

Tasmanian Planning Policies – Scoping Paper Submissions

No	Name	Position	Organisation
81	Sheree Vertigan AM	Chief Executive Officer	Cradle Coast Authority
82	Anna Pafitis		
83	Tricia Ramsay		
84	Peter McGlone	Director	Tasmanian Conservation Trust Inc
85	Sue Henn		
86	Glenys Jones		
87	Phillip Hoysted	President	South Hobart Progress Association
88	Deb Szekely	Senior Planning Officer	Break O'Day Council
89	Graeme Beech		
90	Not for publication		
91	Tim Astley	Network Reform and Regulatory Compliance Team Leader	TasNetworks
92	Denise Leonard		Catholic Care Tasmania
93	Matthew Skirving	Executive Manager City Growth	Devonport City Council
94	Duncan Marshall		Australia ICOMOS
95	Dr Charlie Burton	Manager Policy	TasCOSS
96	Andrew Ricketts	Convenor	The Environment Association (TEA) Inc
97	Tim Baker	Secretary	Department of Primary Industries, Parks, Water and Environment
98	Tasha Tyler- Moore	Manager Development Services	Kingborough Council
99	Michael Purves	Tasmanian President	Planning Institute of Australia
100	Maria Lasso	Town Planner	Launceston City Council

22 October 2021

The Hon Roger Jaensch MP
Minister for Local Government and Planning
C/- Department of Justice
Office of the Secretary
GPO Box 825
HOBART TAS 7001

Dear Minister Jaensch

RE: Tasmanian Planning Policies Scoping Paper

Cradle Coast Authority (CCA) welcomes the opportunity to provide feedback on the Tasmanian Planning Policies (TTP) Scoping Paper, as we recognise the critical role planning policies will have in shaping the future of our region.

We note the next stage is the drafting of the TTP's. CCA has a vital interest in this matter; we have existing expertise in regional development and regional natural resource management, and we are willing to be actively involved in the advancement of regionally relevant and applicable Tasmanian Planning Policies.

Do you agree with the scope of proposed TPP topics?

The TTP Topics are inclusive of the major considerations in planning and are appropriate in scope. However, we believe 'Public engagement in planning processes' is an overarching principle that should be applied in addressing Topics and Issues and is itself not a separate topic. It should be removed as a Topic and included as a principle to guide all planning policies.

Do you agree with the scope of the proposed TPP issues?

It is positive to see the diverse range of issues to be addressed. As with the feedback on TTP Topics above, 'applying the precautionary principle' is a principle that we believe should be applied to all issues and not just in Environmental Protection. This principle has relevance in other TTP Topics such as Hazard and Risks and Heritage Protection. It should be removed as an Issue and incorporated as a guiding overarching principle in addressing the issues raised through the TTP process.

Understandably, many issues are interconnected and complete isolation of their impact is not possible. However, the issue 'Catchment Management' under Environmental Protection is a very board term that encompasses all the other issues listed under Environmental Protection, as well as issues listed under other TTP Topics. This term needs to be further defined to provide greater clarity and specificity to the related issues.

With the issue of 'Waterways and wetlands – water quality' we feel the term water quality does not encompass all water related indicators relevant to planning decisions. A more holistic term should be used for, for example 'Water and wetland health'. Likewise, the issue of flooding could be broadened to 'Flooding and deluge', encompassing more of the likely issues occurring with extreme and sudden rainfall events.

One major consideration for planning in the Northwest region is managing land use in the peri-urban zone and the interface of urban and rural land use. This includes best use of land, for example retaining productive land for agricultural use. It is unclear from the list of TTP Topics and Issues where this fits best and will be addressed. This could be included in the scope and made more visible.

What other topics and/or issues do you think the TPPs should cover?

The list of TTP Topics proposed is inclusive of major considerations, however there are additional Issues that could be added to more completely represent planning considerations, such as:

Environmental Protection includes invasive flora with weed management under biodiversity, but it does not include reference to any invasive animal species. Weed management could be removed from biodiversity and added as a separate issue combining invasive fauna and flora. For example, one invasive species requiring consideration during planning are cats, with linkable elements of cat management currently being implemented through the Tasmanian Government's Cat Management Plan.

The Hazards and Risks Topic talks to coastal erosion but is silent on non-coastal erosion, an important issue in our region. An additional issue should be included covering riverine and floodplain erosion. Additionally, biosecurity should be added. The introduction of biosecurity risk is strongly linked to land use and infrastructure and requires consideration in planning.

Under economic development key Tasmania industries have been singled out, such as agriculture and tourism. Given the importance to the local economy, we feel plantation forestry should likewise be considered separately. There is also opportunity here to highlight and consider listing renewable energy for separate consideration, not just in infrastructure but as an economic development activity in its own right.

Do you agree that climate change should be integrated into all relevant TPPs?

Climate change will influence all elements of future planning and therefore its integration into all relevant TPP is a sensible approach and helps ensure it is considered in all decisions. How climate change is integrated into the TPPs should be strengthened and made more transparent.

This could be done by including a new section to the template which lists predicted or likely effects of climate change on the issue, with these effects being considered throughout the rest of the document. For example, with bushfire effects could be the "reduced rainfall extending risk periods, increased dry lightning strikes leading to increased ignition of fires".

Do you think that the proposed template is appropriate and a useful way of providing guidance on what the TPPs should achieve?

The use of the proposed template will help provide consistency and clarity to the approach. The section 'Implementation into statutory planning' will be significant in shaping the future of the region. Its importance and role should be indicated visually by modifying the template layout to recognise this.

In the example template provided for Sea Level Rise, Coastal Inundation and Erosion the strategy section reads more as an outcome, when stating 'communities are resilient to sea level rise'. In writing these sections, objectives, strategy and outcomes should be clearly defined.

CCA has received a funding commitment to undertake a review into RLUS and planning practice across the regional councils. We are keen to continue to be involved throughout the planning reform.

If we can provide further information or clarification on our response is needed, please do not hesitate to contact us.

Yours sincerely,

Sheree Vertigan AM
Chief Executive Officer

From: [Have Your Say](#)
To: [Planning Unit](#)
Subject: FW: Scope & Structure of TPPs
Date: Friday, 22 October 2021 6:01:57 PM

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

From: Anna Pafitis
Sent: Friday, 22 October 2021 5:55 PM
To: Have Your Say <HaveYourSay@justice.tas.gov.au>
Subject: Scope & Structure of TPPs

To Whom It May Concern

I am writing to strongly endorse Planning Matters Alliance's (PMAT) submission on this Scope /Content and Structure of the draft Tasmanian Planning Policies.

Please accept their representation as my own.

Regards

Anna Pafitis

From: [Have Your Say](#)
To: [Planning Unit](#)
Subject: FW: Scope of the draft Tasmanian Planning Policies - Have your say
Date: Friday, 22 October 2021 5:03:09 PM

From: Tricia Ramsay
Sent: Friday, 22 October 2021 4:53 PM
To: Have Your Say <HaveYourSay@justice.tas.gov.au>
Subject: Scope of the draft Tasmanian Planning Policies - Have your say

Attention: Office of Strategic Legislation and Policy

To whom it may concern:

Thank you for the opportunity to comment on the Tasmanian Planning Policies Scoping Paper for draft TPPs which is open for public comment.

I have read the document as well as the submission provided to you on 20/10/2021 by Planning Matters Alliance Tasmania (PMAT) in response.

Given the PMAT submission is so comprehensive, I wish to endorse its content.

Thank you for your attention to this matter.

Kind regards,

Tricia Ramsay



tasmanian conservation trust inc

Policy Planning Unit
Department of Justice
GPO Box 825
Hobart Tas 7001

haveyoursay@justice.tas.gov.au

22 October 2021

Scoping paper for Draft Tasmanian Planning Policies

Liberal planning policies: a not so short history

The state government's approach to policies related to planning (whether they are state policies or Tasmanian Planning Policies) can only be described as perplexing. In the lead up to the 2014 state election the Liberal party had a policy to:

'Immediately after the election..' 'We will commence drafting state policies to provide the necessary guidance to councils on how to implement the single statewide planning scheme and plan for Tasmania's future land use needs.'

The election policy made it clear the policies were to focus on economic development.

There was no action on planning policies immediately after the election.

The State Government released the documents 'Tasmanian Planning Policies: Overview and suit of policies' and 'Tasmanian Planning Policies: an explanatory document' in April 2017 and requested public comment on them. The introduction to the explanatory document reiterated the 2014 election policy and also stated:

'Feedback from local government and a range of stakeholders on the draft Land Use Planning and Approvals (Tasmanian Planning Scheme) Amendment Bill 2015 indicated that the new Tasmanian Planning Policies will address a widely recognised gap in the planning system by providing strategic direction on matters of state interest, guiding councils when they make decisions regarding development and land use planning.'

But shortly after the release of these documents the government withdraw the 'suit of policies' claiming they were provided merely as examples. And the

Floor 2, 191 Liverpool Street, Hobart TAS 7000 Australia

p (03) 6234 3552 f (03) 6231 2491 e tct6@bigpond.com ABN 63091237520

'widely recognised gap in the planning system' has remained unfilled to this day.

If the government had treated this issue seriously it could have created legislation and developed the planning policies by the end of 2017, well ahead of the roll out of the Statewide Planning Scheme. It could have done this without using the already prepared 'suit of policies'. As it eventuated the legislation to create TPPs was passed by Parliament in November 2018 but no action was taken on TPPs until a few months ago.

The planning policies that were a priority in 2017 and before that in 2014 still have not been developed. Nearly eight years later the Statewide Planning Scheme is in force in much of the state and we have not seen any planning policies developed. Now the government wishes to develop policies that will probably not be finalised until the Statewide Planning Scheme is in place across the state.

The current TPP scoping process

The current consultation process is seeking comments on the scope of yet to be drafted TPPs.

While it is never too late to develop TPPs, the government deserves to be severely criticised for developing the Statewide Planning Scheme in the absence of publically state policies (after promising to develop the policies first), and now wanting to develop policies when the scheme is nearing completion.

The TPPs or other policies such as state policies have the purpose of driving the development or revision of regional planning strategies and then potentially amendments to the Statewide Planning Scheme. The community would be justified in not having faith in the current process having any significant benefit.

The TPP scoping process is occurring in total isolation from the existing planning system. This calls into question whether the government really wants to find out what the community thinks and has an interest in responding to it. Instead it may be that the state government is going through the motions with consultation but will simply develop TPPs that reflect the policy intent of the existing Statewide Planning Scheme, but perhaps with tweaks to better suit its policy interests.

The community is at a great disadvantage by needing to convince the state government to overturn its existing policies, as embodied in the statewide planning scheme, if it is needed to implement its policy interests. If the TPPs had been done first, then the community and government would have been on a level playing field.

To assist in addressing this dire situation, the government should admit to the farcical situation where the planning policies are being developed after the scheme and seek to make amends for this. At a minimum, it must develop and release for public comment a statement of the planning policies that underpin the existing Statewide Planning Scheme and provide detailed justifications for them. This would allow the community to directly challenge the existing policy framework as well as identify what they want that is different. The government should make it clear that it is willing to make changes to the policies in response

to community comments and that this would flow through to changes to the scheme.

When the state government does identify what the existing planning policies are and the justifications for them then the TCT would welcome the opportunity to make a submission.

Yours sincerely

Peter McGlone
Director

From: [Have Your Say](#)
To: [Planning Unit](#)
Subject: FW: Submission about TPPs
Date: Friday, 22 October 2021 5:02:41 PM
Attachments: [Submission for draft TPPs.docx](#)

From: Sue Henn
Sent: Friday, 22 October 2021 4:52 PM
To: Have Your Say <HaveYourSay@justice.tas.gov.au>
Subject: Submission about TPPs

Department of Justice
Office of Strategic Legislation and Policy
GPO Box 825
HOBART TAS 7001

Web www.justice.tas.gov.au

By email: haveyoursay@justice.tas.gov.au
22 October 2021

To Whom It May Concern,

RE: Scope/Content and Structure of the draft Tasmanian Planning Policies (TPPs)

Thank you for the opportunity to comment on this extremely important issue which has long term ramifications for Tasmania and for future generations of Tasmanians. And as the parent of two young adult children who are planning to work and live in Tasmania, decisions about these issues will be particularly relevant in terms of the quality of life and the environment that they will inherit.

Tasmania is a beautiful State that we treasure for many reasons. Our rich agricultural land is becoming even more valuable as climate change is affecting areas of the Australian mainland. Our produce (food, wine and spirits) is recognized for its high quality. Our unique environment with its diverse biodiversity and ecosystems, and our National Parks, World Heritage sites, wonderful coastlines and landscapes are wonderful tourism drawcards. Tasmania's coastal waters are rich in marine life have many other valuable resources – including human resources – that contribute to our sense of Tasmanian identity.

We do not want to lose this identity with inappropriate planning decisions. And this includes the sell off

There are a number of points that I would like to raise.

1. While it is excellent that the community is given the opportunity to comment on

these TPPs, the complexity of the system, and the need for detailed understanding, means that many crucial decisions are made without full community awareness of long term implications that potentially affect our wellbeing.

An example of this is the concept of Infill Development. The idea of reducing urban sprawl with the construction of higher density mixed with 'gentle density' dwellings along transport routes initially sounds like a viable option. The reality is different with the construction of suburbs that resemble post WW2 housing estates in the UK. These developments fail many liveability criteria – lack of adequate public transport, open spaces, recreational areas, meeting places such as community halls, community gardens to compensate for lack of backyard areas. Also, and I comment here from personal experience in the Kingston area, increased traffic delays and congestion caused by lack of traffic infrastructure planning.

In addition, climate change issues should have been incorporated into the decision-making process. The development of higher density dwellings and lack of green areas contributes to microclimates that raise temperatures while traffic congestion adds to greenhouse gas emissions, etc.

Therefore, I would suggest that more community education and engagement is required to fully explain proposed developments and implications. And these forums should involve a range of people presenting multiple points of view and not just those of the developers or proposal consultants. And comments, issues and proposals made by community members and groups should be noted and integrated into decision making.

While the scope of the TPP topics outlined seem comprehensive and reasonable there are 2 major issues. Firstly, **Economic Development** is too broad and generic a topic and it needs to be subdivided into the categories that are currently listed as issues. Secondly, there appears to be an underlying assumption that development is the optimum aim. Perhaps it would be a beneficial to have a preamble that states that for any planning development to succeed it must have Tasmanian identity and intergenerational wellbeing included among its core decision making principles.

2. Comments and additions to the TPP issues:

a. Environmental Protection

- i. The concept of ecocide should be acknowledged – this would further strengthen Tasmania's standing as an environmental

world leader and destination

ii. Biodiversity and ecosystem protection deserve separate mention

iii. Marine environment should be added as Tasmania also has Antarctic waters and Macquarie Island

b. Hazards and Risks

i. Add pesticide runoff and marine farming debris

c. Economic Development

i. As mentioned earlier, these are not issues but simply a list of development 'entities' that should be placed in TPP topics. Each of these entities has issues connected with them that should be addressed e.g. use and development in the coastal zone could include aquaculture issues or land developments such as the Cambria Green proposal. Both are major issues. Industry and business have wide ranging implications including inappropriate developments, sell-off to foreign ownership, etc.

ii. Aquaculture and Forestry should be added

d. Liveable settlements

i. Social amenities such as meeting places (community hall), playgrounds for children and skateboard parks and community gardens, dog areas and green spaces should be included

3. Thank you for including climate change in this draft TPP document. It is a matter of vital concern to our children and to future generations and I acknowledge that Tasmania has been a leader in this area. However, this leadership could be taken one step further by including this issue in all core decision-making principles of the TPPs. So, new developments should be climate neutral, with significant green spaces and bush areas integrated into the planning. Landscape designers and gardeners should be included in the design of large new developments, including the Infill Developments.

Climate security would also be enhanced by not selling off Tasmanian resources, especially agricultural land and aquaculture to foreign ownership. Foreign investment is fine, leasing is acceptable, over 50% Tasmanian ownership is a good option but 25% foreign ownership of agricultural land is an intergenerational issue.

4. Finally, please include maximum community engagement in the template.

Thank you.

Yours sincerely,

Susan Henn (Ms)

Department of Justice
Office of Strategic Legislation and Policy
GPO Box 825
HOBART TAS 7001

21 October 2021

To: ***Have your say***

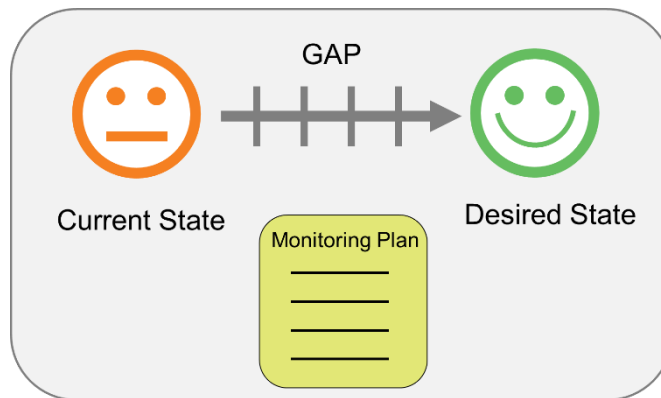
RE: Scope and Structure of the draft Tasmanian Planning Policies (TPPs)

Thank you for the opportunity to provide input on the scope and structure of the draft Tasmanian Planning Policies (TPPs). Below are my comments and suggestions on topics and principles I suggest should be addressed as part of the Scoping Paper process and ongoing development of Tasmania's planning system.

- 1. The role of Planning in articulating and guiding the delivery of a Vision for our future:** I strongly support Minister Jaensch's opening statement "Good land use planning articulates a vision for our future...". Further to this statement, I urge that the Scoping Paper acknowledge and emphasise the vital role of sound strategic Planning in not only articulating a vision for our future, but also in guiding, facilitating and monitoring progress in achievement of that desired future.
- 2. Adaptive management approach.** I urge broader government adoption of [the adaptive management cycle](#) which integrates monitoring, evaluation and reporting into an overall process of planning and adaptive management for continuous learning and improvement. This process, developed by DPIPWE for World Heritage management ([DPIPWE 2016](#), p. 186), is widely regarded as best practice and has been adopted by others nationally and internationally.
- 3. An overarching vision for Tasmania's optimal sustainable future.** The lack of a coherent Vision for Tasmania's future is a crucial, but missing, element of Tasmania's current Planning system. There is a fundamental need for development of a community-supported overarching Vision statement of Tasmania's best possible sustainable future for our collective well-being. Such a statement would articulate high level Planning intent and assist in creating a shared understanding of the path forward. Clear statements of intent and desired outcomes can assist in guiding multiple Policy and Planning matters. As a popular saying goes: "If we don't know where we want to get to, it doesn't matter which way we go".
- 4. Integrated whole-of-government approach to achieving key desired outcomes:** An integrated whole-of-government approach is critically important to achieving the optimal balance between the (sometimes conflicting) goals of economic prosperity, social cohesion and environmental sustainability. Further work is needed to develop a robust Tasmanian Planning system that is founded on sound planning principles, is outcomes-focused, transparent and effective for delivering the desired future. I support the Planning Matters Alliance (PMAT) [Platform](#) of principles for underpinning a sound Tasmanian Planning System.

5. **Sustainability as a core principle.** Tasmania has the potential to become a global exemplar of “quality living in harmony with nature”. However we must remember that Tasmania is a finite island, with finite non-renewable resources, and finite space. Perpetual growth is not possible, desirable, or sustainable on our finite island. Land-use planning must place long-term sustainability as a central pillar of every aspect of policy and planning.
6. **Operationalising the UN Sustainable Development Goals (SDGs) in Tasmania:** The UN Sustainable Development Goals (SDGs) provide a well-established, internationally adopted framework that could be used as a structure for integrating policy and planning to achieve identified desired outcomes for Tasmania. Attachment 1 provides a suggested template for articulating high-level policy and planning commitments for operationalising the global Sustainable Development Goals in Tasmania. The framework could assist in developing clear statements of desired outcomes against each Goal.
7. **Assessing, managing and mitigating risks.** Tasmania is a special island blessed with numerous natural advantages. Tasmanians generally enjoy a comparatively high standard of living (education, health, safety, equality of opportunity etc), and live in attractive environments. However there are complex threats and risks facing Tasmania and the world. For example, global climate change, bushfires and sea-level rise pose significant threats and risks to Tasmania and our way of life. Assessing, managing and mitigating those risks must be a core component of Planning and Policy provisions.
8. **Communicating and consulting with the community in ways everyone can understand.** Most Tasmanians can't begin to understand the planning documents associated with the current Tasmanian Planning Scheme. For example, the State Planning Provisions are several hundred pages long, full of technical jargon, and without a single image to help people understand what's being said. Simply placing documents on a website and advertising their existence in local papers is not good enough. Government communications need to be respectful and accessible to diverse audiences across the Tasmanian community. The use of images may also help communicate Planning concepts in ways everyone can understand. "A picture paints a thousand words" and everyone can understand pictures. Greater emphasis should be given to utilising photos, visual graphics and developing animated visual models to help communicate and consult the community on various important Planning matters, issues and options including future scenarios under different policy and planning settings. A simple example of the use of images to communicate Planning concepts is provided by this community-developed discussion paper outlining community aspirations for the desired future character of a local area in Hobart: [Desired future character in images Blackmans Bay/Kingston](#).

Below is another example of a simple graphic showing the role of monitoring in tracking progress towards the desired state or goal.



Measuring progress is vital to achieving the desired future
 (Source: Gap analysis graphic modified after [Expert Program Management website 2017](#))

9. **Resolution of current anomalies which exempt some land uses from Tasmania's Planning laws.** Some land uses in Tasmania, including mining, dams, forestry (public and private land) and aquaculture, sit wholly or partly outside the Planning system. I support the Planning Matters Alliance (PMAT) '*Principle 5: Integration: Provide an integrated assessment process across all types of developments (including mining, forestry, aquaculture, dams and tourism developments) on all land tenures (including reserved land (e.g. national parks), public land allocated to timber production (formerly known as state forest), and the marine environment) which includes consistent provision of mediation, public comment and appeal rights.*'
10. **Planning Matters Alliance proposed new TPP topics.** I support the Planning Matters Alliance Tasmania (PMAT) [submission](#) and their proposed six new Tasmanian Planning Policy topics viz:
 1. Human Health and Well-being TPP
 2. Ecological Restoration TPP
 3. Scenic Landscape Protection TPP
 4. Good Design TPP
 5. Sustainable Transport and Mobility TPP
 6. Monitoring, Evaluation and Reporting TPP

Attachment 1 overleaf.







OPERATIONALISING THE GLOBAL SUSTAINABLE DEVELOPMENT GOALS IN TASMANIA





Vision for Tasmania: *Our vision is...*
(in 1 sentence)

GLOBAL SUSTAINABLE DEVELOPMENT GOALS	Planning framework for operationalising the Sustainable Development Goals in Tasmania			
	SPECIFIC 10-YEAR GOAL/S	POLICY & PLANNING COMMITMENTS	PERFORMANCE MEASURES	MONITORING AND REPORTING
1 NO POVERTY 				
2 ZERO HUNGER 				
3 GOOD HEALTH AND WELL-BEING 				





ATTACHMENT 1

<div>4</div> <div>QUALITY EDUCATION</div> <div></div>				
<div>5</div> <div>GENDER EQUALITY</div> <div></div>				
<div>6</div> <div>CLEAN WATER AND SANITATION</div> <div></div>				
<div>7</div> <div>AFFORDABLE AND CLEAN ENERGY</div> <div></div>				

ATTACHMENT 1

<div>8</div> <div>DECENT WORK AND ECONOMIC GROWTH</div> <div></div>				
<div>9</div> <div>INDUSTRY, INNOVATION AND INFRASTRUCTURE</div> <div></div>				
<div>10</div> <div>REDUCED INEQUALITIES</div> <div></div>				
<div>11</div> <div>SUSTAINABLE CITIES AND COMMUNITIES</div> <div></div>				

ATTACHMENT 1

<div>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</div> <div></div>				
<div>13 CLIMATE ACTION</div> <div></div>				
<div>14 LIFE BELOW WATER</div> <div></div>				
<div>15 LIFE ON LAND</div> <div></div>				

ATTACHMENT 1

<div>16</div> <div>PEACE, JUSTICE AND STRONG INSTITUTIONS</div> <div></div>				
<div>17</div> <div>PARTNERSHIPS FOR THE GOALS</div> <div></div>				

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SOUTH HOBART PROGRESS ASSOCIATION

(Incorporating Cascades Progress Association)

Founded 1922

ABN 65 850 310 318

President: Phillip Hoysted

Hon. Secretary: David Halse Rogers

Department of Justice
Office of Strategic Legislation
GPO Box 825
HOBART TAS 7001

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

To Whom It May Concern

re: Public Comment Draft Tasmanian Planning Policies (TPPs).

The South Hobart Progress Association Inc. (SHPA Inc.) is a community-based, non-government, not-for-profit organisation that endeavours to promote what is in the best interests of South Hobart and beyond.

The SHPA has long taken an interest in planning issues, particularly as it affects our Suburb. We are a member of *Planning Matters Alliance Tasmania* (PMAT) and, as such, the Association endorses its submission to the review of the draft TPPs, particularly the nomination of additional topics and substantial changes to others for consideration as TPPS.

Those topics include human health and wellbeing, ecological restoration, scenic landscape restoration, good design, transport and monitoring evaluation and reporting. It should be self-evident that human health and well-being be afforded the number one priority in our planning system, and that there is a pressing need to make sure a thorough evaluation and reporting process is instigated.

The Government is to be congratulated on introducing the concept of TPPs into Tasmania's planning system. While the SHPA is supportive of retaining State Policies (SP), it is far too easy to conclude that the *State Policies and Projects Act, 1993* has failed to deliver on its promises. Most major projects have become mired in public controversy and only three SPs have been developed and implemented over what is approaching 30 years: in other words one per decade. The three policies, protection of agricultural land, water quality and coastal policy vary greatly in substance and quality.

The State Coastal Policy became a political football between local and State Governments with so many iterations over so many years that the proverbial truck can be driven through large sections of the final document.

Strategic policies are the missing component of the Resource Management and Planning System and are critical as they provide the **intention** of the planning system. If done properly, TPPs offer to provide more substance to strategic directions in areas of interest and concern to the Tasmanian community. The Association urges the Government to develop TPPs in close consultation with the broader community and with a sense of urgency. Such planning policy directions have essentially been missing in the planning system for some time.

The Association's comments are provided under the questions listed in the Scoping Paper. As can be seen, our comments are more focussed on emphasis rather than content.

As a general observation, the draft TPPs appear to be deliberately grouped in order to limit the number of TPPs, presumably for brevity sake. It is a potentially risky approach. Issues may be lumped together despite only a cursory overlap, potentially burying major issues of concern to the community. Major planning topics, such as energy use and protection of agricultural lands should be front and centre in the new TPPs. This is one exception to making good public policy: more is better.

The Scoping Paper notes that TPPs will not be used directly in assessments of individual developments. This is unfortunate and weakens the new proposed TPP system. How a council for example would *indirectly* take TPPs into account when assessing a development application, is a mystery. TPPs have clear objectives and strategies; clearly they should be considered directly as part of the approval process.

Finally, the concept of sustainability which formed the basis for the old planning system has gone missing under the draft TPPs. Many of the strategies and issues that will underpin the draft TPPs will require to be managed on a sustainable basis. The best planning system in the world fails dismally if it is not sustainable.

1. Do you agree with the scope of proposed TPP topics?

They are too broad: for example, *Environmental Protection* should focus on maintaining biodiversity and protection of Tasmania's natural environment and world-class reserve system. Given the importance of matters such as water quality, energy use and maintaining our agricultural lands to the Tasmanian community and the enormous planning problems they present, their omission from the TPPs topic list is an obvious gap. There also needs to be specific TPP Topics to match the three State Policies dealing with water quality, coastal management and agricultural land. The community has already identified these priority areas only to find them subsumed as an issue. It also appears to undermine the planning hierarchy being developed under the TPP system.

The Association also supports a stand-alone Aboriginal Well Being and Heritage TPP. The Aboriginal community is likely to feel justifiably concerned that the State's planning system will only address one aspect of the myriad of issues confronting its community. Such an approach would leave a built and cultural heritage topic. Given the significance of our rural heritage, it should be included as well. Finally, the importance and prominence of good infrastructure to support the economy and

community well-being makes this topic simply too large to be under one heading: for example, the cost of energy and the switch to renewables warrants its own topic.

2. Do you agree with the scope of proposed TPP issues?

Most of the relevant issues have been identified, but not all. It is surprising that rural health services, mental health, and aged care are absent from the lists of issues, as is literacy levels and the restructure of education in the State. The inclusion of health and well-being and education under the odd phrase 'Liveable Settlements' does not help.

Until a more appropriate list of TPP topics is drawn up, it is difficult to see where the gaps in important issues can be identified.

3. What other topics and/or issues do you think the TPPs should cover?

See above.

4. Do you agree that climate change should be integrated into all relevant TPPs?

The SHPA strongly agrees with the comment in the Scoping Paper that climate change adaption and mitigation principles should be incorporated into the issues for each and every relevant TPP topic. As a community, we have to plan now on how to deal with climate change and its inevitable impact on most aspects of our lives. A holistic approach across the Tasmanian planning system will significantly boost our capacity to deal with this issue.

The Association is agnostic regarding an approach to COVID-19. Depending on how it pans out, particularly with levels of vaccination, we may reach an equilibrium whereby the disease can be dealt with as most other diseases within the health system. It certainly warrants inclusion as an issue but not necessarily across all TPPs like climate change.

5. Do you think that the proposed template is appropriate and a useful way of providing guidance on what the TPPs should achieve?

Given the importance of knowing whether or not the changes to the planning system are working, in other words are we achieving what we set out to do, there needs to be a row/column headed Desired Outcomes, with a further column/row Measuring Progress that provides the data/information on whether or not the Desired Outcome is being achieved. If each TPP has these suggestions it will automatically make monitoring and reporting to Parliament much more efficient and provide information to the public as it is made available.

There will inevitably be confusion between what is a Strategy and what is an Implementation Statement. The Association suggests the definition of an Implementation Statement be shortened to "Describes how each individual strategy will be delivered."

Thank you for the opportunity to comment on the Scoping Paper for draft TPPs. I look forward to seeing the next iteration of TPPs. If you wish to discuss any of our submission, please contact

Yours sincerely

Phillip Hoysted

President

South Hobart Progress Association Inc.

22nd October, 2021

Our ref: 21/18574 Town Planning – Planning Scheme – Tasmanian Planning Policy Framework

Enquiries: Deb Szekely

22 October 2021

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

haveyoursay@justice.tas.gov.au

Dear Sir / Madam,

RE: SCOPE OF THE DRAFT TASMANIAN PLANNING POLICIES

Thank you for the opportunity to provide comment on the draft Tasmanian Planning Policies (TPPs).

Tasmanian Planning System

The Tasmanian Planning System makes provision for the Tasmanian Planning Policies to ensure the state interests in planning are protected and delivered as part of the state wide planning system. To this end it is our understanding that the TPPs are to apply to the extent relevant when:

- a) making or amending the Northern Tasmania Regional Land Use Strategy (relevant to BODC);
- b) making or amending the State Planning Provisions (SPP);
- c) making or amending the Local Provisions Schedule (LPS) particular to each local government area.

The higher order afforded to the TPPs within the Tasmanian Planning System, is to ensure state interests are appropriately integrated into the Regional Land Use Strategies, the SPP and individual Local Provision Schedules and delivered as part of local government planning across Tasmania.

Consequently, it is our opinion, that the Tasmanian Planning Policies should be listed under broad themes that within each theme, identifies the State interests. These themes would equate to the proposed 'TPP Topic'. Collectively the TPPs could form a State Planning Policy document that clearly expresses the state's interests in land use planning and development including:

1. Context – clearly explains the role of the TPPs within the system;
2. Application – explains how the TPPs apply and operate within the system;
3. Purpose and any guiding principles – the purpose of the TPP should be clearly articulated and promote innovative development. It is here that the TPP should indicate how the planning instrument works in conjunction with other instruments, processes and initiatives outside the Tasmanian planning system e.g. development of a state-wide infrastructure plan and how it's development and implementation is related to the delivery of the Tasmanian planning system;
4. State interest policies – outcomes focused and articulate the state interests.

Broad Themes and State Interests

The Scoping Paper provided broad topics that should be included with the draft TPPs. It is the opinion of the Break O'Day Council that these should relate to state interests in planning to ensure they are protected and delivered as part of local government planning across Tasmania. These broad topics or themes should include and should commence with a state interest statement that clearly communicates the states intent in delivering the policy. This will ensure that these interests are captured at such time as the Regional Plans are reviewed. The state interests within each broad topic should be clearly communicated, for example:

Housing and Liveable Communities.

The state interests include housing supply and diversity in housing choice in addition to creating liveable communities. The state interests are then expanded upon in the proposed template format provided in the Scoping Paper.

State Interest Themes	State Interests
Housing and Liveable Communities	<ul style="list-style-type: none"> • Housing supply – sufficient land and housing stock to support the needs of all sectors of the community; • Diversity in housing choice – affordable, accessible, innovative and reflecting demographic needs; • Creating liveable communities – consolidation and expansion • Focus on affordable housing and attempting to ensure the planning system minimizes regulatory barriers and inefficiencies

The TPP topics provided within the Scoping Paper, adequately address the broad topics to which the state should have an interest. In our opinion, how the TPPs progress topics such as Housing and Liveable Communities and Infrastructure, are of paramount importance. The TPPs should be outcome focused and direct state projects to ensure the data is available for informing the Regional Plans.

For example:

1. Housing Demand, Supply and Diversity – Benchmarks within the TPP to ensure data is continually collected to inform the regional plans with respect to housing demand and supply available within the regions; current and projected demographic, economic and social profiling within local government areas; ability to inform the Regional Plans to ensure appropriate and responsive zoning, mix of lot sizes and dwelling types and assisted living requirements etc.
2. State Infrastructure Plan – development of a state infrastructure plan that recognises land use planning and infrastructure planning are related and dependent on each other. There are real challenges in delivering infrastructure in regional Tasmania. There needs to be improved coordination of land use and infrastructure decision making to ensure benefits are maximised and shared.

It is the opinion of the Break O'Day Council that the development and implementation of the Tasmanian Planning Policy should be expedited with a level of urgency to ensure the review of the Regional Plans is appropriately informed and progresses soon after, efficiently and deliberately.

Yours Sincerely

John Brown
General Manager

From: [Have Your Say](#)
To: [Planning Unit](#)
Subject: FW: Scope/Content and Structure of the draft Tasmanian Planning Policies
Date: Tuesday, 26 October 2021 8:10:48 AM

From: Graeme Beech
Sent: Monday, 25 October 2021 10:11 PM
To: Have Your Say <HaveYourSay@justice.tas.gov.au>
Cc: NE Bioregional Network ; Sophie Underwood

Subject: Scope/Content and Structure of the draft Tasmanian Planning Policies

To Whom It May Concern

I apologise for the late submission and request that you include my submission in your consultative process.

RE: Scope/Content and Structure of the draft Tasmanian Planning Policies (TPPs)

Thank you for the opportunity to comment on the Tasmanian Government's Tasmanian Planning Policies Scoping Paper for draft TPPs .

Strategic statewide policies are critical as they provide the intention of the planning system. It is disappointing that state policies are missing from this process as they provide for a whole of

Government approach and are signed off by the Tasmanian Parliament. Having two strategic layers is somewhat confusing so it would assist to explain the relationship between the SPs and TPPs.

I support the 6 TPP's listed however would like to suggest a seventh TPP is required and titled Environmental flows/water management. I do not believe Tasmania has the necessary regulatory and policy framework to ensure the environmentally sustainable allocation and use of surface and groundwater resources. Too often we have seen dams and irrigation schemes built in isolation from consideration of necessary downstream environmental flows as well as direct impacts such as loss of habitat and future salinity issues. Climate change will require a more considered decision-making process that first and foremost ensures the necessary environmental flows are provided when considering developments.

Additionally, I am a member of PMAT and support all elements of their submission.

I look forward to the opportunity to comment on the actual content and implementation statements when the new draft Tasmanian Policies are released in 2022.

Yours faithfully

Graeme Beech

27 October 2021

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

Submitted by email: haveyoursay@justice.tas.gov.au

Dear Sir/Madam

RE: Scope of the draft Tasmanian Planning Policies

TasNetworks welcomes the opportunity to respond to the Department of Justice's consultation on the scope of the draft Tasmanian Planning Policies (**TPPs**).

TasNetworks, as both the Transmission and Distribution Network Service Provider in Tasmania, is pleased to see protection and facilitation of electricity and energy use and development as State wide issues to be addressed through the TPPs.

It has been TasNetworks' (and its predecessors) experience that there can be conflicts between the aims of state and national policy on the development of electricity infrastructure and the practical application at a local level in gaining approvals to build the assets in the most efficient way. The proposed scope of the TPP topics and issues, as well as the template, are supported by TasNetworks as they go some way at addressing these issues.

TasNetworks delivers safe, secure and reliable electricity and communication network services to Tasmanian customers at the lowest sustainable prices. In response to both state and national policies, TasNetworks will contribute to the renewable energy transition by:

- implementing Tasmanian's soon to be legislated renewable energy target;
- renewable energy zone development in Tasmania, assisting in implementation of the Australian Energy Market Operator's Integrated System Plan; and
- implementing the Tasmanian Renewable Energy Action Plan (**TREAP**) and Climate Change Action Plan.

Given the wide ranging state and national benefits from these activities, it is important that any policies within Tasmania's Resource Management and Planning System (**RMPS**) support

the sustainable development and protection of vital electricity and communications infrastructure.

We would advocate that a TPP supporting protection and facilitation of electricity and associated communications infrastructure should:

- recognise and protect existing and strategic energy corridors and assets;
- facilitate the provision of new electricity infrastructure assets both transmission and distribution;
- support innovative application of technology and adaptation to changing customer needs that will support the move to electric vehicles and distributed energy resources in line with the TREAP;
- preserve land corridors to key substation sites;
- result in the requirement that all transmission related substations and communication sites remain zoned Utilities, while transmission line corridors are not zoned utilities to maximise the continued use, consolidation and protection of existing electricity transmission infrastructure;
- ensure broader community benefits gained from a development are not overridden by local considerations. When an appeal against a development is based purely on local community impacts, it is critical that the benefits to the broader national benefits are considered; and
- acknowledge the benefits of a coordinated approach to planning and approvals across various infrastructure classes (for example, water, electricity, roads , communications).

With the development of TPPs, it is important not to lose key aspects of the current framework such as the Electricity Transmission Infrastructure Protection Code which is already incorporated into the State Planning Provisions. This provides surety for the development of long life assets, including transmission corridors, and therefore encourages adequate investment in these critical assets.

For more information or to discuss this submission, please contact TasNetworks' Regulation Leader, Tim Astley, by email on _____ or by phone on _____

Yours faithfully

Chantal Hopwood

Regulation Leader



14 October 2021

Submission from CatholicCare to the Tasmanian Planning Policies Consultation Paper

We are one of a few not for profit Organisations that have multiple programs based around the State. We provide emergency and transitional accommodation and a range of supports to some of Tasmania's most economically and socially disadvantaged individuals and families.

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.

Having social and affordable housing is vital, it can provide secure accommodation that is a fundamental platform to help those people who require assistance to live their best lives. CatholicCare provide a myriad of psychosocial - economic – family support and a range of intervention services that build up and upon the individual / family and or community strengths. Increasingly, we see the visible indicators and symptoms of acute housing stress which is now becoming chronic. The shortage of affordable and/or available stock in the market has been problematic for some time. This directly impacts on the wellbeing of individuals and broader communities, very few immune to the knock-on effects. Resources in a range of community, social and government services are being stretched in an effort to remedy or respond to the growing needs of those who are most marginalised in our society. Schools, health & hospital, child protection, justice, family violence, support and emergency relief services are all under immense pressure to respond to populations whose situation is a direct result of, or has been made increasingly more complex due to an absence or secure accommodation. Band-aiding is no longer enough. Action at all levels needs to be taken to reduce the rate and impact of homelessness and its associated risks.

Homelessness, its causes and its symptoms need to be seen as an area for social policy and planning action not tolerance or acceptance. More can and needs to be done to improve personal and community wellbeing. However, the responsibility needs to sit across the whole community. Social housing includes both public and community housing, affordable housing can be made possible in the private market, through regulations, incentives and

subsidies. The burden of response that is placed upon homelessness support and related services is growing. We have a multitude of individuals and families, many whose voices go unheard that are living in cars, in sheds, between family and friends or in substandard over priced private rentals. If we want to promote, liveable settlements, economic development and a safe, vibrant, thriving community then we need to be considerate of the needs of all Tasmania's particularly those who are least able to speak out and meet their needs. The essential services that our most vulnerable are so heavily dependent upon, and unnecessarily drained due to the response required to remediate the symptoms that are all too often associated with housing stress and homelessness.

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

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 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 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

Denise Leonard



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>



27 October 2021

Office of the Secretary
Planning Policy Unit
Department of Justice
PO Box 825
Hobart TAS 7001

Email: haveyoursay@justice.tas.gov.au
c/o - planning.unit@justice.tas.gov.au

Dear Sir/Madam,

Scoping Paper – draft Tasmanian Planning Policies

I refer to recent correspondence from the Minister for Local Government and Planning seeking input on the Scoping Paper for the preparation of the draft Tasmanian Planning Policies (TPPs).

Council provides its in principle support for the policy intention behind the TPPs and their intended function within the Tasmanian planning system.

The TPPs Scoping Paper provides a reasonable overarching direction for the future preparation of a suite of draft TPPs which will consider a range of contemporary and relevant issues.

Council looks forward to further consultations on the preparation of the draft TPPs as this initiative is further progressed.

Regards,

Matthew Skirving
EXECUTIVE MANAGER CITY GROWTH





Australia ICOMOS Secretariat
Faculty of Arts & Education
Deakin University
221 Burwood Highway
Burwood VIC 3125
ph: +61 3 9251 7131
e: austicomos@deakin.edu.au
w: www.icomos.org/australia

27 October 2021

Ms Ginna Webster
Office of the Secretary
Department of Justice
GPO Box 825
Hobart Tasmania 7001

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

Dear Ms Webster

Tasmanian Planning Policies

Thank you for the opportunity to comment on the draft Tasmanian Planning Policies (TPPs) being developed to provide the first comprehensive, high-level policy framework for the Tasmanian planning system. The TPPs will shape the future for Tasmania through informing the planning rules in the Tasmanian Planning Scheme.

ICOMOS – the International Council on Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an official Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 750 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia, which provides us with an exceptional opportunity to see best-practice internationally. We have a particular interest in Australia's World and National Heritage places.

Australia ICOMOS has previously made comment on the statewide Tasmanian Planning Scheme in relation to cultural heritage matters, including on 17 May 2016. It has noted in such submissions its concerns about the erosion of protections for historic cultural heritage and the lack of adequate consideration for Aboriginal cultural heritage in the statutory planning context.

Australia ICOMOS considers the TPPs could potentially provide an excellent approach to ensuring that important matters, including the protection of cultural heritage values, are properly considered by providing better planning direction.

However, our key concern lies in whether the TPPs as currently proposed will have the power to influence statutory planning. The TPPs will only be useful if they have priority status over the Tasmanian Planning Scheme as a whole. The scoping paper is unclear on this matter but suggests that they will be subsidiary and the focus of their use will be largely on strategic land use planning. In our view the usefulness of the TPPs will be much too limited if used at this level. The TPPs must sit above the Tasmanian Planning Scheme and inform it, and not sit to the side or below. It must also sit above the relatively recent *Land Use Planning and Approvals Amendment (Major Projects) Act 2020*.

Australia ICOMOS is pleased to see that cultural heritage is included as a TPP, with Aboriginal heritage, cultural heritage and landscape heritage included within this. We recommend, however, that this TPP adopt a more standard terminology to avoid confusion. The topic should be 'cultural heritage' not 'heritage', as natural heritage is not included under this TPP; and the areas of consideration should be re-named Aboriginal heritage, historic heritage and landscape heritage.

Australia ICOMOS would urge that the Tasmanian Government utilise cultural heritage best-practice in developing the Cultural Heritage TPP, giving particular regard to the Australia ICOMOS *Burra Charter*, the most broadly accepted guideline for cultural heritage conservation in Australia. Basing the planning policy on a widely accepted approach will result in a robust policy with minimal risk of ambiguity and confusion, it will avoid definitional confusion and provide familiarity across jurisdictions.

As noted above, Australia ICOMOS' overarching concern in relation to the TPPs is their ability to guide statutory planning decisions. Some further comment is made below in relation to this matter and the linkage between TPPs and the Tasmanian Planning Scheme.

- The TPPs must conform with Schedule 1, Parts 1 and 2 objectives of the *Land Use Planning and Approvals Act 1993*.
- There must be a clear link to regulatory mechanisms and the ability for adjustment to maximise effectiveness. There must therefore be capacity to amend the heritage provisions in the Tasmanian Planning Scheme to better reflect the TPPs.
- The TPPs must have priority status over decisions of the Coordinator General's Office.
- The Cultural Heritage TPP must:
 - be a holistic, values-based policy with a focus on conservation of heritage values, significant attributes, character and qualities;
 - have heritage protection and conservation as a principal focus, as per the *Burra Charter*;
 - adopt the precautionary principle;
 - recognise cultural landscapes and social values, especially in relation to landscape and landscape character; and
 - be authored by appropriately experienced heritage professionals.

Australia ICOMOS is happy to contribute further to the development of a Cultural Heritage TPP when the framework issues are resolved.

Yours sincerely

Helen Lardner
President

Brian Risby
Director
Planning Policy Unit
Department of Premier and Cabinet

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

28 October 2021

Submission from TasCOSS and Dr Lisa Stafford to the Tasmanian Planning Policies consultation paper

TasCOSS is the peak body for the community services industry in Tasmania. We represent the interests of our members and their service users to government, regulators, the media, and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage and promote the adoption of effective solutions to address these issues.

Dr Lisa Stafford is a passionate researcher, educator and planner in Inclusive Communities, and holds a Senior academic position at QUT, adjunct at UTAS' School of Planning, Geography and Spatial Sciences, and is a Social Researcher for the Social Action Research Centre Anglicare-Tas. Lisa has over 20 years' combined experience in practice and research, and is a full member of Planning Institute of Australia (PIA).

Thank you for the opportunity to comment on the *Scoping Paper for draft Tasmanian Planning Policies*. We recognise the significance of TPPs as a key part of Tasmania's land use planning system, helping to shape future Tasmanian communities and cities that are sustainable, equitable, inclusive, healthy and thriving. In our response we will answer the direct questions posed in the Scoping Paper and make some general observations and recommendations.

General Observations

The TPPs are seeking to articulate a vision for our future, guiding how our communities and cities can look and work. We therefore feel there is opportunity within the TPPs to strengthen principles to guide high level strategic land use planning. We value and agree with the integration of climate change, however we also feel the same emphasis and approach is needed in terms of *planning for people and communities*, given the impact of land-use planning on lives and livelihoods.

Embed broader principles in the TPPs

We believe the review of the TPPs is an opportunity to build key principles relating to equity, health and inclusion into the TPP topics and/or issues. We believe the Land Use Planning and Approvals Act (LUPAA) gives scope for this under its various objectives, including:

- provide for explicit consideration of social and economic effects when decisions are made about the use and development of land
- promote the health and wellbeing of all Tasmanians and visitors to Tasmania; and
- protect public infrastructure and other assets and enable the orderly provision and coordination of public utilities and other facilities for the benefit of the community.’¹

We feel the three principles of equity, health and inclusion, as well as the concept of climate justice and/or climate change, should be the foundations of the TPPs. These principles and their importance are outlined below:

Equity

The term “just” has been widely embraced in planning for decades, in reference to access to and use of spaces and places like the Just City. However, spatial and social injustice persists as access to shelter, socially valued resources and infrastructure is not accessible nor available to all citizens.

Given the direct and immediate influence planning may have on people and place, we believe equity and fairness must continue to be key concepts incorporated into planning policy and practice. This is critical in addressing poverty and inequality experienced by Tasmanians, as well as the growing divide among inner-urban, urban-rural fringe and rural areas.

Health

We believe the planning system is central to supporting the health and wellbeing of Tasmanians. A well-designed planning system creates ‘healthy spaces and places which provide equitable access to opportunities for active living, active travel and healthy food.’² As well as being reflected in LUPAA, this approach has also received endorsement by the Premier’s Health and Wellbeing Advisory Council which supports a ‘Health in all Policies’ approach. We therefore recommend the inclusion of explicit references to a range of outcomes in health and wellbeing

¹ Schedule 1, Part 2(c), (f), (h) [View - Tasmanian Legislation Online](#)

² Heart Foundation 2019, ‘Support for a State Policy for Healthy Spaces and Places’, [Background Advocacy doc fo State Policy May2019.pdf \(heartfoundation.org.au\)](#)

in the TPPs, beyond the limited reference in the draft TPPs to ‘recreation and open space opportunities’.³

Inclusion/Inclusiveness

We believe that Tasmania’s planning systems must intentionally focus on inclusion and inclusiveness to promote just and healthy cities and communities. This is required in high level policy as it sets the vision and intent.

There is unfortunately a long-term legacy of social exclusion in Tasmania created by poor urban planning and design. These practices have resulted in the alienation of certain members of our community, including Tasmanians living on low-incomes, Tasmanians living with diverse abilities, chronic illness and mental health needs. Planning policies have also failed to recognise and accommodate the needs of people in different points across their lifespan, from toddlers and parents through to older people. The effects of these policies can still be observed in planning policy and design relating to public infrastructure, including public transport systems, housing, neighbourhoods, and public open spaces.

Tasmanian planning systems and policies must also recognise the particular needs of community members with a disability or experiencing mental health issues. According to the 2019 Tasmanian Population Health Survey, 26.8% of Tasmanians have a disability, while 33.6% experience depression and/or anxiety disorders. This means that all Tasmanians will have personal experiences of disability or mental health needs, either from their own personal experience or the experience of family, friends or colleagues. There are diverse experiences of disability: people experiencing disability can be of any age, race, gender or class; disabilities can be highly visible or invisible; disabilities can be chronic, episodic or temporary. This means planning policies must be developed in ways that accommodate the diverse experiences and needs of people with a disability.

There is also a diversity of spatial needs within our communities, relating to different needs and lifestyles of people of different ages and different points in their life. Effective and inclusive planning policies consider these needs: for example, the spatial needs of infants and young children, the temporary spatial needs of expectant mothers and the needs of older people, of whom one in two over the age of 65 years have a disability.

In future, *planning for all people* must be a central principle embedded in TPPs and across subsequent levels of planning policy. We believe this principle will ensure policies adequately

³ [Department of Premier and Cabinet \(dpac.tas.gov.au\)](http://dpac.tas.gov.au)

recognise and respond to the diverse needs of all community members, regardless of their age, race, gender or class.

We suggest these three key principles should be embedded in all relevant TPPS, together with climate change principles. Linking to the Sustainable Development Goals (SDGs) (as suggested below) will also help to turn high level principles into high level goals and implementation actions, such as Zero Poverty (Goal 1) and Transport Equity (Goal 11.2).⁴

Below we provide some detail on themes and issues that we believe should be included or developed more fully in the TPP issues.

Directly connecting themes with Sustainable Development Goals

There is a significant opportunity for the TPPs to be aligned to the Sustainable Development Goals, which may provide greater clarity and improve description, aims and objectives for the TPP themes and issues. One benefit of SDGs is they are well defined with high level targets and measures. SDGs are also flexible enough to grow with TPPs, should they be refined over time in response to Tasmania's changing planning needs.

Recognition of the interconnections in Topics and the policy template

We believe that to achieve an integrated approach to strategic and spatial planning, the policy and template needs to allow for connections between topics and issues, as well as being able to refer to other relevant policy and legislation. For example, issues under 'Infrastructure to support the economy and create liveable communities' should link to issues under other topics including 'economic development' and 'liveable settlements'.

We now turn our focus to the proposed topics and issues in the Scoping Paper.

Response to draft Themes and Issues

We acknowledge the draft Themes and Issues have sought to capture key high-level priorities for planning now and into the future. However, we feel further refinement is necessary to ensure the TPPs operate effectively and in a manner consistent with their intent. Comments and recommendations against each of the proposed TPP topics and issues are below.

⁴ [THE 17 GOALS | Sustainable Development \(un.org\)](https://www.un.org/sustainabledevelopment/)

Topic: Economic Development

- *Concern Issue – Incomplete list under Economic Development.*

In our view, the issues to be addressed under this topic are incomplete. Key areas driving economic development in Tasmania (both in metropolitan and regional areas) include the arts as well as social assistance services, the latter being the fastest growing sector in the State. The issues should also be flexible to adapt to emerging economies.

Topic: Hazards Management

- *Concern – Issue name and ordering*

‘Man-made’ hazards should be removed and renamed as ‘human-made’. We question the delineation between ‘natural’ and ‘human made’ hazards, when for example bushfires can be a direct result of human activity. We recommend simply listing ‘hazards’.

Topic - Livable Settlements

- *Concern: Name and scope*

Planning sets the framework for cities, neighbourhoods and towns for decades to come. There have been significant learnings and documented negative impacts on physical and mental wellbeing and economic participation due to the legacy of poorly planned greenfield sprawl without properly integrated social infrastructure and public transport. This reinforces isolation and poverty. We believe livable features and accessibility should be the base line. SDG Goal 11 is ‘Make cities and human settlements inclusive, safe, resilient and sustainable.’ We suggest this goal provides a useful framework that is well defined, scalable to rural areas as well as urban centers, while remaining high-level and flexible.⁵

Recommend: Change the topic to Sustainable, Inclusive Cities and Communities.

- *Concern: Name of Issue*

We support the inclusion of ‘Health and wellbeing – recreation and open space opportunities’ and ‘Community – health services and education’ under ‘Livable settlements’ but suggest rewording to better capture common usage and the broader intent of their inclusion. We therefore suggest the wording, ‘Health and wellbeing – access to open spaces’, because the term open space is more in line with existing policies, such as the Tasmania Open Space policy,

⁵ [Goal 11 | Department of Economic and Social Affairs \(un.org\)](#)

as well as research and practice. Open space strategy encompasses all forms and levels of engagement including recreation, sports, park and playgrounds, as well as capturing the significant wellbeing benefits (physical, psychological and spiritual) experienced when engaging with open spaces.⁶

We also suggest the wording 'Community – social community infrastructure' because the notion of social infrastructure is already commonly used in practice, policy and research, as well as being measured in the Australian Infrastructure Audit 2019.⁷ Infrastructure Australia describes social infrastructure as: 'the facilities, spaces, services and networks that support the quality of life and wellbeing of our communities. The network of social infrastructure contributes to social identity, inclusion and cohesion and is used by all Australians at some point in their lives, often on a daily basis. Access to high-quality, affordable social services has a direct impact on the social and economic wellbeing of all Australians.'⁸

Recommend: Change the issues to:

- Access to open spaces
- Social community infrastructure

Topic: Infrastructure - Issues Public Transport

We welcome TPPs explicitly considering the issue of public transport. We also welcome the TPPs acknowledging the importance of public transport planning to be integrated with land use (as noted under the theme Liveable Settlements), however we believe the importance of this integration should be reflected in the issue by explicitly linking public transport, land use and infrastructure.

We also believe that equity should be included in this issue. Transport disadvantage is significant in Tasmania, and access to public transport in Tasmania is currently not fair or equal. The existing system is strained with limited services and infrastructure offered, particularly beyond the inner urban areas of Hobart and Launceston. In comparison to all other Australia capital cities, Hobart has the lowest percentage of houses with access to public transport

⁶ https://www.dpac.tas.gov.au/_data/assets/pdf_file/0006/234690/Tasmanian_Open_Space_Policy_Report.pdf

⁷ https://www.infrastructureaustralia.gov.au/sites/default/files/2020-10/Audit%202019_Section6_Updates%20September%202020.pdf

⁸ [Australian Infrastructure Audit 2019 - 6. Social Infrastructure.pdf \(infrastructureaustralia.gov.au\)](#)

options for commuting to work (13.5%) whilst Launceston is the worst city overall, with only 5% of housing with access to public transport.⁹

Many urban, urban-rural fringe and rural residential areas in Tasmania are not being serviced well or at all.¹⁰ This has helped to enforce a culture of car usage, potentially adding financial stress to households or, for those without access to a vehicle, significantly limiting travel options and choices, making travel in some areas an impossibility.¹¹ It is anticipated that those on low-incomes and with intersecting inequalities of disability, age, gender and race living in urban-rural fringe and peri-urban areas are more than likely to experience involuntary transport disadvantage in these under-serviced communities,¹² which creates associated economic and health inequalities and social exclusion.¹³ Young people are particularly impacted by poor public transport, as evident in Youth Network of Tasmania's (YNOT) Tasmanian Youth Forum 2021 Transport report.¹⁴

Demands for a more inclusive and sustainable public transport system in Tasmania are only going to increase, due to intersecting social and economic issues such as housing inequality, precarious work and unemployment, and social exclusion and discrimination.

We therefore recommend explicit recognition of 'equity' in public transport. This reflects the needs of Tasmanians, and also aligns directly with the Sustainable Development Goals 11.2, Equity for All in Transport.¹⁵

Recommend: Rename issue to 'Equitable public transport, land use and infrastructure'

⁹ BITRE2019, https://www.bitre.gov.au/national-cities-performance-framework#all_cities, Getting to work

¹⁰ Tasmanian Council of Social Services (TasCOSS) 2014, Transport in the community: Final report, TasCOSS, Hobart.

¹¹ Stafford, L 2014 The journey of becoming involved in urban spaces by children with diverse mobility. In Buccieri, K (Ed.) Body tensions: Beyond corporeality in time and space. Inter-Disciplinary Press, United Kingdom, pp. 97-120. <https://eprints.qut.edu.au/76201/>

¹² Martens, K. 2016, Transport Justice: Designing fair transport systems. Taylor & Francis.

¹³ Currie, G. and Delbosc, A. 2011, "Transport Disadvantage: A Review", Currie, G. (Ed.) New Perspectives and Methods in Transport and Social Exclusion Research, Emerald Group Publishing Limited, Bingley, pp. 15-25. <https://doi.org/10.1108/9781780522012-002>

¹⁴ <https://www.ynot.org.au/sites/default/files/documents/2021-10/TYF%202021%20Transport%20Report%20FINAL.pdf>

¹⁵ [Goal 11 | Department of Economic and Social Affairs \(un.org\)](#)

Topic: Public engagement in planning processes

Public engagement in the planning process should be embedded and implemented across all TPPs, as required under the objectives of the overarching Resource Management and Planning System (RMPS).¹⁶

Public engagement is critically important in all aspects of planning to ensure communities and cities are designed with and for all people. We believe public engagement in planning is a way to uphold inclusion, equity, health and wellbeing, as well as sustainable economies. Good planning involves genuine public engagement that enables participation from a wide range of community members, particularly by groups who may often be marginalised from public debate or discussion, such as First Nations people, people with disabilities and mental illness, children and young people, and people of all genders.

Social planning is key for creating livable, inclusive communities. It operates from a justice framework and from participatory planning processes aimed at generating collaborative analyses and solutions at the local level in urban and regional planning contexts (see Baldwin & Stafford, 2019).¹⁷ While there has been renewed focus on the social aspects of planning, particularly through the COVID-19 pandemic experience, there are concerns that eroded knowledge and practices of social community planning over time have meant these social planning strategies are not given the primacy they need.¹⁸ While perhaps out of scope of the TPPs, their implementation should consider this gap in knowledge and ensure it is addressed with training and education, as well as clear frameworks to guide practice on the ground.

- ***Concern - Consultation***

We also suggest reviewing the use of ‘Consultation.’ Consultation is a one-way form of engagement and requires a minimal level of participation.¹⁹ The Tasmanian Government’s own *Framework on Engagement* recognises ‘Consult’ is a low level of a continuum of engagement practice.²⁰

¹⁶ [The Resource Management and Planning System \(RMPS\) | EPA Tasmania](#)

¹⁷ Baldwin, C., & Stafford, L. 2019, The role of social infrastructure in achieving inclusive liveable communities: Voices from regional Australia. *Planning Practice & Research*, 34(1), 18–46.
<https://doi.org/10.1080/02697459.2018.1548217>

¹⁸ Stafford, L. 2020, Planning Inclusively: Disrupting ‘Ableism’ to Make Communities Just for All. QUT Centre for Justice Briefing Paper, pp. 1-4, December 2020. [Featured article]<https://eprints.qut.edu.au/210846/>

¹⁹ “A Ladder of Citizen Participation” - See Sherry R. Arnstein, 1996, “A Ladder of Citizen Participation,” *Journal of the American Planning Association*, Vol. 35, No. 4, , pp. 216-224.

²⁰

https://www.dpac.tas.gov.au/data/assets/pdf_file/0006/273633/Tas_Government_Framework_Community_Engagement_Revised_2014.pdf

Good planning should authentically engage with the community in the process of land use planning and should aim for a participatory public planning approach using co-design and community level co-generation. Diversity in voice must also be captured by ensuring inclusive processes. We therefore recommend changing 'Consult' to 'Participatory planning' or 'Inclusive engagement'.

Recommend: Replace 'Consult' with 'Participatory planning' or 'Inclusive engagement'

- *Concern – Issue: Ongoing Review*

We are unclear whether this is ongoing review of engagement practices or ongoing review of the TPPs. We recommend clarifying what is to be reviewed, and to ensure explicit references to community engagement and review processes are included.

Recommend: Clarify the object of 'Ongoing review'.

General comments

- *Concern: Ambiguous wording*

'Contained settlements' and 'Pleasant places to live – amenity and avoiding land use conflict' are highly subjective phrases and are ill-defined. We recommend replacing these with issues we believe are missing (see below).

What other topics and/or issues do you think the TPPs should cover?

Add Issue: Affordable housing

A crucial purpose of Tasmania's planning system is to ensure all Tasmanians 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.²¹ If social and affordable housing is included in the TPPs, Tasmania will have the vital planning mechanisms to ensure everyone can have the home they need. This was acknowledged in an earlier draft of the TPPs.²²

²¹ https://www.communities.tas.gov.au/__data/assets/pdf_file/0014/30254/AHS_Strategy_Final.pdf

²² [Tasmanian Planning Policies and Overview \(justice.tas.gov.au\)](https://www.justice.tas.gov.au/Tasmanian-Planning-Policies-and-Overview)

Safe and affordable housing, along with health and wellbeing, are the foundation on which lives are built. During consultations undertaken by TasCOSS we hear regularly of how lack of affordable housing is a barrier to engagement in education, training, employment and the community people live in, such as through volunteering. Similarly, lack of affordable housing means people make choices between a roof over their heads and adequate heating, food and healthcare, resulting in ill health and negative impacts on wellbeing. Social housing must also be designed for human diversity, across the lifespan and meet 'Livable Housing Design Silver Level' as a standard for all new housing in the National Construction Code (Tasmania has indicated it will adopt these standards but has not yet given a timeframe).²³

While the inclusion of social and affordable housing in the TPPs 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.²⁴ 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 TPPs.

Recommend:

- Social and affordable housing is included in the TPPs as a stand-alone issue under 'Liveable settlements'
- Regulation, monitoring and review of short stay accommodation is included as an issue under 'Economic development'

Add Issue: Food Security

Land use planning has a direct role in food security and we believe the TPPs should therefore include food security as an issue. Food security is a key recommendation of Premier's Economic and Social Recovery Advisory Council Recommendations,²⁵ which recognises in particular the importance of community place-based approaches to food security models, as well as better linkages with agriculture. The link between food security and sustainable agriculture is also reflected in the SDGs, where Goal 2 is 'Zero hunger' while Goal 15 is 'Life on land: protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification and halt and reverse land degradation and halt biodiversity loss.'

Recommend: Include food security as a stand-alone issue under the renamed Topic, 'Sustainable, inclusive cities and communities' and/or under 'Economic development'.

²³ [Accessible housing | ABCB](#)

²⁴ <https://cbos.tas.gov.au/topics/housing/short-stay-accommodation-act>

²⁵ [Premier's Economic & Social Recovery Advisory Council Final Report \(pesrac.tas.gov.au\)](#)

We welcome any discussion on our submission response. Please feel free to contact

Thank you again for the opportunity to provide comment on the draft TPPs, an incredibly important policy that could help to improve the lives of people and communities in Tasmania.

Yours sincerely,

Adrienne Picone
CEO TasCOSS

Dr Lisa Stafford

From: [TEA Inc](#)
To: [Planning Unit](#); [Risby, Brian](#)
Subject: Submission on Tasmanian Planning Policies Scoping Paper.
Date: Thursday, 28 October 2021 11:45:35 PM
Attachments: [TEA SUBMISSION on PPU"s TTP Scoping Paper of September 2021 FINAL.pdf](#)
Importance: High

Dear Brian,

Well, it was with much appreciation for the extension of time you kindly granted me and TEA which has enabled this somewhat rushed and perhaps slightly incomplete submission to be carved out of the Management Team's grey matter. Thank you.

At least our attached, 41 page document, titled 'Comment on the Document Tasmanian Planning Policies, Scoping Paper for draft TPPs, September 2021, produced by Planning Policy Unit, Department of Justice.', has we feel, some important additional issues to improve the RMPS policy environment for Tasmania. We could have written more but we expect another round and a suite of concurrently introduced policies which would be subject to a TPC hearing.

I hope you enjoy our critical comments and positive suggestions made with the best of public interest intent. If there is any ambiguities or problems reading the document please contact me for clarification.

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Sincerely
Andrew Ricketts
Convenor
The Environment Association (TEA) Inc.

Email:

28 October 2021

Principle Author and Contact: Andrew Ricketts

Mr Brian Risby
Department of Justice
Planning Policy Unit
Planning.Unit@justice.tas.gov.au

Comment on the Document Tasmanian Planning Policies, Scoping Paper for draft TPPs, September 2021, produced by Planning Policy Unit, Department of Justice.

About TEA

The Environment Association (TEA) Inc. is a not for profit, volunteer based, regional, community environment association.

TEA has a long-term interest in environmental and social outcomes in our region, Northern Tasmania, particularly in environment, planning, forestry, biodiversity and scenic management and heritage conservation issues.

TEA is a stakeholder in the development of any new planning scheme or land use strategy or policy development with the potential to affect our region or any municipality within it. We regularly comment on state legislation over land use planning, heritage, forestry and other issues.

TEA has long been making representations and submissions to RMPS processes including through the RPDC, the RMPAT, and

more recently the TPC and the PPU. We have also had involvement in local government planning and forestry issues for many years. We are not represented by any other organisation and have no political affiliations.

We wish to thank the Planning Policy Unit for the opportunity to make comment on this Tasmanian Planning Policies Scoping Paper.

The Scoping Paper

It states:

“The TPPs will establish high-level strategic policy ambitions and directions on matters of State and community interest. They will provide a way for the Tasmanian Government and community to consider, and

set direction on, a broad range of complex and emerging planning issues.”

Hence, we have made the following comments and suggestions. Some we have made before.

Some Context

The Environment Association (TEA) Inc. considers the Document Tasmanian Planning Policies, Scoping Paper for draft TPPs to be insufficient, for the purposes of policy development and processes to achieve a set of policy instruments intending to support the Objects of the Resource Management Planning System of Tasmania (RMPS) and especially of Land Use Planning and Approvals Act 1993 (LUPAA).

By the way, we think that the State Planning Provisions currently do not meet the Schedule 1 legal objectives of LUPAA. .

The Government has so far failed to deliver on its promises, such as over State Policies but they are continue to get away with this aspect. We explain the relevance below.

State Policies and Strategies (or the Tasmanian Planning Policies) should have been created and been subject to a comment and hearing opportunity before Statewide style planning schemes were introduced, were it to be done competently and fairly and logically under the RMPS legislation. It would be Fairer because it would be far more transparent as to the particular Policy shifts and introductions that are otherwise embedded in the State Provisions.

It would have been reasonable and fair for State Policies (or the Tasmanian Planning Policies) to have come before the Statewide

Planning Provisions and Local Provisions and would have saved funds for all 29 Councils.

The State Policies and Projects Act through State Policies is the legal instrument by which Statewide consistency is intended to be achieved. Simple as that.

Because the Tasmanian Planning Policies are only a guide we can correctly state they will not achieve a consistency, which could otherwise have been delivered.

The current Government is in our view still trying to understand the fundamental concept of how the planning system should work under the various RMPS legislations.

In December 2015 then Planning Minister, Peter Gutwein, started on about State Policies and second level ones in the PIA Newsletter but the Minister who does such Policies was meant to be Premier William Hodgeman not Planning Minister Gutwein. Minister Gutwein acted well and truly beyond his remit in 2015.

The idea of the RMPS is that the State Policies are there to provide consistency. There is, of course, no legislative mandate for second level policies. We argue it is a second rate idea. It is not consistent with the Liberals election promise of State Policies.

“A fairer, faster, cheaper, simpler planning system”

“A Majority Liberal Government has a plan to fix the Labor-Green planning mess.”

“State policies for consistency”

“Immediately after the election, a majority Liberal Government will provide the leadership and consistency

that has been lacking under Labor and the Greens. We will commence drafting state policies to provide the necessary guidance to councils on how to implement the single state-wide planning scheme and plan for Tasmania's future land use needs."

"These policies will make clear the government's intention to once again make Tasmania 'Open for Business' and provide certainty to both investors and the community about how the planning scheme will work."

"State policies will include, for example, objectives such as:

- Planning and land use is to be geared toward facilitating economic growth and investment;*
- Planning and land use is to take into account future needs of the community and potential growth; and*
- Sustainable and sensible development is to be encouraged to assist in conserving and allowing access to Tasmania's parks and reserves.*

"All state policies will be drafted pursuant to relevant laws and regulations."

However, the government had to create new laws. Obviously the relevant ones at the time were ignored.

TEA was left wondering: What does the word "Immediately" actually mean? Now we know. Excuse us for having very little confidence about this Planning Policy issue.

It is our view that the current government approach avoids forward planning policy, which is transparent, has rigour and adopts an ecologically sustainable approach.

NB. The use of the term "State Policies" in the above extract from the Liberal's 2013 planning promise. What relevant laws for State Policies would apply other than within the State Policies and Projects Act?

Since about 2017 the Tasmanian government bureaucracy has been struggling to pursue the creation of what it calls Tasmanian Planning Policies, now enshrined under LUPAA.

To date no new Tasmanian Planning Policies have been produced, since the first draft back in 2017, which was widely criticised. The content shows the limited understanding that political parties have about the land-use planning process.

It is clear the Tasmanian Liberal Government has a very strong pro-development intent for the Resource Management Planning System of Tasmania. (RMPS). This, we consider, was never the intention of the RMPS, which had a strong grounding in the notion of intergenerational equity and sustainable development. This attempted destruction of the fundamental precepts and principles of the RMPS. Which has been a studious intent of the current government is noted. They installed Ms Mary Massina from the Property Council into the Planning Reform Taskforce.

The Liberal party, in the lead up to the 2013 election where it succeeded in taking power from Labor, committed to the Tasmanian people to create State Policies but instead it is now pursuing Tasmanian Planning Policies, which are highly likely to be inferior, non-mandatory and with a far more restricted application.

State Policies are far preferable and to our mind, superior to Tasmanian Planning Policies. It is noted that the planning policy unit's Mr Risby had a go at overhauling the State Policies and Projects Act back in about 2008. It amounted to nothing.

The Tasmanian Planning Policies are now claimed to be intended as a secondary planning policy, sitting below State Policies, which are created under the State Policies and Projects Act 1993 which should be administered by the Premier.

It must be stated that The Minister's statement in the forward is not correct:

"Planning legislation was amended in 2018 to provide for the development of the Tasmanian Planning Policies to set out the first high-level policy framework for the Tasmanian planning system."

Tasmanian Planning Policies would be administered by the Planning Minister. Tasmanian Planning Policies remain non-compulsory and are intended to gain force especially through Regional Land-use Strategies.

Regional Land-use Strategies have no adequate legislative basis, do not ensure that a right of comment, objection or appeal can be mandated, or enforced and appear to have been periodically or regularly rorted without public oversight at all. We can evidence such problems.

In essence, Regional Land-use Strategies have become a thinly disguised open slather instrument, controlled by the regional local government entities. The lack of independent external expert rigour, inadequate public consultation mechanisms and standards and the absence of a right of objection is a major issue of concern for Regional Land-use Strategies.

The part of the LUPAA, which deals with Regional Land-use Strategies, is completely inadequate. All these issues are relevant for any Tasmanian Planning Policy, which is intended to

only guide, not build consistency, because in essence they have no other adequate means of expression. For policies to be so fundamentally limited and reduced to a guide was never envisaged by the original planning system's architects and is very concerning and inadequate.

Our preference remains to enshrine policies for Statewide planning purposes within the State Policies and Projects Act, which brings far more power and force to those planning policies.

The Planning Policy Unit has clearly been involved in a process which we consider to rorting and reconfigure Regional Land-use Strategies, in the absence of the capacity for the public to make comment on such behaviour and the changes which it effected behind closed doors, thus giving rise to the perception that the Planning Policy Unit (PPU) has a conflict of interest and is simply going through the process of creating a puppy dog type planning system, where boxes are checked off by land-use planners and the opportunity for objection and appeal is reduced to an negligible number of instances and matters.

The table on page 9 of the PPU's Scoping Paper¹, which lists Topics and attributes Issues to particular topics, absolutely and unfortunately is deficient and does not fulfil from a policy position, the Schedule 1 Objectives of the Resource Management Planning System (RMPS) of Tasmania or the LUPAA² Schedule 1 Objectives either. Such a fundamental deficiency of the table's topics and issues will be discussed in detail in this submission.

Also discussed will be the difficult issue of Climate Change and its extensive impact of Tasmania, regardless of what Tasmania may do. Also discussed will be ways in which we can reduce our

¹ Tasmanian Planning Policies, Scoping Paper for draft TPPs, September 2021.

² Land Use Planning and Approvals Act 1993.

carbon footprint rather than simply relying on an aggregated Net Zero target.

Preliminary criticisms and suggestions are listed and considered according to some of TPP topics.

The topics and the issues themselves are undefined, so it is in some cases not known what is meant by the term, which makes it very difficult indeed. This is a sloppy aspect of the paper.

A separate table of applicable definitions, which could be relied upon to give greater certainty to the process and the reader, would be an essential prerequisite and would be most welcome.

We wish to draw attention to the Aichi Targets, to which Australia committed and which in essence are the modern expression of our international biodiversity obligations.

TEA has not commented on all of the subjects, which are presented further on in our revised and amended Table of Topics and Issues (based on the PPU's Table on Page 9 of the September 21st PPU paper.

Environmental Protection:

The issues under the topic of **Environmental Protection** on page 9 of the PPU Scoping paper include "fire management" but to claim that fire management achieves an environmental protection cannot easily be proven for Tasmania. There is no definition of fire management in the PPU Scoping paper. Under the Fire Service Act 1979, (which is under review and not a part of the RMPS) it states: *"fire management means a strategic defined program to manage bushfire fuels"*.

But "Bushfire fuels" is not a term within the RMPS. Under the Fire Service Act, it does not define bushfire fuels. It is TEA's view that the nebulous poorly defined term "Fire management" does not belong under a Policy for environmental protection.

In the Fire Service Act 1979, the reference to "fuels" in this term means and refers to carbon, mostly the humus and litter layer of the soil.

One of TEA's members stated:

"1A. What is not understood still in Tasmania is that prior to an actual policy; there has to be solid research which has helped formulate that particular policy.

1B. Where is that? One might have expected, anticipated, a whole series of Background Documents but there are none."

The issues: *"waterways and wetlands – water quality"*. TEA suggests that there is the potential for the State Policy on Water Quality could easily be subverted in some manner or by way of some future process. This dubious back door approach possibly intending to achieve the removal of State Policies is noted and is highly objectionable and is rejected out of hand. At present TEA suggests the PPU should delete "water quality" from this issue under this Topic, as it is already the subject a State Policy. If the State Policy needs amendment (and we agree it may need to do so) then deal with it directly.

Scenic Protection is an issue, which is not included other than under Heritage Protection, yet scenic protection is far more than heritage; it is obviously amenity. Yet, Tasmania is famous for its high quality scenery. We propose this subject be added to this TPP Topic.

A new term should be included under Environmental Protection: Carbon Conservation. It is essential that Tasmania, on a sector by sector basis, an industry by industry basis, and a land-use by land-use basis, moves from the current carbon liquidation model to a carbon conservation model. It is essential we do this urgently.

Threats Hazards and Risks:

The issues within this section are divided into “natural hazards” and “man-made hazards”.

It is interesting that bushfire is considered to be a ‘natural hazard’, but bushfires, which are aggravated by Climate Change are obviously exacerbated by a human generated (anthropogenic) phenomenon. Additionally many bushfires are caused, that is, lit by humans. We are not referring necessarily to arson but rather the intentional lighting of fires by someone who then finds it has escaped. There is a wide range of reasons for such situations. Some even claim they lit a camp-fire when they, in fact, lit up a stump and then inadvertently burnt down a whole town.

In any case TEA wishes the term “man-made” be replaced with ‘human generated’. Also, when discussing Climate Change the term ‘anthropogenic’ is in common use.

There is an absence of dealing with EPBC matters such as key threatening processes.

The undefined term Fire Management is not even included as a Hazard and Risk, yet this activity potentially (depending on what the term is intended to mean) may well be both hazardous and risky. The omission of a definition and is both an outrage and grossly insufficient.

Is Fire Management a term in the Fire Service Act? It is interesting that Fire Management is proposed to be included in the Tasmanian Planning Policies. Clearly, bushfire Hazard is a Hazard because already there is a bushfire Hazard code. So to consider fire management, claiming or imputing in essence that human lit fire is somehow a protection and not a Hazard is a leap too far. Most fires in Tasmania are lit intending to be for some management aspiration yet in many cases fall short and fail to achieve any protection whatsoever and instead cause harm, often to neighbouring properties. TEA draws your attention to the recent Supreme Court action against those landowners who let the Forcett Fire, which burnt down the town of Dunalley in 2013. We also mention the fire more recently at Dolphin Sands, lit by a neighbour ostensibly for management purposes. We wish to insist, once a definition of fire management is achieved and circulated, that fire management be regarded as a Hazard and Risk, and not an Environmental Protection.

Climate Change is not mentioned under “*man-made hazards*”. The impacts of Climate Change as both a hazard and a risk extend far beyond the issue of emissions which are mentioned. TEA considers a Planning Policy for Climate Change should be developed. It would be best as a State Policy.

Pollution is not mentioned as a Hazard. No reason for its omission is provided.

Noise is not mentioned as a Hazard. No reason for its omission is provided.

Spraying is not mentioned as a Hazard. No reason for its omission is provided.

Irrigation is not mentioned as a Risk. No reason for its omission is provided. This of course is an intensification or use and within the Tasmanian Planning Scheme intensifications of use are

hardly regulated at all, a fundamental flaw of the Scheme, in sustainability terms. Irrigation has been shown to result in a 50% draw down on soil carbon levels on many sites. This is a massive loss of soil carbon.

Emissions is mentioned but not defined in the Scoping Paper: The current Tasmanian draft proposal for a Net Zero Emissions by 2030 is entirely inadequate.

The fact remains that since conservationists studiously worked towards greater forest protection during the 2010 Tasmanian Forest Agreement process, Tasmania has become a Net Zero Emissions state since 2013, perhaps in part because of the collapse of Gunns Limited and the failure of Managed Investment Schemes in the artificial forestry plantations sector.

The uncompleted Tasmanian Forest Agreement (supported by industry and the conservation movement) did ensure that the legislated Category One Sawlog Quota was reduced substantially from 310,000 m³ to 137,000 m³.

There are those within the Tasmanian community who view even the reduced sawlog quota as an unnecessary fetter to the achieving of a low carbon economy and to ensure the maximum benefit is obtained from the ecological retention of Tasmania's native forest estate, which still mostly regarded 90% as waste and thus woodchips it. No other industry has the temerity to claim that 90% of the product being sold is actually a waste arising from a sawlog driven strategy. What a bald faced lie.

Clearly there is a need within the planning policy framework for a **policy on forest protection and conservation and one on sustainable forestry**.

TEA considers the **Category One Sawlog Quota** to be a risk.

The notion of such a 2030 Net Zero Target is highly ridiculous. The state's proposition in the draft Climate Change Bill should be amended to read either 2021 or 2022 simply because Tasmania reached Net Zero, in an aggregated sense back at about 2013.

Land Clearance is listed nationally under EPBC legislation as a Key Threatening Process., A land clearance policy should be included within the RMPS and become a State Policy that ensures land clearance in Tasmania stops forthwith. In the absence of a State Policy, Land Clearance represents a Threat, Hazard and Risk. If it is a Key Threatening process nationally then it obviously is so in Tasmania. If the TPPU requires any scientific papers and wishes to challenge our claim, please advise and we will provide an avalanche of scientific papers.

Economic Development:

TEA proposes this Topic be renamed as: '**Sustainable Economic Development**'.

TEA is surprised by this "Economic Development" term and also the subjects listed under it. The economy and hence the term economic development is merely an artificial social construct of humanity. Nothing more. To give it a section of its own and to include certain subjects, suggests that those subjects are purely of economic interest and not of the broader public interest to our society. We strongly disagree with this approach.. We write below about such matters in more detail. TEA finds such restrictive categorisation of important subjects, often with complexities and a raft of social benefits to be highly problematic. It would be so easy under such a planning policy system for important relevant considerations to not be considered.

TEA notes the list includes “Agriculture”. There is already a policy, which is a State Policy under the State Policies and Projects Act, regarding the Protection of Agricultural Land (PAL) Policy. This agriculture issue would appear to overlap this State Policy, again.

This section includes an issue termed: “use and development in the coastal zone.” The coastal zone is established by way of a State Policy known as the State Coastal Policy 1996. The “coastal zone” has not been defined in the Tasmanian Planning Policies Scoping Paper of 2021. However, the State Coastal Policy states:

“Coastal Zone: Under the State Coastal Policy Validation Act 2003, a reference in the State Coastal Policy 1996 to the coastal zone is to be taken as a reference to State waters and to all land to a distance of one kilometre inland from the high-water mark.”

Again, TEA suggests that the State Coastal Policy 1996 could be subverted by way of some future process. This back door approach is highly objectionable and is rejected out of hand. At present TEA suggests to delete “use and development in that the coastal zone” as the subject is already under a State Policy, which is mostly satisfactory and seems to be working fine.

Liveable Settlements:

It is not clear what is meant by a “Liveable Settlement”.

It is not clear what is meant by: “planned and contained settlements”. There is no definition of this term anywhere we can find.

The issue of “amenity” should be considered to be a separate one to that of “avoiding land-use conflicts”. The use of the word “avoiding” is most unfortunate and suggests that inadequate processes are likely to remain, which deny a fair and just a resolution of land-use conflicts. One does not predicate a strategy or a policy on avoidance; it does not work.

The issue should be titled: ~~Avoiding~~ **Fairly and systematically resolving foreseeable land use conflicts.**

It is quite obvious that the Tasmanian Planning Scheme is an open slather type planning arrangement, which seeks to disadvantage communities that are rightfully concerned that their fundamental rights to appeal obnoxious developments are being whittled away by development advocates.

Heritage Protection

The term: “*Landscape Heritage – scenic protection, including tourist routes*” seemingly encompasses several subjects, which are surely important to be considered separately. The term “Landscape Heritage” is most unfortunate. For the industry, the nomenclature term is “**cultural heritage landscapes**”.

Protecting tourist routes as currently performed under the SPP standard is perfunctory and could not be considered to be landscape protection.

Infrastructure to support the economy and to create liveable communities:

This TPP topic fails to mention **disability access**. The problems of inadequate disability access remain a significant concern for

many new developments and existing townscapes and for people with disabilities.

Footpaths are not included, yet footpaths are not to our mind the same as walkways. However there is no definition of walkways so one does not know what is intended. The term footpaths refers to towns and cities, which have identified developed pedestrian strips, usually adjacent to roadways.

TEA is surprised there is not a new section or issues listed for **atomic nuclear reactors** and for **submarine naval bases**. It is TEA's view that there is no port within Tasmania, which is suitable to house and service nuclear submarines.

There is a reference to "*energy*" in "*electricity and energy*" but this is basically inadequate. These two subjects should be dealt with separately.

In Tasmania on both public and private land there exists significant **dam infrastructure**. The process regarding the creation of new dams is highly opaque and insufficient. Dams are a specific sort of infrastructure, which should be listed specifically under this TPP topic but have been omitted. Dams would benefit from being an issue under Sustainable Economic Development.

"Electricity transmission" is also a part of electricity, which deserves its own issue and subject within this Infrastructure TPP topic.

Rights of Appeal and Rights and Expectations to Meaningful Public engagement and involvement in planning processes

The current name of the topic is inadequate. Note the revised proposed new Topic title above.

This section is a farce, which meets no standards, nor does it meet the objects of the RMPS.

It fails to mention the citizens of Tasmania's **rights to objection** through local government instrumentalities.

It fails to mention one's **right of appeal**.

It fails to mention the option in regard to some decisions to pursue **judicial review**.

Population Stability and any Rate of Growth

It is clear that the questions and issues around human population requires and deserves its own Topic. This is of vital importance and a subject, which may draw a range of opinion and views across Tasmania.

Such aspirations on such a fundamental subject would have significant potentials. It is TEA's view Tasmania offers limited capacity to absorb further population growth and this whole issue underpins and affects the land use planning at the strategic level and associated subjects such as infrastructure.

It is very hard to believe there is no TPP Topic on Tasmania's population. The people who live here, as well as the businesses who operate here should have the opportunity to make comment on the Government's proposals.

Achieving Intergenerational Equity'

'Achieving intergenerational equity' is a commitment of ecological sustainable development, which is ignored in the Tasmanian planning scheme, and thus it is highly important that this issue be

included in the Tasmanian planning policy topics. This should be a separate topic with a raft of subjects below it. This should be the first Tasmanian planning policy topic. The fact that this subject has been ignored is very concerning.

‘Sustainable Development’

Another subject, which should be included as a TPP Topic would be **‘sustainable development’**. Rather than the current focus on various industries, this topic would characterise the qualities of sustainable development, providing an interpretation of the LUPAA Schedule 1’s definition.

Intensification of Use

This is a subject, either a topic or an issue, which should be included in the TPPs. It is essential such a subject be included and given guidance and hopefully will provide additional constraint. Generally, as mentioned, above intensification has been very poorly handled within the TPS, in sustainability terms.

“Anthropogenic climate warming impacts”

Another subject which should be included as a TPP Topic would be: “anthropogenic climate warming impacts”.

TEA’s Comments on What Will Happen Next.

We consider there is ambiguity over whether a suite of Policies will all be introduced together or whether the discretion would be exercised by The Minister to pick and choose which ones suit his agenda.

We consider the poorly defined and opaque process should include the right of hearings into the content of the Policies themselves. This, TEA considers is essential.

We consider the TPP policy guidance limitation is for TPPs and for the RMPS, a severe problem, which we expect will likely relegate the TPPs to the scrap heap of land use planning integrity.

Conclusion

This is a preliminary set of thoughts and notes, completely restricted to the table on page 9 of the Tasmanian Planning Policies scoping paper.

END

DOJ's Current Table from the 2021 Scoping Paper for Tasmanian Planning Policies titled "What topics should the TPPs cover?"

In other words this table, reproduced below, is the current proposal by the Planning Policy Unit. TEA claims it to be grossly inadequate, insufficient and it would be reckless to rely on it.

the original table from the PPU. The second table represents our amendments, proposed alterations and additions.

Below in this document TEA has suggested in a reworked table a range of issues changes and so forth. The table immediately below is

ORIGINAL Tasmanian Planning Policy Unit Scoping Paper Table of September 2021

TPP Topic	Issues (to be addressed under each TPP Topic)
Environmental Protection	Biodiversity – flora and fauna habitat protection, weed management, fire management.
	Waterways and wetlands – water quality
	Catchment management
	Coastal processes and landforms
	Applying the precautionary principle
Hazards and risks	Natural hazards – bushfire
	Flooding
	Landslide

TPP Topic	Issues (to be addressed under each TPP Topic)
	Sea level rise coastal inundation and erosion
	Acid sulphate soils
	Man-made hazards –,
	emissions
	contaminated land
	soil quality/risks
Economic Development	Industry and business
	Tourism
	Agriculture
	Mining and minerals
	Use and development in the coastal zone
Liveable Settlements	Planned and contained settlements
	Pleasant places to live – amenity and avoiding land use conflicts

TPP Topic	Issues (to be addressed under each TPP Topic)
	Integrating land use and transport
	Health and wellbeing – recreation and open space opportunities
	Community – health services and education
Heritage Protection	Aboriginal heritage
	Cultural heritage
	Landscape heritage – scenic protection, including tourist routes
Infrastructure to support the economy and create liveable communities	Airports / Sea ports / Railways
	Roads, car parking, cycleways and walkways
	Public transport
	Telecommunications
	Electricity and energy
	Irrigation, water, sewerage and stormwater
	Waste management

TPP Topic	Issues (to be addressed under each TPP Topic)
Public engagement in planning processes	Consultation
	Strategic planning
	Ongoing review

The above table was predicated upon the following DOJ statement:

“LUPAA describes the minimum content required in order for the TPPs to guide future strategic land use planning through the regional land use strategies and the Tasmanian Planning Scheme. To further the LUPAA requirements, draft TPPs should be developed for each of the following topics.”

TEA disagrees with this position.

However, the RMPS and LUPAA Schedule 1 Objectives State:

“SCHEDULE 1 - Objectives

PART 1 - Objectives of the Resource Management and Planning System of Tasmania

1. The objectives of the resource management and planning system of Tasmania are –

(a) to promote the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity; and

(b) to provide for the fair, orderly and sustainable use and development of air, land and water; and

- (c) to encourage public involvement in resource management and planning; and*
- (d) to facilitate economic development in accordance with the objectives set out in paragraphs (a) , (b) and (c); and*
- (e) to promote the sharing of responsibility for resource management and planning between the different spheres of Government, the community and industry in the State.*

2. In clause 1 (a) , sustainable development means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety while –

- (a) sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and*
- (c) avoiding, remedying or mitigating any adverse effects of activities on the environment.*

PART 2 - Objectives of the Planning Process Established by this Act

The objectives of the planning process established by this Act are, in support of the objectives set out in Part 1 of this Schedule –

- (a) to require sound strategic planning and co-ordinated action by State and local government; and*
- (b) to establish a system of planning instruments to be the principal way of setting objectives, policies and controls for the use, development and protection of land; and*
- (c) to ensure that the effects on the environment are considered and provide for explicit consideration of social and economic effects when decisions are made about the use and development of land; and*
- (d) to require land use and development planning and policy to be easily integrated with environmental, social, economic, conservation and resource management policies at State, regional and municipal levels; and*

(e) to provide for the consolidation of approvals for land use or development and related matters, and to co-ordinate planning approvals with related approvals; and

(f) to promote the health and wellbeing of all Tasmanians and visitors to Tasmania by ensuring a pleasant, efficient and safe environment for working, living and recreation; and

(g) to conserve those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value; and

(h) to protect public infrastructure and other assets and enable the orderly provision and co-ordination of public utilities and other facilities for the benefit of the community; and

(i) to provide a planning framework which fully considers land capability.”

The above September 2021 PPU table does not meet the Objectives of the Act.

Additionally mentioned in the DOJ’s 2021 Scoping Paper for TPPs the following:

“Tasmania’s current Climate Change Action Plan refers to the following 6 priority areas:

- Understanding Tasmania’s future climate*
- Advancing our renewable energy capability*
- Reducing our transport emissions*
- Growing a climate-ready economy*
- Building climate resilience*
- Supporting community action*

In response to COVID-19, the State Government established the Premier’s Economic and Social Recovery Advisory Council (PESRAC). The PESRAC report released in March 2021, included a section on environment and sustainability, referring to immediately prioritising the following:

- Decarbonising the economy*
- Water resource allocation, security and quality*
- Adoption of circular economy principles*
- Ensuring a consistent and coordinated government approach to sustainability*

- *Ensuring decisions account for the interests of future generations.*

The PPU Scoping Paper suggests however that dealing with disparate matters such as COVID and Climate Change should be incorporated generally rather than specifically in a policy basis. TEA strongly disagrees.

TEA considers that the fundamental problems for our collective survival need to be assessed, analysed and addressed including through policy and strategic planning for Tasmania. The issues raised

above by PERSAC and in Tasmania's current Climate Change Action, seem entirely worthy of inclusion but not all have been included. We generally support these ideas and initiatives in the main.

Therefore, TEA's Amended Table of Tasmanian Planning Policies is provided below, bearing in mind we consider that the whole concept of a second tier of policies is a faulty and unduly complex approach.

It should be noted that the RMPS approach under Schedule 1 is quite anthropocentric.

TEA's Amended and Expanded Table of Tasmanian Planning Policies, derived from the Planning Policy Unit's September 2021 Table

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
Environmental Protection	Biodiversity Protection.	See Aichi 2021 Targets (<u>enclosed</u>) for more detail on our obligations, (<u>attached</u>) which disgracefully most States of Australia seem to have ignored.
	Maintenance of ecological processes.	This is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Flora and fauna habitat protection.	Much of this needs to occur on private land yet the protection program was basically demolished. It is a cadaverous relictual shadow now.
	Identify for Planning Purposes Critical and Priority Habitat for Threatened and Endangered Species	Regardless of Land Tenure.'

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
	Weed management	Currently there is no requirement for Local Governments to employ and deploy a Weed Officer. This should be rectified in the Policy.
	fire management.	<p>Reasons for moving this to Risks and Hazards is also included in the text: See text.</p> <p>The threat is fire. It may be that some Fire Hazard Reduction (aka Aboriginal Burning) can protect some elements of the environment but this requires considerable further study before any attempt to employ it on a landscape scale. The range of scientific opinion should cause the precautionary principle to be applied.</p>
	Securely Managed and Protected Gazetted Conservation Reserves	<p>These are gazetted reserves set aside to protect nature and which also have a Management Plan. They may be on public or private land.</p> <p>Safeguarding life supporting capacity of ecosystems is mentioned in the LUPAA Schedule 1 Objectives, yet this important issue was not included in the PPU's scoping paper.</p>
	Protected Gazetted Conservation Reserves	<p>These are gazetted reserves set aside to protect nature, which do not have a Management Plan.</p> <p>There are about 600, perhaps more of such reserves across Tasmania. They will all be on public land.</p> <p>Safeguarding life supporting capacity of ecosystems is mentioned in the LUPAA Schedule 1 Objectives, yet</p>

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
		this important issue was not included in the PPU's scoping paper.
	Waterways	Water is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Wetlands, Swamps and Sensitive Riparian Places.	Under our RAMSAAR obligations. Should be a separate issue. Low lying and damp and seasonally wet places across Tasmania continue to be drained, relentlessly, including when they are carrying Critically Endangered vegetation communities.
	Water quality.	This clearly overlaps entirely with the State Water Quality Policy. Water is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Catchment Management	Water is mentioned in the LUPAA Schedule 1 Objectives.
	Coastal processes.	
	Landforms (Geomorphology)	
	Applying the precautionary principle Effectively and diligently	This Precautionary Principle aspect of the RMPS should be included in LUPAA Objectives. This term is used within EMPCA and TSA.

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
		It would be better included in a section on sustainable development, as it is not a mechanism for protection or conservation.
	Air (The Atmosphere).	Air is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Soil and Land Capability.	Both Soil and Land Capability is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Geomorphology.	
	Marine Protected Areas.	Safeguarding life supporting capacity of ecosystems is mentioned in the LUPAA Schedule 1 Objectives, yet this important issue was not included in the PPU's scoping paper.
	Protected Catchment Headwaters.	Water is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper. Safeguarding life supporting capacity of ecosystems is mentioned in the LUPAA Schedule 1 Objectives, yet this important issue was not included in the PPU's scoping paper.
	Protected Private Land.	Part 5 Agreements, which is the LUPAA mechanism used by Local Government in the absence of anything more responsible by the Tasmanian Government, needs Policy Support.

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
		<p>A new Tasmanian program is needed which is not captured or privatised by one operator.</p> <p>Safeguarding life supporting capacity of ecosystems is mentioned in the LUPAA Schedule 1 Objectives, yet this important issue was not included in the PPU's scoping paper.</p>
Threats, Hazards and Risks	NATURAL HAZARDS –	<p>This demarcation or classification of hazards is seriously problematic and thus is either hard or impossible to support, but we have used it at present with some serious qualms.</p>
	<p>Bushfire.</p> <p>Fire.</p>	<p>Not all fires are Bushfires.</p> <p>Bushfires are usually regarded as natural disasters but this aspect needs to be reconsidered. This is both a natural issue and a human generated problem.</p> <p>Fire is not only a threat, it is a hazard and a significant risk.</p>
	Flooding	A is generally natural hazard issue.
	Land Slips and Landslide	<p>These similar issues are both a natural issue and a human generated problem. Well before one has a landslide, landslip represents a threat to any structure.</p>

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
	Erosion	<p>Is a more widely occurring problem than merely related to the coast and so it has been separated from the issue of Sea level rise and coastal inundation.</p> <p>This is both a natural issue and a human generated problem.</p>
	Acid sulphate soils	A natural risk issue.
	Storms	<p>This issue should be included because of the examples we are seeing such as Logan in Queensland.</p> <p>The storms of 2016 in Tasmania showed very well we need to consider this issue much more in land use planning. It affects infrastructure, siting of buildings, water catchments, bridges etc.</p>
	HUMAN GENERATED – Man-made HAZARDS –	<p>New words to replace the unacceptable term “man made”. Have been suggested</p> <p>This demarcation or classification of hazards is seriously problematic and thus is either hard or impossible to support, but we have used it at present with some serious qualms.</p>
	Emissions	Climate Change is more than just “emissions”.

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
	Sea level rise and coastal inundation	This is only occurring as a consequence of Anthropogenic Climate Warming. So it is not a natural issue at all. It should be and has been moved.
	Contaminated land	This is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Soil quality/risks	This is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Climate Change	Anthropogenic Climate Warming may be a better term
	Fire Management	<p>The term Fire Management is given oxygen in the Fire Service Act, meaning: fire management means a strategic defined program to manage bushfire fuels;</p> <p>This has been moved from TPU's Protection category to the Risk category. Not all fires are Bushfires, which is regarded as natural disasters.</p> <p>Fire is not only a threat, it is a hazard and a significant risk.</p>
	Smoke.	<p>Relates to smoke from fires, either heating, hazard reduction or uncontrolled. End stubble burning.</p> <p>This is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.</p>

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
	Noise.	This important subject clearly has a planning context and impact. This is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Pollution.	This is a very wide-ranging subject and clearly has a planning context and impact. This is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Loss of terrestrial climatic habitat caused by anthropogenic emissions of Greenhouse Gases.	This coincides with the EPBC term Key Threatening Process.
	Loss of Marine climatic habitat caused by anthropogenic emissions of Greenhouse Gases.	Tasmania's giant kelp forest is 95% reduced with far reaching effects on the ecology of the Southern Ocean.
	Land Clearing.	A Key Threatening Process under EPBC Law. Tasmania has a failure of a forestry Policy termed: Land Clearing is Unsustainable but continues in Tasmania.
	Over Allocation of Resources.	Over Allocation of Resources almost always leads to over use and unsustainable depletion. TEA has not defined the meaning of resources but can do so if the TPU requires. The term is used in LUPAA.

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
	Category One Sawlog Quota	Over Allocation of Resources almost always leads to over use and unsustainable depletion. Ditch it! AN idea which inevitably leads to unsustainability.
	Conservation Reserves without a Management Plan	When such Gazetted Reserves are managed without a Management Plan. All gazetted reserves must have a Statutory Management Plan but currently do not. PWS has had many years to rectify this problem. There is no adequate template for creating Reserve Management Plans.
	The Ignore or Avoidance of Threatened and Endangered Species Recovery Plans.	
	Invasive Species and Diseases	The avoidance of such very important matters in this PPU Policy document is amazing. Despite there being an increasing number of Biosecurity signage on private land across the State, not enough is being done on this issue. This is a planning issue. People unwittingly spread harmful invasive diseases, pests and weeds. The PPU included weeds yet there is so much more and it causes considerable expense to the State of Tasmania. Think Fox. Think Blueberry Rust. Think COVID 19. The list is long.
Sustainable Economic Development	The Carbon Liquidation Economy and Decarbonising the Economy	Please see the section on the Carbon Liquidation Economy and Decarbonising the economy. This may

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
		be viewed as a risk but the process of decarbonising is not.
	The Carbon Conservation Economy and Achieving Intergenerational Equity	Please see the section on The Carbon Conservation Economy and Achieving Intergenerational Equity This sustainability issue is a strong part of the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Industry and business	
	Tourism and Visitation	Visitation takes many forms other than by the tourist and is far more inclusive. Schedule 1 Objectives refer to visitors to Tasmania.
	Agriculture	This clearly overlaps entirely with the State Protection of Agricultural Land Policy.
	Mining and Minerals	
	Use and development in the coastal zone	This clearly overlaps entirely with the State Coastal Policy
	A Price on Carbon.	Not at first glance an obvious planning policy but an economic planning one. Many of the impacts of adopting such a Tasmanian Policy however would affect land use planning and use and sustainability. This is discussed in the text.

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
Liveable Settlements		The word “liveable” is not defined. Nor is Settlement. This section should cover all manner of settlements not just villages, towns and cities. To not do so would be extremely discriminatory.
	Planned and contained settlements.	The planning system has been watering down boundary limits for towns and cities, with the help of the PPU. This is not supported by TEA. Tasmania can and should avoid urban sprawl. Now Councils can have a bob each way.
	Unfettered Urban Sprawl	A rabid idea which could easily come to Tasmania.
	Ribbon Development	A rabid idea which has already come to Tasmania and accepted gormlessly by the TPC at Entally, for example.
	Rural Residential Settlements with lower levels of Services and lower energy consumptions.	These can easily be described as Liveable Settlements and should not be discriminated over. Indeed they residents often pursue some sort of domestic agriculture, an increase in local food. So it is unfortunate the Government discriminated.
	Pleasant places to live – amenity.	TEA sees this as a separate topic or issue. This is mentioned in the LUPAA Schedule 1 Objectives.

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
	Avoiding Resolving with fairness and solving systematically the various foreseeable land use conflicts.	TEA sees this as a separate topic or issue.
	Integrating land use and transport.	This is mentioned in the LUPAA Schedule 1 Objectives.
	Health and wellbeing.	This is mentioned in the LUPAA Schedule 1 Objectives.
	Recreation and open space opportunities.	Recreation is mentioned in the LUPAA Schedule 1 Objectives.
	Community – health services and education.	This is mentioned in the LUPAA Schedule 1 Objectives.
	Pandemic Design.	This relates to a range of issues, which clearly need to be actioned, such a hospital ventilation for example. It is of vital importance and needs to be included. This is generally mentioned in the LUPAA Schedule 1 Objectives.
	Disability Access.	A requirement based on our obligations and on legislation. For some people disability access is essential to participation, well beyond a mere liveability.
Population Stability and a Deliberation over and a Determination about any Sustainable Rate of Growth	Human Population level and changes in Tasmania.	Government only has an informal policy rather than a Planning Policy on this subject, yet clearly the

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
		<p>Government's position has far reaching planning consequences.</p> <p>This Topic is Essential and deserves its own TOPIC.</p> <p>This is a sustainability issue and as such is covered within Schedule 1 in a broad sense, But has not been included by the PPU.</p>
	Accepting that Growth has Limits	This falls into the issue of sustainable development in a generic sort of way.
Cultural Heritage Protection	Aboriginal heritage	<p>TEA proposes adding the word "Cultural" to the Topic description.</p> <p>Special cultural value is mentioned and potentially but Aboriginal heritage is not explicitly mentioned in the LUPAA Schedule 1 Objectives. A shame.</p>
	Cultural heritage	Special cultural value is mentioned in the LUPAA Schedule 1 Objectives.
	Landscape heritage	Special cultural value is mentioned in the LUPAA Schedule 1 Objectives.
	Scenic protection	<p>These two subjects have been separated by TEA.</p> <p>An aesthetic and pleasant environment is mentioned in the LUPAA Schedule 1 Objectives.</p>
	Tourist routes	These two subjects have been separated by TEA.

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
		An aesthetic and pleasant environment is mentioned in the LUPAA Schedule 1 Objectives.
Resilient and Effective Efficient Infrastructure to support the economy and create liveable communities		The suggested words ' Resilient and Effective Efficient ' have been added by TEA.
	Airports / Sea ports / Railways and Light Rail.	This is generally mentioned in the LUPAA Schedule 1 Objectives.
	Safe and Efficient Roads, car parking, cycleways and walkways and footpaths.	This is generally mentioned in the LUPAA Schedule 1 Objectives.
	Effective and Relevant Public transport – and a Transition to electric powered transport.	Electric vehicles will be more reliable, quieter, less polluting, and will lower emissions in the transport sector. There is an urgent need to get on with this transition.
	Private transport – a Transition to electric powered vehicular transport.	Electric vehicles will be more reliable, quieter, less polluting, and will lower emissions in the private transport sector. There is an urgent need to get on with this transition. Climate Change Action in Tasmania needs to be Sectorally based now.
	Telecommunications	
	Electricity and Feed in Tariffs.	These two subjects have been separated by TEA.

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
	Energy and Energy Security.	These two subjects have been separated by TEA.
	Irrigation, water, sewerage and stormwater	This is mentioned in the LUPAA Schedule 1 Objectives.
	Waste management and Adoption of circular economy principles.	
	Electric Vehicle Transition	
Rights of Appeal and Rights and Expectations and Encouragement to Meaningful Public engagement and involvement in planning processes		The name of this Topic has been significantly reworded and improved by TEA. This is mentioned in the LUPAA Schedule 1 Objectives, See Schedule 1, Part 1, Section 1 (C)
	The Deliberate Raft of Discouragements	This encouragement issue (which has broken down) is mentioned in the LUPAA Schedule 1 Objectives, See Schedule 1, Part 1, and Section 1 (C) but was not included in the PPU's scoping paper.
	Meaningful, Transparent Public Consultation Processes	
	Strategic planning	This is currently a closed process and often changes are made to Strategic Plans such as Land Use Strategies including by the Policy Unit yet no rights to have and consider public comment is forthcoming. This is a disgrace.

TPP Topic	Issues (to be addressed under each TPP Topic)	Reason or Comment
	Ongoing review	
	A reasonable and fair right of Objection	We do not support the diminution of community rights of involvement over developments within the planning process. This is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Hearings	
	Appeals which can be afforded and which are accessible for all members of the community.	This is mentioned in the LUPAA Schedule 1 Objectives, yet was not included in the PPU's scoping paper.
	Judicial Reviews	
	Avoiding Resolving land use Conflicts	
	The Democratic Right to Protest	This is undeniably a part of the democratic process.

Now TEA would agree we have added a few things (Issues) but it is all well intentions to be inclusive and in line with the intent of the RMPS. Most fitted into the PPU given Topics

Climate Change and Related Sustainable Economic Issues

TEA considers that all aspects of Climate Change should be reflected and considered in Policies in Tasmania, including Planning Policies.

We write out of great concern and alarm, to warn of the urgent and pernicious problem of Climate Change, caused indisputably by the anthropogenic pollution of the Earth's atmosphere by Greenhouse Gas emissions, for statistical purposes simplified down to an expression of an amount of CO₂ residue in our atmosphere.

Human activity, in its mostly unabated industrialised forms, continues to pump Greenhouse Gases (emissions), regarded by many, including this writer as pollution, into that thin but crucially vital layer of atmosphere surrounding the planet Earth, which we know as the sky. We seem to take for granted this layer, and its oxygen rich atmosphere, clearly essential for all.³

Even though we have known of CO₂ pollution and the seemingly irretrievable build-up of carbon dioxide and other gases in the earth's atmosphere for over 40 years, almost no action has so far been taken. Certainly, the trend globally has not reversed.

³ The Earth's atmosphere can be divided into specific layers. These layers begin from the ground level of Earth and go all the way up into space. Every single one of these layers is vital for keeping our planet healthy and alive. The final layer of the atmosphere extends upwards to 621 miles above the Earth's surface. However, since space starts 62 miles above the surface, that is generally considered to be the highest point of our atmosphere. This 62 miles, or about 100 kms is not a very great distance.

⁴ The existence of the greenhouse effect, while not named as such, was proposed by Joseph Fourier in 1824. The argument and the evidence were further strengthened by Claude Pouillet in 1827 and 1838. John Tyndall was the first to measure the infrared absorption and emission of various gases and

Indeed the Greenhouse Gas pollution problem and the related climate warming and destabilisation of the planet's climate continue to worsen at an escalating rate. The problem can be expressed by observing the planet's human population continues to grow, the aspirations of undeveloped countries to development continues to escalate and those high energy consuming developed educated countries, for decade after decade show little sign of heeding the warning signs.

In 2015, dangerously late, the Australian government signed The Paris Climate Agreement but then continued with a Laissez Faire approach, without a plan, without a strategy but rather continued gifting our common future to the coal and gas miners. These companies donate vast amounts to political parties.

Humanity has known of the Greenhouse Effect since the 19th Century⁴ and has measured the change in earth's temperature and its causal connection with rising CO₂ levels at Hawaii at the Mauna Loa Observatory, since the 1950s.

Recently The Intergovernmental Panel on Climate Change (IPCC)⁵ released the first instalment of its Sixth Assessment Report in 2021, titled: *'Climate Change 2021: The Physical*

vapours. From 1859 onwards, he showed that the effect was due to a very small proportion of the atmosphere, with the main gases having no effect, and was largely due to water vapour, though small percentages of hydrocarbons and carbon dioxide had a significant effect. The effect was more fully quantified by Svante Arrhenius in 1896, who made the first quantitative prediction of global warming due to a hypothetical doubling of atmospheric carbon dioxide. However, the term "greenhouse" was not used to refer to this effect by any of these scientists; the term was first used in this way by Nils Gustaf Ekholm in 1901. (From Wikipedia)

⁵ The Intergovernmental Panel on Climate Change (IPCC) is the UN body for assessing the science related to climate change. It was set up in 1988 by the

Science Basis'. This is the most comprehensive and authoritative overview of the physical science of Climate Change to date.

We write from and about planning policies at one of the ends of the habitable (for humans) parts of the planet - the island state of Tasmania, the smallest and poorest state of Australia. About 42% of Tasmania is reserved and this stronghold of nature represents an important carbon sink.

Greenhouse Gas pollution is of our making. No matter what steps humanity may be taking individually, locally, economically, regionally or in any way, this problem requires an urgent consensus type solution. It is far more important than jobs. It is far more important than the coal industry. It is the most important thing confronting humanity and its existence in the 21st century. Glasgow COP described as *"the Last Saloon"*⁴.

There is always a difficulty in forecasting and writing about the future but, in the 1980s, the human society of the time identified some notions, which characterised the concept of ecologically sustainable development. Those notions included the precautionary principle and intergenerational equity. These are some of the components of Ecologically Sustainable Development (ESD), which have found their way into Australia's environment legislation the EPBC Act 1999. These seem to be simply ignored. The Tasmanian legislation of the mid 1990s borrowed from Brundtland's concepts, when the Resource Management Planning System (RMPS) was born.

Importantly a Key Threatening Process under the EPBC is obviously not taken seriously either: *'Loss of terrestrial climatic*

World Meteorological Organization and United Nations Environment Programme to provide policymakers with regular assessments of the scientific basis of climate change, its impacts and future risks, and options for adaptation and mitigation. ⁴ HRH Prince Charles.

habitat caused by anthropogenic emissions of Greenhouse Gases'. This is reckless. This is a matter, termed an issue, which should be included in Tasmanian Planning Policies.

In any case, from that time of the 1980s, in broad terms, the existing insular Australian economy of the times, globalised itself, removed tariffs rendering our industries uncompetitive, continued to intensify various land uses, continued with land clearing, forest clearing, removed various economic barriers, did free trade deals, built more dams, did much more irrigation over allocating the Murray Darling, consumed more steel, aluminium and other energy intensive products and continued to ignore the looming problems and consequences of unfettered growth.

Australia did not accept the scientific warnings and did not adopt precaution or a long-term intergenerationally equitable approach. Those are both matters, termed issues, which should be included in Tasmanian Planning Policies.

*"As of March 2021, 59 countries have communicated a Net Zero target, representing 54% of global GHG emissions..."*⁶

If the current rate of countries' climate action ambition prevails, by the time we get to 2050, TEA expects many of the life supporting natural systems on which humanity relies for survival will be in a state of collapse, probably irretrievably and possibly irreversibly so. When we talk in this letter about *"our"* or *"we"* TEA is referring to global community of humanity, not merely Australia or Tasmania.

⁶ Westphal, April 30 2021, Congressional Research Service, Net Zero Emissions Pledges: Background and Recent Developments.

It appears that a massive change is required to the artificial cultural construct, termed: 'The Economy', including in Tasmania. Often, in sustainable development terms, the economy is described, clustered with society and the environment, termed *'the triple bottom line'*, ostensibly suggesting that all those things need to be considered side-by-side.

Sustainable Development is a term used in the RMPS, referred and referenced specifically in the Schedule 1 Objectives of the Act. So there is some sort of basic a definition: Schedule 1 states:

"2. In clause 1 (a) , sustainable development means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety while –

(a) sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations; and

(b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and

(c) avoiding, remedying or mitigating any adverse effects of activities on the environment."

But there has never been an adequate interpretation in a policy sense. There is no meaning in planning terms; it is a deafening silence. It is incompetent, a deliberate avoidance which degrades and diminishes the planning schemes and system of Tasmania.

The COVID 19 pandemic and Australia's economic response to it demonstrated clearly how the economy can be manipulated in

the short term to suit the needs of society. So in the real world The Economy, Per Se, is currently being considered in a disproportionate sense, beyond what is reasonable and logical because basically it only serves societies' interests. It is also so in the RMPS.

Currently in Australia and across the planet, virtually all nations have an economy, which in one form or another, liquidates carbon and produces atmospheric pollution, labelled Emissions, simplified as CO2 Emissions but involving a number of Greenhouse Gases. This occurs by design, because of the influence of powerful vested interests and a historic ignorance of the effects of our actions. Hence, TEA is terming such economies: Carbon Liquidation Economies. It is an anthropogenic impact of a system, which places people and our cultural artifices such as the growth based carbon liquidation economy before nature, before precaution, before intergenerational equity, even before our own survival. It is stupid really.

The Globe's existing Carbon Liquidation Economies currently impact three important things: A/ A liquidation of carbon and B/ Generation of Greenhouse Gas pollution (Emissions), and C/ A drawdown on biological diversity of the natural world, i.e. all the other species on the planet than our own. We argue and assert all of these three things are and always will be vitally important for our survival as a species.

All nations and states, including Tasmania need to urgently change the design of economy, without delay, away from a Carbon Liquidation Economy. The Glasgow COP is the ideal opportunity where such urgently needed change can become commitment at the global level. But Tasmania also has opportunities to change its economy away from the growth based carbon liquidation model, the system we are mindlessly stuck

on. We can think of no other path. Yet, in 2013 Tasmania achieved a Net Zero Carbon economy. That does not mean certain sectors are free of the generation of emissions, of course Tasmania continues to generate emissions. So it is important Tasmania disaggregates its target and develops emissions goals for the various sectors, striving to reduce our CO2 footprint.

Tasmania should accept that a transition pathway is needed but that cannot be an obfuscation mechanism. There can however be no more avoidance, weaselling and prevarication over the changes we urgently need to make to mitigate the disasters, which are already upon us and which will inevitably worsen. The proposed 2030 Net Zero Emissions Target mooted recently when we have been Net Zero since 2013 is absurd and unacceptable.

All subsidies and other largess accorded to industries engaged currently in carbon liquidation activity, need to be abolished without delay. TEA says this because in Australia currently the playing field is significantly skewed towards carbon liquidation industries, yet no sound reasons have been given for such irrational policy by any political party or in any policy document or strategy.

Australia does not have international obligations to run a Carbon Liquidation Economy. It simply does so, seemingly by choice of industry with the help of government. Tasmania is the only State fit to lead on this issue.

In short: Tasmania still needs to replace the Carbon Liquidation Economy with a Carbon Conservation Economy. This may appear to be a complex undertaking at first but TEA is in no doubt it is essential if we are to survive as a place and as a planet and it would ensure Tasmania thrives. Tasmania would benefit enormously from such a change.

For Australia: There is no national strategy, no national plan, and no new legislation for something like a carbon price. It is obviously up to the States. Tasmania should create a Carbon Pricing Scheme. We have abundant carbon and means of carbon dioxide sequestration.

Australia has delayed, procrastinated, argued, weaselled and failed to lead, so it is now crucially urgent to act decisively, effectively and meaningfully, without delay.

This need for urgent action now is not anyone's fault. It is an accumulation of avoidance that has carried on for over 40 years. The hole in the ozone was our early warning and it affected Tasmania especially. If Climate Change is avoided it will continue to destabilise and worsen and it has already affected Tasmania, with increased and more intense fires.

Fossil fuels are a major part of the problem and for Tasmania that relates especially to transport. New low carbon solutions should be demanded, planned and facilitated by Governments but currently what we have in Australia is the community and industry taking the lead.

Luckily, Tasmania's power system is based on renewables so we know they work. These renewables power our homes and our industry.

TEA Inc. cannot understand why the Liberal/National Coalition Australian Government removed the carbon price rather than amending it. Setting up a system, a price, and a set of standards to encourage the conservation and trading of carbon is absolutely fundamental.

Tasmania would benefit greatly from a price on Carbon and from having a carbon trading scheme. We should have a State Policy to create a Price on Carbon.

Developing a Carbon Conservation Economic system, which includes Carbon Trading would seem to be very useful and indeed fundamental for Tasmania. Tasmania is well placed to benefit enormously from such a shift.

There is quite an amount of forest in Tasmania in public and private ownership, which in terms of a carbon price would almost certainly be more valuable if left standing. Plus then there are no new roads, no road maintenance, no catchment impacts, no land use conflicts, no scarring of the landscape and no biological diversity loss.

In the Australian context, Tasmania's forested environments are far more productive in carbon terms.

This carbon price initiative and system would impact everyone who owns land in Tasmania and it should potentially be able to benefit everyone, not just large corporations in a new Carbon Conservation Economy.

A Carbon Price should certainly be able to improve the lot of farmers and other landowners, be they family businesses or giant corporations, or indeed the aboriginal community. It would make Tasmanians wealthier. We control and have under our Nation vastly more land and hence more carbon per capita than virtually all other OECD countries. Likewise does Tasmania.

Australia is not currently on track to meet our Paris commitments but Tasmania has already achieved the 2050 Target some 37 years in advance. That is a negotiation point in federal terms.

Tasmania, has since 2013, quietly been in a Net Zero Emissions' performer, under the prevailing rules at the time. Tasmania is

only a small place, with a small population and it has achieved an extraordinary performance.

It is TEA's view that Tasmanians can easily do even more towards saving the planet and could even be recognised economically by the Commonwealth for those efforts.

Tasmania's power system astoundingly, operates successfully on renewables at about or over 90% of the time and we even export renewable power to Victoria.

We are one of the more populous States of the Commonwealth in density terms but have a decentralised population across the State. We are a place, which shows how it can be done. Tasmania benefitted from a Carbon price back around 2012, 2013 and if Tasmania can remain Carbon Neutral then the larger states should well and truly be able, as well.

Tasmania has a tiny reliance on imported coal based energy from Victoria and we should have a Policy to remain essentially free of reliance on coal.

During the eight years in the coalition Government, Australia, a party to the United Nations Framework Convention on Climate Change, signed the Paris Climate Agreement⁷ in 2015. Included within the Paris obligation it states:

“(a) Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this

⁷ As contained in the report of the Conference of the Parties on its twenty-first session,

would significantly reduce the risks and impacts of climate change;

(b) Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food production; and

(c) Making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development.”⁸

Tasmania’s Policy over Climate Change can and should massively exceed this commitment.

Tasmania is a part of Australia’s international commitment and obligation.

Warming and the Climate Change impacts on the oceans and the increased temperature is destroying the largest living structure on the planet, the World Heritage listed Great Barrier Reef. The Great Barrier Reef. Tasmania can and should play a part in that protection ambition.

Climate Change impacts and degrades the Tasmanian Wilderness World Heritage Area (TWWHA). Again, Australia has international obligations, yet Tasmania’s special part of the planet, containing irreplaceable Gondwanic vegetation is being increasingly impacted by wildfire, a product of Climate Change.

Tasmania could do much more to be ready and able to fight remote fires more quickly and effectively.

In our view, the only way to deal with such stubborn Australian recalcitrance with regards to coal is to recommend that the global

community moves to a system of placing a serious Greenhouse Gas levy at the pit face of all coal mines, oil wells, gas wells and so forth, across the Globe. Tasmania does not have any of these concerns. It is in a vastly better place regarding its climate damaging emissions performance.

It is proposed Tasmania converts its hydro power to a pumped system, increasing management and extending the power generated from a finite source of water. Tasmania should have a Policy to not use coal to pump the water back up the hill.

The Black Summer bushfires are a relevant consideration when thinking about the big picture for Tasmania. Our climate is similar to SE Victoria and indeed dryer in some parts of the SE of the State.

The Black Summer fires occurred at a time when the global average temperature had warmed by about 1°C, over preindustrial levels. However, in south-east Australia, the typical temperature was not 1° but almost 1.5°C, over preindustrial levels. Tasmania is not immune from such increases in temperatures too.

Some parts of the globe are heating more than other parts. It seems south-east Australia has a bigger Climate Change warming problem than many other places.

Tasmania should adopt a Nuclear Free status, sending a clear message of the peaceful aspirations of the people of this State. Tasmania would never need to consider technologies such as Nuclear Power.

More than 12 months after those Climate fuelled fires Australia still has no adequate policy, nationwide strategy or set of new

⁸ This objective (c) is of vital importance but seems overlooked.

legislation to fight Climate Change. Tasmania's climate strategy remains in its infancy and certainly isn't yet bold enough to be proposing changes to our economic system.

The writer currently has no means of being compensated for his permanently reserved carbon sink (Private Forest reserve), which has already sequestered significant CO₂ and which will continue unless it is burned down in a Climate Change inferno. That fundamental deficiency should be rectified and it is deserving of a Tasmanian Policy position.

In Tasmania there are many opportunities for employment in a carbon conservation and solar, wind and hydro renewable powered economy. Later Tasmania should be in a position to produce Green Hydrogen.

Meanwhile Tasmanians are missing the fantastic opportunities a carbon conservation economy would provide Tasmanians.

Why not find out what Tasmanians are willing to do now, what assistance they would need, what sort of transitions would be acceptable, what additional information is required, what changes to our economic system people need, what sectoral problems confront each sector to reduce Greenhouse Gas pollution and the worst effects of Climate Change?

We sincerely ask Tasmania to urge and agree to and support a national consultation inviting public submissions over suitable and preferred actions that Australia should take to mitigate Climate Change and Greenhouse Gas pollution. Please act on the Paris Climate Agreement and advocate a transition to a new economic model.

The government can and should develop a National Strategy of Climate Action that both Australians and Tasmanians can support.

The Carbon Liquidation Economy of Australia is currently skewed firmly towards an ongoing and relentless liquidation of carbon, especially in the form of coal and gas. That activity has an inevitable consequence of the generation of carbon dioxide and other Greenhouse Gas pollution. Tasmania is entirely different and should adopt a different position.

The global economy is merely an artificial construct. Climate Change is now obviously already an emergency for Australia and Tasmania and yet we are currently only at 1.2°C of average global warming.

We urgently need to do things, which we know will work including in Australia with our unsustainably carbon intensive lifestyles for even in Tasmania we generate significant emissions in some sectors.

It would seem immensely obvious that in our economically driven world, avoiding carbon pricing allows a lack of adequate consideration and economic distortions that favour unsustainable practices admittedly these are not the dominant players in the Tasmanian Economy but they do contribute to Climate Change.

The removal of the mining of and combustion of fossil fuels from human endeavour is a goal, which is obviously highly pressing and which should be embraced in Tasmanian energy Policy.

Unpolluting alternative fuels, need to be rolled urgently out in Tasmania A roadmap is obviously required and in Australia, we have no roadmap, so Tasmania should create its own renewables based transition strategy and policy. The notion that Australia is relying on technology seems to me to be code for the natural gas industry. It hardly applies to Tasmania. We are ignored over and over yet we have already adopted the solutions.

By putting a price on carbon and by penalising Greenhouse Gas polluters (which to some extent even in Tasmania is widespread) a pathway to more sustainable developments will almost automatically arise.

The other parts of the equation are that the natural forested vegetation of Tasmania needs to be retained and enhanced.

Land clearance remains a significant problem, which again liquidates carbon and through burning, creates more CO₂. Reducing the over allocated water extraction by irrigators is clearly also a priority.

The sequestration services of retained vegetation, needs to be explicitly valued in a new economic model.

It may be that even at 1° C of warming, Australia loses, over a relatively short time most of the Great Barrier Reef. Already Tasmania has lost 95% of its giant kelp forests very quickly. This is a tragedy: a whole ecosystem that has already collapsed. Collapses can happen all of a sudden. We don't know what might be next.

The pricing of fossil fuels in Australia (and in Tasmania) and across the globe must reflect and compensate for the damage, which is the inevitable consequence of their extraction and use. We clearly need an international agreement to achieve a consistent fee structure, which should be paid across the globe over this harm.

Fossil fuel resources need to be recognised as destructive when extracted and combusted by humans and such should be included in Policy in Tasmania.

Land clearance of both tropical and temperate forests urgently needs to come to an end, including such places as Brazil and SE Asia, as well as Australia, including Tasmania.

All governments must commit to legislated CO₂ pollution/emission reductions and national/state decarbonisation strategies including Tasmania.

The global economic system must be changed away from dependence on fossil fuel energy extraction and away from the liquidation of nature. Tasmania may be performing well in terms of net zero but it is still liquidating nature.

The global economic system needs to transition to renewable energy and the conservation and restoration of natural systems, which will better supply carbon sequestration services. Tasmania can lead the way in this field.

Transport, cars, trucks, trains, planes and ships need to transition urgently, wherever possible to renewable power, electricity and green hydrogen. Tasmania can achieve much of this.

In Tasmania hydro-electric power runs an aluminium smelter, a zinc refinery and an amount of other heavy industry including a pulp mill. It proves that renewable energy works.

Electric cars and trucks are a no-brainer for Tasmania and a Policy for them is needed, especially because we have so much reliance on the car as a mode of transport. The imperative is to electrify the cars in Tasmania as soon as possible. A range of Policy issues would need to be resolved. They are simply not luxury vehicles as claimed by Energy Minister, Angus Taylor. They would be cheaper if we started buying more of them. It needs Government start up schemes to get over the inertia.

We need to mandate and to legislate energy policy, which will have a high certainty of achieving significant emissions, that is Greenhouse Gas pollution reduction.

A climate survival levy on carbon liquidation activities at the mine extraction site is going to be highly desirable. All such places would measure the volume or tonnage of material which leaves the mine site and would pay the levy into the climate survival fund, or some other such fund. Tasmania would be virtually immune from such levees and could address this issue in its Carbon Conservation Policy.

The massive change, which needs to be urgently applied to Tasmania's economy, will ultimately be viewed as wise, essential, proportionate, decisive change.

When we look back we will be grateful for the bravery of those decision-makers who took the path that made a vital difference that saved the planet and this wonderful country.

What an amazing decision now faces the Australia and Tasmania. Well Tasmania can lead the way.

Tasmania needs something very simple in terms of Carbon Trading that can to some extent be natted out now in a Carbon Conservation Policy.

END

Department of Primary Industries, Parks, Water & Environment

OFFICE OF THE SECRETARY

Hobart GPO Box 44, Hobart, Tasmania, 7001

Launceston PO Box 46, Kings Meadows, Tasmania, 7249

Devonport PO Box 303, Devonport, Tasmania, 7310

Ph 1300 368 550

Web www.dpipwe.tas.gov.au

Our ref: D21-189273



Planning Policy Unit
Department of Justice

Via email: Planning.Unit@justice.tas.gov.au

Draft Tasmanian Planning Policies

Thank you for your letter of 16 August 2021 seeking input on the scope of the Draft Tasmanian Planning Policies (TPPs) and for granting an extension to the comment period for the Department of Primary Industries, Parks, Water and Environment (DPIPWE).

I can advise that DPIPWE has considered the scoping paper for the draft TPPs and has the following comments to make framed by the questions raised in the scoping paper.

Scope of proposed TPP topics and issues

DPIPWE supports the scope of TPPs as largely appropriate. Similarly the issues addressed within the topics seem generally appropriate with the proviso consideration should be given to the inclusion of the following amendments/additions to the nominated 'Issues' under each 'TPP Topic'.

Environmental Protection:

- Biodiversity – suggest adding the following italicised concepts to Biodiversity - flora and fauna habitat and *communities* protection, *restoration and recovery*; *connectivity and corridors*, weed management, *pathogens*, fire management;
- Add 'Geodiversity' – as the foundation of habitat diversity and therefore biodiversity;
- Add 'Carbon sinks and repositories' e.g. forests and wetlands;
- Clarify that 'Waterways and wetlands values' are not restricted to water quality issues and include availability for ecosystem function;
- Add 'Biosecurity'; and
- Remove 'Precautionary Principle' – refer to note under climate change discussion below.

DPIPWE supports the inclusion of fire management as an aspect of biodiversity management in recognition of the potential biodiversity benefits stemming from appropriate fire regimes. Fire management will also be relevant to some of the the other issues identified for Environmental Protection but does not need to be explicitly stated.

Hazards and Risks

- Expand 'Landslide' to 'Landslide and slope instability';
- Add 'Karst' e.g. sinkhole potential;
- Add 'Mobile sand dunes';
- Expand 'Flooding' to 'Riparian flooding - including potential dam-burst and river channel migration';
- Add 'Biosecurity' (this could be addressed under either Environmental Protection or Hazards and Risks or both).

Economic Development

- Expand 'Agriculture' to: 'Agriculture, silviculture and aquaculture'.

Heritage Protection

- Aboriginal heritage should include consideration of Aboriginal landscape values.

DPIPWE recommends that terms and definitions referenced in the TPPs be consistent with those that are adopted in the *Land Use Planning and Approvals Act 1993* and the *Historic Cultural Heritage Act 1995*, i.e. 'cultural heritage' be referenced as 'historic cultural heritage' in the context of the two relevant acts.

As a general comment, DPIPWE believes that the TPP should specifically address those issues for which local government authorities are the relevant regulator, such as the clearance of threatened native vegetation communities for activities which are exempt under the *Forest Practices Act 1985* and *Forest Practices Regulation 2017*; and the management of disturbance to threatened species which is regulated by the Crown under the *Threatened Species Protection Act 1995*. The TPPs should explicitly outline the roles of state and local government authorities to identify the separate and joint responsibilities each part has management of each TPP Issue.

Integration of climate change into all relevant TPPs

DPIPWE supports the integration of climate change considerations into all relevant TPPs. This intention should be explicitly stated at the introduction to the TPP Topic and Issues list to clearly indicate that it will be addressed. Each TPP should clearly define what climate change risks need to be mitigated or addressed for each issue. By default this includes a requirement to develop strategies that take into account risks and threats which potentially lie a decade or decades in the future.

Applying the precautionary principle is included as a separate issue to be addressed under 'Environmental Protection'. Rather than an issue, this is really a principle which should be applied over the top of all issues in 'Environmental Protection' and also to the several of those in 'Hazards and Risks'. It is particularly relevant to various climate change related factors and how these might interact with the risks, values and processes which are being addressed by the TPP. Cumulative impacts should also be addressed across various TPP Issues.

Proposed template

DPIPWE supports the proposed template. Appropriate site selection should be a high-level attribute acknowledging that some uses are not acceptable in certain areas. We also support the detailed information on the process and procedures provided in the second alternative proposed in the 'Implementation statements' section. Greater detail provides better direction and clarity.

If you have any further questions on this matter please contact

Yours sincerely

Tim Baker

SECRETARY

28 October 2021



Civic Centre
15 Channel Highway, Kingston, Tas, 7050
Locked Bay 1, Kingston, Tas, 7050
T: (03) 6211 8200
F: (03) 6211 8211
AusDoc: DX 70854
E: kc@kingborough.tas.gov.au

27 October 2021

Mr Brian Risby
Director Planning Policy Unit Department of Justice
GPO Box 825
HOBART TAS 7001

Dear Mr Risby,

SCOPING PAPER FOR THE TASMANIAN PLANNING POLICIES (TPPs)

Thank you for the opportunity to make a submission in relation to the above scoping paper.

We have reviewed the information made available on the PPU's website and would like to provide the following comments and suggestions for your consideration.

It is understood that the TPPs will have no head of power to directly influence development decisions at local level, however we consider that this a fundamental omission in the Tasmanian planning system. The scoping paper provides a unique opportunity to shift the Tasmanian planning system into a strategic-lead planning framework that provides a balance between the competing social, economic and environmental interests at federal, state, regional and local level.

If the intention is to genuinely move towards a more contemporary planning system in Tasmania, the TPPs should clearly articulate the vision and principles upon which all state, regional and local planning decisions and future changes in land use in Tasmania will be based.

The regulatory tools contained in the Tasmanian Planning Scheme are currently limited in the way it can influence and ensure that the future and desired aspirations of the state are achieved at local level. Similar to the [Ministerial Planning Directions of NSW](#), the TPPs should be able to direct and inform decision making at local level, particular where planning proposals (for example rezoning or large scale development and subdivisions) may have an impact on employment, resources, housing diversity and affordability as well as transport, bulk infrastructure and service provision (i.e. to include consideration of the issues not explicitly covered by the Tasmanian Planning Scheme).

Noting the limitations of the Tasmanian Planning Scheme, the TPPs are therefore critical to influence development and should have the statutory status to allow planning authorities to make decisions at local level that will advance the economic, social and environmental outcomes sought at regional and state level.

TPP Topics

The proposed topics are considered broad and generally supported, but because the topics may carry a range of policy agendas, it may be necessary to refine the scope of each topic to focus

on specific policy directions. To assist, we suggest the following changes to the list of topics provided in the scoping paper.

- The '*Liveable Settlements*' topic should be split into two separate sections. One to cover all matters relating to improved liveability and the other to address the range of issues that are relevant to the overall settlement strategy of the state and those applicable to regional and local level.
- Similarly, the '*Infrastructure to support the economy and create liveable community*' topic should preferably be split into two or three sections. One to deal with infrastructure to support economic growth and the other to address the infrastructure requirements to create liveable communities and to ensure well planned settlements. The latter could also be addressed under the two topics as suggested in 1 above.
- It is agreed that climate change and pandemic response can be included under a range of topics and don't necessarily need its own sections.

TPP Issues and strategies

It is unclear if the intention is to continue with the strategic strategies of the draft TPPs that were made available during the public consultation process of the amendments to LUPAA to introduce the TPPs. The issues identified in the scoping paper could be broadened to cover a range of policy agendas that are important at state, regional and local level. To assist, Council suggests that the following issues be added to the scoping paper.

Environmental Protection

The environmental protection section will need to be broadened to protect and manage the state's many environmental assets and values, including natural landscapes, waterways more broadly (not just water quality, but aquatic ecosystems, water quantity, streambed and streambank processes and condition and buffers).

The TPPs must provide for a consistent policy framework across regulators for biodiversity and native vegetation which:

- establishes agreed biodiversity conservation objectives and outcomes;
- identifies the roles and responsibilities of the different regulators;
- clarifies the role of land use planning in biodiversity conservation;
- provides mechanisms to achieve biodiversity conservation outcomes at the strategic planning stage; and
- requires reporting on loss and gain by all regulators for all biodiversity surrogates, not just the FPA for forest communities.

It specifically will need to address issues that may arise from development in areas of high environmental value, including identifying no go areas and applying the mitigation hierarchy (as well as the precautionary principle), including avoidance, minimisation and consideration of offsets or other mitigation mechanism for unavoidable impacts.

Liveability

The liveability section should be unpacked into specific objectives that will improve social connection, access to work, schools, public spaces, social services, safety, wellbeing, feelings of inclusion and sense of community (connectivity and accessibility may need to be explicitly addressed under 'health and wellbeing' where it relates to recreation and open space provision).

The issues will need to provide policy direction to:

- encourage flexible and innovative development that responds to changing needs of the population (for example, rejuvenation of existing neighbourhoods to accommodate changing housing needs and supporting infrastructure to accommodate population growth).
- facilitate diverse, well designed, affordable and social housing;
- facilitate vibrant activity and local centres;
- improve landscape, streetscape and neighbourhood amenity;
- provide high-quality public spaces with an engaging urban character and
- encourage active lifestyles through the availability of a range of active transport options.

In addition to the comments provided under the environmental section, the liveability strategies should support development that responds to Tasmania's unique landscape setting and integrates with the natural environment. It should include strategies to improve natural and iconic landscape settings and to manage and plan for a long-term green canopy across the urban areas. There should also be specific policy directions to ensure development is appropriately designed and located to improve environmental conditions.

Settlement

The settlement section should have the main objective to build strong and self-sufficient communities. The strategies itself will need to provide policy direction at state, regional and local level to earmark appropriate places for growth and specifically identify areas where further growth will be limited. Where growth is supported, it should provide policy direction for well planned development precincts, supported with infrastructure and services to future proof communities. The list of infrastructure issues in the scoping paper is comprehensive, but it's unclear if it will cover digital connectivity.

The policy directions should ensure that land use and transport infrastructure is coordinated. It specifically should provide strategies to support the development of a balanced and sustainable transportation system that supports smart growth and intention to provide all settlements with reasonable and affordable transportation choices. The strategies must ensure that there are synergies between housing and employment areas so that people do not have to rely solely on travel by motor vehicle to meet their daily needs to keep urban settlement compact. The strategies could suggest increased average densities in appropriate locations to put people and their activities (homes, jobs, services) closer together.

The TPPs should support the strategic identification and protection of employment areas to ensure that investment is protected and that business/industries can function optimally.

Similar to the comments provided under the liveability section, the strategies should encourage sustainable development that compliments and respects the natural environment. It should advocate for the adaptation to the impacts of urban and natural hazards and climate change specifically by avoiding new settlement within high-risk natural hazard areas.

Economic development

The main objective of this section should be to grow a sustainable and flexible economy and to ensure that planning and regulation maximise employment and income-generating opportunities.

The strategies should provide policy direction to accelerate economic growth in key sectors such as agribusiness, tertiary education and health care, taking full advantage of trade and tourism opportunities to ensure Tasmania continues to play a critical role in the Australian economy.

Tourism issues may need to specifically address accommodation, and food and beverage services which is a major component of the tourism industry in Tasmania.

The policy directions will have to provide support for freight, logistics and distribution services, foreign investment, agribusiness and technology enabled primary industries, renewable energy, employment and tertiary vocational training services. It will specifically need to provide a high-level support for improved coordination, joined-up governance and clear signals to attract industries to targeted locations to optimise local advantages.

To ensure sustainable outcomes, the strategies should provide direction on circular economy opportunities to target and maximise resource optimisation, reduce waste and to promoting green energy options. This could include specific directions to support renewable energy industries, emerging and creative industries and the development of new small business ventures.

Implementation

It appears that the TPP strategies will solely rely on the regional land use strategies and the Tasmanian Planning Scheme to achieve the desired outcomes. Unfortunately, as previously indicated, the regional land use strategies and the Tasmanian Planning Scheme are limited in what it can achieve. For example, if the policy directions were to advocate for the uptake of vacant and underutilised land to provide housing for the needs of Tasmania's growing population, a change in the zoning or development provisions alone won't be able to encourage the uptake of those opportunities by the development industry. For such policy direction to succeed, incentives (outside the planning regulation tools) will need to be introduced from various levels of government to encourage infill development. As such, the implementation of the policy directions will need to go beyond the regional land use strategies and Tasmanian Planning Scheme as proposed in the scoping paper.

Noting that we are the only Australian state without a consistent development contribution regime, it may also be appropriate for the TPPs instigate this discussion and if there is appetite for it, to align with the Tasmanian planning system to improve infrastructure financing, timely infrastructure delivery, and the financial sustainability of infrastructure authorities, particularly for local government.

If you wish to discuss the above, please contact the Council's Strategic Planner,

Yours sincerely,

TASHA TYLER-MOORE
MANAGER DEVELOPMENT SERVICES

cc.

Michael Edrich
Senior Policy Officer
Local Government Association of Tasmania
326 Macquarie Street
HOBART TAS 7000

Hon Roger Jaensch MP
Minister of Planning
GPO Box 123
HOBART TAS 7001

27 October 2021

Brian Risby
Director
Planning Policy Unit
Department of Premier and Cabinet

Dear Brian

SUBMISSION – TASMANIAN PLANNING POLICIES (TPPs) SCOPING PAPER

Thank you for the opportunity to comment on the *Scoping Paper for draft Tasmanian Planning Policies*, and for providing a briefing to our members in September 2021.

PIA Tasmania has long called for State policy to drive and inform the implementation of the Tasmanian Planning Scheme (TPS). It is also pleasing to see that some of our recommendations from our submission in May 2017 have been adapted into the proposed framework for the TPPs.

For this submission, PIA has provided responses to the questions listed on Page 11 of the *Scoping Paper for draft TPPs* in Annexure 1. In summary, we broadly support the intended topics and the issues that will be addressed under each of the TPP topic. There are, however, a number of matters where refinement is necessary to ensure that the TPPs would operate in a manner that achieves the positive change to the operation of Tasmania's Resource Management Planning System. Comments and recommendations against each of the proposed TPP topic and issue is expanded in Annexure 2, while a summary of our key recommendations to the proposed TPP topics and issues is provided below:

- Rebadging of 'issues' under each TPP topic to 'aspect'.
- Incorporation of a purpose or aim statement for each TPP.
- Rebadging of the following TPPs:
 - 'Hazards and Risks' to 'Hazard Management' TPP,
 - 'Liveable Settlements' to 'Sustainable and Integrated Communities' TPP, and
 - 'Infrastructure to support the economy and create liveable communities' to 'Infrastructure and utility provision' TPP.
- Incorporation of 'Primary production', 'Forestry and timber production', 'Aquaculture', 'Energy', and 'Arts and culture' into the Economic Development TPP.
- Incorporation of 'Housing affordability and supply' and 'Built Environment' into the Sustainable and Integrated Communities TPP.
- Removal of the 'Public engagement in planning process' TPP given overlap with mandated requirements under legislation and objectives of overarching Resource Management and Planning System (RMPS).

Further to our recommendations outlined in Annexure 1 and 2, we wish to raise three additional matters for the PPU's consideration.

Ongoing review of TPPs

The TPPs need to be written and structured in a manner that allows the policy documents to be easily amended, as opposed to needing to amend the whole gamut every time a review or update is needed. A good example is the New South Wales State Environmental Planning Policies (SEPPs), which are issue-based and therefore easily manageable for review.

It is also noted that with any policy work and strategic planning work, the Department needs to allocate ongoing resources and efforts to allow continual review and improvement of these TPPs.

Prioritisation of TPPs within planning reform timeline

Clarity on the implementation schedule of the TPPs is critical to their successful implementation. However, it is not clear in the scoping paper whether all TPPs will be delivered at the same time, or whether it is proposed as a staggered release. In PIA's opinion and acknowledging the limited resources within the Planning Policy Unit (PPU), it would be sensible to prioritise those TPP topics where there are currently no other applicable policies, e.g. the TPP relating to housing affordability and supply.

Furthermore, noting the range of aspects covered under each TPP, the rollout and implementation of the TPPs by Quarter 4 2023 is arguably ambitious. We wish to stress the importance of setting well-articulated objectives, strategies and implementation statements, and that the process cannot be rushed to minimise the need for short-term rework.

Additionally, while we support the intention that the TPPs will inform a review of the regional land use strategies, it is recommended that they do not occur in isolation of each other. This would ensure that the proposed hierarchy will work together, and that objectives of the RLUS leverages off the implementation statements of the various TPPs.

Alignment with international agenda on sustainable future

In PIA's view, the overarching purpose of the Tasmanian Planning Policies is to facilitate the planning and creation of communities which are sustainable and connected. On an international level, the United Nations Sustainable Development Goals (SDGs) were adopted as a "blueprint to achieve a better and more sustainable future for all". While the SDGs are intended to be achieved by 2030, they provide a holistic summary of the elements which contribute to planning and building of sustainable communities. By aligning the TPPs with the relevant SDGs, this allows for the work of planners to contribute to a more sustainable world, and guidance of how planners can direct efforts to a more sustainable future in line with a coherent framework adopted by government and business alike.

Incorporation of SDGs into strategic planning is not novel in Australia; a recent example is Victoria's new *Guidelines for Precinct Structure Planning*, which interlinks the SDGs with planning principles. Similarly, the Tasmanian Government's recent commitment to the recommendations from the Premier's Economic & Social Recovery Advisory Council (PESRAC) demonstrates clear linkages to the aspects covered by the SDGs. In addition, the PESRAC report clearly recommends alignment of its Sustainability Vision with the SDGs¹, and support for government wide adoption of the SDGs. As

¹ https://www.premier.tas.gov.au/site_resources_2015/additional_releases/state_of_the_the_state_address

such it is recommended that the purpose and objectives under each TPP recognises the SDGs, and respective goal statements, allowing the TPPs to remain relevant over the long-term.

While some goals, such as #3 (Good Health and Wellbeing), #9 (Industry, Innovation and Infrastructure) and #11 (Sustainable Cities and Communities) are seemingly more relevant to planning and the work of planners, others like goals #13 (Climate Action) and #17 (Partnerships for the Goals) are equally as critical for planning policy to achieve connected and sustainable communities. Proposed alignment of the TPPs with the SDGs are provided in the below table for PPU's consideration, and demonstrates that all 17 goals can be seamlessly linked to the six TPP topics.

TPP topic (referred by PIA's recommended heading)	Core SDG	Related SDGs
Environmental protection		 
Hazard management		 
Economic development		
Sustainable and integrated communities		     
Heritage protection		-
Infrastructure and utility provision		 

Thank you again for the opportunity to comment. Should you wish to discuss any part of our submission, please do not hesitate to contact me on _____ or by return email.

Yours sincerely

Michael Purves
Tasmanian President
Planning Institute of Australia

Attachments:

Annexure 1 – Response to questions on Page 11 of Scoping Paper

Annexure 2 – Feedback and recommendations on proposed TPP topics/issues

Annexure 1 – Response to questions on Page 11 of Scoping Paper

Do you agree with the proposed scope of the TPPs topic/issues?

While PIA broadly agrees with the scope of the topics and issues as presented in the Scoping Paper and their alignment with Schedule 1 of the *Land Use Planning and Approvals Act 1999* (LUPAA), we have some concerns and suggested refinements for the topics and scope of the issues that are encompassed under each topic. We have separately addressed each topic in Annexure 2, with commentary and recommendations for PPU's consideration.

However, it is our view that the term 'issues' for matters under a TPP topic should be better referred to as an 'aspect' or a 'matter'. 'Issue' can carry a negative connotation that change needs to occur to rectify it, while the term 'aspect' is a component of a topic that may imply risk and/or opportunity. For example, biodiversity is most certainly a part of environmental protection but not necessarily a matter that needs to be changed.

What other topics and/or issues do you think the TPPs should cover?

In accordance with the Scoping Paper, it is stated that the 'TPPs will establish high-level strategic policy ambitions and directions on matters of State and community interest'. The topics and issues therefore should be associated with longer term directions and centred around holistic planning matters, such as adaptable and resilient communities. This would then allow the policies to address shorter term ambitions, such as COVID-19 recovery as outlined in the Premier's Economic & Social Recovery Advisory Council response.

Housing affordability and supply are two interlinked issues which are currently missing from the TPP issues. Aside from that it is a pressing matter in Tasmania, there is a federal inquiry into housing affordability and supply in Australia. Planners have a key role in developing communities, including forward thinking/planning for land suitable for housing and ensuring links with infrastructure and transport, ensuring liveability and sustainable outcomes, translating strategies into spatial plans via processes such as rezoning. The aspect of housing supply would also have direct linkages to the concept of the Urban Growth Boundary in the current Southern Tasmania Regional Land Use Strategy.

Under the TPP associated with communities, **urban design** and **neighbourhood character** should be incorporated as aspects. A stalwart of planning is the capacity for local development decisions to reflect existing or future neighbourhood character and local character objectives. This is currently missing from the SPPs framework, however the TPPs present an opportunity to set objectives, strategies and implementation statements for delivery via the strategic and/or statutory planning tools that sit under the TPPs.

Furthermore, PIA recognises the limited resources within the Planning Policy Unit (PPU), and would urge that the TPP encompassing housing affordability and supply is addressed as the priority among all of the TPPs. Other aspects can continue to be managed with the State Policies or under the State Planning Provisions until such time the relevant TPP/s have been implemented.

Do you agree that climate change should be integrated into all relevant TPPs?

PIA broadly supports the inclusion of climate change as sensitivity analysis that should be applied to all relevant TPPs, however it must be explicitly and effectively included into each policy, with holistic objectives, implementable strategies and statements. Furthermore, the objectives and strategies need to be directly relevant to the TPP topic and not an overarching statement that recommends consideration of the TPP as part of assessment.

Do you think that the proposed template is appropriate and a useful way of providing guidance on what the TPPs should achieve?

The template is generally appropriate, however there are opportunities to enhance it.

Each TPP should include a purpose statement or an aim, outlining why the TPP exists. For example, purpose or aims for the Infrastructure TPP could include:

- Improving regulatory certainty through a consistent planning regime for provision of services
- Ensuring that the planning of infrastructure accounts for anticipated population growth and climate change scenarios
- Opportunities for infrastructure to demonstrate good design outcomes.

These purpose/aim statements should largely be relevant for all aspects which the TPPs address. Furthermore, there could be multiple objectives under aspect, and not limited to the one as implied in the example draft TPP on Page 13 of the Scoping Paper.

The TPP should also identify whether any incorporated documents apply to the TPP, or at least make allowance for other guidance documents to be linked to the TPP in the future.

Annexure 2 – Feedback and recommendations on proposed TPP topics/issues

The following is a response to the topics and issues contained with the *Tasmanian Planning Policies – Scoping Paper for draft TPPs – September 2021*. Responses are made with specific reference to PIA's National Planning Policy platform as well as the resources of the local divisional knowledge.

1.0 Environmental Protection

PIA supports the need for a TPP on environmental protection. Planning policy needs to protect the health of our environment (including the various ecosystems, habitats and species that it supports), and identify and conserve areas which are of value. This TPP needs to reiterate the importance of ecologically sustainable development goals that have been established across the national and international agreements, such as the SDGs as alluded to in the cover letter. Apart from policy to protect, the TPP should also allow for restoration of the environment as part of developments where applicable.

Our recommendations for the proposed issues are provided below.

Issues to be addressed under each TPP topic (as presented in Scoping Paper)	Comment and recommendation
Biodiversity – flora and fauna habitat protection, weed management, fire management	Supported, however it is <u>recommended</u> that 'offsets' be included in the sub-list given the lack of policy governing offsets at present. Alternatively, there needs to be suitable objectives and strategies incorporated to ensure that offsets are considered as part of managing residual biodiversity impacts.
Waterways and wetlands – water quality	While the management of waterways and wetlands is a function of a variety of matters, both aquatic and terrestrial, many of the direct impacts and operations associated with catchment health area dealt with through the <i>Water Management Act 1999</i> and other related water use laws and rights. Therefore, this issue is supported, however it is <u>recommended</u> that 'water quality' be removed from this aspect as it should be addressed separately, given that water quality matters are not solely related to waterways and wetlands. Further, water quality matters are currently addressed under the <i>State Policy on Water Quality Management 1997</i> .
Catchment management	While catchment management is a function of a variety of matters, both aquatic and terrestrial, many of the direct impacts and operations associated with catchment health area dealt with through the <i>Water Management Act 1999</i> and other related water use laws and rights. Clarity needs to be provided on the focus of 'catchment management' in the context of the TPPs, and whether it will be setting out suitable development standards or expectations regarding the intensification of land use that may threaten catchment management.

Issues to be addressed under each TPP topic (as presented in Scoping Paper)	Comment and recommendation
Coastal processes and landforms	Supported and no further recommendation.
Applying the precautionary principle	This is not an issue, rather it is a principle that may be relevant to some policy and planning decisions. Given that the objectives of the RMPS requires the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity. It is hard to conceptualise what objectives, strategies and implementation statements would sit under this issue. It is <u>recommended</u> that this issue be removed.

2.0 Hazards and risks

PIA broadly supports the need for a TPP addressing hazards and risks. However, the TPP is better rebadged as 'Hazard management' as it is important to emphasise the intention of *managing* the identified hazards by way of policy. This would also align with the heading of other TPP topics, e.g. environmental *protection*.

It is also important for this TPP to strengthen the resilience and safety of communities to adopting best practice environmental protection and management. Importantly, the objectives and strategies need to manage compatibility with other land uses, and the potential for environmental changes to impact on the economic, environmental, or social wellbeing of communities, including response to the impacts of climate change.

Our recommendations for the proposed issues are provided below.

Issues to be addressed under each TPP topic (as presented in Scoping Paper)	Comment and recommendation
Natural hazards – bushfire	Supported, however it is <u>recommended</u> that this issue be referred to as 'Bushfire' and to remove 'Natural hazards', as other issues identified in the proposed list are also forms of natural hazards such as flooding and landslide.
Flooding	Supported, however it is <u>recommended</u> that this issue should include 'Floodplain management' as it is an issue that is increasingly prevalent. For example, we may need to rethink 1% AEP flood mapping with the likely increase in flood events.
Landslide	Supported and no further recommendation.
Sea level rise coastal inundation and erosion	Supported, however it is <u>recommended</u> that this be rebadged as 'Coastal inundation and erosion' to better align with nomenclature within the current planning system, and to remove 'sea level rise'.
Acid sulphate soils	Supported and no further recommendation.
Man-made hazards – emissions, contaminated land, soil quality/risks	Supported, however it is <u>recommended</u> that this issue should be separated given the varying objectives and strategies that could fall out of each. Recommended breakdown could include:

Issues to be addressed under each TPP topic (as presented in Scoping Paper)	Comment and recommendation
	<ul style="list-style-type: none"> • Air quality and emissions • Salinity • Contaminated and potentially contaminated land • Soil quality and degradation.

3.0 Economic Development

PIA broadly supports the proposed issues identified. National planning policy also has a strong emphasis on regions, and the provision of infrastructure to achieve economic development. As such it is important that when the objectives and strategies are set, that they are relevant across both regional and metropolitan settings.

It is evident however, that there are several key industries missing from the current list but that are key to the state's economic activity. It is **strongly recommended** that the following are included as aspects of this TPP:

- Primary production
- Forestry and timber production
- Aquaculture (onshore and offshore)
- Energy
- Arts and culture.

Other recommendations of issues presented under this TPP are summarised in the following table.

Issues to be addressed under each TPP topic (as presented in Scoping Paper)	Comment and recommendation
Industry and business	<p>This is a very vague issue and hard to conceptualise what objectives and strategies would fall under this that would not otherwise apply for the following matters. It is <u>recommended</u> that this issue be removed, and replaced with more specific aspects as recommended above.</p> <p>If the intention of this issue is to cover activity or commercial centres, then the issue should be rebadged as 'Commercial and activity centres' for clarity. It is noted that PIA has previously recommended the inclusion of activity centres into this TPP.</p>
Tourism	Supported and no further recommendation.
Agriculture	Supported and no further recommendation.
Mining and minerals	Supported, however it is <u>recommended</u> that consideration be given to rename this to 'Resource exploration' to better align with the activities carried out under the <i>Mineral Resources Development Act</i>

Issues to be addressed under each TPP topic (as presented in Scoping Paper)	Comment and recommendation
	1999, which includes both mining and exploration, both of which may impact on adjoining land uses.
Use and development in the coastal zone	It is unclear what the intention of this aspect is, given that use and development in the coastal zone is also an issue associated with settlements (next TPP), or if referring to hazards, that it is addressed under another TPP.

4.0 Liveable Settlements

Drawing on the recommendations of national PIA's initiative *The Tipping Point* – the Institute's call for a National Settlement Strategy (which was subsequently endorsed by the Federal Government), clear strategies for managing and planning population growth is necessary for long-term growth and liveability outcomes.

PIA is supportive of the need for a TPP addressing matters associated with planning for integrated communities. It is our view that planning for sustainable and integrated communities should result in inclusive communities, and accessibility is a core element of this. However, there are some deficiencies within the issues presented in the Scoping Paper as well as missing aspects.

Firstly, the heading 'Liveable Settlements' does not carry an aspirational connotation. Liveable is the baseline for the planning and design of communities, and it would be important for the TPP to reflect an aspiration for integrated and well-planned communities for human settlement. It is therefore recommended that this TPP should be rebadged as '**Sustainable and integrated communities**.' This would also further align the purpose and intention of the TPPs with international agreements and goals on the creation of sustainable communities, as well as with the work of planners in planning and creating these communities.

Further, as stated in Annexure 1 and in PIA's submission in May 2017, urban design and neighbourhood character is absent in planning policy areas and should be incorporated. Urban design and neighbourhood character are stalwarts for planning at local development decisions, and should be directly incorporated into policy and implemented into strategies and objectives. Built form is also pertinent in creating integrated and sustainable communities. As such it is recommended that '**built environment**' be incorporated as an aspect of this TPP as a method to consolidate urban design, built form and neighbourhood character under the one aspect.

Housing affordability has been, and continues to be an issue across Australia, including in Tasmania. PIA's National Policy relevant to housing affordability includes that urban and regional planning, including development of strategic land use policy and planning frameworks at all levels of government, is critical in the provision of appropriate, affordable, safe, secure, sustainable and well-located housing. Planning policy can, and should, be structured in a way that promotes and facilitates the provision of housing in appropriate context, and to advocate for an appropriate balance with community involvement and quality outcomes. As such it is strongly recommended that '**Housing affordability and supply**' be incorporated as an aspect of this TPP.

Other recommendations of issues presented under this TPP are summarised in the following table.

Issues to be addressed under each TPP topic (as presented in Scoping Paper)	Comment and recommendation
Planned and contained settlements	The choice of the word ‘contained’ is misleading. Good settlements should be integrated and connected. Further, planned and integrated settlements should be the purpose of this TPP and not an aspect of its own. It is <u>recommended</u> that this issue be removed, and instead integrated into the objectives of each of the following aspects to ensure the outcome of integrated settlements.
Pleasant places to live – amenity and avoiding land use conflict	Similar to above, ‘pleasant places to live’ is not an issue. It should be a high-level objective of the TPP. It is <u>recommended</u> that this issue be removed, and instead integrated into the objectives of the following aspects.
Integrating land use and transport	Supported and no further recommendation.
Health and wellbeing – recreation and open space opportunities	PIA broadly supports the intention of this as an aspect of this TPP, however it is <u>recommended</u> that this aspect be rebadged as ‘Recreation and open space’ given that health is covered in the next aspect. This aspect would then focus on matters such as integrated open space networks and the design of open and public spaces which should also take into account climate change (e.g. increased temperatures, extreme weather events).
Community – health services and education	PIA broadly supports this, however the delineation with the above issue of ‘Health and wellbeing’ is likely to cause confusion given the incorporation of health services in this issue. It is <u>recommended</u> that this is rebadged as ‘Social and community infrastructure’.

5.0 Heritage Protection

PIA supports the need for a TPP addressing heritage protection and conservation and have no further recommendation of the aspects proposed.

6.0 Infrastructure to support the economy and create liveable communities

PIA is supportive of the need for a TPP addressing infrastructure and utilities needed to support the economy and communities. However, considering the intended aspects to be covered under this TPP, we would recommend that this TPP is rebadged as ‘Utility and infrastructure provision’. In addition to better aligning with the nomenclature of the other TPPs, this avoids confusion as there are a number of other infrastructure that would be necessary to support the economy and communities, such as education, health and social and cultural infrastructure.

Further, the aspects under this TPP should ensure that the growth and development of settlements is planned in a manner that provides for logical provision and maintenance of infrastructure. This should include localised utilities for new settlements, needs for education, culture, health, as well as social and community facilities. Subsequently we have recommended some changes to the issues presented under this TPP, as summarised in the following table.

Issues to be addressed under each TPP topic (as presented in Scoping Paper)	Comment and recommendation
Airports / sea ports / railways	PIA broadly supports this, however these issues should be separated into their own aspect given the varying objectives and strategies that could fall out of each.
Roads, car parking, cycleways and walkways	PIA broadly supports this, however these issues should be separated into two categories of 'passive transport' and 'active transport' given the varying objectives and strategies that could fall out of each. Alternatively, the issues can be separately into: <ul style="list-style-type: none"> • Road system • Car parking • Active transport infrastructure.
Public transport	Supported and no further recommendation.
Telecommunications	Supported and no further recommendation.
Electricity and energy	Supported and no further recommendation.
Irrigation, water, sewerage and stormwater	PIA broadly supports this, however would <u>recommend</u> that 'irrigation' be separated into its own aspect given the different objectives and strategies that could fall out of this aspect. Further, irrigation is also associated with other aspects of the RMPS (such as water management) and therefore it would be sensible to not associate this with other more localised infrastructure requirements such as stormwater.
Waste management	Supported and no further recommendation.

7.0 Public engagement in planning processes

PIA supports, and advocates for, the need for public engagement in planning processes, however for the purposes of the TPPs and their function within the Tasmanian planning system and its suite of documents, it does not warrant as a standalone TPP. Rather, the 'issues' of consultation, strategic planning and ongoing review should be integrated into every TPP, and mandated through legislation.

Further, public engagement and continual improvement of the planning system should be an objective of the Resource Management and Planning System—which it already is—and should not be reliant on a TPP to upward manage.

29 October 2021

Planning Policy Unit
haveyoursay@justice.tas.gov.au
HOBART TAS 7001

TO: Planning Policy Unit

Tasmanian Planning Policies Scoping Paper

Thank you for the invitation to provide comments on the scope and issues identified in the Scoping Paper dated September 2021.

We strongly agree that climate change should be integrated into all relevant TPPs and whilst we agree in principle with the scope of proposed topics and issues, we make the following comments:

1. The issues presented do not appear to include climate change mitigation

The Minister's foreword recognises the need to integrate principles of climate change adaptation and mitigation, however, the issues presented on page 9 only address adaptation. TPPs can accommodate climate change mitigation policies such as sustainable development and sustainable transport policies and issues. Each of these should be treated as a separate issue.

1.1 Environmentally sustainable development

Climate change mitigation strategies such as ensuring environmentally sustainable development are already included in planning policy elsewhere in Australia. For instance, the Victorian Government endorsed a planning policy for Energy and resource efficiency (15.02-1S). The objective of this policy is to encourage land use and development that is energy and resource-efficient, supports a cooler environment and minimises greenhouse gas emissions. The strategies under this policy are contained in Attachment 1.

Local provisions in response to the state policy provide different tools, like BESS assessments, for instance, which assist in demonstrating whether a development meets sustainability standards as part of a planning application. Standards generally included in a BESS assessment include water resources, indoor environment quality, stormwater

management, transport, waste management and urban ecology. These tools usually result in development that encourages higher permeability levels, planting of vegetation, efficient water systems like rainwater tanks and support the use of electric vehicles and active transport modes.

An example of a local provision of the Yarra Planning Scheme is contained in Attachment 2.

1.2 Sustainable and Active Transport

'Roads, car parking, cycleways and walkways' is included as an issue on Page 9, however, the extent to which policies will accommodate sustainable and active transport is unknown. Based on the strategies included in 'Integrated Transport and Land Use Planning' in a previous consultation draft, the majority of strategies under this policy were in relation to existing and future road, rail port and air infrastructure and not about public transport and cycling. In fact, the only strategy which made reference to this did not assert a commitment to ensure sustainable and active transport modes. It read: *Provide for public transport, walking and cycling infrastructure as part of new and upgraded road infrastructure, wherever possible.*

The City of Launceston submits that the TPPs are an appropriate mechanism to set the direction for planning schemes to provide sustainable and active transport outcomes and must do so. TPPs must aim to create sustainable networks and ensure development that encourages people to walk, ride and use public transport within urban centres. TPPs should simultaneously discourage private vehicle use within urban areas. It is considered that a separate policy should address this topic, it should not be included as part of general infrastructure upgrades and maintenance policies.

2. Loss of vegetation protection

Scenic protection is included as part of a heritage protection item. It appears that it is not intended to protect significant landscapes outside of a heritage context. Whilst the removal of scenic protection codes may not be part of the objectives of this consultation, the loss and need for green infrastructure in urban areas should be an issue within the planning policies. Under Liveable Settlements, the TPPs may accommodate the protection of vegetation as part of climate change adaptation as tree cover in urban environments reduce surface and air temperatures. This is particularly important as the TPS provisions have removed site permeability controls from residential areas.

3. Planned and contained settlements - Activity centres

Planning policy that encourages the creation and maintenance of activity centres contributes to the access to local goods, services and employment within walking and cycling distance. Activity centres allow the concentration of activities in key areas and support planning and creation of public transport and active transport infrastructure. Similarly, TPPs should discourage large-scale business, professional and commercial uses from areas outside activity centres. This may be accommodated under the issue: Planned and contained settlements.

4. Comments on the example draft for hazards and risks

Consider using simplified action verbs when drafting objectives. For instance, the objective for 'man-made hazards, emissions and contaminated land' is:

Objective: Land use and development is undertaken in a manner that minimises the risks to human health and the environment arising from hazardous uses and harmful or nuisance emissions.

The above objective does not include a clear action verb. Objectives should be simpler and clearer:

Objective: To ensure land use and development minimises the risk to human health and the environment arising from (...).

The objective under 'Sea Level Rise and Coastal Inundation' is not measurable. It can be summarised as 'the community's resilience is improved'. Improving current situations is not an ideal objective for land use and development planning. Consider concrete and measurable objectives:

Objective: To ensure communities are resilient to climate change impacts through avoidance, mitigation and management.

The strategy under 'man-made hazards' reads as a way to achieve an objective, in contrast the strategy presented under 'sea level rise' is practically an objective, not a strategy. Consider strategies that are generally more measurable and can be easily translated into local policies. For example for 'sea level and coastal inundation', strategies could be worded as follows:

- a) Recognise the vulnerability of existing and future land use and development in the creation of strategic plans.
- b) Encourage development to be located outside hazardous areas such as (...).
- c) Mitigate and manage the risk from hazards to existing land use and development.

4. Other matters

Please refer to hazards generated by human activity as 'anthropogenic hazards' or 'human-made hazards' rather than 'man-made' to use gender inclusive language.

Yours sincerely

Maria Lasso
Town Planner

Attachment 1. State provision 15.02-1S Energy and resource efficiency

Attachment 2. Local provision - 22.17 Environmentally Sustainable Development

Attachment 1. State provision 15.02-1S Energy and resource efficiency

15.02-1S

31/07/2018
VC148

Energy and resource efficiency

Objective

To encourage land use and development that is energy and resource efficient, supports a cooler environment and minimises greenhouse gas emissions.

Strategies

Improve the energy, water and waste performance of buildings and subdivisions through environmentally sustainable development.

Promote consolidation of urban development and integration of land use and transport.

Improve efficiency in energy use through greater use of renewable energy technologies and other energy efficiency upgrades.

Support low energy forms of transport such as walking and cycling.

Reduce the urban heat island effect by greening urban areas, buildings, transport corridors and open spaces with vegetation.

Encourage retention of existing vegetation and planting of new vegetation as part of development and subdivision proposals.

Attachment 2. Local provision - 22.17 Environmentally Sustainable Development

Table 1 – ESD Application Requirements

Type of Development	Application requirements	Example tools
Accommodation/Mixed Use with residential component of:		
<ul style="list-style-type: none"> 2- 9 dwellings; or Development of a building for accommodation other than dwellings with a gross floor area between 100m² and 1000m². 	Sustainable Design Assessment (SDA)	BESS STORM
<ul style="list-style-type: none"> Development of 10 or more dwellings. Development of a building for accommodation other than dwellings with a gross floor area of more than 1000m². 	Sustainability Management Plan (SMP)	BESS Green Star MUSIC STORM
Non-residential		
<ul style="list-style-type: none"> Development of a non-residential building with a gross floor area between 100m² and 1000m². 	Sustainable Design Assessment (SDA)	BESS