arrangements for each RLUS. For example, the Southern Tasmanian Regional Land Use Strategy (STRLUS), in the absence of appropriate resources and governance structure, has not kept pace with changing strategic issues that face the region such as housing supply.

With respect to the scoping paper, the future role of regional planning is not clear. If there are to be TPPs on discrete issues such as acid sulphate soils, education or Aboriginal heritage, there may be little room for a regional strategy to value add. For instance, the existing STRLUS policy position on acid sulphate soils could be elevated to a TPPs with minimal change, leaving little for a RLUS to do other than to restate the TPP position.

Will a future RLUS also need to be comprehensive as they now are, or limited to regional issues such as settlement planning?

Inclusion of Planning Principles in the TPPs framework

The Queensland¹ and South Australian² state planning policies incorporate guiding principles. In SA, the guiding principles 'serve as a mission statement for the planning system, describing how good planning should be applied across the state'. Whilst Tasmania has the Resource Management and Planning System (RMPS) objectives, principles for the TPPs could provide a more descriptive, aspirational and clear framework for the system and express how the RMPS objectives are to be furthered.

Should you wish to discuss any of these issues further, please contact Shane Wells using the contact details at the top of this letter.

Yours sincerely

Lyndal Byrne
Senior Strategic Planner

¹ (<https://dsdmipprd.blob.core.windows.net/general/spp-july-2017.pdf>)

² (https://plan.sa.gov.au/__data/assets/pdf_file/0005/552884/State_Planning_Policies_for_South_Australia_-_23_May_2019.pdf)

From: [Have Your Say](#)
To: [Planning Unit](#)
Subject: FW: Comment on the Tasmanian Planning Policies Scoping Paper
Date: Friday, 22 October 2021 8:41:41 AM

-----Original Message-----

From: Malcolm Wells
Sent: Wednesday, 20 October 2021 3:46 PM
To: Have Your Say <HaveYourSay@justice.tas.gov.au>
Subject: Comment on the Tasmanian Planning Policies Scoping Paper

Thank you for the opportunity to comment on the draft Planning Policies and Issues (TPPs) that aim to guide future strategic land use planning through the regional land use strategies and the Tasmanian Planning Scheme. The National Parks & Wildlife Advisory Council considered these out-of-session but tender the following comments for consideration. In doing so, the Council notes that more than half the State covered by the Parks and Reserves system is effectively outside the statutory planning process although the Council is aware that there is current consideration being given to this matter by the Government.

“Fragmentation of natural habitats and ecosystems” is an increasing issue in Environmental Protection.

The Biodiversity issue under Environmental Protection should be expanded to include “weed, disease & pathogen management and “Biosecurity” should be added to Hazards and risks.

The Council recommends that the topic Economic Development should be “Sustainable Economic Development”.

Under Heritage Protection, “including consideration of Aboriginal cultural landscapes) could be added to “Aboriginal heritage”.

The Council supports climate change adaptation and mitigation principles being incorporated as an issue under the various relevant topics for which TPPs are developed, rather than as a stand-alone TPP. The Council is not so sure about COVID-19, that could well be a phenomena of the past with the future medical advancements in this area and may be treated as an issue under "Hazards and risks", albeit a very pervasive one.

Malcolm Wells
Chair

From: [Have Your Say](#)
To: [Planning Unit](#)
Subject: FW: Draft Tasmanian Planning Policies (TPPs)
Date: Friday, 22 October 2021 8:35:54 AM

From: Felicity Hargraves
Sent: Wednesday, 20 October 2021 10:47 PM
To: Have Your Say <HaveYourSay@justice.tas.gov.au>
Subject:

Dear officer,
I endorse the PMAT submission, especially addressing climate change and ecological restoration.
Kind regards,
Felicity Hargraves