

Southern Tasmania Regional Land Use Strategy
Urban Growth Boundary
Submissions received

Number	Submission name
51	Tasmanian Planning Commission
52	Sorell Council
53	Tasmanian Active Living Coalition
54	Harry Lambrakis Family Trust
55	MC Planners obo M & A Shady
56	Sven Rand
57	Leigh and Cindy Lincoln
58	Hobart City Council
59	Gray Planning obo Meredith family
60	Sorell East landowners group
61	Michael Figg
62	Archdiocese of Hobart
63	Tasmanian Planning Information Network
64	Emma Riley Associates obo 10 Alannah Court, Old Beach
65	Form Planning & Projects obo James Polanowski
66	Advance Lauderdale Association
67	Luca Vanzino
68	Peter Marshall
69	Louise Walsh
70	Tasmanian Conservation Trust Inc
71	Anonymous
72	Tasmanian Greens
73	Australian Institute of Architects
74	Cradle Coast Authority
75	Damian Shady
76	Thomas Moore
77	Hobart International Business Park
78	Dourias - Mannata Street Lauderdale
79	Dourias - 69 Brighton Road Brighton
80	Form Planning and Projects obo Dourias - Ringwood Road Lauderdale
81	Form Planning and Projects obo Thornbury & Garrott
82	Kate Wilson
83	Niche Studio
84	Tasmania Fire Service & State Emergency Service
85	South Hobart Sustainable Community
86	Requested to remain confidential
87	Department of Health
88	Regional Development Australia - Tasmania
89	Property Council of Australia
90	Department of Natural Resources & Environment Tasmania
91	Housing Industry Association
92	Planning Institute of Australia
93	Master Builders Tasmania
94	TasWater
95	Department of State Growth

TASMANIAN PLANNING COMMISSION



Our ref: DOC/25/24661
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7 March 2025

The Hon. Felix Ellis MP
Minister for Planning

By email: Minister.Ellis@dpac.tas.gov.au

Dear Minister

Proposed STRLUS Urban Growth Expansion

I refer to correspondence dated 6 February 2025 from the State Planning Office relating to the above. The Commission makes no comment on the extent of the proposed expansion of the Urban Growth Boundary, the potential yield and the selected sites.

However, to ensure sound planning outcomes and decision making, consistent with the Resource Management and Planning System and specifically the Schedule 1 Objectives of the *Land Use Planning and Approvals Act 1993* (the Act), it is critically important that appropriate decision criteria is available to the Commission to inform the assessment of future zone application.

For this reason, the Commission recommends the following:

That Guideline No.1, related to the application of zones, issued under section 8A of the Act, be amended to assist with the assessment and suitability of applying higher order urban zones. Specifically, it is proposed that Guideline No.1 be amended as follows:

- a) After clause 3.5, insert a new clause 3.6 as follows:

3.6	<p>The application of one or more higher order urban zones must be supported by a Precinct Structure Plan.</p> <p>The requirement for a Precinct Structure may be waived where a proposal is made under section 40T of the Act and accompanied by a concurrent application for subdivision and/or development proposal fulfilling the function of a Precinct Structure Plan as relevant and within its context.</p>
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- b) In the Glossary, before “LIST”, insert a new row and the term “higher order urban zones” as follows:

higher order urban zones	General Residential, Low Density Residential, Inner Residential, General Business, Central Business, Commercial, Light Industrial and General Industrial
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- c) In the Glossary, after “LPS”, insert a new row and the term Precinct Structure Plan” as follows:

Precinct Structure Plan	<p>Precinct Structure Plans and associated documentation, including a demand analysis, supporting the zone application, must be endorsed by the planning authority and demonstrate:</p> <ul style="list-style-type: none">• how the site connects to, and integrates with, or builds on, the surrounding settlement.• potential sources for land use conflict and any mitigation measures required to reduce conflict if necessary.• traffic and pedestrian connectivity and legibility through and to the site.• servicing capacity and need for any upgrades required to service the use and development potential provided for in the zone.• proximity to existing or future public transport corridors.• allocation of open space and consistency with any applicable adopted strategy.• proximity to hazards and any mitigation measures required to ensure future development furthers the zone purpose.• proximity to activity centres, civic and social infrastructure.• impact on natural assets.
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The Act provides that Section 8A Guidelines are issued by the Commission with your approval. The Commission would be pleased to further discuss the above proposal, and its wording with your Office and the State Planning Office.

I would be pleased to provide further information if required.

Yours sincerely

John Ramsay
Chairperson

cc State Planning Office State Planning Office
Department of State Growth
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Hobart TAS 7001

By email: spo@stateplanning.tas.gov.au

13 March 2025

State Planning Office
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Council supports the inclusion of the three urban growth boundary changes proposed for the LGA. Council is concerned, however, with false expectations created through the process and by the systems in place that have led to this process being initiated.

Unfortunately, no engagement occurred with Council staff prior to the release of the consultation paper. Engagement could have ensured that the consultation paper did not exaggerate estimated yields or omit key education, industrial and open space land uses that are critical to the future social and economic success of the south-east region. The overarching aim for the LGA is to increase the level of self-sufficiency for employment, healthcare, recreation and other services. This requires growth, particularly growth in employment and services which is a central part of the Sorell East Growth Area. Misrepresentations in the background report have attracted undue and unnecessary negative commentary. A more practical yield estimate is detailed below.

Practical vs Claimed Yield			
Area	Claimed	Practical	Why
Area 1	103	30-60	Three hectares (27.5%) subject to Electricity Transmission Infrastructure Protection Area. Approximately one hectare (9%) above 45m contour level with water service limitations.
Area 2	355	15 (without sewer extension) 190-250 with sewer	Sewer extension requires external funding and/or modifications to TasWater Price and Servicing Plan with respect to who bears the upfront cost of service extensions. The Weston Hill Road and Gatehouse Drive Zone Review has identified potential yields based on existing lots.
Area 3	2,951	1,100 to 1,500 (subject to densities)	The site includes an 11 hectare school site, up to 32 hectares of (light/service) industrial land and other land allocated to open space, foreshore protection and convenience retail.

The lack of consultation also has Council unsure as to why the Inghams site at 82 Main Road Sorell, has not been included in this process despite being incorporated into the draft regional land use strategy work. Why increase the supply of residential land without also increasing the supply of industrial land? Particularly in a LGA where a total lack of industrial land has impeded economic and employment growth.

Department of Treasury and Finance population projections place Sorell LGA with the highest rate of population growth from 2024 to 2046. From 2021 to 2023, Sorell LGA had the highest rate of population growth. There is a 40 year plus span of growth that desperately requires appropriate sub-regional light/service industrial land to provide jobs locally.

Urban expansion options were first identified in the Sorell Land Supply Strategy 2019. Since then, Council has worked closely with TasWater, the Department of State Growth, TasNetworks and others to integrate land use and infrastructure planning. We are in a position now where we know with certainty that the land can be serviced and is therefore appropriate to include in the UGB ahead of rezoning. The substantial work required to confirm serviceability must be done before inclusion in the UGB.

While it is appropriate to progress the LGA's well-considered and developed urban growth boundary expansions, it is unclear how this current process fits within strategic planning frameworks or on what basis you will reach your decision. While you have a draft set of Tasmanian Planning Policies, with all 254 strategies, these do not resolve where growth should or could occur. You have considered parts of the draft regional land use strategy, from which most UGB changes come from, but perhaps not regional supply and demand work that informs it. A consistent and level playing field needs to exist, now and into the future. Putting politics into planning in this manner risks the significant work done by this Council and others to take concepts through to realisable, and much needed, urban expansions.

Looking ahead, a better system needs to be in place so that there is no actual or perceived need for Ministerial intervention. We know that the RLUS has been delayed by sedate State agencies seemingly unaware of how to implement State and regional land use. Perhaps a State of this size does not need the weight of TPPs with 254 strategies, State Policies, and regional land use strategies. If regional land use strategies are to continue to have a role, the TPPs need to be stripped back to core matters of state significance rather than duplicate matters addressed regionally. For strategic land use planning to catch up to where it should be, and help address issues facing Tasmania, focused regulation and processes are required. Finally, the three regions have a critical need for a land supply and monitoring system to understand housing supply and support timely land use and infrastructure integration.

To summarise, Council welcomes the expansion of the urban growth boundary at Sorell while having strong concerns regarding due process and the future of strategic land use planning in Tasmania.

If you have any queries regarding the above, please contact Council's Manager Planning Shane Wells on .

Yours sincerely,

Robert Higgins
General Manager

Tasmanian Active Living Coalition

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State Planning Office

Department of State Growth

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Subject: STRLUS Urban Growth Boundary Update Consultation February 2025

Thank you for the opportunity to provide feedback on the Consultation Paper for the STRLUS Urban Growth Boundary Update. On behalf of members of the Tasmanian Active Living Coalition please find a consultation submission attached in response.

The Tasmanian Active Living Coalition works together to influence and inform policies, decisions and strategies encouraging the creation of active living environments, food security and social inclusion benefiting health and wellbeing.

Yours sincerely

Professor Verity Cleland

TALC Chair

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Date: 13 March 2025

Tasmanian Active Living Coalition

STRLUS Urban Growth Boundary Update Consultation February 2025



Tasmanian Active Living Coalition

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I. Introduction

The Tasmanian Active Living Coalition (TALC) welcomes the opportunity to submit feedback on the STRLUS Urban Growth Boundary Update Consultation (the Consultation).

The objective of TALC's submission is to note the importance of opening up land for housing whilst highlighting the disadvantages in increasing the city's size on the outer boundaries without the adequate provision of housing mix to include a variety of households and social infrastructure including employment opportunities, health services, education, active and public transport.

The rationale and supporting evidence is detailed throughout the submission with a reference list attached. Individual TALC members have contributed to this submission and may have also made separate submissions on behalf of their organisations.

This submission has been approved by TALC's Chair and endorsed by TALC's membership.

2. About the Tasmanian Active Living Coalition

TALC is an independent, not-for-profit coalition made up of representatives from a broad range of non-Government and Government organisations with an interest in active living.

TALC members work together to influence and inform policies, decisions and strategies encouraging the creation of active living environments.

TALC's aim is to lead, support and promote the creation of environments supporting active living, and to add value by providing a mechanism for an integrated approach and potentially drive behaviour change in relation to active living.

TALC's purpose is to:

- translate evidence into policy and practice;
- build on existing partnerships and develop new partnerships as required;
- raise the profile of active living;
- support, advise and advocate for improvements in the built and natural urban environments including improved access to our parks and open spaces;
- provide advice for consideration by the Premier's Health and Wellbeing Advisory Council; and
- highlight the importance the built and natural urban environments play in active living.

3. The Importance of Integrating Health and Wellbeing in all Policies

Improving health and wellbeing by supporting Tasmanians to live active lives requires a coordinated approach across government agencies and sectors as called for in the World Health Organization's (WHO) 'Health in All Policies' approach to preventive health (World Health Organization, 2018c). In Tasmania, key existing policies which reference active living and are relevant to planning are detailed as follows to provide context and background to the existing policy landscape.

The *Tasmania Statement* supports the connection between health and wellbeing enhanced by natural open spaces. It further notes the opportunities available as Tasmania grows to plan communities to create healthy, liveable and connected spaces (Premier's Health and Wellbeing Advisory Council, 2021). The *Tasmania Statement* creates an authorising environment for those working within the Tasmanian Government to adopt and integrate health and wellbeing considerations within the planning scheme.

Currently under development, the *Tasmanian 20-year Preventive Health Strategy* aims to create environments that make the healthy choice the easy choice and support people to live well. Recognising that over 70 per cent of health happens outside the health system, including schools, local businesses, parks, and neighbourhoods, the strategy will focus on how these domains can support good health outcomes (Tasmanian Department of Health, 2025).

The *Healthy Tasmania Five Year Strategic Plan 2022-26* advocates for a health in all policies approach, including an analysis of the systems outside the health sector which influence the health status of populations (Department of Health and Human Services, 2022). The plan focuses on systems and supporting active living initiatives, particularly through planning and building places that support health, wellbeing and physical activity, and by building infrastructure that makes walking, cycling, accessibility, and public transport safe and viable alternatives to driving (Department of Health and Human Services, 2022). This builds on earlier work under *Tasmania's Plan for Physical Activity 2011-2021* which aimed to 'create built and natural environments that enable and encourage physical activity' (Department of Infrastructure, 2010).

In 2016, a Tasmanian Joint Parliamentary Select Committee Inquiry into Preventative Health Report outlined key findings and recommendations. The Heart Foundation previously highlighted the report's key findings and recommendations in relation to active living in its 2016 *Representation to the Final Draft State Planning Provisions* as follows (Heart Foundation, 2016):

Executive summary (page 2)

'The Committee recognises the link between health and the built environment. Liveability

principles must be embedded in all Government policy decisions relating to the built environment including but not limited to transport, infrastructure and land use planning.'

Recommendation 3 (k) in relation to a preventative health strategy (page 4):

(k) The importance of active lifestyles, healthy eating and physical activity to improve the health and wellbeing of Tasmanians.

Recommendation 4 (page 4)

4. The Government's health and wellbeing policies are reflected in the Tasmanian Planning System and transport infrastructure policy.

- a) Government adopts a state-wide planning policy that ensures liveability principles are embodied in all planning decisions;*
- b) Government ensures transport infrastructure planning and policy decisions embody liveability principles; and*
- c) Provisions in the new state-wide planning scheme give consideration to active transport links (e.g. walking and cycling), especially within and between urban communities.*

Findings (page 8):

22. The built environment is a significant contributor to improving longer term health and wellbeing outcomes.

23. There is a need to recognise the link between health and the built environment, and this needs to be embodied into State policy and the TPS.

The planning system also operates alongside a number of developed or developing frameworks and strategies in Tasmania including: the draft *Wellbeing Framework*; *Sustainability Framework*, *Future of Local Government Review* (including *Local Government in the 21st Century*); *Population Strategy*; and *30 Year Greater Hobart Plan* all of which have/will have strong links to health and wellbeing of Tasmanians.

The principal interest of TALC is how environments (often through the planning system) can enhance (and not hinder) active living (including physical activity and active travel). TALC has previously made submissions to the Tasmanian Planning System (TPS) and the State Planning Provisions and those submissions are in the Attachments section and available on the TALC website.

4. The Importance of physical activity

Physical activity can prevent heart disease, type two diabetes, numerous cancers, dementia, weight gain, gestational diabetes, and anxiety and depression (Bellew et al., 2020). Being physically active improves sleep and improves brain function at all ages (Bellew et al., 2020).

Despite this, almost half of all Tasmanians aged 18 and over do not do enough physical activity for good health (Australian Bureau of Statistics, 2016). Tasmania is below the national average and is ranked sixth out of the eight states and territories (Australian Bureau of Statistics, 2016). Planning arrangements that provide opportunities to increase physical activity levels are fundamental for good physical and mental health and wellbeing.

Internationally, the World Health Organization's *Global Action Plan on Physical Activity 2018-2030* has as one of its four key pillars a priority focus to 'Create active environments' (World Health Organization, 2018). This includes strengthening the integration of urban and transport planning policies, delivering highly connected neighbourhoods to support active and public transport, improving walking and cycling network infrastructure, accelerating implementation of policy actions to improve road and personal safety for active and public transport users, strengthening access to public and green open spaces, and strengthening policy, regulatory, and design guidelines and frameworks.

The International Society for Physical Activity and Health recommend eight key investments to address physical inactivity (International Society for Physical Activity and Health, 2020). The eight investment areas are the evidence-based domains where Governments and organisations can get the best return on investment to improve health and wellbeing through increasing physical activity. Of the eight identified domains, those that can be directly influenced by planning policies include: active transport and active urban design (International Society for Physical Activity and Health, 2020).

The Planning Institute of Australia (Tasmania) noted in their submission to the Tasmanian Planning Policies (TPPs) Scoping Paper the following which is supported by TALC

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 SDGs, and support for government wide adoption of the SDGs. (Planning Institute of Australia, 2021)

Nationally, the Heart Foundation's *Blueprint for an Active Australia* states 'reshaping the built environments in which most Australians live, work, learn and recreate can significantly increase daily physical activity levels. Community and neighbourhood design impacts on local walking, cycling and public transport use, as well as on recreational walking and physical activity' (National Heart Foundation of Australia, 2019). The *Getting Australia Active III* report identified eight policy domains for systems level action on physical activity, notably transport, the built environment, and workplaces (Bellew et. al., 2020).

It is within this context of national and international best practice evidence that TALC asserts the extension of the urban boundaries can make a significant contribution to the liveability of Tasmanian's living in Southern Tasmania if liveability factors are taken into consideration. Other co-benefits of environments supporting liveability include economic growth, strengthening communities, environmental sustainability/climate change mitigation, and safety.

5. TALC Response to the STRLUS Urban Growth Boundary Update

For this submission, TALC believes that extending the urban growth boundary is in itself not problematic provided consideration is given to liveability with a primary focus on active living. TALC recognises the need for affordable and varied housing options at a time of housing shortages and views the extension of the boundary as one way of meeting that need.

5.1 Past learnings

The historical outward growth of urban centres across Australia, as a response to housing shortages, particularly after World War II, whilst providing a bricks and motor response to housing, often failed to consider the social and wellbeing outcomes of residents. In Tasmania, particularly in the Hobart metropolitan area, from the 1950s through to the 1980s, the broadacre policies of the then State Housing Department have with the benefit of hindsight been broadly criticised for the lack of social and physical infrastructure to service the locational decision to locate houses in broadacre

estates. Locational decisions were based on cheaper land or on Crown Land with infrastructure principally limited to the provision of roads, water and sewerage (Woodruff, 1987). This land was peripheral to middle and inner rim suburbs for example Bridgewater.

Residents in public housing broadacre developments had little social infrastructure, limited transport options (both public and active), few employment opportunities and a high dependence on social welfare (Alexander and Sproule, 2006). This resulted in an isolated urban expansion that did little to support health and wellbeing outcomes and created a cycle of generational disadvantage for many

Housing affordability throughout Tasmania has declined significantly in recent times. The shortage of affordable housing has adverse effects across a variety of areas, including community development, the economy and employment, education, transport and health and wellbeing. Affordability is not only linked to locational disadvantage but by being on the urban periphery.

As noted in the Local Government Association of Tasmania (LGAT) submission to the Select Committee on Housing Affordability *“ensuring an adequate supply of housing is not simply a matter of constructing more houses. Building cheap houses on the urban fringe away from employment and services will not improve housing affordability – it will just shift the costs (in dollars and time) from housing to transport and social isolation. Housing supply must be well located and well serviced in areas where infrastructure can provide for and attract new residents, with supporting jobs, social and community infrastructure and public transport”* (LGAT, 2019).

The expansion of land and housing developments away from Southern urban centres has increased again in recent times. Examples of these developments include but are not limited to the Brighton, Kingsborough and Clarence municipalities. The opening up of land for residential suburbs in these and other areas has provided people with the opportunity to purchase land at a lower cost than land closer to the main urban centres. Generally, these developments have been focused on getting houses on the ground and the required physical and social infrastructure has lagged.

The expansion of the Urban Growth Boundary and the housing developments which follow must offer a mix of social, affordable and other housing provision models in an environment where liveability and accessibility are considered at the forefront of development. It is important to learn the lessons from previous periods of expansion around Hobart and ensure the proposed expansion of the current boundaries occur within a much wider development plan.

The current proposed Urban Growth Boundary amendment proposes the introduction of specific sites in addition to the Urban Growth Boundary. The criteria for inclusion of specific sites where they adjoin the Urban Growth Boundary for incorporation must be accompanied by a Master Plan or other agreement between developers and councils to ensure improved liveability outcomes. Without this planning and agreement, the risk of socio-spatial disadvantage and unaffordability will

continue, so strengthening of criteria and good governance would enable improved liveability outcomes.

5.2 Neighbourhoods designed for active living

The way the environment is planned, designed and built can directly affect the health and wellbeing of people who use and inhabit the space. A series in *The Lancet*, one of the world's top-ranking medical journals, *Urban Design and Transport to Promote Healthy Lives* recognises the importance of the built environment for active living (Goenka and Andersen, 2016). The series recommends creating compact cities that locate shops, schools, other services, parks and recreational facilities, as well as jobs near homes, and providing highly connective street networks making it easy for people to walk and cycle to places (Goenka and Andersen, 2016). The Heart Foundation of Australia's *Healthy Active by Design* framework (National Heart Foundation of Australia, 2017a) notes 'planning for active living calls for a commitment to applying healthy planning principles to all levels of the planning system, at every stage of the planning process and in every planning project and policy initiative' (National Heart Foundation of Australia, 2017a).

There are many co-benefits of improving planning for active living including reductions in greenhouse gas emissions, improved air quality, reduced traffic congestion, more sustainable infrastructure, increased economic productivity, improved social capital and more liveable towns and cities (Goenka and Andersen, 2016).

The COVID-19 pandemic required people to stay close to home, further highlighting the importance of how the local built environment supports liveability, health and wellbeing. The living with COVID-19 landscape provides an important reminder to prioritise the development of built environments supportive of liveability.

Future developments and housing locational policy must focus on active travel and public transport considerations and move away from the reliance on private motor vehicles, as has been the case in the past. Strengthening urban and active centres and a clear hierarchy of these to enable sequenced, sustainable growth will improve liveability.

TALC provides the following key research findings on active living, with reference to density and distances between homes and amenities to further support this position.

- Research indicates two key factors encourage walking for transport: 'the connectivity of streets (more intersections, fewer big blocks) and a high number of local living destinations, such as supermarkets, shops, parks and public transport, within 1600m' (Giles-Corti et al., 2017).

- A strong body of evidence confirms the association between higher residential density (and the associated mixed land uses) and increased transport walking across all age groups. The association is particularly evident in adult populations. Moreover, living closer to shops and services is a consistent predictor of walking, both for transport and recreational purposes, for all age groups (Giles-Corti et al., 2012).
- Other factors associated with increased active travel include safety from traffic, well-lit streets and the presence of footpaths (Sallis et al., 2012).
- Higher population and residential densities are associated with increased physical activity. There is significant research evidence linking higher residential density and mixed-use planning and walking, across all life stages (National Heart Foundation of Australia, 2017b).
- Studies also show the prevalence of using public transport is associated with higher residential density and a greater availability of walkable destinations (National Heart Foundation of Australia, 2017b).

The quality of design in denser areas to optimize health and wellbeing outcomes should also be considered. Doing so would help to facilitate outcomes such as: adequate soil zones to enable trees; open space of a suitable aspect to enable year-round solar access for both recreational use and growing of local produce; and ensuring adequate green infrastructure and surface permeability in new infill development to reduce heat entrapment and optimise health outcomes.

Increased temperature projections should be reviewed and data providing overlays in planning schemes analysed to consider whether adequate protection of land either developed for residential purposes or to be developed for residential purposes is sufficiently buffered against projections of sea level rise, storm surge, bushfire and other climate hazards.

Tasmanians want liveable, walkable, connected communities. The Heart Foundation's *2020-21 What Australia Wants* survey found Tasmanians expressed a desire to live close to shops and amenities, and in a safe area that is quiet and away from main roads. Tasmanians prioritise access to healthy food, housing diversity and a sense of place (that is, safety, community, natural elements as the most important design features) (National Heart Foundation of Australia, 2020). Support for government investment in active infrastructure (67%) and public transport funding (64%) was strong, as was support for speed limit reductions in neighbourhood streets (59%) (National Heart Foundation of Australia, 2020).

Being close to amenities, shops and services, safety/low crime, and having fresh food close by were important considerations for Tasmanians when deciding where to live. However, only 31% of Tasmanians believe their neighbourhood helps them a lot in being active (National Heart Foundation of Australia, 2020). The results indicate important attributes are not always accessible to Tasmanians and should be embedded within the planning system.

In 2021, Place Score ran the Australian Liveability Census, which found nationally, walking/jogging/bike paths connecting housing to community amenity was selected as being most important to their ideal neighbourhood by 55 per cent of respondents, again highlighting the value placed on liveability and the built environment by communities (Malshe et. al., 2021).

TALC supports the strategies aiming to increase travel mode choices, expand public transport services and design subdivisions which encourage walking, cycling and public transport use. TALC is supportive of planning regulations which recognise carparking as a key travel demand management measure, and appropriately manage carparking provision to support a modal shift. Car parking proportionate to the hierarchy of the area to rationalise its role according to the degree to which the area is serviced by public transport and walkable from surrounding catchment areas (i.e. residential areas accessing local shops and activity centres). A liveable Streets Code could achieve many of these aspects (Heart Foundation, 2016).

Such a code would support active travel through provisions including standards for footpaths suitable for walking and requirements for safe cycling infrastructure. In addition, retrofitting streets to encourage active transport and requiring new developments to build active transport infrastructure is also supported by TALC as an important aspect of liveability. The Bellerive Specific Area Plan within the Clarence Local Provisions Schedule of the Tasmanian Planning Scheme is a good example of this. It provides for an activity centre for the surrounding area and emphasises good urban design and pedestrian prioritisation, encourages off streetcar parking consolidated in internal areas rather than car parking dominating street frontages. To encourage liveability and support optimal health, car parking should be proportionate and in some instances reduced where it compromises walkability and optimal pedestrian environments, particularly in activity centres.

Equity of active transport options is an important consideration which can be influenced through planning. Active transport infrastructure catering to all ages and abilities so it removes the need for separate consideration for young people, migrants, older people or people with disabilities should be considered. This includes infrastructure supporting accessibility such as shelters; seating; park and ride facilities; visible and shaded pedestrian connections; reducing cost burdens on Council's due to maintenance of such infrastructure through implementing this in tandem with medium density infill in existing areas (i.e. urban renewal) and increased density in newly developed areas without compromising quality, effectively enabling an adequate rates base to provide quality maintenance of such infrastructure (i.e. street trees, water sensitive urban design, accessible design of walkways, pedestrian crossings, ramps, etc).

As growth on the urban fringe increases, the need for active transport connections to public transport hubs outside of town centres will continue.

5.3 The importance of the provision of infrastructure – physical and social

Appropriate physical and social infrastructure can positively impact liveability. The integration of public and active transport networks with infrastructure, location of infrastructure close to residential areas and supporting mixed use of existing recreational, education and community facilities as examples.

TALC notes the importance of social infrastructure to support social inclusion in Tasmanian communities. The *Tasmanian Joint Parliamentary Select Committee Inquiry Into Preventative Health Report* identified social inclusion as a key social determinant that impacts on health (Parliament of Tasmania, 2016). The report highlighted the importance of a focus on implementation of measures increasing social inclusion across all government agencies (Parliament of Tasmania, 2016).

5.4 Diversity of housing types

In relation to housing, the *Tasmanian Joint Parliamentary Select Committee Inquiry Into Preventative Health Report* notes Tasmania has less diverse housing compared to other jurisdictions yet population targets exceed projected timeframes. TALC supports consideration tailored to population change and the impact on housing stocks. Changes in population should be considered as it grows and the types of households driving demand for housing types, giving consideration as to the profile of current stock and the degree to which this matches demand for household types (i.e. lone person households, family households, stock for those entering the market, opportunities for downsizing and 'empty nesters'). This rationalises land use and enables well designed density, concurrently improving housing affordability and in turn liveability. Evaluating the degree to which price points of new and existing housing supply match household incomes and policy and regulatory levers to manage supply side strategies (i.e. grants, tax concessions, shared equity arrangements, social inclusion policies) should also be considered in contemporary criteria contributing to an analysis of land supply and release.

Boundary expansions should be linked to population growth with updates to targets for supply and demand with cohorts linked to suitable housing stock and location types (i.e. families within proximity to activity centres with schools and open space).

Boundary expansions should be connected to population growth with updates to targets for supply and demand with cohorts linked to suitable housing stock and location types. This should be related to specific demographic planning (i.e. families within proximity to activity centres with schools and open space). Social mix policies in Western and Northern Europe are seeking to facilitate liveable outcomes for diverse demographics in land release programs and should be drawn upon to enable equitable outcomes across diverse demographics. VINEX locations in Utrecht (the Netherlands) and

Housing Land Use and Transport (MAL) Agreements in Espoo (Finland) provide exemplars of governance arrangements across levels of Government within a market driven environment whilst maintaining a legacy of historic welfare state values (Schwanen, et al., 2004 and State of Finland, 2021). These respective cities share high level synergies with Greater Hobart in relation to socio-spatial distribution and population, notwithstanding significantly different physical geographies and political environments which influence land use development.

The way density is designed should account for the varying needs of different population groups. Designing and locating safe, affordable, well-connected, higher density housing options is important for different age groups to be able to access the housing market appropriate for their lifestyle and situation (Stone et al., 2013). Providing a diversity of housing options increases the likelihood people of lower socioeconomic backgrounds have convenient access to public transport, health services, schools and employment opportunities (The Stone et al., 2013). Ensuring people can work close to where they live will provide more equitable access to employment and services.

5.5 The quality of publicly owned areas

The quality of the public realm influences whether people feel safe and comfortable in that area as well as opportunities for social interaction, particularly for women, children and older people. Design of the public realm supports social inclusion by taking into account how that space operates during different times of the day, with different demographics using it, and across all seasons of the year (Hulse et al., 2011).

Feeling unsafe in public spaces has a significant impact on whether residents, specifically women, the elderly, people with a disability or chronic health condition/s, and young children are prepared to use them. Designing spaces which support activities attract more people and promote the perception they are orderly and peaceful, can be important for social groups in enhancing active living opportunities, and support overall community liveability (Hulse et al., 2011).

It is important to consider the role of the built environment on mobility limitations and disability to ensure accessible movement networks are created and maintained. This will support older adults to age in place and improve quality of life through the encouragement of participation in physical activity, exposure to the natural environment, and social interaction with friends and neighbours (Hulse et al., 2011).

5.6 Social inclusion

Access to local opportunities for physical activity for exercise, recreation or active transport supports social inclusion and builds a sense of community connectedness beneficial to health and wellbeing (National Heart Foundation of Australia, 2019, National Heart Foundation of Australia, 2017a). This is particularly important in Tasmania's aging population. The Heart Foundation's *Healthy Active by Design* resource asserts 'an essential part of good governance is embedding a socially inclusive and respectful approach to older people into policies and processes' (National Heart Foundation of Australia, 2017a). This principle serves as an example of how good planning can impact on the social determinants of health in the Tasmanian context. The design of the places we live, work and play must be inclusive of all community members.

The planning system can act as a mechanism to enhance social inclusion by ensuring the provision of safe, affordable, well-connected, higher density housing options, access to public open/green space, safe and enjoyable active travel networks to a variety of destinations with a focus on equity and inclusion (Heart Foundation, 2016, National Heart Foundation of Australia, 2019, Hulse et al., 2011).

5.7 Staged development

In urban areas expanding the urban growth boundaries in many greenfield directions does not support staged development providing the required levels of services. This often results in services which are too thinly provided over multiple development sites. This is a fine balance in placing restrictions on developments to ensure development costs do not increase to the point of being unaffordable for the very target demographic being targeted in the first instance.

Where there have been stricter urban growth policies, lack of land availability has led to housing unaffordability. Therefore, any significant change to urban infill targets would need to account for the right fiscal, tax, and property settings and developed in congruence with State Housing Strategy and cascading action plans.

Finally, it is critical that planning policies and other levers dynamically reflect population and demographic change through iterative updating. For example, infrastructure in local government areas (LGAs) can be targeted towards demographic change through urban renewal and asset management upgrades according to needs based assessments. In LGAs where there are higher proportions of older adults, infrastructure is provided to support their 'health span' if that LGA struggles to attract more diverse demographics, in turn improving their engagement with and contribution regardless of age. VINEX development (spatial planning policy of the Netherlands) is accommodating urban restructuring and provision of housing typologies to provide for urban renewal (Schwanen, et al., 2004).

5.8 The importance of public open spaces

Public areas that are aesthetically pleasing, safe, clean and comfortable attract people to the area thus leading to increased walking, cycling, and opportunities for social interaction. Access to public open space (POS) is a key aspect of liveability which was demonstrated during the COVID-19 pandemic. POS includes spaces that are freely accessible to everyone such as streets, squares, parks, natural features, landmarks, building interfaces, green spaces, pedestrian and bike ways, and other outdoor places (National Heart Foundation of Australia, 2017a). The quality of the POS influences how much time people spend being active both of which directly influence health and wellbeing. The Heart Foundation's Healthy Active by Design framework reports that residents with larger neighbourhood parks within 1600 m engage in 150 minutes more recreational walking per week than those with smaller parks (National Heart Foundation of Australia, 2017a). Research links physical activity in or near green space to important health outcomes including obesity reduction, lower blood pressure and extended life spans (Davern et al., 2017).

The responsibility for POS currently falls to individual Council Policies under the Local Government (Building and Miscellaneous) Act 1993, which lacks consistency and transparency for stakeholders. TALC has made submissions on the Tasmanian Planning Policies (TPPs) calling for the inclusion of policies specific to the provision of POS. Another key challenge is for councils to maintain POSs. If a contribution for open space is made when a developer submits plans to Council, Council must be able to maintain that open space long term and there may be greater potential to do so through adequate rates of the area (i.e. slightly greater density without compromising on quality of design).

5.9 The importance of urban greening

Related to POS is urban greening. A growing body of evidence demonstrates urban green spaces, such as parks, playgrounds, and residential greenery, help keep cities cool, act as places of recreation, support physical activity and improve mental health (Byrne, 2021, National Heart Foundation of Australia, 2019, Davern et al., 2017). All of this contributes to a sense of wellbeing for individuals and communities.

TALC has previously provided comment on the lack of opportunities to encourage green infrastructure under the State Planning Policies (SPPs) and through local councils. Research indicates urban greenery including trees, vegetation and green surfaces (e.g., roofs and facades) can act as mechanisms for cooling within cities, helping mitigate the urban heat island effect and climate change (Davern et al., 2017). Urban greenery can reduce temperatures by 1- 4 °C (Davern et al., 2017).

TALC has strong interests in mitigation of urban heat waves through built environment measures given city dwellers are at risk and more Australians have been killed by heat waves than all other natural hazards (Perkins-Kirkpatrick et al., 2016), as well as both heat waves and urban heat islands

will be worsened by climate change. Furthermore, some demographic groups are vulnerable such as older people, those with pre-existing medical conditions, and those with a physical disability (Paravantis et al. 2017; Hatvani-Kovacs et al. 2016; Pyrgou 2018;). Those of lower socioeconomic position will also be more impacted by heat waves. The Tasmania Statement also recognises the link between climate change and poverty both for current and future generations. In addition to greening, Evidence identifies a series of other measures to reduce the urban heat island effect within the realm of urban planning and design.

With expected extension of the Southern urban boundary TALC strongly supports adequate POS and greening is in place to ensure density does not outpace quality. Supply of POS could be estimated according to demand (i.e. types of open space for families, older persons etc) and the capacity to provide and maintain this. This is similar to consideration of 'carrying capacity' in environmental policy of a landscape, considering the 'carrying capacity' of urban areas to support population density and increase so as not to exceed 'planetary boundaries' and in turn encroach on other important land (i.e. agricultural, environmental) that is supplying food and ecosystem services.

5.10 The importance of collaboration across government

Improvements to liveability for all Tasmanians can only occur through collaboration across multiple agencies and authorities. Drawing on the cross-disciplinary expertise of the Premier's Health and Wellbeing Advisory Council and coalitions like TALC and are ways this can occur. Changes to the planning system take time and occur incrementally. Through the Tasmanian Government's Planning Reforms there are many opportunities to shape planning system policies (previous TALC submissions are available on the TALC website). The importance of collaboration cannot be downplayed in the Urban Growth Boundary expansion, and it should be closely aligned with Tasmanian planning reforms and Homes Tasmania.

The planning reforms must ensure liveability, health and wellbeing remain a priority in these processes. Joined up planning has the ability to create compact cities that locate shops, schools, other services, parks and recreational facilities, as well as jobs near homes, providing highly connective street networks making it easy for people to walk and cycle to places (Goenka et al 2016).

Adopting a health in all policies approach would also be instrumental in ensuring liveability issues are front and centre.

6. Implementation

TALC's submission identifies the importance of improving active living opportunities within communities and how important it is to have these considerations at the beginning of any development of greenfield sites. TALC has provided extensive local, national and international evidence illustrating that active living as a key element of liveability and better health outcomes.

6.1 Legislation

In Tasmania there are substantial obligations in legislation supporting 'enabling planning arrangements that improve liveability'. The legislative obligations can be found in the Objectives for the Resource Management and Planning System found in 19 pieces of Tasmanian legislation including the *State Policies and Projects Act 1993* and the *Land Use Planning and Approvals Act 1993*. To the latter Act there is the additional Part 2 Objectives, including and specifically:

'(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;'

Then turning to contents and purposes of Tasmanian Planning Policies (*Land Use Planning and Approvals Act 1993*) we find:

(2) The TPPs may relate to the following:

'(c) liveability, health and wellbeing of the community;'

The Objectives in the various pieces of Tasmanian legislation are then supported and implemented by a hierarchy of statutory plans:

- State Policies under the *State Policies and Projects Act 1993*. For example, of a State Policy and supporting documentation see the *Draft State Policy on Healthy Space and Places* (Heart Foundation, 2019) and *Support for a State Policy for Healthy Spaces and Places* (Heart Foundation, 2019); and
- Tasmanian Planning Policies, Regional Land Use Strategies and the Tasmanian Planning Scheme under the *Land Use Planning and Approvals Act 1993*.

The current STRLUS proposes a mix of greenfield/infill (50/50), as does the current Greater Hobart Plan (70/30). These need to be aligned and consistent, with discrepancies acknowledged such as statistical geography boundaries, informed by consistent supply and demand measures that enable horizontal policy integration between the two.

6.2 The impact of the private sector

TALC acknowledges the speculative nature of the development industry within Australia and how this fundamentally compromises good, long term design outcomes in housing and has cascading

effects on the health, wellbeing, and liveability outcomes of populations in both urban and regional areas. Currently, developers operate within a neoliberal market based environment and therefore Government should act collaboratively as a regulator to enable sustainable liveability outcomes. By adopting new development models, the severity of this impact can be reduced. Examples of such models, which seek to focus on housing as an urban provision and human right over a business model are able to achieve significant savings which then redirect costs into good design outcomes.

For instance, the Nightingale Model, founded by Jeremy McLeod of Breathe Architecture, redirects costs into good design through removing overheads commonly employed in development such as marketing teams, advertising fees, real estate agents, display suites and second or third bathrooms. Additions to improve savings of this Model include shared laundries, shared services to allow for bulk purchase (i.e. electricity), photovoltaic (pv) cells, and, where possible, retention of ground floor tenancies to provide an ongoing income for the owner's corporation (in turn, lowering owners' corporation fees). This cascades down to greater outcomes in design features and liveability, such as rooftop and productive gardens, site acquisition near public transport corridors, and a focus on energy efficiency and carbon neutrality which in turn leads to a reduction of the Urban Heat Island Effect, a cleaner environment and, in turn, better health and wellbeing outcomes.

TALC recommends affordability is considered holistically, not only the upfront purchase price, but the liveability and whole of life cycle costs and health outcomes due to design.

6.3 Community engagement

Engaging communities is essential in determining what liveability means to them. Finding new ways to consult must become the norm, for example, citizen science approaches have been successful as a method of understanding local needs and having meaningful community engagement (Davern et al 2022).

6.4 The absence of a State Architect and State Policy

It is worth noting that Tasmania has previously had a State Architect, but this position was abolished in 2014. Prior to that the role of the State Architect was to advocate for quality design and sustainable built outcomes across the State; provide strategic and independent advice to Government on matters relating to planning, urban design, architecture and heritage; form collaborative working relationships with State agencies and stakeholder groups to develop a shared vision of the built environment; and develop best practice guidelines to create better a more sustainable urban environments and buildings (Right to Know, 2025). TALC recommends consideration be given to reintroducing this position.

Finally, a State Policy on healthy spaces and places would also support active living and active travel through design initiatives.

7. Examples of innovation at state levels

To take further steps to improve active living opportunities Tasmania should look at some innovation through design guides for subdivisions. The *New South Wales (NSW) Pattern Book* is a good example. The Book contains designs and guidelines to support the construction of more high-quality housing with a range of dwelling types and will meet will meet the Liveable Housing Design Standard for accessibility and adaptability. Homes will meet the community's need across the life course and support young families, those working from home and those ageing in place. The Government Architect NSW is leading this process (State Government of NSW, 2022).

Plan Melbourne 2017-2050 and now the new development of *Plan Victoria* are also examples Tasmania could look towards. Plan Victoria is the first community-led strategic land use plan for the state and will replace the existing metropolitan strategy *Plan Melbourne 2017-2050* and regional growth plans. It will provide guidance around how Victoria can create more homes near transport, job opportunities and essential services in vibrant, liveable and sustainable suburbs, towns and regions (State Government of Victoria 2024).

8. Summary

In summary, an extension of the STRLUS Urban Growth Boundary can be viewed positively as long as the following is included:

- liveability and accessibility are considered at the forefront of development, such that housing developments offer a mix of social, affordable and other housing provision models. It is important to learn the lessons from previous periods of expansion around Hobart and ensure the proposed expansion of the current boundaries occur within a much wider development plan.
- Future developments and housing locational policy focus on active travel and public transport considerations. Appropriate physical and social infrastructure can positively impact liveability. The integration of public and active transport networks with infrastructure, location of infrastructure close to residential areas and supporting mixed use of existing recreational, education and community facilities are key aspects of liveability.
- Consideration is given to prioritising infill development and consolidation, maximisation of existing physical infrastructure and active transport modes.
- Boundary expansions are linked to population growth with updates to targets for supply and demand with cohorts linked to suitable housing stock and location types (i.e. families within proximity to activity centres with schools and open space).

- The planning system acts as a mechanism to enhance social inclusion by ensuring the provision of safe, affordable, well-connected, higher density housing options, access to public open/green space, safe and enjoyable active travel networks to a variety of destinations with a focus on equity and inclusion
- Adequate future public open spaces and greening provisions are in place to ensure density does not outpace quality, particularly with expected extension of the Southern urban boundary.
- Collaboration across multiple agencies and authorities occurs. This is essential for improvements to liveability for all Tasmanians.
- Liveability, health and wellbeing remain a priority in planning reform processes. Joined up planning has the ability to create compact cities that locate shops, schools, other services, parks and recreational facilities, as well as jobs near homes, providing highly connective street networks making it easy for people to walk and cycle to places.
- The position of the State Architect is reinstated. Without this role there is an absence of coordination and advice and a lack of shared vision for the future of Tasmania's built environment.

Definitions

The following terms used by TALC are defined as:

Active living - a way of life that integrates physical activity into daily routines (Heart Foundation, 2016).

Active travel or active transport - travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling and may allow for integration of multi-modal transport in the course of a day (Heart Foundation, 2016).

Built environment - the structures and places in which we live, work, shop, learn, travel and play, including land uses, transportation systems and design features (National Heart Foundation of Australia, 2017a).

Health - a state of complete physical, mental and social wellbeing and not merely the absence of disease (World Health Organization, 2022a).

Liveability - a liveable community is one that is safe, socially cohesive, inclusive and environmentally sustainable. Highly liveable areas provide affordable housing that is well serviced by public transport, walking and cycling infrastructure (Department of Agriculture Water and the Environment, 2021). They have good access to employment, education, shops and services, public open spaces, and social, cultural and recreational facilities (Department of Agriculture Water and the Environment, 2021).

Physical activity - any bodily movement produced by skeletal muscles that requires energy expenditure encompassing all movement during leisure time, for transport to get to and from places, or as part of a person's work (World Health Organization, 2022b).

Social inclusion – is a term used to describe how government, community, business, services and individuals can work together to make sure that all people have the best opportunities to enjoy life and do well in society. It is about making sure that no one is left out or forgotten in our community (Social Inclusion Unit, 2008).

Wellbeing – mental health is a state in which an individual can realise their own potential cope with normal stresses, work productively and contribute to their community (World Health Organization, 2022a)¹.

¹ TALC acknowledges that Tasmania will likely develop its own definition of wellbeing as part of the development of Tasmanian Health and Wellbeing Framework.

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Appendices

Appendix A Tasmanian Active Living Coalition, Tasmania's Planning System – Opportunities for Health and Wellbeing, 2021



TALC Planning
Report Final for circ

Appendix B: Tasmanian Active Living Coalition Submission to State Planning Provisions Review, Phase I – Scoping Paper



FINAL - TALC
submission - SPP Re

Appendix C: Tasmanian Active Living Coalition Submission to the Tasmanian Housing Strategy Discussion Paper



FINAL DRAFT - TALC
submission - Tasmai

Appendix D: Heart Foundation's Representation to the final draft State Planning Provisions 2016



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representation_on_5

Appendix E

Summary of Active Living Integrated Policies

Tasmanian

- Tasmania Statement – Working Together for the Health and Wellbeing of Tasmanians (Premier’s Health and Wellbeing Advisory Council, 2021)
- Healthy Tasmania Five-Year Strategic Plan 2022-26 (Department of Health and Human Services, 2022)
- Joint Select Committee Inquiry Into Preventative Health Report (Parliament of Tasmania, 2016)
- Heart Foundation Representation to the final draft State Planning Provisions 7 March 2016 (Heart Foundation, 2016)
- Tasmania’s Walking and Cycling for Active Transport Strategy 2011-2021 (Department of Infrastructure, 2010)
- Hobart City Deal (Commonwealth of Australia, 2019)
- The Southern Tasmanian Regional Land Use Strategy (STRLUS) 2010-2035 – Regional Policies 10, 11, 13, 18 and 19 (State Planning Office, 2010)

National²

- National Preventative Health Strategy 2021-30 (Department of Health, 2021)
- National Obesity Strategy 2022-32 (Commonwealth of Australia, 2022)
- Getting Australia Active III – a Systems Approach to Physical Activity for Policy Makers (Bellew et al., 2020)
- National Heart Foundation - Blueprint for an Active Australia (National Heart Foundation of Australia, 2019)
- National Heart Foundation – Healthy Active by Design (National Heart Foundation of Australia, 2017a)

International

- Global Action Plan on Physical Activity 2018-30 (World Health Organization, 2018)
- International Society for Physical Activity and Health- Eight Investments that Work for Physical Activity (International Society for Physical Activity and Health, 2020)
- United Nations Sustainable Development Goals (UN General Assembly, October 2015)

² There is no **National Physical Activity Plan** to provide an overarching framework for addressing physical inactivity and guide future action. In 2020, the Australian Prevention Partnership Centre published [Getting Australia Active III : A systems approach to physical activity for policy makers](#) which identifies eight key areas for action to address physical inactivity. This serves as a guide for policy makers in Australia in the absence of a national plan.

Draft – Discussion Paper
Tasmania's Planning System –
Opportunities for Health and Wellbeing



Tasmanian Active Living Coalition

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DRAFT

I. Introduction

The Built Environment and Health and Wellbeing

The design of the built environment has typically not included the consideration of health and wellbeing outcomes. Factors such as the return on investment and provision of road networks has often characterised urban developments. The growth of these developments has often been out of step with public transport options, local employment and more generally the concept of the '20-minute neighbourhood'. The location of affordable homes on the outskirts of metropolitan areas without the provision of alternative transport options has seen an increase in private vehicle usage for work and other necessities. While the impact of rapid development on systems such as transport is well documented, the impact on health and wellbeing is less well known. Work is being undertaken to develop a greater understanding of the impact planning systems have on health and wellbeing outcomes and this paper outlines key knowledge and recommendations in a Tasmanian context.

The Healthy Tasmania Five Year Strategic Plan advocated for a health in all policies approach, including an analysis of the systems outside the health sector which influence the health status of populations.. The plan identified transport and the creation of environments which support people to make healthier choices as key focus areas. The second *Healthy Tasmania Plan* will focus on systems and supporting active living initiatives. This builds on earlier work under *Tasmania's Plan for Physical Activity 2011-2021* which included the goal to 'Create built and natural environments that enable and encourage physical activity'. The Built Environment Working Group of the Premier's Physical Activity Council worked directly towards this purpose.

The highly respected medical journal *The Lancet* published a series on 'Urban design and transport to promote healthy lives' in 2016, providing further recognition of the importance of the built environment for active living. This series defined the built environment features that increase activity. The series recommended creating compact cities that locate shops, schools, other services, parks and recreational facilities, as well as jobs near homes, and providing highly connective street networks making it easy for people to walk and cycle to places¹. There are many co-benefits of improving planning for active living including reductions in greenhouse gas emissions, improved air quality, reduced traffic congestion, more sustainable infrastructure, increased economic productivity, improved social capital and more liveable towns and cities².

¹ Goenka S, Anderson L Urban Design and transport to promote healthy lives, *The Lancet*, Vol 388, Issue 10062, Dec 2016

² : Bellew B, Nau T, Smith B, Bauman A (Eds.) *Getting Australia Active III: A systems approach to physical activity for policy makers*. Sydney, Australia. The Australian Prevention Partnership Centre and The University of Sydney. April 2020

The way the environment is planned, designed and built can directly affect the health and wellbeing of people who use and inhabit the space. As noted by the Heart Foundation's *Healthy Active by Design* framework 'planning for active living calls for a commitment to applying healthy planning principles to all levels of the planning system, at every stage of the planning process and in every planning project and policy initiative. These principles can be applied no matter what the scale, in metropolitan or regional contexts, from neighbourhoods in regional, rural and remote communities to large scale centres'.

The recently re-signed Healthy Tasmania Statement supports the connection between health and wellbeing enhanced by natural open spaces. It further notes the opportunities available as Tasmania grows to plan communities to create healthy, liveable and connected spaces. The Tasmania Statement creates an authorising environment for the Premier's Health and Wellbeing Advisory Council ('the Council') to support health and wellbeing considerations within the planning scheme.

The COVID-19 pandemic has required people to stay close to home, highlighting the importance of improving understanding of how the built environment can support health and wellbeing. This provides a unique opportunity for groups such as the Tasmanian Active Living Coalition (TALC) to leverage off the greater awareness of the benefits of supportive environments.

This paper was produced upon request from the Council but it has also been made available to TALC members for general use.

The Built Environment and Physical Activity

Physical activity is a core health behaviour of interest to TALC, and hence is the focus of this discussion paper. Physical activity is fundamental for good physical and mental health and wellbeing. Physical activity can help prevent heart disease, type 2 diabetes, numerous cancers, dementia, weight gain, gestational diabetes, and anxiety and depression. Being physically active improves sleep and improves brain function at all ages. Despite this, almost half of all Tasmanians aged 18 and over do not do enough physical activity for good health. Tasmania is below the national average and is ranked sixth out of the eight states and territories.

There are many reasons why people are not active enough. At a population level, the environments where people live, work and play (the built environment) can have a significant impact on physical activity levels. Towns and cities, neighbourhoods, public spaces and places, shopping areas and town and neighbourhood centres designed appropriately for all stages of life can result in increased physical activity levels. For example, designing neighbourhoods which offer public transport reduces private vehicle use and results in more active communities. Places that are supportive of walking and cycling have well designed streets (including footpaths

for all ages and abilities), street connectivity, mixed density, and mixed land use. People walk more if they perceive streets are safe and aesthetically pleasing³.

Key national frameworks (*Getting Australia Active III: A systems approach to physical activity for policy makers*; the Heart Foundation's *Blueprint for an Active Australia*) and international frameworks (World Health Organisation's *Global Action Plan for Physical Activity*) highlight the importance of the built environment, including urban and transport planning, walking and cycling infrastructure, public open spaces and recreational spaces, on health outcomes.⁴

2. Aims

The three key aims of this discussion paper are to:

1. Provide an overview of the Tasmanian planning system and how it relates to health and wellbeing.
2. Highlight planning system gaps and barriers to improving the health and wellbeing of Tasmanians.
3. Identify opportunities through planning system reform to improve the health and wellbeing of Tasmanians.

³ Jerome R, J Rozek J, Villanueva K, Gunn I, Giles-Corti B. Evidence supporting the health benefits of Movement Networks. National Heart Foundation of Australia 2021

⁴ Bellew B, Nau T, Smith B, Bauman A (Eds.) *Getting Australia Active III: A systems approach to physical activity for policy makers*. Sydney, Australia. The Australian Prevention Partnership Centre and The University of Sydney. April 2020

3. Impediments and Actions

Prepared by Rob Nolan, Planning Institute of Australia Tasmanian division

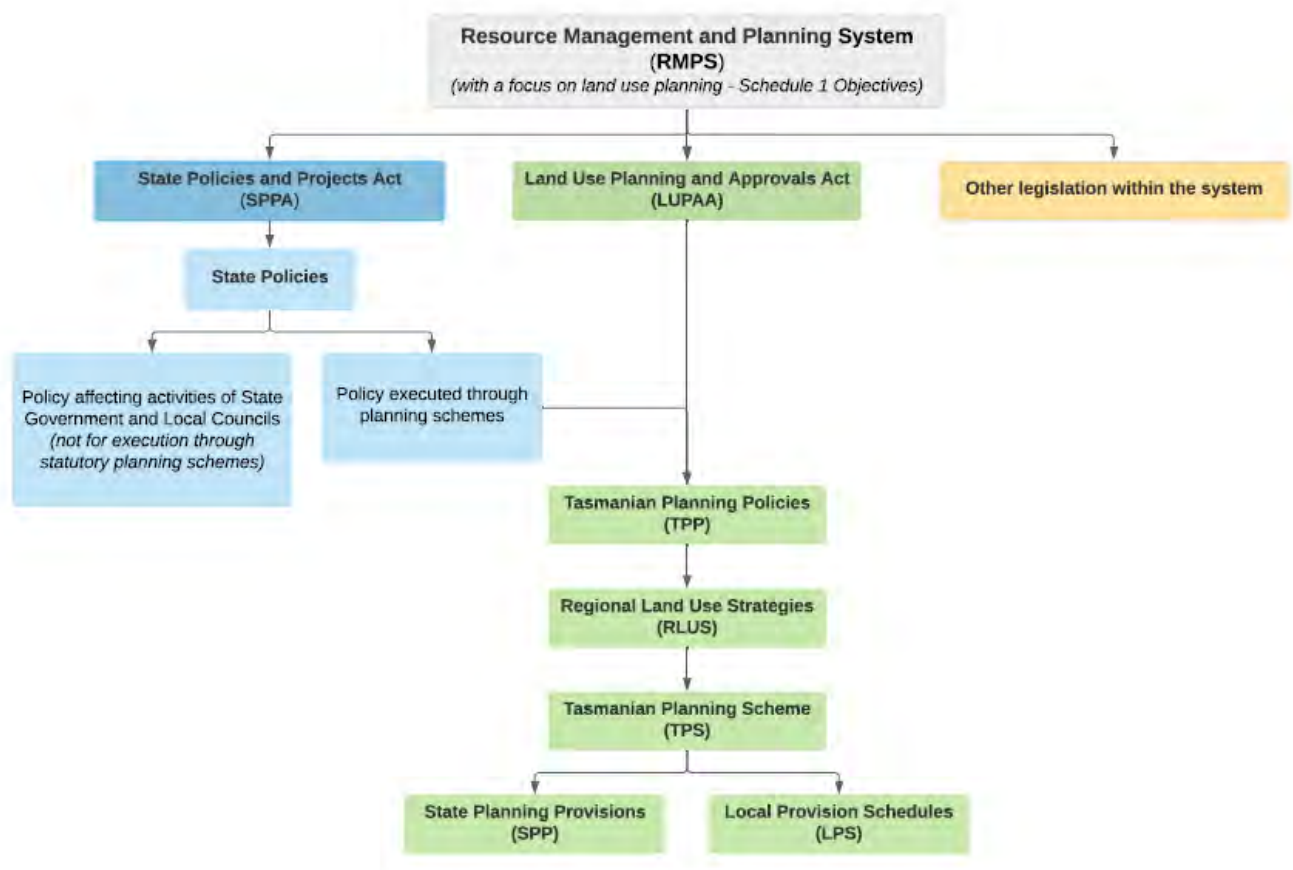
Overview

A first principle is that planning (or town planning) has through the ages been rooted in health improvement and wellbeing with legislation to support activism for healthier built environments. The current Tasmanian planning system is the Resource Management and Planning System (RMPS). The RMPS was primarily introduced through 1993 legislation that captured many existing and new Acts⁵ under a common set of objectives being the '*Objectives of the Resource Management and Planning System of Tasmania*'. These objectives are predominately contained in Schedule 1 of each Act and are based on sustainable development, defined in legislation as:

'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.'

– ⁵ comprises some 19 pieces of legislation



The Planning System and Health and Wellbeing

The planning system offers opportunities to improve population health and wellbeing outcomes that remain to be fully realised.

Specific legislative authority that enables a health and wellbeing focus on the built environment can be found in:

- RMPS objectives – based on sustainable development defined with reference to ‘*cultural wellbeing and health and safety*’.
- *Land Use Planning and Approvals Act 1993 (LUPAA), Schedule 1, part 2 - ‘Objectives of the Planning Process Established by this Act’.*
 - sub clause (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.
- S.12B – contents of Tasmanian Planning Policies.
 - (2)(c) liveability, health and wellbeing of the community.

Planning System Instruments for Health and Wellbeing Intervention for the Built Environment

There are three key planning system instruments that can influence the built environment to improve population health and wellbeing outcomes.

State Policy and Projects Act 1993

Under the Premier, this Act provides for the making of Tasmanian Sustainable Development Policies (State Policies) that apply to the activities of State Government and Councils. State Policies may direct policy and desired outcomes or indirectly give effect to policy through the provisions in planning schemes. In this way a State Policy can be a critical element for pursuing health and wellbeing outcomes. The *State Policy and Projects Act 1993* also provides for 'State of the Environment Reporting'. State of Environment Reporting (SOE) can be a valuable reference for monitoring outcomes of health and wellbeing policies. It has been many years since a State Policy was made with the most recent being the 2009 *State Policy on the Protection of Agricultural Land*. The most recent SOE report was also in 2009.

Land Use Planning and Approvals Act 1993

Under the Minister for Planning, this Act provides for Tasmanian planning policies, regional land use strategies, planning schemes, and through planning schemes the regulation framework for use and development and the granting of permits.

Tasmanian Planning Policies

Tasmanian Planning Policies are being prepared with public involvement and are intended for release in 2022. In comparison to the wide scope afforded State Policies, the Tasmanian Planning policies limit their scope to affecting the content of regional land use strategies and planning schemes. Tasmanian Planning Policies therefore provide a contemporary mechanism for embedding health and wellbeing policy in the built environment through the regional strategies and planning schemes. At the applied level, Tasmanian Planning Policies will work to set standards for the regulation of use and development.

Regional Land Use Strategies

Regional land use strategies exist for the three Tasmanian regions (south, north, northwest). They are due for review by the State Government after completion of the making of the Tasmanian Planning Policies. Planning schemes must be consistent with the regional strategies.

Planning Schemes

The completed Tasmanian Planning Scheme will comprise the State Planning Provisions, common to all planning schemes, and local provisions schedules that provide content relevant to individual municipalities. The planning scheme is required to embody all the policies and interests of State Government and Councils into a statutory framework that is applied to the assessment of applications for permits to change the use of land or develop land.

Local Government (Building and Miscellaneous Provisions) Act 1993

Although not part of the RMPS, this Act has the provisions for taking public open space and littoral (coastal) and riparian (edge of river) reserves. Public open space and coastal and river reserves are critical for recreation and conservation. The merit of local public parks and reserves came to the forefront during the COVID-19 pandemic when travel for recreation was severely restricted. The provisions in legislation for public reserves has been neglected since 1993. The legislation has been proposed for replacement since 1993. In their current state, the legislated provisions for the taking of public open space and reserves do not maximise the positive influence these assets could have on population health and wellbeing.

Planning System Guidelines and Directives for the Built Environment

Planning system guidelines and directives affecting elements of the built environment which impact on health and wellbeing are extensive. They include:

Planning Directive No.4.1 – Standards for Residential Development in the General Residential Zone.

This planning directive sets out the planning standards for houses covering matters such as housing density, building envelopes and boundary setbacks, the provision of private open space, building orientation and overshadowing. Although the planning directive covered some aspects of streetscape (eg fencing) it made no mention of the design of streets which is the critical component of the residential built environment. The General Residential Zone is where most of the housing activity happens in Tasmania. The standards in the Planning Directive have now been incorporated into the State Planning Provisions.

LGAT Tasmanian Subdivision Guidelines October 2013 and Tasmanian Standard Drawings 2020.

The subdivision guidelines and standard drawings apply to participating Tasmanian councils and prepared in conjunction with the Institute of Public Works Engineering Australia. The standard drawings provide detailed

design of roads and in-road infrastructure. These guidelines tend to focus on motor vehicles with minimum regard for active travel and lead to a repetitive standard of roads in subdivisions.

Positive Provision Policy for cycling infrastructure Tasmania 2013

The policy places onus on the State road authority to show why cycling infrastructure should not be provided on State roads as opposed to having to justify its provision.

Planning System Opportunities for Improving the Built Environment for Health and Wellbeing

There are five key opportunities for advocacy within the planning system to improve the built environment so that it better supports health and wellbeing: State Policy, Tasmanian State Coastal Policy, Tasmanian Planning Policies, Regional land use strategies, and the Tasmanian Planning Scheme.

1 State Policy

Advocate for the making of a State Policy with a focus on health and wellbeing and the built environment that affects the activities of State Government and councils (for example, see the National Heart Foundation, Tasmania Draft for a State Policy for Healthy Spaces and Places).

2 Tasmanian State Coastal Policy 1996

Advocate for amendments to the Policy to cover the provision and management of littoral and riparian reserves for their contribution as key components for active living. This should also include policies providing contemporary responses to climate change, sea level and storm surge all of which have health and wellbeing implications.

3 Tasmanian Planning Policies

Contribute to the preparation of the policies for a focus on health and wellbeing and the built environment that directly affect the content of regional land use strategies and planning schemes.

4 Regional land use strategies

Contribute to the review of the regional land use strategies for a sharper focus on health and wellbeing through strategies for the structure of cities and towns, the provision of public open space and reserves and the transportation networks.

5 Tasmanian Planning Scheme

Contribute to the review of the State Planning Provisions for a sharper focus on health and wellbeing outcomes through amendments to the use and development standards for the zones and codes.

Issues and Actions for Health and Wellbeing

The following provides some examples of issues and specific actions for better health and wellbeing with a focus on the State Planning Provisions of the Tasmanian Planning Scheme.

General

State Planning Provisions – Purpose and Objective Statements

Issues:

- Prepared in a policy vacuum on health and wellbeing outcomes.
- No reference to health.
- No reference to wellbeing.
- No reference to mental health.

Actions:

- CI 2.1 include a statement of outcomes within the framework of the RMPS objectives with specific reference to health and wellbeing.
- Include in the purpose and the objectives for each zone, use standard, development standard and code the desired health and wellbeing outcome from the implementation of the specific provision.

Active Living

Issues:

- Loss of 'public' in open space.
- Public open space being viewed as a tradable commodity.
- Loss of favour of small parks in preference for mega structures (theme parks mainly accessed by car).
- Lost legislation requiring the provision of riparian and littoral reserves.
- Planning lacking for lifecycle changes in neighbourhoods (i.e., differing requirements as residents age and young families replace).
- Limited strategic planning for public open space.

Actions Within the State Planning Provisions for Active Living

- Insert use and development standards that focus on community led housing models for increasing residential density.
- Include standards for the provision of public open space and littoral and riparian reserves.
- Leverage off opportunity of COVID with a renewed interest in local parks and recreation locally.

Active Travel

Issues:

- Lack of provisions/design guidelines for streets that are inclusive for all users.
- Permeability, limited connectivity of streets, dead end culs-de-sac and paths.
- Regulations preventing narrow streets, zero setbacks, shop top housing, main street shopping.
- *LGAT Tasmanian Subdivision Guidelines October 2013 and Tasmanian Standard Drawings 2020* that are not helpful for active travel where they intrude on planning and design for streets rather the keeping to a focus on engineering detail.

Actions Within the State Planning Provisions for Active Travel:

- Resolve the confusing provisions over streets and roads.
- Remove the exemption status from planning scheme permit requirements for upgrading of streets/roads to allow active travel to be realised.
- Insert a streets code that supports active travel through provisions that include standards for footpaths suitable for walking and requirements for safe cycling infrastructure.
- Revise the *Parking and Sustainable Transport Code* to comprehensively treat 'sustainable transport' as a component of active travel.
- Through LGAT and Institute of Public Works Engineering Australia revise the *Tasmanian Subdivision Guidelines October 2013 and Tasmanian Standard Drawings* to delete aspects of the guidelines that intrude on planning and design of streets that have limited regard for active travel and to confine their content to engineering detail.

Food Security

While food security is considered a critical component of health and wellbeing, it is not directly within the remit of TALC.

Issues:

- Non-food related use and development intruding on agricultural activities including fettering those activities.
- State Planning Provisions that prohibit urban farming (qualified agricultural use in the resource development use class).
- Application of the *State Policy on the Protection of Agricultural Land 2009* limited to land not previously zoned for another use.
- Opportunity for policy and guidelines relating to competing land uses for reasons of community health (eg fast food outlets close to schools).

Actions:

- Review and amend the *State Planning Provisions* where they prohibit urban farming (qualified agricultural use in the resource development use class).
- Review the application of the *State Policy on the Protection of Agricultural Land 2009* to contemporary policies on food security and application of the policy to protect agricultural land in the peri-urban areas.

Mental Health and Wellbeing

This section is under development.

4. The Tasmanian Planning System in Practice – a Case Study

Prepared by David Allingham, Manager, Development Services, Brighton Council

Brighton Council is on the northern fringe of Greater Hobart. Brighton Council's population is expected to grow by 33 per cent to 2042, which is the fastest growing Council in percentage terms across Tasmania.

The suburbs of Bridgewater, Gagebrook, and Herdsmans Cove are characterised by poorly designed and disconnected public housing suburbs with an under-developed public realm. Recently, Housing Tasmania have contracted Community Housing Provider, Centacare Evolve Housing, to build hundreds more social housing units in these suburbs placing more people with complex needs in an area without supporting infrastructure.

With rapid growth in public and private housing, Brighton Council needs a planning system that delivers a high-quality built environment and the social infrastructure needed to provide communities with good liveability and health and wellbeing outcomes.

In April 2021, Brighton Council became the third Council in Tasmania to operate under the Tasmanian Planning Scheme (TPS). All Tasmanian Councils will operate under the TPS in the coming months.

The Manager of Development Services of Brighton Council is responsible for both statutory and strategic planning. A typical week involves the statutory planning team reviewing current Development Applications.

Planning staff express frustration that the State Planning Provisions (SPPs) do not have the tools to deliver good liveability and health and wellbeing outcomes compared to the Interim Planning Schemes (in place from 2015-2021). These small changes have important implications for how residential settlements are built. This is particularly pertinent for Brighton Council where mainly social and affordable housing is being built and developers are trying to build low-cost housing, particularly multiple dwelling units.

Site and Building Design

Having access to sunlight, outdoor areas and quality green space is critical for health and wellbeing in the home. This has become increasingly important during restrictions in response to the COVID-19 pandemic. Yet broadly, design standards have been removed from the State Planning Provisions, for example:

- There are no requirements for north facing windows.
- There are no requirements for private open space to be accessed directly from living areas.
- There are no requirements for landscaping.

Subdivision Design

Well-designed subdivisions are critical to active living and active travel. Compact neighbourhoods, provision of housing choice and diversity, way-finding and public open space are critical for promoting access to services and active living. Well designed neighbourhoods that provide opportunities for healthy living have become increasingly more important during the COVID-19 pandemic. Many subdivision standards that provide health and wellbeing outcomes have been removed from the State Planning Provisions, for example:

- The Southern Tasmanian Regional Land Use Strategy (STRLUS) sets a target of 15 dwellings per hectare. This was an objective in the General Residential Zone standards in interim schemes, as was promotion of higher densities closer to services, facilities and public transport corridors and planning controls to achieve this.
- The SPPs provide no density targets and no standards to require higher densities closer to services (minimum lot size of 450m² and no maximum lot size). For example, a developer could be advised by a real estate agent that 700m² lots are selling best and therefore deliver only lots at this size (approximately 10 dwelling per hectare).
- Ways and Public Open Space requirements have been removed from State Planning Provisions. Interim schemes had provisions for the provision of high-quality open space and way-finding. This now falls back to the *Local Government (Building and Miscellaneous) Act 1993* individual Council Policies, which lacks consistency and transparency for stakeholders. It is far clearer for developers and Councils to have public open space requirements as a subdivision standard in the planning scheme.

Key actions could address these issues:

- Re-instate design standards as per the Interim Planning Schemes the above into the Residential Zones in the State Planning Provisions.
- Urgently review General Residential Zone Development and Subdivision standards from the SPPs with liveability and health and well-being at front of mind.

Urban Greening

Another issue that is consistently raised by planning staff is the lack of opportunities to encourage green infrastructure under the SPPs. Brighton Council has a *Greening Brighton Strategy* which aims to increase trees across Brighton's urban areas through strategic tree planting, including in private developments and subdivisions.

However, implementation of the *Greening Brighton Strategy* under the SPPs is extremely difficult, given they do not promote urban greening at all. There are no landscaping requirements for units, commercial developments, streets or vegetation retention (except if priority vegetation).

To address the failings of the SPPs, Council tried to introduce a Landscaping Specific Area Plan as part of its Local Provisions Schedule (LPS) for the TPS, but it was rejected by the Tasmanian Planning Commission (TPC).

Urban green spaces, such as parks, playgrounds, and residential greenery, can promote mental and physical health, and reduce morbidity and mortality in urban residents by providing psychological relaxation and stress alleviation, stimulating social cohesion, supporting physical activity, and reducing exposure to air pollutants, noise and excessive heat.

Key action that could address this issue:

- The State Planning Provisions need landscaping requirements for multiple dwellings and commercial and industrial use and require street trees in new subdivisions.

Multiple Dwelling Units

Brighton Council is seeing a significant increase in multiple dwelling units on large sites as opposed to subdivisions. It can be assumed that in part this is to do with avoiding public open space contribution fees and other subdivision costs (eg utility connections). Multiple dwelling units are generally smaller and have less private open space thus increasing demand for quality public open space provision. Multiple dwelling units are also often inward facing and have poor passive surveillance to street frontages. They have no public land and when developed on larger sites often block potential connectivity to surrounding land. Body Corporates can be problematic on larger sites and include ongoing costs for the owner that are effectively passed on by the developer in choosing strata over subdivision.

Key action that could address this issue:

- Standards in the State Planning Provisions are needed which encourage subdivision instead of strata where possible and ensure there is equity in public open space contributions, improved passive surveillance and connectivity.

Infrastructure Contributions

Trunk infrastructure provides critical services for communities, and usually includes:

- Transport (e.g., roads, pathways, ferry terminals and bus stops).
- Stormwater (e.g., pipes and water quality treatment devices).
- Water supply and wastewater (e.g., reservoirs, pipes and sewage treatment plants).
- Public parks (e.g., parks and sporting facilities).
- Land for community facilities (e.g., land for libraries and community centres).
- Other infrastructure depending on the area.

Fragmented land ownership and the significant cost of trunk infrastructure means it may not be feasible for any one developer, landowner, or government entity to fund the trunk infrastructure required to service the area. In other jurisdictions there are infrastructure contributions frameworks that provide for the cost of trunk infrastructure to be shared equitably between the users of the infrastructure based on forward planning (eg structure plans). Currently there is no infrastructure contributions framework in Tasmania. In the absence of an infrastructure contributions framework, it is generally a 'first user pays' system, which is costly and inequitable. There is a reluctance for first movers to invest in liveability elements if they are paying for utility infrastructure that will benefit future developers. There is also a lack of forward planning about what social infrastructure is needed in existing and greenfield development areas.

Key action that could address this issue:

- Creating a State Government Infrastructure Policy would lead to more equitable infrastructure costs, greater certainty, and better infrastructure outcomes, including social infrastructure.

Southern Tasmanian Regional Land Use Strategy 2010-2035 (STRLUS)

Council is required to regularly meet with developers or elected members about issues with the outdated STRLUS. The STRLUS is a 'broad policy document that will facilitate and manage change, growth, and development within Southern Tasmania over the next 25 years'⁶. STRLUS was declared in 2011 and has not been updated since. The STRLUS uses data from the 2006 ABS Census and therefore does not capture significant changes in the region in the intervening years (eg the opening of MONA).

Council regularly meets with stakeholders about the need to extend the urban growth boundary to allow more development on the urban fringe. Whether or not this is appropriate is unknown because there is a lack of recent data about supply and demand for housing.

Section 5A(6) of LUPAA requires that 'The Minister must keep all regional land use strategies under regular and periodic review.' In the last 10 years the regional land use strategies have not had a comprehensive review.

The STRLUS also has a suite of policies that promoted health and well-being were being implemented through the interim planning schemes. For example, Policy ROS 1.6 is to 'Ensure subdivision and development is consistent with principles outlined in *Healthy by Design: A Guide to Planning and Designing Environments for Active Living in Tasmania*'. However, these policies are not being implemented through the SPPs.

⁶ STRLUS page 1

Key actions could address these issues:

- Amend LUPAA to require the Minister review the regional land use strategies at least every five years.
- Review the regional land use strategies as a matter of urgency.

DRAFT

5. Opportunities for Action

Creating environments that support health and wellbeing through active living and active travel is challenging and requires collaboration across multiple agencies and authorities but has the potential to have significant population health impacts. This paper has described the relationship between the built environment and health and wellbeing, provided an overview of the Tasmanian Planning System, and highlighted opportunities for where the planning system could better and more equitably support the health and wellbeing of Tasmanians, with a particular focus on the link with physical activity.

Through the *Tasmanian Government's Planning Reforms Work Program 2021-2024* (see Attachment 1), there are many opportunities to shape planning system policies. As planning reform occurs over many years, bodies such as the Council and TALC must ensure that health and wellbeing remains a priority in these processes. Key opportunities within, and outside of the planning reform process that could be leveraged are detailed below.

Opportunities Within the Tasmanian Government's Planning Reform Agenda

1. Tasmanian Planning Policies

- 1.1. Define in submission(s) to the Government the meaning and application of the requirements for 'liveability, health and wellbeing in the community' (LUPAA s.12B(2)(c)) during the coming period of policy preparation.
- 1.2. Advocate for health and wellbeing policies on land subdivision setting, residential/lot density, and public open space, and a policy preference for separate lots rather than the strata.

2. Regional land use strategies

- 2.1. Contribute to the review of the regional land use strategies for a sharper focus on health and wellbeing through strategies for the structure of cities and towns, density of residential development, the provision of public open space and reserves, and transportation networks.
- 2.2. Advocate for short-term fixes to the STRLUS (and presumably the northern and northwest coast strategies) to emphasise the application of health and wellbeing policies.
- 2.3. Advocate for the need for timely reviews of the regional land use strategies including shorter legislated time frames.

3. Tasmanian Planning Scheme (State Planning Provisions) – advocate for

- 3.1. Clause 2.1 purpose to state how the RMPS objectives give effect to health and wellbeing.
- 3.2. Inclusion in the purpose and the objectives for each zone, use standard, development standard, and code the desired health and wellbeing outcomes from the implementation of the specific provision.

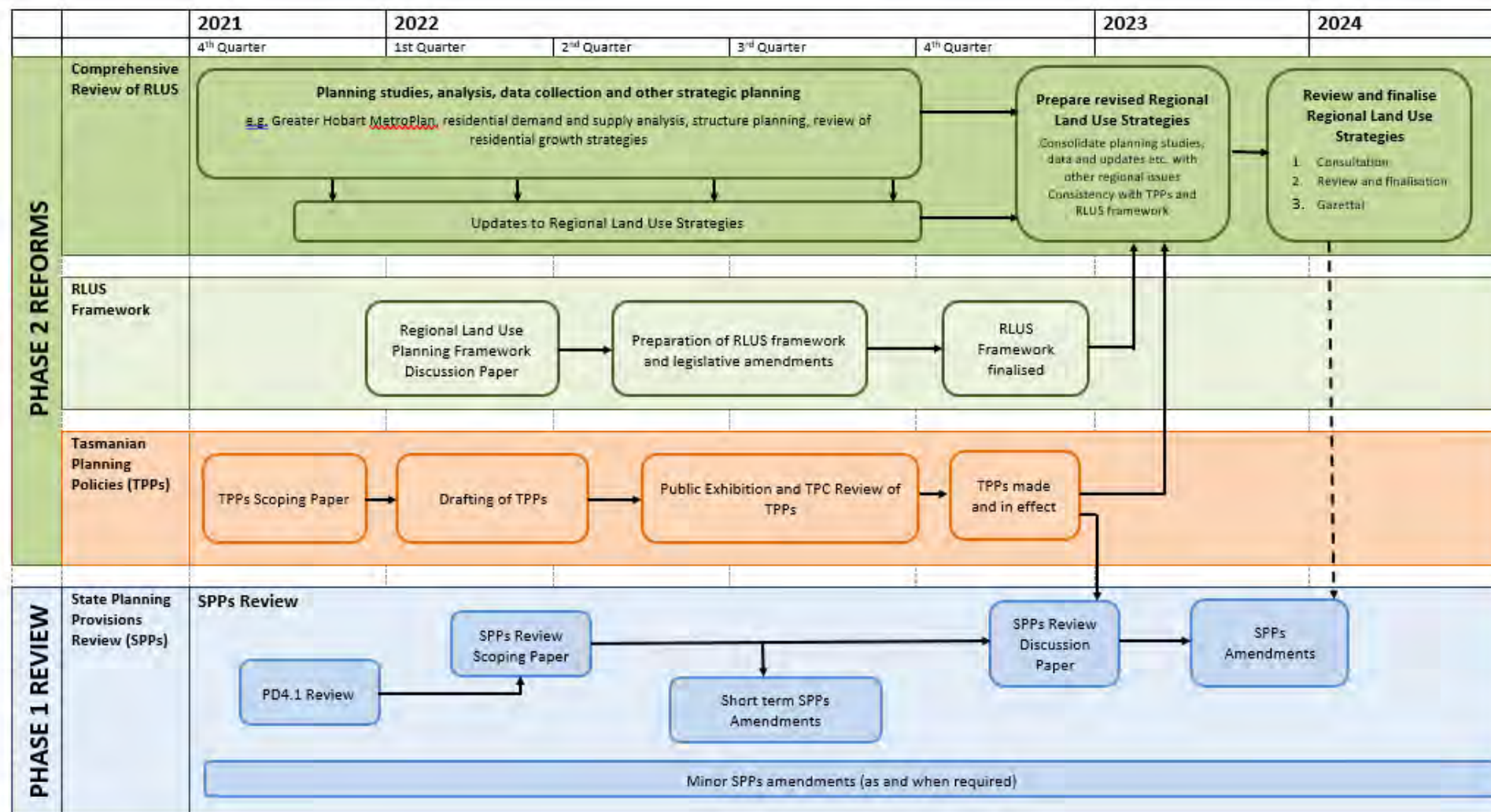
- 3.3. Insertion of use and development standards that focus on community led housing models for increasing residential density derived from a review of Planning Directive No.4.I. The review to have specific reference to aspects of design standards for liveability including sun aspect, private open space, and landscaping.
- 3.4. Inclusion of standards for the provision of public open space and littoral (coastal) and riparian (edge of river) reserves.
- 3.5. Resolution of the confusing provisions over streets and roads.
- 3.6. Removal of the exemption status from planning scheme permit requirements for upgrading of streets/roads to allow active travel to be realised.
- 3.7. Insertion of a streets code that supports active travel through provisions that include standards for footpaths suitable for walking, requirements for safe cycling infrastructure, and landscaping.
- 3.8. Revision of the Parking and Sustainable Transport Code to comprehensively treat sustainable transport as a component of active travel.
- 3.9. Revision and amendment of the use and development provisions where they prohibit urban farming (qualified agricultural use in the resource development use class).

Opportunities Outside the Tasmanian Government's Planning Reform Agenda

4. State Policies – advocate for

- 4.1. The creation of a State Policy on health, wellbeing and the built environment.
- 4.2. Amendments to the *Tasmanian State Coastal Policy 1996* to cover the provision and management of littoral (coastal) and riparian (edge of river) reserves and to provide contemporary responses to climate change, sea level, and storm surge.
- 4.3. A State Government Infrastructure State Policy on physical and social infrastructure, equitable infrastructure costs and contributions, greater certainty, and better infrastructure outcomes.
- 4.4. State of the Environment Reporting for the evaluation and monitoring of health and wellbeing policies.
- 4.5. Amendment to the *Local Government (Building and Miscellaneous Provisions) Act 1993*, or alternative legislation, providing for the taking of public open space and littoral (coastal) and riparian (edge of river) reserves.
- 4.6. Amendments to the LGAT Tasmanian Subdivision Guidelines October 2013 and Tasmanian Standard Drawings 2020 to provide for active travel for components of the documents that concern the design of streets and to have those aspects concerning the design of streets removed.
- 4.7. A review of the application of the State Policy on the Protection of Agricultural Land 2009 for contemporary policies on food security and application of the policy to protect agricultural land in the peri-urban areas.

PHASE 2 PLANNING REFORMS WORK PROGRAM
(indicative timeframes only)



Tasmanian Active Living Coalition

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To the State Planning Office

Subject: State Planning Provisions Review

Thank you for the opportunity to provide feedback on phase one of the State Planning Provisions Review. On behalf of members of the Tasmanian Active Living Coalition please find a consultation submission attached in response to the State Planning Provisions Review Scoping Paper.

The Tasmanian Active Living Coalition works together to influence and inform policies, decisions and strategies that encourage the creation of active living environments, food security and social inclusion that benefit health and wellbeing.

Yours sincerely

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Date: 17 March 2025

Tasmanian Active Living Coalition

Submission to State Planning Provisions Review

Phase I – Scoping Paper



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Introduction

The Tasmanian Active Living Coalition (TALC) welcomes the opportunity to submit feedback to the State Planning Provisions (SPPs) Review Scoping Paper under phase one of the review process.

The objective of TALC's submission is to embed health and wellbeing in the SPPs and the future Tasmanian Planning Policies. TALC proposes this can be achieved by putting a 'health in all policies' lens on the SPPs and including improved or additional provisions that support and promote active living, access to open space, food security and social inclusion.

In late 2021, TALC was commissioned to provide a discussion paper to the Premier's Health and Wellbeing Advisory Committee - *Tasmania's Planning System – Opportunities for Health and Wellbeing*. A number of key issues with Tasmania's State Planning Provisions were raised in this discussion paper and have been included in this submission.

The rationale and supporting evidence for the recommended amendments is detailed throughout the submission with a reference list attached. Individual TALC members have contributed to this submission and may have also made separate submissions on behalf of their organisations.

This submission has been approved by TALC's Chair and endorsed by TALC's membership.

About the Tasmanian Active Living Coalition

TALC is an independent, not-for-profit coalition made up of representatives from a broad range of non-Government and Government organisations with an interest in active living.

TALC members work together to influence and inform policies, decisions and strategies that encourage the creation of active living environments.

TALC's aim is to lead, support and promote the creation of environments supporting active living, and to add value by providing a mechanism for an integrated approach and potentially drive behaviour change in relation to active living.

TALC's purpose is to:

- translate evidence into policy and practice;
- build on existing partnerships and develop new partnerships as required;
- raise the profile of active living;
- support, advise and advocate for improvements in the built and natural urban environments including improved access to our parks and open spaces; and
- highlight the importance the built and natural urban environments play in active living.

The principal interest of TALC is for the SPPs to enhance (and not hinder) active living (including physical activity and active transport) and access to healthy food for community health and wellbeing.

Therefore TALC advocates to have *health and wellbeing* as priority outcomes from land use planning as regulated through the Tasmanian Planning System.

Definitions

The following terms included in this submission are defined as

Active living - a way of life that integrates physical activity into daily routines (1).

Active travel - travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling and may allow for integration of multi-modal transport in the course of a day (1).

Built environment - the structures and places in which we live, work, shop, learn, travel and play, including land uses, transportation systems and design features (2).

Food security - the ability of individuals, households and communities to physically and economically access food that is healthy, sustainable, affordable and culturally appropriate. The domains of food security include supply, demand, utilisation and access (financial and physical) (1).

Health - a state of complete physical, mental and social wellbeing and not merely the absence of disease (3).

Liveability - a livable community is one that is safe, socially cohesive, inclusive and environmentally sustainable. Highly liveable areas provide affordable housing that is well serviced by public transport, walking and cycling infrastructure (4). They have good access to employment, education, shops and services, POSs, and social, cultural and recreational facilities (4).

Physical activity - any bodily movement produced by skeletal muscles that requires energy expenditure encompassing all movement during leisure time, for transport to get to and from places, or as part of a person's work (5).

Social inclusion – is a term used to describe how government, community, business, services and individuals can work together to make sure that all people have the best opportunities to enjoy life and do well in society. It is about making sure that no one is left out or forgotten in our community (6).

Wellbeing – mental health is a state in which an individual can realise their own potential cope with normal stresses, work productively and contribute to their community (3)¹.

¹ TALC acknowledges that Tasmania will likely develop its own definition of wellbeing as part of the development of Tasmanian Health and Wellbeing Framework.

Active Living Overview

The SPPs are a key mechanism for applying healthy planning principles to the built environment in Tasmania to create liveable locations which promote physical activity, healthy eating and social connection. TALC provides the following overview of key aspects of active living which are directly related to implementation of the SPPs.

The Built Environment

The way the environment is planned, designed and built can directly affect the health and wellbeing of people who use and inhabit the space. A series in *The Lancet*, one of the top-ranking medical journals in the world, *Urban Design and Transport to Promote Healthy Lives* recognises the importance of the built environment for active living (7). The series recommends creating compact cities that locate shops, schools, other services, parks and recreational facilities, as well as jobs near homes, and providing highly connective street networks making it easy for people to walk and cycle to places (7). The Heart Foundation of Australia's *Healthy Active by Design* framework (2) notes 'planning for active living calls for a commitment to applying healthy planning principles to all levels of the planning system, at every stage of the planning process and in every planning project and policy initiative' (2).

There are many co-benefits of improving planning for active living including reductions in greenhouse gas emissions, improved air quality, reduced traffic congestion, more sustainable infrastructure, increased economic productivity, improved social capital and more liveable towns and cities (7).

Physical Activity

Physical activity is fundamental for good physical and mental health and wellbeing. Physical activity can help prevent heart disease, type two diabetes, numerous cancers, dementia, weight gain, gestational diabetes, and anxiety and depression (8). Being physically active improves sleep and improves brain function at all ages (8).

Despite this, almost half of all Tasmanians aged 18 and over do not do enough physical activity for good health (9). Tasmania is below the national average and is ranked sixth out of the eight states and territories (9).

The International Society for Physical Activity and Health outline eight investments that work to address physical inactivity (10). The eight investment areas are the evidence-based domains where Governments and organisations can get the best return on investment to improve health and wellbeing through increasing physical activity. Of the eight identified domains, those that can be directly influenced by the SPPs include: active transport, active urban design and workplaces (10).

The Heart Foundation's *Blueprint for an Active Australia* states 'reshaping the built environments in which most Australians live, work, learn and recreate can significantly increase daily physical activity levels. Community and neighbourhood design impacts on local walking, cycling and public transport use, as well as on recreational walking and physical activity' (11).

Liveability

The Heart Foundation's 2020-21 What Australia Wants survey measured community sentiment around qualities of active neighbourhoods and support for initiatives to increase infrastructure for physical activity in and around neighbourhoods (12). Tasmanians expressed a desire to live close to shops and amenities, and in a safe area that is quiet/away from main roads. Tasmanians prioritise access to healthy food, housing diversity and a sense of place (that is, safety, community, natural elements as the most important design features) (12). The report noted that 'a lower proportion of Tasmanians believe their neighbourhood helps them to be active (75 per cent compared to a national average of 80 per cent)' (12). Compared with other jurisdictions, a sense of community was rated lower – with only 58 per cent scoring it as good/excellent – below items such as quality of sports facilities and footpaths (12). These results highlight that liveability, access to healthy food and local physical activity opportunities are important to Tasmanians. However, the results also indicate that these attributes are not always accessible to Tasmanians and should be embedded within the planning system.

In 2021, Place Score ran the Australian Liveability Census, the largest social research project in Australia which included 3 200 records gathered from community members in Tasmania (13). The census explored what was most important in terms of neighbourhood liveability and current performance (13). Ideas for improving local neighbourhoods were collected and included improving walkability to local amenities and open spaces (13). Nationally, walking/jogging/bike paths that connect housing to community amenity was selected as being most important to their ideal neighbourhood by 55 per cent of respondents and ranked third most important overall.

The COVID-19 pandemic has required people to stay close to home, further highlighting the importance of how the built environment can support health and wellbeing. The living with COVID-19 landscape provides a unique opportunity to prioritise the development of liveable built environments supportive of health and wellbeing by embedding these principles with key policy levers such as the SPPs.

Integrated Policies in Active Living

Improving health and wellbeing by supporting Tasmanians to live active lives requires a coordinated approach across government agencies and sectors as called for in the World Health Organization's (WHO) 'Health in All Policies' approach to preventative health (14). In Tasmania, key existing policies which reference active living and are relevant to the SPP review are detailed as follows to provide context and background to the existing policy landscape.

The *Tasmania Statement* supports the connection between health and wellbeing enhanced by natural open spaces. It further notes the opportunities available as Tasmania grows to plan communities to create healthy, liveable and connected spaces (15). The *Tasmania Statement* creates an authorising environment for the Premier's Health and Wellbeing Advisory Council to support health and wellbeing considerations within the planning scheme.

The *Healthy Tasmania Five Year Strategic Plan 2022-26* advocates for a health in all policies approach, including an analysis of the systems outside the health sector which influence the health status of populations (16). The plan focuses on systems and supporting active living initiatives (16). This builds on earlier work under *Tasmania's Plan for Physical Activity 2011-2021* which aimed to 'create built and natural environments that enable and encourage physical activity' (17).

In 2016, a Parliamentary Select Committee Inquiry into Preventative Health Report outlined key findings and recommendations. The Heart Foundation previously highlighted the report's key findings and recommendations in relation to active living in its 2016 *Representation to the Final Draft State Planning Provisions* as follows (1):

Executive summary (page 2)

'The Committee recognises the link between health and the built environment. Liveability principles must be embedded in all Government policy decisions relating to the built environment including but not limited to transport, infrastructure and land use planning.'

Recommendation 3 (k) in relation to a preventative health strategy (page 4):

(k) The importance of active lifestyles, healthy eating and physical activity to improve the health and wellbeing of Tasmanians.

Recommendation 4 (page 4)

4. The Government's health and wellbeing policies are reflected in the Tasmanian Planning System and transport infrastructure policy.

- a) *Government adopts a state-wide planning policy that ensures liveability principles are embodied in all planning decisions;*
- b) *Government ensures transport infrastructure planning and policy decisions embody liveability principles; and*
- c) *Provisions in the new state-wide planning scheme give consideration to active transport links (e.g. walking and cycling), especially within and between urban communities.*

Findings (page 8):

22. The built environment is a significant contributor to improving longer term health and wellbeing outcomes.

23. There is a need to recognise the link between health and the built environment, and this needs to be embodied into State policy and the Tasmanian Planning System.

Health and wellbeing are embedded in the SPPs under *Schedule 1 Objectives of the Resource Management and Planning System (RMPS)* and specifically the *Land Use Planning and Approvals Act 1993 (LUPAA)* Part 2 Objective (1)(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...’

Whilst the SPP Review Scoping Paper is limited specifically to the five-year review of the SPP implementation, it will be important to subsequently review the SPPs for compatibility with Tasmanian Planning Policies currently under review. Examples of how a further detailed review of SPPs might be improved to meet Schedule 1, Part 2 Objective are comprehensively set out in the *Heart Foundation Representation to the final draft State Planning Provisions 7 March 2016* (1).

Summary of Active Living Policies

Tasmanian

Tasmania Statement – Working Together for the Health and Wellbeing of Tasmanians (15)

Healthy Tasmania Five-Year Strategic Plan 2022-26 (16)

Joint Select Committee Inquiry Into Preventative Health Report (18)

Heart Foundation Representation to the final draft State Planning Provisions 7 March 2016 (1)

Tasmania's Walking and Cycling for Active Transport Strategy 2011-2021 (17)

Hobart City Deal (19)

The Southern Tasmanian Regional Land Use Strategy (STRLUS) 2010-2035 – Regional Policies 10, 11, 13, 18 and 19 (20)

National²

National Preventative Health Strategy 2021-30 (21)

National Obesity Strategy 2022-32 (22)

Getting Australia Active III – a Systems Approach to Physical Activity for Policy Makers (8)

National Heart Foundation - Blueprint for an Active Australia (11)

National Heart Foundation – Healthy Active by Design (2)

International

Global Action Plan on Physical Activity 2018-30 (23)

International Society for Physical Activity and Health- Eight Investments that Work for Physical Activity (10)

United Nations Sustainable Development Goals (24)

² There is no **National Physical Activity Plan** to provide an overarching framework for addressing physical inactivity and guide future action. In 2020, the Australian Prevention Partnership Centre published [Getting Australia Active III : A systems approach to physical activity for policy makers](#) which identifies eight key areas for action to address physical inactivity. This serves as a guide for policy makers in Australia in the absence of a national plan.

TALC Response to Scoping Paper Questions

1. Which parts of the SPPs do you think work well?

No comment.

2. Which parts of the SPPs do you think could be improved?

Health in All Policies

The Parliament of Tasmania *Select Committee Inquiry Into Preventative Health Report* recommended Government ‘adopt a ‘Health in All Policies’ approach to improving the health and wellbeing of Tasmanians’ (18). The SPPs review provides an opportunity to better align the SPPs with a ‘Health in All Policies’ approach.

In a broader policy context, it is important to consider how the Tasmanian Planning Policies will be developed and integrated with current Government initiatives including development of a Sustainability Strategy, Wellbeing Framework and Review of Local Government.

SPP Purpose Statements clause 2.1

Currently, the Planning Scheme Purpose simply refers to the Resource Management Planning System (RMPS) objectives. The SPPs lack statements about desired outcomes, which leave the contents of the SPPs in a policy vacuum. Specifically, they do not currently reference their relationship to population health or wellbeing.

TALC recommends under the SPPs Planning Scheme Purpose clause 2.1 to include a statement of outcomes within the framework of the RMPS objectives with specific reference to health and wellbeing.

Furthermore, TALC recommends inclusion in the purpose and the objectives for each zone, use standards, development standards and codes, the desired health and wellbeing outcomes from the implementation of the specific provision.

The mechanisms by which the SPPs will further the Schedule 1 Objectives related to health and wellbeing should be explicit. For example, provisions should improve food security, social inclusion the quality of the public realm to optimise walkability, reduce travel distances between locations, improve air quality, safety, comfort, and increase active travel opportunities.

Active Living

The SPPs should focus on active living through the built environment. A key aspect of active living is the provision of public open space (POS). TALC notes the following issues relating to the provision and retention of POS:

- POS being viewed as a tradable commodity since legislation removed the requirement that POS be held in perpetuity;
- A preference away from small neighbourhood parks towards centralised playgrounds (mainly accessed by car);
- Loss of legislation requiring the provision of riparian and littoral reserves, as was the case for pre 1993 legislation;
- Planning lacking for lifecycle changes in neighbourhoods (i.e., differing requirements as residents age and young families replace); and
- Limited strategic planning for POS.

TALC proposes the following actions related to the SPPs which can have a positive impact on active living:

- Leverage off the opportunity of the COVID-19 pandemic with a renewed interest in local parks and recreation locally;
- Review the Local Government of Tasmania (LGAT) *Tasmanian Subdivision Guidelines October 2013* and *Tasmanian Standard Drawings 2020*. These documents should enhance (and not hinder) planning and design for streets which promote active travel, rather than simply focusing on engineering detail; and
- Identify elements of each Regional Land Use Strategy that relate to active living principles and align the SPPs with these. For example, taking the STRLUS, TALC recommends alignment with regional Policies 10, 11, 13, 18 and 19 (11).

TALC recommends the following provisions within the SPPs to improve active living:

- Insert use and development standards focusing on community-led housing models for increasing residential density; and
- Include standards for the provision of POS and littoral and riparian reserves.

Active Travel

TALC recommends the SPPs make specific provisions for streets that are inclusive for all users to improve active travel through:

- Permeability and connectivity of streets and paths, and limiting dead end cul-de-sacs; and

- Reviewing standards that prevent or are averse to varying street widths, alignment etc to suit the street function with reference to public transport, walking and cycling provision, zero building setbacks, shop top housing, and main street shopping.

Climate Change

Key State, National and International policies reference the link between health and wellbeing and climate change. The *Tasmania Statement* refers to climate change and health, stating ‘we need to continue to take practical action on climate change and poverty because they impact on the health and wellbeing of current and future generations of Tasmanians’ (15). Australia is a signatory to the United Nations 2030 Agenda for Sustainable Development which includes 17 Sustainable Development Goals which include addressing climate change (24). The robust research evidence and direct reference in the *Tasmania Statement* create a call to action to consider climate change across all policies and is critically relevant in reviewing the SPPs.

The Medical Journal of Australia’s 2021 report on the health impacts of climate change found that ‘Australians are increasingly exposed to and vulnerable to excess heat and that this is already limiting our way of life, increasing the risk of heat stress during outdoor sports, and decreasing work productivity across a range of sectors’ (25). In addition, the report notes that ‘other weather extremes are also on the rise, resulting in escalating social, economic and health impacts’ (25).

The Heart Foundation’s *Blueprint for an Active Australia* asserts ‘emphasising urban resilience, through inclusive, safe and sustainable design is critical to addressing climate change. Also, the national and international uptake of renewable energy can also help propel a required energy efficiency mode-shift toward more public transport and active transport modes’ (11). *Getting Australia Active III: A systems approach to physical activity for policy makers* highlights the policy co-benefits for active transport and PA including climate change mitigation (8). This policy guide asserts interventions to promote active transport need to be implemented in conjunction with interventions that address the built form and land use to achieve co-benefits of health and climate change mitigation (8).

Throughout this submission, TALC recommends provisions which support active and public transport, urban greening and public open space all of which address the impact of climate change on health and wellbeing (see summary of TALC recommendations numbers 5, 8, 9, 12 and 16). TALC recommends prioritising these provisions which provide contemporary responses to climate change.

3. What improvements do you think should be prioritised?

TALC recommends prioritising improvements supporting:

1. Provision and prioritisation of active travel modes (eg walking, cycling, public transport) and the transport infrastructure that is inclusive for all users;
2. Provision of quality footpaths and cycleway networks;
3. Access to quality POS; parks; playgrounds with shade and shelter;
4. Liveability;
5. Food security;
6. Social inclusion;
7. Climate change; and
8. Workplace health and wellbeing.

4. Are there any requirements that you don't think should be in the SPPs?

No comment.

5. Are there additional requirements that you think should be included in the SPPs?

TALC asserts that compared to the Interim Planning Schemes (in place from 2015-2021), the SPPs do not have the tools to deliver good outcomes for health and wellbeing, liveability, food security, social inclusion, climate change and workplace health and wellbeing. The following additional requirements are proposed as mechanisms for the SPPs to address the priorities outlined under question three.

Site and Building Design

Design standards have been removed from the SPPs around access to sunlight, outdoor areas, and quality green space, which is critical for health and wellbeing in the home. This has become increasingly important during restrictions in response to the COVID-19 pandemic.

TALC recommends reviewing provisions around site and building designs including:

- Requirements for north facing windows;
- Requirements for private open space to be accessed directly from living areas; and
- Requirements for landscaping.

Subdivision Design

Many subdivision standards that provide health and wellbeing outcomes have been removed from the SPPs. Well-designed subdivisions are critical to active living and active travel. Compact neighbourhoods, provision of housing choice and diversity, wayfinding and POS are critical for promoting access to services and active living. Well-designed neighbourhoods that provide opportunities for healthy living have become increasingly more important during the COVID-19 pandemic.

TALC notes the following omissions around subdivision design:

- The STRLUS sets a target of 15 dwellings per hectare. This was an objective in the General Residential Zone standards in interim schemes, as was promotion of higher densities closer to services, facilities and public transport corridors and planning controls to achieve this; and
- The SPPs provide no density targets and no standards to require higher densities closer to services (minimum lot size of 450m² and no maximum lot size). For example, a developer could be advised by a real estate agent that 700m² lots are selling best and therefore deliver only lots at this size (approximately 10 dwelling per hectare).

TALC recommends the following key actions to address these issues:

- Re-instate design standards as per the Interim Planning Schemes into the Residential Zones in the SPPs; and
- Urgently review General Residential Zone Development and Subdivision standards from the SPPs with liveability and health and well-being at front of mind.

Public Open Spaces Code

Ways and POS requirements have been removed from the SPPs. Previous interim schemes included provisions for high-quality POS and wayfinding. This now falls to individual Council Policies under the *Local Government (Building and Miscellaneous) Act 1993*, which lacks consistency and transparency for stakeholders. The SPPs offer an opportunity to significantly enhance POS. This can be through improving the value and use of existing POS, such as parks and natural areas, through ensuring they are useable, accessible and have sufficient facilities to encourage maximum utilisation (such as public toilets, seating, play equipment, and shade). There is also opportunity the provision of new POS including parks and natural areas, greenways, landscaping and planting, community gardens, and areas that foster a sense of community whilst providing a greater connection with nature.

POS comprise spaces that are freely accessible to everyone such as streets, squares, parks, natural features, landmarks, building interfaces, green spaces, pedestrian and bike ways, and other outdoor

places (2). POS should not be seen in isolation but in the context of adjacent buildings, its uses and location in a wider network of public and private spaces.

The quality of the POS influences how much time people spend being active or in nature, both of which directly influence health and wellbeing. Public areas that are aesthetically pleasing, safe, clean and comfortable attract people to the area thus leading to increased walking, cycling, and opportunities for social interaction. The Heart Foundation's *Healthy Active by Design* framework reports that residents with a larger neighbourhood parks within 1600 m engage in 150 minutes more recreational walking per week than those with smaller parks (2). Research links physical activity in or near green space to important health outcomes including obesity reduction, lower blood pressure and extended life spans (26). Sufficient provision of POS including parks and reserves, sporting facilities, community gardens and greenways is important in supporting opportunities for being active.

TALC recommends the development of a specific Public Open Spaces Code which includes detailed provisions on POS within the Tasmanian planning system.

Urban Greening

A growing body of evidence demonstrates that urban green spaces, such as parks, playgrounds, and residential greenery, help keep cities cool, act as places of recreation, support physical activity and improve mental health (11, 26, 27).

TALC notes a lack of opportunities to encourage green infrastructure under the SPPs. TALC's Discussion Paper - *Tasmania's Planning System – Opportunities for Health and Wellbeing* demonstrated difficulties in providing green spaces under the SPPs through a case study of Brighton Council's *Greening Brighton Strategy* (the Strategy). The Strategy aims to increase trees across Brighton's urban areas through strategic tree planting, including in private developments and subdivisions.

Implementation of the Strategy under the SPPs is extremely difficult, given the provisions do not promote urban greening at all. There are no landscaping requirements for units, commercial developments, streets, or vegetation retention (except if priority vegetation). To address the limitations of the SPPs, Council tried to introduce a Landscaping Specific Area Plan as part of its Local Provisions Schedule (LPS), but it was rejected by the Tasmanian Planning Commission. This case study demonstrates the roadblocks created by the SPPs for local government in providing green spaces.

Research indicates that urban greenery including trees, vegetation and green surfaces (eg roofs and facades) can act as mechanisms for cooling within cities, helping mitigate the urban heat island effect and climate change (26). Urban greenery can reduce temperatures by 1- 4 °C (26).

TALC recommends the SPPs include provisions for urban greening such as landscaping requirements for multiple dwellings and commercial or industrial use, street trees, vegetation and green surfaces, and green POS.

Multiple Dwelling Units

Multiple dwelling units are generally smaller and have less private open space thus increasing demand for quality POS provision. Multiple dwelling units are also often inward facing and have poor passive surveillance to street frontages. They have no public land and when developed on larger sites often block potential connectivity to surrounding land. Body Corporates can be problematic on larger sites and include ongoing costs for the owner that are effectively passed on by the developer in choosing strata over subdivision.

A local example of increasing multiple dwelling units can be seen in Brighton Council on large sites as opposed to subdivisions. It can be assumed that in part this is to do with avoiding POS contribution fees and other subdivision costs (eg utility connections). This impacts on the liveability of these residential areas as they lack access to POS, connectivity through active and public transport and reduced passive surveillance.

TALC recommends the SPPs include provisions which encourage subdivision instead of strata where possible and ensure there is equity in dwelling density settings, POS contributions, improved passive surveillance and connectivity.

Social inclusion

The *Joint Select Committee Inquiry Into Preventative Health Report* identified social inclusion as a key social determinant that impacts on health (18). The report highlighted the importance of a focus on implementation of measures increasing social inclusion across all government agencies (18).

The way density is designed should account for the varying needs of different population groups. Designing and locating safe, affordable, well-connected, higher density housing options is important for different age groups to be able to access the housing market appropriate for their lifestyle and situation (28). Providing a diversity of housing options increases the likelihood that people of lower socioeconomic backgrounds have convenient access to public transport, health services, schools and employment opportunities (28). Ensuring people can work close to where they live will provide more equitable access to employment and services.

The quality of the public realm influences whether people feel safe and comfortable in that area as well as opportunities for social interaction, particularly for women and children. Design of the public realm supports social inclusion through taking into account how that space operates during different times of the day, with different demographics using it, and across all seasons of the year (29).

Feeling unsafe in public spaces has a significant impact on whether residents, specifically women, the elderly and young children are prepared to use them. Designing spaces which support activities attract more people and promote the perception that they are orderly and peaceful, can be important for social groups in enhancing active living opportunities, and support overall community liveability (29).

It is important to consider the role of the built environment on mobility limitations and disability to ensure accessible movement networks are created and maintained. This will support older adults to age in place and improve quality of life through the encouragement of participation in physical activity, exposure to the natural environment, and social interaction with friends and neighbours (29).

Access to local opportunities for physical activity for exercise, recreation or active transport supports social inclusion and builds a sense of community connectedness beneficial to health and wellbeing (2, 11). The Heart Foundation's *Healthy Active by Design* resource asserts that 'an essential part of good governance is embedding a socially inclusive and respectful approach to older people into policies and processes' (2). This principle could equally be applied to how the SPPs impact all social determinants of health. The design of the places we live, work and play must be inclusive of all community members.

The SPPs can act as a mechanism to enhance social inclusion by providing safe, affordable, well-connected, higher density housing options, access to public open/green space, safe and enjoyable active travel networks to a variety of destinations with a focus on equity and inclusion (1, 11, 29).

6. Are there any issues that have previously been raised on the SPPs that you agree with or disagree with?

Liveable Streets Code

TALC is aware of and supports the Heart Foundation's previous recommendation of the development of a Liveable Streets Code in their 2016 *Representation to the final draft State Planning Provisions* (1). A Liveable Streets code, or similar, would provide measurable standards to the assessment of permit applications (1).

In addition, a Liveable Streets Code would support active travel through provisions that include standards for footpaths suitable for walking and requirements for safe cycling infrastructure.

Specifically, TALC recommends such a code address the following issues:

- Resolve confusing provisions over streets and roads; and

- Remove the exemption status from planning scheme permit requirements for upgrading of streets/roads to allow active travel to be realised.

C2.0 Parking and Sustainable Transport Code

Under section C2.0 'general comments' in the *Summary of Issues Previously Raised on the SPPs* document, TALC agrees with the comment that car parking space requirements are excessive and do not encourage other forms of sustainable transport (e.g. public transport and active transport) and impacts on liveability.

TALC recommends revising the Parking and Sustainable Transport Code to comprehensively treat 'sustainable transport' as a component of active travel.

TALC is aware of and supports Bicycle Network Tasmania's recommendations for the provision of bike parking for both visitors and employees, provision of safe and secure bike parking, end of trip facilities as well as introduction of provisions for bike parking in apartment buildings.

Workplace health

The Heart Foundation's 'Blueprint for an Active Australia outlines evidence on the importance of being active in the workplace.

The workplace is increasingly being recognised (nationally and internationally) as a priority high reach setting for health behaviour interventions, extending from a labour-based approach to a public health 'healthy workers' approach (11).

In general, a physically active workforce can improve physical and mental health, reduce absenteeism and increase productivity, thereby providing important benefits to individuals and workplaces (11). Workplaces should see the implementation of physical activity programs as a strategic business enhancement opportunity (11).

TALC is aware of and supports the Heart Foundation's previous detailed recommendations related to workplace health in their 2016 *Representation to the final draft State Planning Provisions* (1). The representation asserts that workplaces can 'support increased levels of physical activity through the design of a building's circulation system, encouragement of stair use, the provision of end-of-trip facilities (such a secure bicycle storage and change facilities), and there is convenient and safe access to public transport' (1). In addition, 'safe access to workplaces by active travel is enhanced where buildings provide for natural surveillance of outside spaces and the street' (1).

The SPPs provide a mechanism for supporting healthy workplaces through provisions that address these barriers and enablers to physical activity in the workplace and during commutes. TALC recommends reviewing provisions related to workplaces to enhance physical activity in line with recommendations previously made by the Heart Foundation in 2016 (1).

Food Security

Whilst TALC's primary interest in the SPP review is in reference to active living, the importance of a food system that provides access to healthy and affordable food locally is acknowledged. A more-accessible urban environment in which active travel can be used to access healthy local food provides a range of health, wellbeing and environmental benefits (4).

The *Joint Select Committee Inquiry Into Preventative Health Report* specifically references access to food under finding 30 'it is important that people have access to healthy affordable food' (18).

TALC is aware of the Heart Foundation's extensive recommendations relating to food security outlined in their *Representation to the final draft State Planning Provisions 2016* (1). Whilst comments to this level of detail are out of scope for this submission, TALC is supportive of the Heart Foundation's food security recommendations.

7. Are there any of the issues summarised in the Review of Tasmania's Residential Development Standards – Issues Paper that you agree or disagree with?

3.2 Planning Directive No. 4.1 and the SPPs

In reference to the revision of prescriptions for north facing windows: TALC recommends this directive is revisited and considered in tandem with other energy efficient aspects of building design. While a north facing window is not a discrete measure of success, it is one element that contributes to energy performance of a dwelling alongside other measures.

4.3 Detailed comments on residential development standards

TALC recommends redrafting of Residential Development Standards to reference open space in relation to access, dimensions, permeable surfaces, green areas, privacy, and solar access. Providing direct access to open space from habitable rooms can encourage biophilic design and connection with nature, enhancing the indoor-outdoor relationship. Incorporating these principles within urban infill environments and higher density residential developments enhance liveability and active living (4).

4.3.6 Standards for garage and carport opening widths

TALC recommends in the case of multiple dwellings and group developments, consideration be given to laneways, rear access, and grouping of driveways to reduce the number of crossings and maximise pedestrian access.

4.3.8 Frontage fences

Fence height and transparency contributes towards crime prevention through environmental design by allowing sightlines between habitable rooms and the street ('eyes on the street') (30). This supports active living through enabling people to transverse public spaces at different times of the day with passive surveillance in turn reducing crime (30).

4.4 Other issues

Tandem or jockey car parking spaces are not supportive of active living unless in a policy environment supportive of electric vehicles. TALC recommends individual parking spaces should be reduced, and public transport and other active forms of travel prioritised.

Summary of TALC recommendations for SPP review

1. Consider how the Tasmanian Planning Policies will be developed and integrated with existing relevant policies and planned policies (eg Sustainability Strategy, Wellbeing Framework and Review of Local Government).
2. Reference health and wellbeing outcomes in the SPPs including:
 - 2.1. Clause 2.1 purpose to state how the RMPS objectives give effect to health and wellbeing.
 - 2.2. Inclusion in the purpose and the objectives for each zone, use standard, development standard, and codes the desired health and wellbeing outcomes from the implementation of the specific provision.
 - 2.3. Detail the mechanisms by which the SPPs will further the Schedule 1 Objectives related to health and wellbeing.
3. Insert use and development standards focusing on community led housing models for increasing residential density.
4. Include standards for the provision of POS and littoral and riparian reserves.
5. Improve provisions for active transport which provide:
 - 5.1. Permeability and connectivity of streets and paths;
 - 5.2. Limited dead end cul-de-sacs; and
 - 5.3. Varying street widths and alignment to suit the street function.
6. Review provisions around site and building designs including:
 - 6.1. Requirements for north facing windows;
 - 6.2. Requirements for private open space to be accessed directly from living areas; and
 - 6.3. Requirements for landscaping
7. Review of provisions for subdivision design including:
 - 7.1. Re-instate design standards as per the Interim Planning Schemes into the Residential Zones in the SPPs; and
 - 7.2. Urgently review General Residential Zone Development and Subdivision standards from the SPPs with liveability and health and well-being at front of mind.
8. Development of a specific Public Open Spaces Code which includes detailed provisions on POS within the Tasmanian planning system.
9. Revise provisions related to urban greenery including:
 - 9.1. Landscaping requirements for multiple dwellings and commercial or industrial use;
 - 9.2. Require street trees in new subdivisions; and
 - 9.3. Provisions for access to open green space.
10. Revise provisions related to multiple dwelling units to:
 - 10.1. Encourage subdivision instead of strata where possible;
 - 10.2. Ensure equity in dwelling density settings;

- 10.3.Ensure POS contributions; and
- 10.4.Improve passive surveillance and connectivity.
- 11. Social Inclusion - consider how the SPPs can promote social inclusion.
- 12. Development of a Liveable Streets Code in line with the Heart Foundation's 2016 *Representation to the final draft State Planning Provisions* (1).
- 13. Review of the Parking and Sustainable Transport Code to:
 - 13.1.Comprehensively treat 'sustainable transport' as a component of active travel; and
 - 13.2.Include provisions for safe and secure bike parking, end of trip facilities as well as introduction of provisions for bike parking in apartment buildings.
- 14. Workplace health and wellbeing - reviewing provisions related to workplaces to enhance physical activity in line with recommendations previously made by the Heart Foundation in 2016 (1).
- 15. Food security – review of the Heart Foundation's extensive recommendations relating to food security outlined in their *Representation to the final draft State Planning Provisions 2016* (1).
- 16. Further review of the Residential Development Standards including:
 - 16.1.provision of POS;
 - 16.2.Provisions for laneways, rear access, and grouping of driveways to maximise pedestrian access in multiple dwellings and group developments;
 - 16.3.Requirements for parking spaces and provisions for secure bicycle parking;
 - 16.4.Provision of north facing windows;
 - 16.5.Consideration of crime prevention through environmental design principles; and
 - 16.6.Prioritising active transport modes and limiting individual car parking spaces.

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Tasmanian Active Living Coalition

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Tasmanian Housing Strategy
Department of Communities Tasmania
GPO Box 65
Hobart Tasmania 7001

ATTN: Tasmanian Housing Strategy

Subject: Tasmanian Housing Strategy Discussion Paper

Thank you for the opportunity to provide feedback on phase one of the Tasmanian Housing Strategy Discussion Paper. On behalf of members of the Tasmanian Active Living Coalition please find a consultation submission attached in response to the Tasmanian Housing Strategy Discussion Paper.

The Tasmanian Active Living Coalition works together to influence and inform policies, decisions and strategies that encourage the creation of active living environments, food security and social inclusion that benefit health and wellbeing.

Yours sincerely

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Date: 17 March 2025

Tasmanian Active Living Coalition

Submission to Tasmanian Housing Strategy

Discussion Paper



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Introduction

The Tasmanian Active Living Coalition (TALC) welcomes the opportunity to submit feedback to the Tasmanian Housing Strategy (THS) Discussion Paper.

The objective of TALC's submission is to embed health and wellbeing in the THS and its implementation. TALC proposes this can be achieved by putting a 'health in all policies' lens on the THS and including policy and plans that support and promote active living, access to open space, food security and social inclusion.

In late 2021, TALC was commissioned to provide a discussion paper to the Premier's Health and Wellbeing Advisory Committee - *Tasmania's Planning System – Opportunities for Health and Wellbeing*. Key issues with Tasmania's State Planning Provisions (SPPs) were raised in this discussion paper and have been included in this submission.

The rationale and supporting evidence for the recommended amendments is detailed throughout the submission with a reference list attached. Individual TALC members have contributed to this submission and may have also made separate submissions on behalf of their organisations.

This submission has been approved by TALC's Chair and endorsed by TALC's membership.

About the Tasmanian Active Living Coalition

TALC is an independent, not-for-profit coalition made up of representatives from a broad range of non-Government and Government organisations with an interest in active living.

TALC members work together to influence and inform policies, decisions and strategies that encourage the creation of active living environments.

TALC's aim is to lead, support and promote the creation of environments supporting active living, and to add value by providing a mechanism for an integrated approach and potentially drive behaviour change in relation to active living.

TALC's purpose is to:

- translate evidence into policy and practice;
- build on existing partnerships and develop new partnerships as required;
- raise the profile of active living;
- support, advise and advocate for improvements in the built and natural urban environments including improved access to our parks and open spaces; and
- highlight the importance the built and natural urban environments play in active living.

The principal interest of TALC is for the THS to enhance (and not hinder) active living (including physical activity and active travel) and access to healthy food for community health and wellbeing.

Therefore, TALC advocates to have health and wellbeing as priority objectives and outcomes of the THS.

Definitions

The following terms included in this submission are defined as follows.

Active living - a way of life that integrates physical activity into daily routines (Heart Foundation, 2016).

Active travel - travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling and may allow for integration of multi-modal transport in the course of a day (Heart Foundation, 2016).

Built environment - the structures and places in which we live, work, shop, learn, travel and play, including land uses, transportation systems and design features (National Heart Foundation of Australia, 2017).

Food security - the ability of individuals, households and communities to physically and economically access food that is healthy, sustainable, affordable and culturally appropriate. The domains of food security include supply, demand, utilisation and access (financial and physical) (Heart Foundation, 2016).

Health - a state of complete physical, mental and social wellbeing and not merely the absence of disease (World Health Organization, 2022a).

Liveability - a liveable community is one that is safe, socially cohesive, inclusive and environmentally sustainable. Highly liveable areas provide affordable housing that is well serviced by public transport, walking and cycling infrastructure (Department of Agriculture Water and the Environment, 2021). They have good access to employment, education, shops and services, POSs, and social, cultural and recreational facilities (Department of Agriculture Water and the Environment, 2021).

Physical activity - any bodily movement produced by skeletal muscles that requires energy expenditure encompassing all movement during leisure time, for transport to get to and from places, or as part of a person's work (World Health Organization, 2022b).

Social inclusion – is a term used to describe how government, community, business, services and individuals can work together to make sure that all people have the best opportunities to enjoy life and do well in society. It is about making sure that no one is left out or forgotten in our community (Social Inclusion Unit, 2008).

Wellbeing – mental health is a state in which an individual can realise their own potential cope with normal stresses, work productively and contribute to their community (World Health Organization, 2022a)¹.

¹ TALC acknowledges Tasmania will likely develop its own definition of wellbeing as part of the development of Tasmanian Health and Wellbeing Framework.

Response to Discussion Paper Questions

Overview

Should the vision for the Strategy include other factors?

Physical activity is a modifiable behaviour critical for the prevention and management of a range of common, chronic and costly conditions such as cardiovascular disease, type 2 diabetes, hypertension, obesity, depression, and anxiety (Bellew et al., 2020). Yet less than half of Australian adults (including Tasmanians) undertake physical activity at the levels recommended for good health (150 mins/week) (Australian Bureau of Statistics, 2018). Improving health and wellbeing by supporting Tasmanians to live active lives requires a coordinated approach across government agencies and sectors as called for in the World Health Organization's (WHO) 'Health in All Policies' approach to preventative health (World Health Organization, 2022c). In Tasmania, key existing policies which reference to active living and are relevant to the THS are listed under Appendix I to provide context and background to the existing policy landscape. Key Tasmanian policy relevant to the THS are highlighted as follows.

The *Tasmania Statement* supports the connection between health and wellbeing enhanced by natural open spaces. It further notes the opportunities available as Tasmania grows to plan communities to create healthy, liveable and connected spaces (Premier's Health and Wellbeing Advisory Council, 2021). The *Tasmania Statement* creates an authorising environment for the Tasmanian State Government to support health and wellbeing considerations within the planning scheme.

The *Healthy Tasmania Five Year Strategic Plan 2022-26* advocates for a health in all policies approach, including an analysis of the systems outside the health sector which influence the health status of populations (Department of Health and Human Services, 2022). The plan focuses on systems and supporting active living initiatives (Department of Health and Human Services, 2022). This builds on earlier work under *Tasmania's Plan for Physical Activity 2011-2021* which aimed to 'create built and natural environments that enable and encourage physical activity' (Department of Infrastructure, 2010).

In 2016, a Parliamentary Select Committee Inquiry into Preventative Health Report outlined key findings and recommendations.

Executive summary (page 2)

'The Committee recognises the link between health and the built environment. Liveability principles must be embedded in all Government policy decisions relating to the built environment including but not limited to transport, infrastructure and land use planning.'

Recommendation 3 (k) in relation to a preventative health strategy (page 4):

(k) The importance of active lifestyles, healthy eating and physical activity to improve the health and wellbeing of Tasmanians.

Recommendation 4 (page 4)

4. The Government's health and wellbeing policies are reflected in the Tasmanian Planning System and transport infrastructure policy.

- a) Government adopts a state-wide planning policy that ensures liveability principles are embodied in all planning decisions;*
- b) Government ensures transport infrastructure planning and policy decisions embody liveability principles; and*
- c) Provisions in the new state-wide planning scheme give consideration to active travel links (eg walking and cycling), especially within and between urban communities.*

Findings (page 8):

22. The built environment is a significant contributor to improving longer term health and wellbeing outcomes.

23. There is a need to recognise the link between health and the built environment, and this needs to be embodied into State policy and the Tasmanian Planning System.

Health and wellbeing are embedded in the State Planning Provisions (currently under review) under *Schedule 1 Objectives of the Resource Management and Planning System (RMPS)* and specifically the *Land Use Planning and Approvals Act 1993 (LUPAA)* Part 2 Objective (1)(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...'

Furthermore, the Tasmanian Planning Policies are currently under development and will also be relevant to the THS.

The existing policy context in Tasmania provide clear recommendations that all future Government policy should adopt a *Health in All Policies approach*, which is directly relevant to the THS. Therefore, TALC recommends the vision includes reference to health and wellbeing.

For example:

Every Tasmanian has access to safe, secure and affordable housing with access to the necessary infrastructure that supports health and wellbeing and sustainable communities.

OR

Every Tasmanian has access to safe, secure, healthy and affordable housing.

Are there important issues not covered by the focus areas?

TALC recommends the THS include a Health and Wellbeing focus area which has objectives and outcomes related to the built environment, active travel, public open space (POS), green spaces and liveability. The links between health and wellbeing and these factors are detailed as follows.

Housing and Health and Wellbeing

Housing has a significant influence on health and wellbeing. In addition to providing shelter, safety, security and privacy, having affordable, sustainable and appropriate housing enables people to better participate in the social, economic and community aspects of their lives (Australian Institute of Health and Welfare, 2022). The construction and design of housing as well as the social and neighbourhood environment can affect physical and mental health and quality of life (Australian Institute of Health and Welfare, 2022).

The THS has an opportunity to contribute to improved health and wellbeing objectives by including outcomes which:

1. improve the built environment;
2. link housing with active travel infrastructure;
3. link housing with POS and green spaces; and
4. improve the liveability of housing.

The Built Environment

The way the environment is planned, designed and built can directly affect the health and wellbeing of people who use and inhabit the space. The Lancet, one of the top-ranking medical journals in the world, published the series Urban Design and Transport to Promote Healthy Lives recognising the importance of the built environment for active living (Goenka and Andersen, 2016). The series recommends creating compact cities locating shops, schools, other services, parks and recreational facilities, as well as jobs near homes, and providing highly connective street networks making it easy for people to walk and cycle to places (Goenka and Andersen, 2016).

The Heart Foundation Australia's Healthy Active by Design framework (National Heart Foundation of Australia, 2017) notes 'planning for active living calls for a commitment to applying healthy planning principles to all levels of the planning system, at every stage of the planning process and in every planning project and policy initiative' (National Heart Foundation of Australia, 2017).

There are many co-benefits of improving planning for active living including reductions in greenhouse gas emissions, improved air quality, reduced traffic congestion, more sustainable infrastructure, increased economic productivity, improved social capital and more liveable towns and cities (Goenka and Andersen, 2016).

The COVID-19 pandemic has required people to stay close to home, further highlighting the importance of how the built environment can support health and wellbeing. The living with COVID-19 landscape provides a unique opportunity to prioritise the development of liveable built environments supportive of health and wellbeing by embedding these principles with key policy levers such as the THS.

TALC recommends the THS include outcomes related to the improvement of the built environment in which housing is provided/developed.

Active travel

Active travel is the process of being physically active (usually walking or cycling) while moving from one place to another and can include multiple modes of transport in one trip. Active travel provides physical and mental health and wellbeing benefits, as well as reductions in greenhouse gas emissions and traffic congestion and less noise and air pollution (Australian Institute of Health and Welfare, 2016, Bellew et al., 2020).

Australian research indicates two key factors encourage walking for transport: 'the connectivity of streets (more intersections, fewer big blocks) and a high number of local living destinations, such as supermarkets, shops, parks and public transport, within 1600m' (Giles-Corti et al., 2017).

International research has led to recognised standard distances to a range of amenities of 400m - 800m about a 10 - 20 minute walk (Sallis et al., 2012). Other factors associated with increased active travel include safety from traffic, well-lit streets and the presence of footpaths (Australian Institute of Health and Welfare, 2016, Sallis et al., 2012). The Heart Foundation's *Support for a State Policy for Healthy Spaces* identifies some standards for walking infrastructure (Heart Foundation, 2019).

To optimise active travel opportunities investments should ensure that housing is situated in areas that have:

- Connected street networks (that include footpaths and cycling infrastructure)
- Easy access to a diversity of destinations and to public transport
- The housing (and therefore population) density required to make mixed use planning and public transport services viable (Bellew et al., 2020)

Mechanisms to achieve these might include:

- Subdivision standards in residential zones for planning schemes

- Provisions under the TPPs
- Retrofitting of existing neighbourhoods that do not currently meet standards through government grants and programs

Whilst these mechanisms fall outside the scope of the THS, TALC recommends locally relevant measurable standards are established under the THS for target distances to facilities as well as standards for adjacent foot paths and cycle ways.

Public Open Space and Green Space

POS comprise spaces freely accessible to everyone such as streets, squares, parks, natural features, landmarks, building interfaces, green spaces, pedestrian and bike ways, and other outdoor places (National Heart Foundation of Australia, 2017). POS should not be seen in isolation but in the context of adjacent buildings including housing, its uses and location in a wider network of public and private spaces.

The quality of the POS influences how much time people spend being active or in nature, both of which directly influence health and wellbeing. Public areas which are aesthetically pleasing, safe, clean and comfortable attract people to the area thus leading to increased walking, cycling, and opportunities for social interaction. The Heart Foundation's Healthy Active by Design framework reports residents with a larger neighbourhood parks within 1600 m engage in 150 minutes more recreational walking per week than those with smaller parks (National Heart Foundation of Australia, 2017). Research links physical activity in or near green space to important health outcomes including obesity reduction, lower blood pressure and extended life spans (Davern et al., 2017). Sufficient provision of POS including parks and reserves, sporting facilities, community gardens and greenways is important in supporting opportunities for being active.

A growing body of evidence demonstrates urban green spaces, such as parks, playgrounds, and residential greenery, help keep cities cool, act as places of recreation, support physical activity and improve mental health (Byrne, 2021, National Heart Foundation of Australia, 2019, Davern et al., 2017). Research indicates urban greenery including trees, vegetation and green surfaces (eg roofs and facades) can act as mechanisms for cooling within cities, helping mitigate the urban heat island effect and climate change (Davern et al., 2017). Urban greenery can reduce temperatures by 1- 4 °C (Davern et al., 2017).

Currently, the Tasmanian Planning Scheme does not encourage urban greening as there is no requirement for landscaping to be provided in developments or subdivision in the residential zones. TALC recommends the THS include outcomes related to the provision of and/or access to POS and green space.

Liveability

The Heart Foundation's 2020-21 What Australia Wants survey measured community sentiment around qualities of active neighbourhoods and support for initiatives to increase infrastructure for physical activity in and around neighbourhoods (National Heart Foundation of Australia, 2020).

Tasmanians expressed a desire to live close to shops and amenities, and in a safe area that is quiet/away from main roads. Tasmanians prioritise access to healthy food, housing diversity and a sense of place (that is, safety, community, natural elements as the most important design features) (National Heart Foundation of Australia, 2020). The report noted that 'a lower proportion of Tasmanians believe their neighbourhood helps them to be active (75 per cent compared to a national average of 80 per cent)' (National Heart Foundation of Australia, 2020). Compared with other jurisdictions, a sense of community was rated lower – with only 58 per cent scoring it as good/excellent – below items such as quality of sports facilities and footpaths (National Heart Foundation of Australia, 2020). These results highlight liveability, access to healthy food and local physical activity opportunities are important to Tasmanians.

In 2021, Place Score ran the Australian Liveability Census, the largest social research project in Australia which included 3 200 records gathered from community members in Tasmania (Malshe et al., 2021). The census explored what was most important in terms of neighbourhood liveability and current performance (Malshe et al., 2021). Ideas for improving local neighbourhoods were collected and included improving walkability to local amenities and open spaces (Malshe et al., 2021).

Nationally, walking/jogging/bike paths connecting housing to community amenity was selected as being most important to their ideal neighbourhood by 55 per cent of respondents and ranked third most important overall.

The COVID-19 pandemic has required people to stay close to home, further highlighting the importance of how the built environment can support health and wellbeing. The living with COVID-19 landscape provides a unique opportunity to prioritise the development of liveable built environments supportive of health and wellbeing by embedding these principles with key policy levers such as the THS.

TALC recommends the THS include outcomes related to improved liveability of housing locations.

Food Security

Whilst TALC's primary interest in the THS is in reference to active living, the importance of a food system providing access to healthy and affordable food locally is acknowledged. A more accessible urban environment in which active travel can be used to access healthy local food provides a range of health, wellbeing and environmental benefits (4).

The *Joint Select Committee Inquiry Into Preventative Health Report* specifically references access to food under finding 30 'it is important that people have access to healthy affordable food' (18).

TALC is aware of the Heart Foundation's extensive recommendations relating to food security outlined in their *Representation to the final draft State Planning Provisions 2016* (1).

Whilst TALC notes adopting specific recommendations on food security are out of scope of the THS, the strategy can play a significant role in improving food security through the consideration of access to healthy food in areas of housing supply. TALC recommends reference is made to the role of the THS in food security in Tasmania.

Are there additional objectives that are important for Tasmanians and should be included?

The TALC acknowledges the three existing objectives of the THS outlined in the Discussion Paper:

- Improved housing affordability in Tasmania
- Improved housing supply that meets the needs of Tasmanians now and into the future.
- Improved sustainability of housing into the future.

The principal interest of TALC is for the THS to enhance (and not hinder) active living (including physical activity and active travel) and access to healthy food for community health and wellbeing. As outlined under question two, the 'additional issues not covered by the focus areas' principally relate to health and wellbeing outcomes. Therefore TALC advocates to have health and wellbeing included as priority outcomes under the THS.

TALC proposes an additional objective relevant to health and wellbeing, for example:

- Improved health and wellbeing through housing.

Are there additional housing outcomes that are important for Tasmanians and should be included?

As outlined in question 3, TALC recommends the addition of the objective:

- Improved health and wellbeing through housing.

Outcomes related to this additional objective may include:

- Homes are located within 1600 metres of amenities, centred around the '20 minute' neighbourhood concept.
- Homes are within 1600 metres of walking and cycling tracks to support active travel modes.
- Homes are within 1600 metres of POS and green spaces.
- Homes are in areas rated as highly liveable.

Focus Area One: Affordable Housing

TALC makes the general observation that the outcome 'more affordable housing for Tasmanians on low incomes' could be further clarified to indicate whether the outcome is that existing stock of housing is more affordable or that additional affordable housing stock is made available.

What additional interventions could governments consider to improve housing affordability?

TALC recommends investigation of interventions such as affordable housing offset schemes and developer contributions (i.e. in new greenfield developments), where five to 15 per cent of housing stock delivered as affordable housing by measures such as purchase price, affordable design features, and location. Such interventions could be led by Housing Tasmania in partnership with Local Governments and implemented through the TPS, allied policies and/or agreements under legislation (i.e. a Part 5 Agreement under the *Land Use Planning and Approvals Act 1993*).

Examples of offset schemes could be investigated and are interconnected with liveability are as follows:

- Section 62 Planning Permit Conditions of the *Planning & Environment Act 1987* (Victoria)
 - Planning permit conditions requiring payment for or provision of infrastructure can validly be imposed, where the permit condition requires, in the implementation of a payment-in-lieu of parking provision in accordance with a parking precinct plan approved for the relevant Planning Scheme.
 - The payment or provision of a POS contribution up to five per cent of the site value of the land in accordance with Section 18 of the *Subdivision Act 1988*.
 - The payment of an infrastructure levy in accordance with an approved Development Contribution Plan.
- Community Infrastructure Levies (CILs), the United Kingdom
 - CILs are a planning charge, introduced by the Government through the *Planning Act 2008*, to provide a fair and transparent means for ensuring that development contributes to the cost of the infrastructure it will rely upon (i.e. schools, roads).
 - The levy applies to most new buildings with charges based on the size and type of new floor space.
 - CIL, as a general levy on all development, is designed to raise funds for infrastructure needed generally as a result of an increase in development of an area and local Planning Authorities can use CIL money to provide or improve infrastructure, and to pay for the operation and maintenance of this infrastructure.
- Section 94 Development Contributions, New South Wales

- S. 94 provisions under the *Environment Planning and Assessment Act 1979* enable Councils to obtain development contributions as a means for funding local infrastructure and services that are required as a result of new development.
- Section 94 is an efficient means of reducing the impact of future development on the provision and financing of public amenities and services as it internalises the impacts to individual developments.

TALC recommends requirements for mandatory disclosure of energy ratings in residential development (ie as measured by the National House and Energy Rating Scheme under the National Construction Code) to generate accountability of the building industry to delivering more affordable stock, such as is implemented in the Australian Capital Territory.

What scope is there to increase the role of the private and community sectors in improving housing affordability?

The National Housing and Homelessness Agreement (NHHA) provides funding and mechanisms for Strategy Preparation and cascading levers and partnerships with a range of stakeholders across the housing continuum, including the private sector (i.e. investors, market developers) and the community sector (i.e. community housing providers, supported accommodation services, and allied services, such as those for persons exiting homelessness and entering social or affordable housing accommodation).

The levers mentioned above (i.e. offset schemes, mandatory disclosure) are examples of policy levers that can be used to improve affordable housing outcomes through the private sector. The community sector has a continuum of competency and effectiveness depending upon the governance, funding mechanisms and maturity of the organisation. For instance, Community Housing Providers (CHPs) are ranked according to tier under National Legislation and this determines the sophistication of housing products that they can deliver, including health and wellbeing outcomes, good design, and liveability by location and other parameters (i.e. acquisition of property in central locations that can optimise liveable outcomes for vulnerable cohorts). Tier 1 CHPs, such as Anglicare, are major providers that may have more advanced development models and therefore have capacity to scale up to an increasingly holistic focus upon health, wellbeing and liveability outcomes for their clients (i.e. social housing tenants). However, Tier 3 providers may be smaller, fragmented not-for-profits less resilient to political cycles and subsequent funding changes, governance adjustments and staff turnover. In turn, their capacity to achieve resilience is less. Therefore, any focus upon improving design outcomes through design and development in community housing should focus upon Tier 1 providers with lessons and outcomes cascading down and building capacity of lower tiers.

TALC recommends the development of Design Guidelines tailored to the above stakeholders across the Housing Continuum, health, wellbeing, and liveability outcomes can be improved. Drafting of such guidelines is a common approach employed by State Housing Departments and Statutory Land Development Corporations to achieve such outcomes. For example, liveability and sustainability guidance was provided in the development of the Alkimos Beach Greenfield Development in Perth, Western Australia. This was facilitated by the State Government's Land Development arm.

What other issues would you like to be considered regarding housing affordability?

TALC acknowledges the speculative nature of the development industry within Australia and how this fundamentally compromises good, long term design outcomes in housing and has cascading effects on the health, wellbeing, and liveability outcomes of populations in both urban and regional areas. Currently, developers prioritise financial return over outcomes of sustainability and liveability. By adopting new development models, the severity of this impact can be reduced. Examples of such models, which seek to focus on housing as an urban provision and human right over a business model are able to achieve significant savings which then redirect costs into good design outcomes.

For instance, the Nightingale Model, founded by Jeremy McLeod of Breathe Architecture, redirects costs into good design through removing overheads commonly employed in development such as marketing teams, advertising fees, real estate agents, display suites and second or third bathrooms. Additions to improve savings of this Model include shared laundries, shared services to allow for bulk purchase (ie electricity), photovoltaic (pv) cells, and, where possible, retention of ground floor tenancies to provide an ongoing income for the owner's corporation (in turn, lowering owners corporation fees). This cascades down to greater outcomes in design features and liveability, such as rooftop and productive gardens, site acquisition near public transport corridors, and a focus on energy efficiency and carbon neutrality which in turn leads to a reduction of the Urban Heat Island Effect, a cleaner environment and, in turn, better health and wellbeing outcomes.

TALC recommends affordability is considered holistically, not only upfront purchase price, but the liveability and whole of life cycle costs and health outcomes due to design.

Noting increased rental prices and decreased rental vacancies across Tasmania, what are some of the ways the challenges in the private rental sector, particularly around security of tenure, could be addressed?

No comment.

How could the effects of the short-stay accommodation industry on the rental sector be managed into the future?

TALC recommends that policies which prioritise long-term accommodation outcomes across the housing continuum for all demographics within Tasmania be strengthened to protect spatial locations

in proximity to open space, public transport, activity centres, and services (i.e. schools, health facilities) where affordable rental and home ownership opportunities can be both retained and increased. These should be in accordance with the settlement and activity centre hierarchies specified within the *Southern Tasmania Regional Land Use Strategy 2010 – 2035*, with policy settings aligned with the other two regions of the State to a greater degree. Precedents and legislative frameworks of other jurisdictions could be reviewed to identify how these are balanced.

Focus Area Two: Housing Supply

What must be considered to make sure new housing meets diverse needs into the future?

Social inclusion

The *Joint Select Committee Inquiry Into Preventative Health Report* identified social inclusion as a key social determinant impacting on health (Parliament of Tasmania, 2016). The report highlighted the importance of a focus on implementation of measures increasing social inclusion across all government agencies (Parliament of Tasmania, 2016).

The way housing density is designed should account for the varying needs of different population groups. Designing and locating safe, affordable, well-connected, higher density housing options is important for different age groups to be able to access the housing market appropriate for their lifestyle and situation (The Department for Communities and Social Inclusion, 2013). Providing a diversity of housing options increases the likelihood people of lower socioeconomic backgrounds have convenient access to public transport, health services, schools and employment opportunities (The Department for Communities and Social Inclusion, 2013). Ensuring people can work close to where they live will provide more equitable access to employment and services.

Safety

The quality of the public realm influences whether people feel safe and comfortable in that area as well as opportunities for social interaction, particularly for women and children. Design of housing and the surrounding public realm supports social inclusion through taking into account how that space operates during different times of the day, with different demographics using it, and across all seasons of the year (Hulse et al., 2011).

Feeling unsafe in public spaces has a significant impact on whether residents, specifically women, the elderly and young children are prepared to use them. Designing spaces which support activities attract more people and promote the perception they are orderly and peaceful, can be important for social groups in enhancing active living opportunities, and support overall community liveability (Hulse et al., 2011).

Accessibility

It is important to consider the role of the built environment on mobility limitations and disability to ensure accessible movement networks are created and maintained. This will support older adults to age in place and improve quality of life through the encouragement of participation in physical activity, exposure to the natural environment, and social interaction with friends and neighbours (Hulse et al., 2011).

Equity of access to physical activity opportunities

Access to local opportunities for physical activity for exercise, recreation or active travel supports social inclusion and builds a sense of community connectedness beneficial to health and wellbeing (National Heart Foundation of Australia, 2019, National Heart Foundation of Australia, 2017). The Heart Foundation's *Healthy Active by Design* resource asserts 'an essential part of good governance is embedding a socially inclusive and respectful approach to older people into policies and processes' (National Heart Foundation of Australia, 2017). This principle could equally be applied to how the THS impact all social determinants of health and wellbeing. The design of the places we live, work and play must be inclusive of all community members.

The THS can act as a mechanism to enhance social inclusion by providing safe, affordable, well-connected, higher density housing options, access to public open/green space, safe and enjoyable active travel networks to a variety of destinations with a focus on equity and inclusion (Heart Foundation, 2016, National Heart Foundation of Australia, 2019, Hulse et al., 2011). TALC recommends considering how the THS can improve social inclusion, accessibility, safety and equitable access to physical activity opportunities.

How can housing supply respond rapidly to changing social and economic environments?

No comment.

What additional interventions could governments consider to improve housing supply?

The THS Discussion Paper outlines strategies for the provision of housing supply though both new stock and the retention of the current stock. Whilst the discussion paper acknowledges the loss of stock to non-residential uses, TALC proposes strategies to address this issue could be strengthened and expanded. TALC notes this has been a long term issue, particularly for urban centres in Tasmania where a considerable number of houses have been lost to other uses. Historically, this loss has been to services such as doctors' surgeries, car yards, offices, parking lots etc. However, the latest is the change of residential use to visitor accommodation (eg Airbnb). Lost housing stock is often in the better serviced areas where there is good transport and ready access to amenities. Where housing stock is changed from residential to other use, residents may be required to move to locations where housing supply is more readily available though less well serviced by amenities and public transport. To date, policy has been in support of visitor accommodation (see 'Planning Directive No. 6 Exemptions and standards for visitor accommodation in planning schemes').

TALC recommends the Government develop policies and strategies that retaining housing stock for residential use, including strong measures to prevent the loss of housing stock through a change to non-residential use.

The THS Discussion Paper identifies the roles and responsibilities of governments (page 8, Table I). TALC asserts the roles and responsibilities of local government are significantly understated. The Discussion Paper outlines plans related to local government in terms of 'streamlining planning processes' and 'making rezoning applications easier'. There is an absence of policy relating to improving urban environments.

TALC recommends specific provisions under the THS which specify responsibility of local government for the approval of design and management of streets, pedestrian paths and cycle paths, the provision of POS and liveability.

What other interventions could improve housing supply?

TALC recommends the THS include measures to retrofit the public spaces (e.g. streets and POS) of existing housing areas of low amenity. Retrofitting the public realm of low amenity housing areas will provide the incentive for private investment in additional housing in these areas.

What can be done further to improve planning processes in Tasmania, particularly in the context of the delivery of social and affordable housing and increased density via infill development?

The following TALC publications (see appendix 2 and 3) related to improving planning processes in Tasmania, are relevant to the development of the THS.

- Tasmanian Active Living Coalition, *Tasmania's Planning System – Opportunities for Health and Wellbeing*, 2021.
- Tasmanian Active Living Coalition, *Submission to State Planning Provisions Review, Phase I – Scoping Paper*, August 2022.

What scope is there to increase the role of private developers and local government in improving housing supply?

No comment

How can we bring whole communities along to promote the benefits of social and affordable housing in local areas?

No comment

Focus Area 3: Housing Sustainability

What actions are needed to improve sustainability of housing?

Urban Greening

A growing body of evidence demonstrates urban green spaces, such as parks, playgrounds, and residential greenery, help keep cities cool, act as places of recreation, support physical activity and improve mental health (Byrne, 2021, National Heart Foundation of Australia, 2019, Davern et al., 2017).

TALC notes a lack of opportunities to encourage green infrastructure under the Tasmanian Planning System. Research indicates urban greenery including trees, vegetation and green surfaces (eg roofs and facades) can act as mechanisms for cooling within cities, helping mitigate the urban heat island effect and climate change (Davern et al., 2017). Urban greenery can reduce temperatures by 1- 4 C (Davern et al., 2017).

TALC recommends the THS include outcomes related to urban greening such as landscaping requirements for multiple dwellings, vegetation, and green surfaces, and consider access to green POS where housing is located.

What Government assistance programs could help young people and people with changed life circumstances access affordable home ownership?

See comments under housing affordability focus area.

What can be done to improve the energy efficiency of existing and new homes?

TALC recommends the THS include ambitious targets for energy efficiency ratings (e.g. 8 star) especially for social housing (for example by ensuring requirements north facing windows etc).

What else can be done by stakeholders to improve sustainability?

TALC's principle interest is health and wellbeing through active living, which can be supported by the THS through integration with existing active living infrastructure as well as the provision of new infrastructure in new and existing housing to support residents to use active and public transport. Key mechanisms relevant to the THS are detailed below.

Liveable Streets Code

TALC has previously supported the Heart Foundation's recommendation for the development of a Liveable Streets Code under their 2016 *Representation to the Final Draft State Planning Provisions* (Heart Foundation, 2016). The submission recommends of the development of a Liveable Streets Code. A Liveable Streets code, or similar, would provide measurable standards to the assessment of permit applications (Heart Foundation, 2016).

A Liveable Streets Code would support active travel through provisions including standards for footpaths suitable for walking and requirements for safe cycling infrastructure, which is directly relevant to the liveability of housing in Tasmania.

TALC recommends the THS reference and support the development of a Liveable Streets Code under the current review of the SPPs and development of the Tasmanian State Policies.

Parking and Sustainable Transport Code

TALC has previously highlighted car parking space requirements in both residential and commercial settings are excessive and do not encourage other forms of sustainable transport (eg public and active travel) which impacts on liveability.

TALC has previously recommended, under its *Submission to State Planning Provisions Review, Phase 1 – Scoping Paper*, revising the Parking and Sustainable Transport Code to comprehensively treat 'sustainable transport' as a component of active travel. This recommendation is relevant to the development of new and existing housing in Tasmania.

TALC is also supportive of Bicycle Network Tasmania's recommendations, under its submission to the SPPs, for the provision of bike parking and end of trip facilities in workplaces as well as introduction of provisions for bike parking in apartment buildings.

TALC recommends the THS include outcomes related to the provision of active travel infrastructure within new and existing housing as well as links to active travel infrastructure (eg bike paths and footpaths).

Summary of TALC Recommendations

1. The vision includes reference to health and wellbeing.
2. Include a health and wellbeing focus area with an objective and outcomes relevant to health and wellbeing through housing.
3. Development of policies and strategies that retaining housing stock for residential use, including strong measures to prevent the loss of housing stock through a change to non-residential use.
4. Include outcomes related to the improvement of the built environment in which housing is provided/developed.
5. Development of locally relevant measurable standards under the THS for target distances to facilities as well as standards for adjacent foot paths and cycle ways.
6. Include outcomes related to the provision of and/or access to POS and green space.
7. Include outcomes related to improved liveability of housing locations.
8. Reference the role of the THS in food security in Tasmania.
9. Investigation of interventions such as affordable housing offset schemes and developer contributions and their application in Tasmania.
10. Requirements for mandatory disclosure of energy ratings in residential development.
11. Development of Design Guidelines tailored to health, wellbeing, and liveability outcomes.
12. Affordability is considered holistically, not only upfront purchase price, but the liveability and whole of life cycle costs and health outcomes due to design.
13. Consider how the THS can improve social inclusion, accessibility, safety and equitable access to physical activity opportunities.
14. Specific provisions under the THS which specify responsibility of local government for the approval of design and management of streets, pedestrian paths and cycle paths, the provision of POS and liveability.
15. Include measures to retrofit the public spaces (streets, POS) of existing housing areas of low amenity.
16. Include outcomes related to urban greening such as landscaping requirements for multiple dwellings, vegetation, and green surfaces, and consider access to green POS where housing is located.
17. Include ambitious targets for energy efficiency ratings (eg 8 star) especially for social housing (for example by ensuring requirements north facing windows etc).
18. Reference and support the development of a Liveable Streets Code under the current review of the SPPs and development of the Tasmanian Planning Policies.
19. Include outcomes related to the provision of active travel infrastructure within new and existing housing as well as links to active travel infrastructure (eg bike paths and footpaths).

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Appendix I – Summary of Active Living Policies

Tasmanian

Tasmania Statement – Working Together for the Health and Wellbeing of Tasmanians (Premier's Health and Wellbeing Advisory Council, 2021)

Healthy Tasmania Five-Year Strategic Plan 2022-26 (Department of Health and Human Services, 2022)

Joint Select Committee Inquiry Into Preventative Health Report (Parliament of Tasmania, 2016)

Heart Foundation Representation to the final draft State Planning Provisions 7 March 2016 (Heart Foundation, 2016)

Tasmania's Walking and Cycling for Active travel Strategy 2011-2021 (Department of Infrastructure, 2010)

Hobart City Deal (Commonwealth of Australia, 2019)

The Southern Tasmanian Regional Land Use Strategy (STRLUS) 2010-2035 – Regional Policies 10, 11, 13, 18 and 19 (State Planning Office, 2010)

National²

National Preventative Health Strategy 2021-30 (Department of Health, 2021)

National Obesity Strategy 2022-32 (Commonwealth of Australia, 2022)

Getting Australia Active III – a Systems Approach to Physical Activity for Policy Makers (Bellew et al., 2020)

National Heart Foundation - Blueprint for an Active Australia (National Heart Foundation of Australia, 2019)

National Heart Foundation – Healthy Active by Design (National Heart Foundation of Australia, 2017)

International

Global Action Plan on Physical Activity 2018-30 (World Health Organization, 2018)

International Society for Physical Activity and Health- Eight Investments that Work for Physical Activity (International Society for Physical Activity and Health, 2020)

United Nations Sustainable Development Goals (UN General Assembly, October 2015)

² There is no **National Physical Activity Plan** to provide an overarching framework for addressing physical inactivity and guide future action. In 2020, the Australian Prevention Partnership Centre published [Getting Australia Active III : A systems approach to physical activity for policy makers](#) which identifies eight key areas for action to address physical inactivity. This serves as a guide for policy makers in Australia in the absence of a national plan.

Appendix 2 – TALC Discussion Paper: Tasmania's Planning System – Opportunities for Health and Wellbeing

Discussion Paper Tasmania's Planning System – Opportunities for Health and Wellbeing



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DRAFT

I. Introduction

The Built Environment and Health and Wellbeing

The design of the built environment has typically not included the consideration of health and wellbeing outcomes. Factors such as the return on investment and provision of road networks has often characterised urban developments. The growth of these developments has often been out of step with public transport options, local employment and more generally the concept of the '20-minute neighbourhood'. The location of affordable homes on the outskirts of metropolitan areas without the provision of alternative transport options has seen an increase in private vehicle usage for work and other necessities. While the impact of rapid development on systems such as transport is well documented, the impact on health and wellbeing is less well known. Work is being undertaken to develop a greater understanding of the impact planning systems have on health and wellbeing outcomes and this paper outlines key knowledge and recommendations in a Tasmanian context.

The Healthy Tasmania Five Year Strategic Plan advocated for a health in all policies approach, including an analysis of the systems outside the health sector which influence the health status of populations. The plan identified transport and the creation of environments which support people to make healthier choices as key focus areas. The second *Healthy Tasmania Plan* will focus on systems and supporting active living initiatives. This builds on earlier work under *Tasmania's Plan for Physical Activity 2011-2021* which included the goal to 'Create built and natural environments that enable and encourage physical activity'. The Built Environment Working Group of the Premier's Physical Activity Council worked directly towards this purpose.

The highly respected medical journal *The Lancet* published a series on 'Urban design and transport to promote healthy lives' in 2016, providing further recognition of the importance of the built environment for active living. This series defined the built environment features that increase activity. The series recommended creating compact cities that locate shops, schools, other services, parks and recreational facilities, as well as jobs near homes, and providing highly connective street networks making it easy for people to walk and cycle to places³. There are many co-benefits of improving planning for active living including reductions in greenhouse gas emissions, improved air quality, reduced traffic congestion, more sustainable infrastructure, increased economic productivity, improved social capital and more liveable towns and cities⁴.

³ Goenka S, Anderson L Urban Design and transport to promote healthy lives, *The Lancet*, Vol 388, Issue 10062, Dec 2016

⁴ : Bellew B, Nau T, Smith B, Bauman A (Eds.) *Getting Australia Active III: A systems approach to physical activity for policy makers*. Sydney, Australia. The Australian Prevention Partnership Centre and The University of Sydney. April 2020

The way the environment is planned, designed and built can directly affect the health and wellbeing of people who use and inhabit the space. As noted by the Heart Foundation's *Healthy Active by Design* framework 'planning for active living calls for a commitment to applying healthy planning principles to all levels of the planning system, at every stage of the planning process and in every planning project and policy initiative. These principles can be applied no matter what the scale, in metropolitan or regional contexts, from neighbourhoods in regional, rural and remote communities to large-scale centres'.

The recently re-signed Healthy Tasmania Statement supports the connection between health and wellbeing enhanced by natural open spaces. It further notes the opportunities available as Tasmania grows to plan communities to create healthy, liveable and connected spaces. The Tasmania Statement creates an authorising environment for the Premier's Health and Wellbeing Advisory Council ('the Council') to support health and wellbeing considerations within the planning scheme.

The COVID-19 pandemic has required people to stay close to home, highlighting the importance of improving understanding of how the built environment can support health and wellbeing. This provides a unique opportunity for groups such as the Tasmanian Active Living Coalition (TALC) to leverage off the greater awareness of the benefits of supportive environments.

This paper was produced upon request from the Council but it has also been made available to TALC members for general use.

The Built Environment and Physical Activity

Physical activity is a core health behaviour of interest to TALC, and hence is the focus of this discussion paper. Physical activity is fundamental for good physical and mental health and wellbeing. Physical activity can help prevent heart disease, type 2 diabetes, numerous cancers, dementia, weight gain, gestational diabetes, and anxiety and depression. Being physically active improves sleep and improves brain function at all ages. Despite this, almost half of all Tasmanians aged 18 and over do not do enough physical activity for good health. Tasmania is below the national average and is ranked sixth out of the eight states and territories.

There are many reasons why people are not active enough. At a population level, the environments where people live, work and play (the built environment) can have a significant impact on physical activity levels. Towns and cities, neighbourhoods, public spaces and places, shopping areas and town and neighbourhood centres designed appropriately for all stages of life can result in increased physical activity levels. For example, designing neighbourhoods which offer public transport reduces private vehicle use and results in more active communities. Places that are supportive of walking and cycling have well designed streets (including footpaths

for all ages and abilities), street connectivity, mixed density, and mixed land use. People walk more if they perceive streets are safe and aesthetically pleasing⁵.

Key national frameworks (*Getting Australia Active III: A systems approach to physical activity for policy makers*; the Heart Foundation's *Blueprint for an Active Australia*) and international frameworks (World Health Organisation's *Global Action Plan for Physical Activity*) highlight the importance of the built environment, including urban and transport planning, walking and cycling infrastructure, public open spaces and recreational spaces, on health outcomes.⁶

2. Aims

The three key aims of this discussion paper are to:

1. Provide an overview of the Tasmanian planning system and how it relates to health and wellbeing.
2. Highlight planning system gaps and barriers to improving the health and wellbeing of Tasmanians.
3. Identify opportunities through planning system reform to improve the health and wellbeing of Tasmanians.

⁵ Jerome R, J Rozek J, Villanueva K, Gunn I, Giles-Corti B. Evidence supporting the health benefits of Movement Networks. National Heart Foundation of Australia 2021

⁶ Bellew B, Nau T, Smith B, Bauman A (Eds.) *Getting Australia Active III: A systems approach to physical activity for policy makers*. Sydney, Australia. The Australian Prevention Partnership Centre and The University of Sydney. April 2020

3. Impediments and Actions

Prepared by Rob Nolan, Planning Institute of Australia Tasmanian division

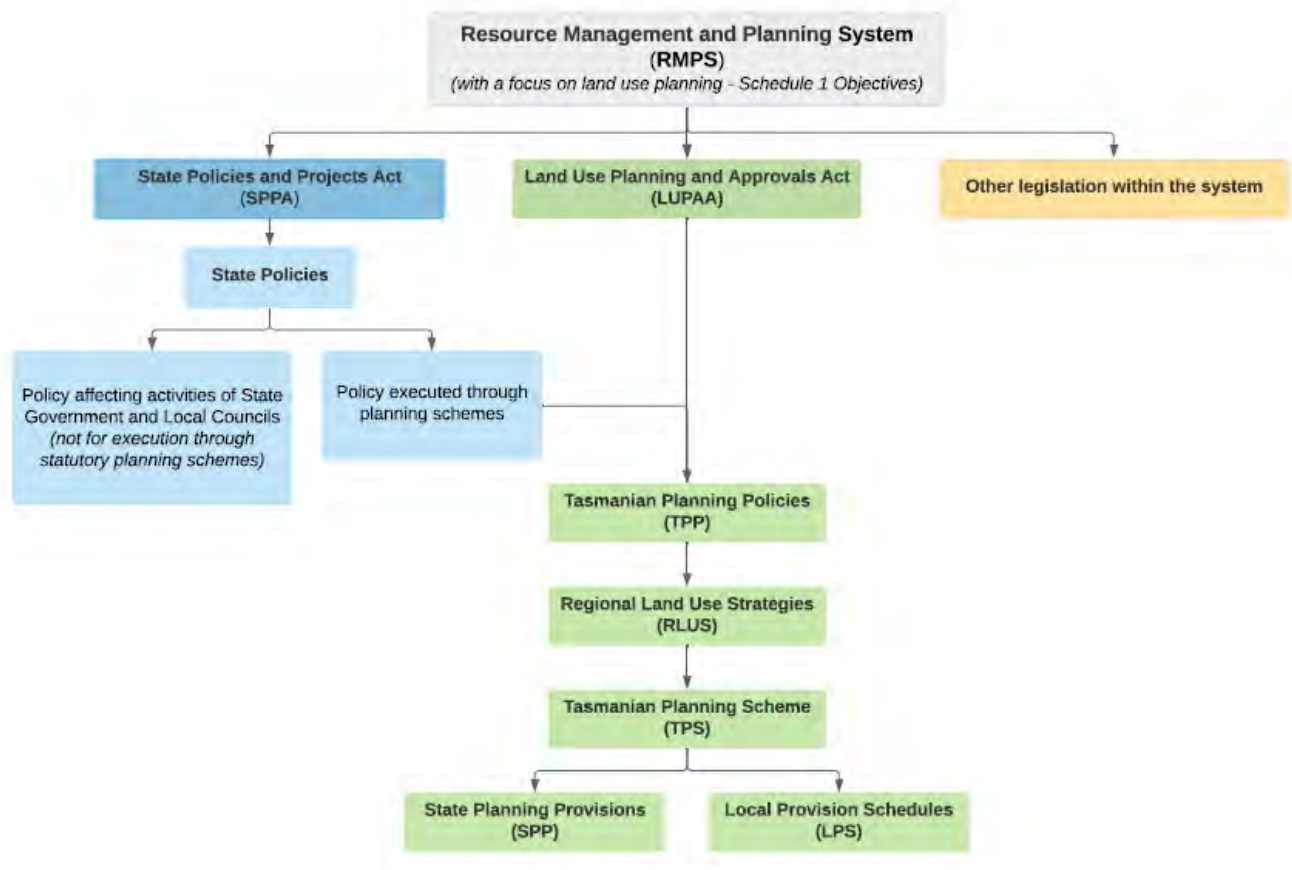
Overview

A first principle is that planning (or town planning) has through the ages been rooted in health improvement and wellbeing with legislation to support activism for healthier built environments. The current Tasmanian planning system is the Resource Management and Planning System (RMPS). The RMPS was primarily introduced through 1993 legislation that captured many existing and new Acts⁷ under a common set of objectives being the '*Objectives of the Resource Management and Planning System of Tasmania*'. These objectives are predominately contained in Schedule 1 of each Act and are based on sustainable development, defined in legislation as:

'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.'

– ⁷ comprises some 19 pieces of legislation



The Planning System and Health and Wellbeing

The planning system offers opportunities to improve population health and wellbeing outcomes that remain to be fully realised.

Specific legislative authority that enables a health and wellbeing focus on the built environment can be found in:

- RMPS objectives – based on sustainable development defined with reference to ‘*cultural wellbeing and health and safety*’.
- *Land Use Planning and Approvals Act 1993 (LUPAA), Schedule 1, part 2 - ‘Objectives of the Planning Process Established by this Act’.*
 - sub clause (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.
- *Land Use Planning and Approvals Act 1993 (LUPAA) s.12B – contents of Tasmanian Planning Policies.*
 - (2)(c) liveability, health and wellbeing of the community.

Planning System Instruments for Health and Wellbeing Intervention for the Built Environment

There are three key planning system instruments that can influence the built environment to improve population health and wellbeing outcomes.

State Policy and Projects Act 1993

Under the Premier, this Act provides for the making of Tasmanian Sustainable Development Policies (State Policies) that apply to the activities of State Government and Councils. State Policies may direct policy and desired outcomes or indirectly give effect to policy through the provisions in planning schemes. In this way a State Policy can be a critical element for pursuing health and wellbeing outcomes. The *State Policy and Projects Act 1993* also provides for 'State of the Environment Reporting'. State of Environment Reporting (SOE) can be a valuable reference for monitoring outcomes of health and wellbeing policies. It has been many years since a State Policy was made with the most recent being the 2009 *State Policy on the Protection of Agricultural Land*. The most recent SOE report was also in 2009.

Land Use Planning and Approvals Act 1993

Under the Minister for Planning, this Act provides for Tasmanian planning policies, regional land use strategies, planning schemes, and through planning schemes the regulation framework for use and development and the granting of permits.

Tasmanian Planning Policies
Tasmanian Planning Policies are being prepared with public involvement and are intended for release in 2022. In comparison to the wide scope afforded State Policies, the Tasmanian Planning policies limit their scope to affecting the content of regional land use strategies and planning schemes. Tasmanian Planning Policies therefore provide a contemporary mechanism for embedding health and wellbeing policy in the built environment through the regional strategies and planning schemes. At the applied level, Tasmanian Planning Policies will work to set standards for the regulation of use and development.

Regional Land Use Strategies

Regional land use strategies exist for the three Tasmanian regions (south, north, northwest). They are due for review by the State Government after completion of the making of the Tasmanian Planning Policies. Planning schemes must be consistent with the regional strategies.

Planning Schemes

The completed Tasmanian Planning Scheme will comprise the State Planning Provisions, common to all planning schemes, and local provisions schedules that provide content relevant to individual municipalities. The planning scheme is required to embody all the policies and interests of State Government and Councils into a statutory framework that is applied to the assessment of applications for permits to change the use of land or develop land.

Local Government (Building and Miscellaneous Provisions) Act 1993

Although not part of the RMPS, this Act has the provisions for taking public open space and littoral (coastal) and riparian (edge of river) reserves. Public open space and coastal and river reserves are critical for recreation and conservation. The merit of local public parks and reserves came to the forefront during the COVID-19 pandemic when travel for recreation was severely restricted. The provisions in legislation for public reserves has been neglected since 1993. The legislation has been proposed for replacement since 1993. In their current state, the legislated provisions for the taking of public open space and reserves do not maximise the positive influence these assets could have on population health and wellbeing.

Planning System Guidelines and Directives for the Built Environment

Planning system guidelines and directives affecting elements of the built environment which impact on health and wellbeing are extensive. They include:

Planning Directive No.4.1 – Standards for Residential Development in the General Residential Zone.

This planning directive sets out the planning standards for houses covering matters such as housing density, building envelopes and boundary setbacks, the provision of private open space, building orientation and overshadowing. Although the planning directive covered some aspects of streetscape (eg fencing) it made no mention of the design of streets, which is the critical component of the residential built environment. The General Residential Zone is where most of the housing activity happens in Tasmania. The standards in the Planning Directive have now been incorporated into the State Planning Provisions.

LGAT Tasmanian Subdivision Guidelines October 2013 and Tasmanian Standard Drawings 2020.

The subdivision guidelines and standard drawings apply to participating Tasmanian councils and prepared in conjunction with the Institute of Public Works Engineering Australia. The standard drawings provide detailed design of roads and in-road infrastructure. These guidelines tend to focus on motor vehicles with minimum regard for active travel and lead to a repetitive standard of roads in subdivisions.

Positive Provision Policy for cycling infrastructure Tasmania 2013

The policy places onus on the State road authority to show why cycling infrastructure should not be provided on State roads as opposed to having to justify its provision.

Planning System Opportunities for Improving the Built Environment for Health and Wellbeing

There are five key opportunities for advocacy within the planning system to improve the built environment so that it better supports health and wellbeing: State Policy, Tasmanian State Coastal Policy, Tasmanian Planning Policies, Regional land use strategies, and the Tasmanian Planning Scheme.

1 State Policy

Advocate for the making of a State Policy with a focus on health and wellbeing and the built environment that affects the activities of State Government and councils (for example, see the [National Heart Foundation, Tasmania Draft for a State Policy for Healthy Spaces and Places](#)).

2 Tasmanian State Coastal Policy 1996

Advocate for amendments to the Policy to cover the provision and management of littoral and riparian reserves for their contribution as key components for active living. This should also include policies providing contemporary responses to climate change, sea level and storm surge all of which have health and wellbeing implications.

3 Tasmanian Planning Policies

Contribute to the preparation of the policies for a focus on health and wellbeing and the built environment that directly affect the content of regional land use strategies and planning schemes.

4 Regional land use strategies

Contribute to the review of the regional land use strategies for a sharper focus on health and wellbeing through strategies for the structure of cities and towns, the provision of public open space and reserves and the transportation networks.

5 Tasmanian Planning Scheme

Contribute to the review of the State Planning Provisions for a sharper focus on health and wellbeing outcomes through amendments to the use and development standards for the zones and codes.

Issues and Actions for Health and Wellbeing

The following provides some examples of issues and specific actions for better health and wellbeing with a focus on the State Planning Provisions of the Tasmanian Planning Scheme.

General

State Planning Provisions – Purpose and Objective Statements

Issues:

- Prepared in a policy vacuum on health and wellbeing outcomes.
- No reference to health.
- No reference to wellbeing.
- No reference to mental health.

Actions:

- State Planning Provisions, Planning Scheme Purpose, clause 2.1 include a statement of outcomes within the framework of the RMPS objectives with specific reference to health and wellbeing.
- Include in the purpose and the objectives for each zone, use standard, development standard and code the desired health and wellbeing outcome from the implementation of the specific provision.

Active Living

Issues:

- Loss of 'public' in open space.
- Public open space being viewed as a tradable commodity.
- Loss of favour of small parks in preference for mega structures (theme parks mainly accessed by car).
- Lost legislation requiring the provision of riparian and littoral reserves.
- Planning lacking for lifecycle changes in neighbourhoods (i.e., differing requirements as residents age and young families replace).
- Limited strategic planning for public open space.

Actions Within the State Planning Provisions for Active Living

- Insert use and development standards that focus on community led housing models for increasing residential density.
- Include standards for the provision of public open space and littoral and riparian reserves.
- Leverage off opportunity of COVID with a renewed interest in local parks and recreation locally.

Active Travel

Issues:

- Lack of provisions/design guidelines for streets that are inclusive for all users.
- Permeability, limited connectivity of streets, dead end culs-de-sac and paths.
- Regulations preventing narrow streets, zero setbacks, shop top housing, main street shopping.
- *LGAT Tasmanian Subdivision Guidelines October 2013* and *Tasmanian Standard Drawings 2020* that are not helpful for active travel where they intrude on planning and design for streets rather the keeping to a focus on engineering detail.

Actions Within the State Planning Provisions for Active Travel:

- Resolve the confusing provisions over streets and roads.
- Remove the exemption status from planning scheme permit requirements for upgrading of streets/roads to allow active travel to be realised.
- Insert a streets code that supports active travel through provisions that include standards for footpaths suitable for walking and requirements for safe cycling infrastructure.
- Revise the *Parking and Sustainable Transport Code* to comprehensively treat 'sustainable transport' as a component of active travel.
- Through LGAT and Institute of Public Works Engineering Australia revise the *Tasmanian Subdivision Guidelines October 2013* and *Tasmanian Standard Drawings* to delete aspects of the guidelines that intrude on planning and design of streets that have limited regard for active travel and to confine their content to engineering detail.

Food Security

While food security is considered a critical component of health and wellbeing, it is not directly within the remit of TALC.

Issues:

- Non-food related use and development intruding on agricultural activities including fettering those activities.

- State Planning Provisions that prohibit urban farming (qualified agricultural use in the resource development use class).
- Application of the *State Policy on the Protection of Agricultural Land 2009* limited to land not previously zoned for another use.
- Opportunity for policy and guidelines relating to competing land uses for reasons of community health (eg fast food outlets close to schools).

Actions:

- Review and amend the *State Planning Provisions* where they prohibit urban farming (qualified agricultural use in the resource development use class).
- Review the application of the *State Policy on the Protection of Agricultural Land 2009* to contemporary policies on food security and application of the policy to protect agricultural land in the peri-urban areas.

Mental Health and Wellbeing

This section is under development.

4. The Tasmanian Planning System in Practice – a Case Study

Prepared by David Allingham, Manager, Development Services, Brighton Council

Brighton Council is on the northern fringe of Greater Hobart. Brighton Council's population is expected to grow by 33 per cent to 2042, which is the fastest growing Council in percentage terms across Tasmania.

The suburbs of Bridgewater, Gagebrook, and Herdsmans Cove are characterised by poorly designed and disconnected public housing suburbs with an under-developed public realm. Recently, Housing Tasmania have contracted Community Housing Provider, Centacare Evolve Housing, to build hundreds more social housing units in these suburbs placing more people with complex needs in an area without supporting infrastructure.

With rapid growth in public and private housing, Brighton Council needs a planning system that delivers a high-quality built environment and the social infrastructure needed to provide communities with good liveability and health and wellbeing outcomes.

In April 2021, Brighton Council became the third Council in Tasmania to operate under the Tasmanian Planning Scheme (TPS). All Tasmanian Councils will operate under the TPS in the coming months.

The Manager of Development Services of Brighton Council is responsible for both statutory and strategic planning. A typical week involves the statutory planning team reviewing current Development Applications.

Planning staff express frustration that the State Planning Provisions (SPPs) do not have the tools to deliver good liveability and health and wellbeing outcomes compared to the Interim Planning Schemes (in place from 2015-2021). These small changes have important implications for how residential settlements are built. This is particularly pertinent for Brighton Council where mainly social and affordable housing is being built and developers are trying to build low-cost housing, particularly multiple dwelling units.

Site and Building Design

Having access to sunlight, outdoor areas and quality green space is critical for health and wellbeing in the home. This has become increasingly important during restrictions in response to the COVID-19 pandemic. Yet broadly, design standards have been removed from the State Planning Provisions, for example:

- There are no requirements for north facing windows.
- There are no requirements for private open space to be accessed directly from living areas.
- There are no requirements for landscaping.

Subdivision Design

Well-designed subdivisions are critical to active living and active travel. Compact neighbourhoods, provision of housing choice and diversity, way-finding and public open space are critical for promoting access to services and active living. Well-designed neighbourhoods that provide opportunities for healthy living have become increasingly more important during the COVID-19 pandemic. Many subdivision standards that provide health and wellbeing outcomes have been removed from the State Planning Provisions, for example:

- The Southern Tasmanian Regional Land Use Strategy (STRLUS) sets a target of 15 dwellings per hectare. This was an objective in the General Residential Zone standards in interim schemes, as was promotion of higher densities closer to services, facilities and public transport corridors and planning controls to achieve this.
- The SPPs provide no density targets and no standards to require higher densities closer to services (minimum lot size of 450m² and no maximum lot size). For example, a developer could be advised by a real estate agent that 700m² lots are selling best and therefore deliver only lots at this size (approximately 10 dwelling per hectare).
- Ways and Public Open Space requirements have been removed from State Planning Provisions. Interim schemes had provisions for the provision of high-quality open space and way-finding. This now falls back to the *Local Government (Building and Miscellaneous) Act 1993* individual Council Policies, which lacks consistency and transparency for stakeholders. It is far clearer for developers and Councils to have public open space requirements as a subdivision standard in the planning scheme.

Key actions could address these issues:

- Re-instate design standards as per the Interim Planning Schemes the above into the Residential Zones in the State Planning Provisions.
- Urgently review General Residential Zone Development and Subdivision standards from the SPPs with liveability and health and well-being at front of mind.

Urban Greening

Another issue that is consistently raised by planning staff is the lack of opportunities to encourage green infrastructure under the SPPs. Brighton Council has a *Greening Brighton Strategy* which aims to increase trees across Brighton's urban areas through strategic tree planting, including in private developments and subdivisions.

However, implementation of the *Greening Brighton Strategy* under the SPPs is extremely difficult, given they do not promote urban greening at all. There are no landscaping requirements for units, commercial developments, streets or vegetation retention (except if priority vegetation).

To address the failings of the SPPs, Council tried to introduce a Landscaping Specific Area Plan as part of its Local Provisions Schedule (LPS) for the TPS, but it was rejected by the Tasmanian Planning Commission (TPC).

Urban green spaces, such as parks, playgrounds, and residential greenery, can promote mental and physical health, and reduce morbidity and mortality in urban residents by providing psychological relaxation and stress alleviation, stimulating social cohesion, supporting physical activity, and reducing exposure to air pollutants, noise and excessive heat.

Key action that could address this issue:

- The State Planning Provisions need landscaping requirements for multiple dwellings and commercial and industrial use and require street trees in new subdivisions.

Multiple Dwelling Units

Brighton Council is seeing a significant increase in multiple dwelling units on large sites as opposed to subdivisions. It can be assumed that in part this is to do with avoiding public open space contribution fees and other subdivision costs (e.g. utility connections). Multiple dwelling units are generally smaller and have less private open space thus increasing demand for quality public open space provision. Multiple dwelling units are also often inward facing and have poor passive surveillance to street frontages. They have no public land and when developed on larger sites often block potential connectivity to surrounding land. Body Corporates can be problematic on larger sites and include ongoing costs for the owner that are effectively passed on by the developer in choosing strata over subdivision.

Key action that could address this issue:

- Standards in the State Planning Provisions are needed which encourage subdivision instead of strata where possible and ensure there is equity in public open space contributions, improved passive surveillance and connectivity.

Infrastructure Contributions

Trunk infrastructure provides critical services for communities, and usually includes:

- Transport (e.g., roads, pathways, ferry terminals and bus stops).
- Storm water (e.g., pipes and water quality treatment devices).
- Water supply and wastewater (e.g., reservoirs, pipes and sewage treatment plants).
- Public parks (e.g., parks and sporting facilities).
- Land for community facilities (e.g., land for libraries and community centres).
- Other infrastructure depending on the area.

Fragmented land ownership and the significant cost of trunk infrastructure means it may not be feasible for any one developer, landowner, or government entity to fund the trunk infrastructure required to service the area.

In other jurisdictions there are infrastructure contributions frameworks that provide for the cost of trunk infrastructure to be shared equitably between the users of the infrastructure based on forward planning (eg structure plans). Currently there is no infrastructure contributions framework in Tasmania. In the absence of an infrastructure contributions framework, it is generally a 'first user pays' system, which is costly and inequitable. There is a reluctance for first movers to invest in liveability elements if they are paying for utility infrastructure that will benefit future developers. There is also a lack of forward planning about what social infrastructure is needed in existing and greenfield development areas.

Key action that could address this issue:

- Creating a State Government Infrastructure Policy would lead to more equitable infrastructure costs, greater certainty, and better infrastructure outcomes, including social infrastructure.

Southern Tasmanian Regional Land Use Strategy 2010-2035 (STRLUS)

Council is required to regularly meet with developers or elected members about issues with the outdated STRLUS. The STRLUS is a 'broad policy document that will facilitate and manage change, growth, and development within Southern Tasmania over the next 25 years'⁸. STRLUS was declared in 2011 and has not been updated since. The STRLUS uses data from the 2006 ABS Census and therefore does not capture significant changes in the region in the intervening years (e.g. the opening of MONA).

Council regularly meets with stakeholders about the need to extend the urban growth boundary to allow more development on the urban fringe. Whether or not this is appropriate is unknown because there is a lack of recent data about supply and demand for housing.

Section 5A(6) of LUPAA requires that 'The Minister must keep all regional land use strategies under regular and periodic review.' In the last 10 years the regional land use strategies have not had a comprehensive review.

The STRLUS also has a suite of policies that promoted health and well-being were being implemented through the interim planning schemes. For example, Policy ROS 1.6 is to 'Ensure subdivision and development is consistent with principles outlined in *Healthy by Design: A Guide to Planning and Designing Environments for Active Living in Tasmania*'. However, these policies are not being implemented through the SPPs.

Key actions could address these issues:

- Amend LUPAA to require the Minister review the regional land use strategies at least every five years.
- Review the regional land use strategies as a matter of urgency.

⁸ STRLUS page 1
Page 16 of 75

5. Opportunities for Action

Creating environments that support health and wellbeing through active living and active travel is challenging and requires collaboration across multiple agencies and authorities but has the potential to have significant population health impacts. This paper has described the relationship between the built environment and health and wellbeing, provided an overview of the Tasmanian Planning System, and highlighted opportunities for where the planning system could better and more equitably support the health and wellbeing of Tasmanians, with a particular focus on the link with physical activity.

Through the *Tasmanian Government's Planning Reforms Work Program 2021-2024* (see Attachment 1), there are many opportunities to shape planning system policies. As planning reform occurs over many years, bodies such as the Council and TALC must ensure that health and wellbeing remains a priority in these processes. Key opportunities within, and outside of the planning reform process that could be leveraged are detailed below.

Opportunities Within the Tasmanian Government's Planning Reform Agenda

1. Tasmanian Planning Policies

- 1.1. Define in submission(s) to the Government the meaning and application of the requirements for 'liveability, health and wellbeing in the community' (LUPAA s.12B(2)(c)) during the coming period of policy preparation.
- 1.2. Advocate for health and wellbeing policies on land subdivision setting, residential/lot density, and public open space, and a policy preference for separate lots rather than the strata.

2. Regional land use strategies

- 2.1. Contribute to the review of the regional land use strategies for a sharper focus on health and wellbeing through strategies for the structure of cities and towns, density of residential development, the provision of public open space and reserves, and transportation networks.
- 2.2. Advocate for short-term fixes to the STRLUS (and presumably the northern and northwest coast strategies) to emphasise the application of health and wellbeing policies.
- 2.3. Advocate for the need for timely reviews of the regional land use strategies including shorter legislated time frames.

3. Tasmanian Planning Scheme (State Planning Provisions) – advocate for

- 3.1. Clause 2.1 purpose to state how the RMPS objectives give effect to health and wellbeing.

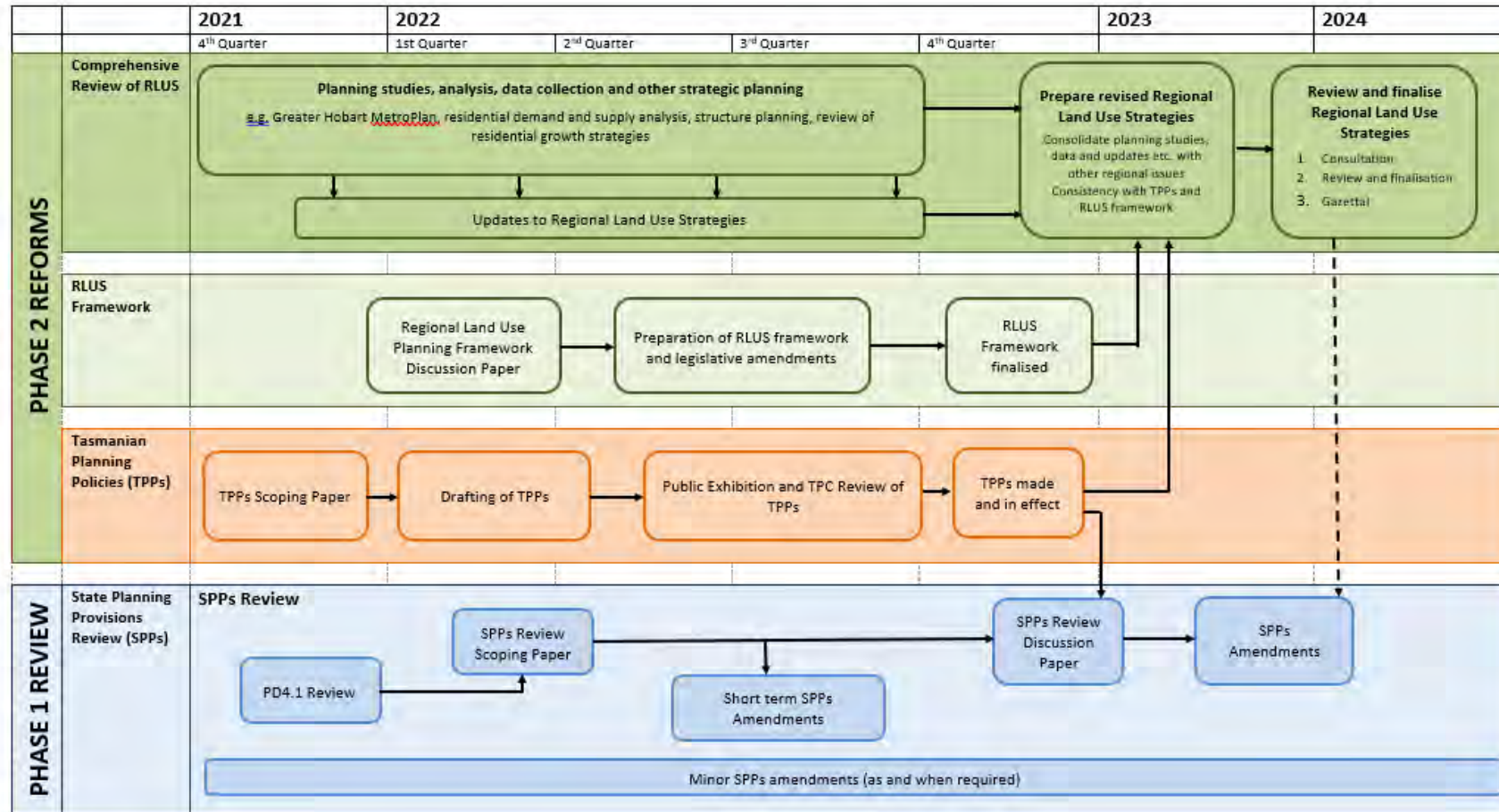
- 3.2. Inclusion in the purpose and the objectives for each zone, use standard, development standard, and code the desired health and wellbeing outcomes from the implementation of the specific provision.
- 3.3. Insertion of use and development standards that focus on community led housing models for increasing residential density derived from a review of Planning Directive No.4.1. The review to have specific reference to aspects of design standards for liveability including sun aspect, private open space, and landscaping.
- 3.4. Inclusion of standards for the provision of public open space and littoral (coastal) and riparian (edge of river) reserves.
- 3.5. Resolution of the confusing provisions over streets and roads.
- 3.6. Removal of the exemption status from planning scheme permit requirements for upgrading of streets/roads to allow active travel to be realised.
- 3.7. Insertion of a streets code that supports active travel through provisions that include standards for footpaths suitable for walking, requirements for safe cycling infrastructure, and landscaping.
- 3.8. Revision of the Parking and Sustainable Transport Code to comprehensively treat sustainable transport as a component of active travel.
- 3.9. Revision and amendment of the use and development provisions where they prohibit urban farming (qualified agricultural use in the resource development use class).

Opportunities Outside the Tasmanian Government's Planning Reform Agenda

4. State Policies – advocate for

- 4.1. The creation of a State Policy on health, wellbeing and the built environment.
- 4.2. Amendments to the *Tasmanian State Coastal Policy 1996* to cover the provision and management of littoral (coastal) and riparian (edge of river) reserves and to provide contemporary responses to climate change, sea level, and storm surge.
- 4.3. A State Government Infrastructure State Policy on physical and social infrastructure, equitable infrastructure costs and contributions, greater certainty, and better infrastructure outcomes.
- 4.4. State of the Environment Reporting for the evaluation and monitoring of health and wellbeing policies.
- 4.5. Amendment to the *Local Government (Building and Miscellaneous Provisions) Act 1993*, or alternative legislation, providing for the taking of public open space and littoral (coastal) and riparian (edge of river) reserves.
- 4.6. Amendments to the LGAT Tasmanian Subdivision Guidelines October 2013 and Tasmanian Standard Drawings 2020 to provide for active travel for components of the documents that concern the design of streets and to have those aspects concerning the design of streets removed.
- 4.7. A review of the application of the State Policy on the Protection of Agricultural Land 2009 for contemporary policies on food security and application of the policy to protect agricultural land in the peri-urban areas.

PHASE 2 PLANNING REFORMS WORK PROGRAM
(indicative timeframes only)



Appendix 3 – TALC Submission to State Planning Provisions Review

Tasmanian Active Living Coalition

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To the State Planning Office

Subject: State Planning Provisions Review

Thank you for the opportunity to provide feedback on phase one of the State Planning Provisions Review. On behalf of members of the Tasmanian Active Living Coalition please find a consultation submission attached in response to the State Planning Provisions Review Scoping Paper.

The Tasmanian Active Living Coalition works together to influence and inform policies, decisions and strategies that encourage the creation of active living environments, food security and social inclusion that benefit health and wellbeing.

Yours sincerely

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Date: 17 March 2025

Tasmanian Active Living Coalition

Submission to State Planning Provisions Review

Phase I – Scoping Paper



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Introduction

The Tasmanian Active Living Coalition (TALC) welcomes the opportunity to submit feedback to the State Planning Provisions (SPPs) Review Scoping Paper under phase one of the review process.

The objective of TALC's submission is to embed health and wellbeing in the SPPs and the future Tasmanian Planning Policies. TALC proposes this can be achieved by putting a 'health in all policies' lens on the SPPs and including improved or additional provisions that support and promote active living, access to open space, food security and social inclusion.

In late 2021, TALC was commissioned to provide a discussion paper to the Premier's Health and Wellbeing Advisory Committee - *Tasmania's Planning System – Opportunities for Health and Wellbeing*. A number of key issues with Tasmania's State Planning Provisions were raised in this discussion paper and have been included in this submission.

The rationale and supporting evidence for the recommended amendments is detailed throughout the submission with a reference list attached. Individual TALC members have contributed to this submission and may have also made separate submissions on behalf of their organisations.

This submission has been approved by TALC's Chair and endorsed by TALC's membership.

About the Tasmanian Active Living Coalition

TALC is an independent, not-for-profit coalition made up of representatives from a broad range of non-Government and Government organisations with an interest in active living.

TALC members work together to influence and inform policies, decisions and strategies that encourage the creation of active living environments.

TALC's aim is to lead, support and promote the creation of environments supporting active living, and to add value by providing a mechanism for an integrated approach and potentially drive behaviour change in relation to active living.

TALC's purpose is to:

- translate evidence into policy and practice;
- build on existing partnerships and develop new partnerships as required;
- raise the profile of active living;
- support, advise and advocate for improvements in the built and natural urban environments including improved access to our parks and open spaces; and
- highlight the importance the built and natural urban environments play in active living.

The principal interest of TALC is for the SPPs to enhance (and not hinder) active living (including physical activity and active transport) and access to healthy food for community health and wellbeing.

Therefore TALC advocates to have *health and wellbeing* as priority outcomes from land use planning as regulated through the Tasmanian Planning System.

Definitions

The following terms included in this submission are defined as

Active living - a way of life that integrates physical activity into daily routines (Heart Foundation, 2016).

Active travel - travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling and may allow for integration of multi-modal transport in the course of a day (Heart Foundation, 2016).

Built environment - the structures and places in which we live, work, shop, learn, travel and play, including land uses, transportation systems and design features (National Heart Foundation of Australia, 2017).

Food security - the ability of individuals, households and communities to physically and economically access food that is healthy, sustainable, affordable and culturally appropriate. The domains of food security include supply, demand, utilisation and access (financial and physical) (Heart Foundation, 2016).

Health - a state of complete physical, mental and social wellbeing and not merely the absence of disease (World Health Organization, 2022a).

Liveability - a livable community is one that is safe, socially cohesive, inclusive and environmentally sustainable. Highly liveable areas provide affordable housing that is well serviced by public transport, walking and cycling infrastructure (Department of Agriculture Water and the Environment, 2021). They have good access to employment, education, shops and services, POSs, and social, cultural and recreational facilities (Department of Agriculture Water and the Environment, 2021).

Physical activity - any bodily movement produced by skeletal muscles that requires energy expenditure encompassing all movement during leisure time, for transport to get to and from places, or as part of a person's work (World Health Organization, 2022b).

Social inclusion – is a term used to describe how government, community, business, services and individuals can work together to make sure that all people have the best opportunities to enjoy life and do well in society. It is about making sure that no one is left out or forgotten in our community (Social Inclusion Unit, 2008).

Wellbeing – mental health is a state in which an individual can realise their own potential cope with normal stresses, work productively and contribute to their community (World Health Organization, 2022a)⁹.

⁹ TALC acknowledges that Tasmania will likely develop its own definition of wellbeing as part of the development of Tasmanian Health and Wellbeing Framework.

Active Living Overview

The SPPs are a key mechanism for applying healthy planning principles to the built environment in Tasmania to create liveable locations which promote physical activity, healthy eating and social connection. TALC provides the following overview of key aspects of active living which are directly related to implementation of the SPPs.

The Built Environment

The way the environment is planned, designed and built can directly affect the health and wellbeing of people who use and inhabit the space. A series in *The Lancet*, one of the top-ranking medical journals in the world, *Urban Design and Transport to Promote Healthy Lives* recognises the importance of the built environment for active living (Goenka and Andersen, 2016). The series recommends creating compact cities that locate shops, schools, other services, parks and recreational facilities, as well as jobs near homes, and providing highly connective street networks making it easy for people to walk and cycle to places (Goenka and Andersen, 2016). The Heart Foundation of Australia's *Healthy Active by Design* framework (National Heart Foundation of Australia, 2017) notes 'planning for active living calls for a commitment to applying healthy planning principles to all levels of the planning system, at every stage of the planning process and in every planning project and policy initiative' (National Heart Foundation of Australia, 2017).

There are many co-benefits of improving planning for active living including reductions in greenhouse gas emissions, improved air quality, reduced traffic congestion, more sustainable infrastructure, increased economic productivity, improved social capital and more liveable towns and cities (Goenka and Andersen, 2016).

Physical Activity

Physical activity is fundamental for good physical and mental health and wellbeing. Physical activity can help prevent heart disease, type two diabetes, numerous cancers, dementia, weight gain, gestational diabetes, and anxiety and depression (Bellew et al., 2020). Being physically active improves sleep and improves brain function at all ages (Bellew et al., 2020).

Despite this, almost half of all Tasmanians aged 18 and over do not do enough physical activity for good health (Australian Bureau of Statistics, 2016). Tasmania is below the national average and is ranked sixth out of the eight states and territories (Australian Bureau of Statistics, 2016).

The International Society for Physical Activity and Health outline eight investments that work to address physical inactivity (International Society for Physical Activity and Health, 2020). The eight investment areas are the evidence-based domains where Governments and organisations can get the best return on investment to improve health and wellbeing through increasing physical activity. Of the

eight identified domains, those that can be directly influenced by the SPPs include: active transport, active urban design and workplaces (International Society for Physical Activity and Health, 2020).

The Heart Foundation's *Blueprint for an Active Australia* states 'reshaping the built environments in which most Australians live, work, learn and recreate can significantly increase daily physical activity levels. Community and neighbourhood design impacts on local walking, cycling and public transport use, as well as on recreational walking and physical activity' (National Heart Foundation of Australia, 2019).

Liveability

The Heart Foundation's 2020-21 What Australia Wants survey measured community sentiment around qualities of active neighbourhoods and support for initiatives to increase infrastructure for physical activity in and around neighbourhoods (National Heart Foundation of Australia, 2020). Tasmanians expressed a desire to live close to shops and amenities, and in a safe area that is quiet/away from main roads. Tasmanians prioritise access to healthy food, housing diversity and a sense of place (that is, safety, community, natural elements as the most important design features) (National Heart Foundation of Australia, 2020). The report noted that 'a lower proportion of Tasmanians believe their neighbourhood helps them to be active (75 per cent compared to a national average of 80 per cent)' (National Heart Foundation of Australia, 2020). Compared with other jurisdictions, a sense of community was rated lower – with only 58 per cent scoring it as good/excellent – below items such as quality of sports facilities and footpaths (National Heart Foundation of Australia, 2020). These results highlight that liveability, access to healthy food and local physical activity opportunities are important to Tasmanians. However, the results also indicate that these attributes are not always accessible to Tasmanians and should be embedded within the planning system.

In 2021, Place Score ran the Australian Liveability Census, the largest social research project in Australia which included 3 200 records gathered from community members in Tasmania (Malshe et al., 2021). The census explored what was most important in terms of neighbourhood liveability and current performance (Malshe et al., 2021). Ideas for improving local neighbourhoods were collected and included improving walkability to local amenities and open spaces (Malshe et al., 2021). Nationally, walking/jogging/bike paths that connect housing to community amenity was selected as being most important to their ideal neighbourhood by 55 per cent of respondents and ranked third most important overall.

The COVID-19 pandemic has required people to stay close to home, further highlighting the importance of how the built environment can support health and wellbeing. The living with COVID-19 landscape provides a unique opportunity to prioritise the development of liveable built

environments supportive of health and wellbeing by embedding these principles within key policy levers such as the SPPs.

Integrated Policies in Active Living

Improving health and wellbeing by supporting Tasmanians to live active lives requires a coordinated approach across government agencies and sectors as called for in the World Health Organization's (WHO) 'Health in All Policies' approach to preventative health (World Health Organization, 2022c). In Tasmania, key existing policies which reference active living and are relevant to the SPP review are detailed as follows to provide context and background to the existing policy landscape.

The *Tasmania Statement* supports the connection between health and wellbeing enhanced by natural open spaces. It further notes the opportunities available as Tasmania grows to plan communities to create healthy, liveable and connected spaces (Premier's Health and Wellbeing Advisory Council, 2021). The *Tasmania Statement* creates an authorising environment for the Premier's Health and Wellbeing Advisory Council to support health and wellbeing considerations within the planning scheme.

The *Healthy Tasmania Five Year Strategic Plan 2022-26* advocates for a health in all policies approach, including an analysis of the systems outside the health sector which influence the health status of populations (Department of Health and Human Services, 2022). The plan focuses on systems and supporting active living initiatives (Department of Health and Human Services, 2022). This builds on earlier work under *Tasmania's Plan for Physical Activity 2011-2021* which aimed to 'create built and natural environments that enable and encourage physical activity' (Department of Infrastructure, 2010).

In 2016, a Parliamentary Select Committee Inquiry into Preventative Health Report outlined key findings and recommendations. The Heart Foundation previously highlighted the report's key findings and recommendations in relation to active living in its 2016 *Representation to the Final Draft State Planning Provisions* as follows (Heart Foundation, 2016):

Executive summary (page 2)

'The Committee recognises the link between health and the built environment. Liveability principles must be embedded in all Government policy decisions relating to the built environment including but not limited to transport, infrastructure and land use planning.'

Recommendation 3 (k) in relation to a preventative health strategy (page 4):

(k) The importance of active lifestyles, healthy eating and physical activity to improve the health and wellbeing of Tasmanians.

Recommendation 4 (page 4)

4. *The Government's health and wellbeing policies are reflected in the Tasmanian Planning System and transport infrastructure policy.*

- d) *Government adopts a state-wide planning policy that ensures liveability principles are embodied in all planning decisions;*
- e) *Government ensures transport infrastructure planning and policy decisions embody liveability principles; and*
- f) *Provisions in the new state-wide planning scheme give consideration to active transport links (e.g. walking and cycling), especially within and between urban communities.*

Findings (page 8):

22. *The built environment is a significant contributor to improving longer term health and wellbeing outcomes.*

23. *There is a need to recognise the link between health and the built environment, and this needs to be embodied into State policy and the Tasmanian Planning System.*

Health and wellbeing are embedded in the SPPs under *Schedule 1 Objectives of the Resource Management and Planning System (RMPS)* and specifically the *Land Use Planning and Approvals Act 1993 (LUPAA)* Part 2 Objective (1)(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...'

Whilst the SPP Review Scoping Paper is limited specifically to the five-year review of the SPP implementation, it will be important to subsequently review the SPPs for compatibility with Tasmanian Planning Policies currently under review. Examples of how a further detailed review of SPPs might be improved to meet Schedule 1, Part 2 Objective are comprehensively set out in the *Heart Foundation Representation to the final draft State Planning Provisions 7 March 2016* (Heart Foundation, 2016).

Summary of Active Living Policies

Tasmanian

Tasmania Statement – Working Together for the Health and Wellbeing of Tasmanians (Premier's Health and Wellbeing Advisory Council, 2021)

Healthy Tasmania Five-Year Strategic Plan 2022-26 (Department of Health and Human Services, 2022)

Joint Select Committee Inquiry Into Preventative Health Report (Parliament of Tasmania, 2016)

Heart Foundation Representation to the final draft State Planning Provisions 7 March 2016 (Heart Foundation, 2016)

Tasmania's Walking and Cycling for Active Transport Strategy 2011-2021 (Department of Infrastructure, 2010)

Hobart City Deal (Commonwealth of Australia, 2019)

The Southern Tasmanian Regional Land Use Strategy (STRLUS) 2010-2035 – Regional Policies 10, 11, 13, 18 and 19 (State Planning Office, 2010)

National¹⁰

National Preventative Health Strategy 2021-30 (Department of Health, 2021)

National Obesity Strategy 2022-32 (Commonwealth of Australia, 2022)

Getting Australia Active III – a Systems Approach to Physical Activity for Policy Makers (Bellew et al., 2020)

National Heart Foundation - Blueprint for an Active Australia (National Heart Foundation of Australia, 2019)

National Heart Foundation – Healthy Active by Design (National Heart Foundation of Australia, 2017)

International

Global Action Plan on Physical Activity 2018-30 (World Health Organization, 2018)

International Society for Physical Activity and Health- Eight Investments that Work for Physical Activity (International Society for Physical Activity and Health, 2020)

United Nations Sustainable Development Goals (UN General Assembly, October 2015)

¹⁰ There is no **National Physical Activity Plan** to provide an overarching framework for addressing physical inactivity and guide future action. In 2020, the Australian Prevention Partnership Centre published [Getting Australia Active III : A systems approach to physical activity for policy makers](#) which identifies eight key areas for action to address physical inactivity. This serves as a guide for policy makers in Australia in the absence of a national plan.

TALC Response to Scoping Paper Questions

1. Which parts of the SPPs do you think work well?

No comment.

2. Which parts of the SPPs do you think could be improved?

Health in All Policies

The Parliament of Tasmania *Select Committee Inquiry Into Preventative Health Report* recommended Government ‘adopt a ‘Health in All Policies’ approach to improving the health and wellbeing of Tasmanians’ (Parliament of Tasmania, 2016). The SPPs review provides an opportunity to better align the SPPs with a ‘Health in All Policies’ approach.

In a broader policy context, it is important to consider how the Tasmanian Planning Policies will be developed and integrated with current Government initiatives including development of a Sustainability Strategy, Wellbeing Framework and Review of Local Government.

SPP Purpose Statements clause 2.1

Currently, the Planning Scheme Purpose simply refers to the Resource Management Planning System (RMPS) objectives. The SPPs lack statements about desired outcomes, which leave the contents of the SPPs in a policy vacuum. Specifically, they do not currently reference their relationship to population health or wellbeing.

TALC recommends under the SPPs Planning Scheme Purpose clause 2.1 to include a statement of outcomes within the framework of the RMPS objectives with specific reference to health and wellbeing.

Furthermore, TALC recommends inclusion in the purpose and the objectives for each zone, use standards, development standards and codes, the desired health and wellbeing outcomes from the implementation of the specific provision.

The mechanisms by which the SPPs will further the Schedule 1 Objectives related to health and wellbeing should be explicit. For example, provisions should improve food security, social inclusion the quality of the public realm to optimise walkability, reduce travel distances between locations, improve air quality, safety, comfort, and increase active travel opportunities.

Active Living

The SPPs should focus on active living through the built environment. A key aspect of active living is the provision of public open space (POS). TALC notes the following issues relating to the provision and retention of POS:

- POS being viewed as a tradable commodity since legislation removed the requirement that POS be held in perpetuity;
- A preference away from small neighbourhood parks towards centralised playgrounds (mainly accessed by car);
- Loss of legislation requiring the provision of riparian and littoral reserves, as was the case for pre 1993 legislation;
- Planning lacking for lifecycle changes in neighbourhoods (i.e., differing requirements as residents age and young families replace); and
- Limited strategic planning for POS.

TALC proposes the following actions related to the SPPs which can have a positive impact on active living:

- Leverage off the opportunity of the COVID-19 pandemic with a renewed interest in local parks and recreation locally;
- Review the Local Government of Tasmania (LGAT) *Tasmanian Subdivision Guidelines October 2013* and *Tasmanian Standard Drawings 2020*. These documents should enhance (and not hinder) planning and design for streets which promote active travel, rather than simply focusing on engineering detail; and
- Identify elements of each Regional Land Use Strategy that relate to active living principles and align the SPPs with these. For example, taking the STRLUS, TALC recommends alignment with regional Policies 10, 11, 13, 18 and 19 (11).

TALC recommends the following provisions within the SPPs to improve active living:

- Insert use and development standards focusing on community-led housing models for increasing residential density; and
- Include standards for the provision of POS and littoral and riparian reserves.

Active Travel

TALC recommends the SPPs make specific provisions for streets that are inclusive for all users to improve active travel through:

- Permeability and connectivity of streets and paths, and limiting dead end cul-de-sacs; and

- Reviewing standards that prevent or are averse to varying street widths, alignment etc to suit the street function with reference to public transport, walking and cycling provision, zero building setbacks, shop top housing, and main street shopping.

Climate Change

Key State, National and International policies reference the link between health and wellbeing and climate change. The *Tasmania Statement* refers to climate change and health, stating ‘we need to continue to take practical action on climate change and poverty because they impact on the health and wellbeing of current and future generations of Tasmanians’ (Premier’s Health and Wellbeing Advisory Council, 2021). Australia is a signatory to the United Nations 2030 Agenda for Sustainable Development which includes 17 Sustainable Development Goals which include addressing climate change (UN General Assembly, October 2015). The robust research evidence and direct reference in the *Tasmania Statement* create a call to action to consider climate change across all policies and is critically relevant in reviewing the SPPs.

The Medical Journal of Australia’s 2021 report on the health impacts of climate change found that ‘Australians are increasingly exposed to and vulnerable to excess heat and that this is already limiting our way of life, increasing the risk of heat stress during outdoor sports, and decreasing work productivity across a range of sectors’ (Paul J Beggs et al., 2021). In addition, the report notes that ‘other weather extremes are also on the rise, resulting in escalating social, economic and health impacts’ (Paul J Beggs et al., 2021).

The Heart Foundation’s *Blueprint for an Active Australia* asserts ‘emphasising urban resilience, through inclusive, safe and sustainable design is critical to addressing climate change. Also, the national and international uptake of renewable energy can also help propel a required energy efficiency mode-shift toward more public transport and active transport modes’ (National Heart Foundation of Australia, 2019). *Getting Australia Active III: A systems approach to physical activity for policy makers* highlights the policy co-benefits for active transport and PA including climate change mitigation (Bellew et al., 2020). This policy guide asserts interventions to promote active transport need to be implemented in conjunction with interventions that address the built form and land use to achieve co-benefits of health and climate change mitigation (Bellew et al., 2020).

Throughout this submission, TALC recommends provisions which support active and public transport, urban greening and public open space all of which address the impact of climate change on health and wellbeing (see summary of TALC recommendations numbers 5, 8, 9, 12 and 16). TALC recommends prioritising these provisions which provide contemporary responses to climate change.

3. What improvements do you think should be prioritised?

TALC recommends prioritising improvements supporting:

1. Provision and prioritisation of active travel modes (eg walking, cycling, public transport) and the transport infrastructure that is inclusive for all users;
2. Provision of quality footpaths and cycleway networks;
3. Access to quality POS; parks; playgrounds with shade and shelter;
4. Liveability;
5. Food security;
6. Social inclusion;
7. Climate change; and
8. Workplace health and wellbeing.

4. Are there any requirements that you don't think should be in the SPPs?

No comment.

5. Are there additional requirements that you think should be included in the SPPs?

TALC asserts that compared to the Interim Planning Schemes (in place from 2015-2021), the SPPs do not have the tools to deliver good outcomes for health and wellbeing, liveability, food security, social inclusion, climate change and workplace health and wellbeing. The following additional requirements are proposed as mechanisms for the SPPs to address the priorities outlined under question three.

Site and Building Design

Design standards have been removed from the SPPs around access to sunlight, outdoor areas, and quality green space, which is critical for health and wellbeing in the home. This has become increasingly important during restrictions in response to the COVID-19 pandemic.

TALC recommends reviewing provisions around site and building designs including:

- Requirements for north facing windows;
- Requirements for private open space to be accessed directly from living areas; and
- Requirements for landscaping.

Subdivision Design

Many subdivision standards that provide health and wellbeing outcomes have been removed from the SPPs. Well-designed subdivisions are critical to active living and active travel. Compact neighbourhoods, provision of housing choice and diversity, wayfinding and POS are critical for promoting access to services and active living. Well-designed neighbourhoods that provide opportunities for healthy living have become increasingly more important during the COVID-19 pandemic.

TALC notes the following omissions around subdivision design:

- The STRLUS sets a target of 15 dwellings per hectare. This was an objective in the General Residential Zone standards in interim schemes, as was promotion of higher densities closer to services, facilities and public transport corridors and planning controls to achieve this; and
- The SPPs provide no density targets and no standards to require higher densities closer to services (minimum lot size of 450m² and no maximum lot size). For example, a developer could be advised by a real estate agent that 700m² lots are selling best and therefore deliver only lots at this size (approximately 10 dwelling per hectare).

TALC recommends the following key actions to address these issues:

- Re-instate design standards as per the Interim Planning Schemes into the Residential Zones in the SPPs; and
- Urgently review General Residential Zone Development and Subdivision standards from the SPPs with liveability and health and well-being at front of mind.

Public Open Spaces Code

Ways and POS requirements have been removed from the SPPs. Previous interim schemes included provisions for high-quality POS and wayfinding. This now falls to individual Council Policies under the *Local Government (Building and Miscellaneous) Act 1993*, which lacks consistency and transparency for stakeholders. The SPPs offer an opportunity to significantly enhance POS. This can be through improving the value and use of existing POS, such as parks and natural areas, through ensuring they are useable, accessible and have sufficient facilities to encourage maximum utilisation (such as public toilets, seating, play equipment, and shade). There is also opportunity the provision of new POS including parks and natural areas, greenways, landscaping and planting, community gardens, and areas that foster a sense of community whilst providing a greater connection with nature.

POS comprise spaces that are freely accessible to everyone such as streets, squares, parks, natural features, landmarks, building interfaces, green spaces, pedestrian and bike ways, and other outdoor places (National Heart Foundation of Australia, 2017). POS should not be seen in isolation but in the context of adjacent buildings, its uses and location in a wider network of public and private spaces.

The quality of the POS influences how much time people spend being active or in nature, both of which directly influence health and wellbeing. Public areas that are aesthetically pleasing, safe, clean and comfortable attract people to the area thus leading to increased walking, cycling, and opportunities for social interaction. The Heart Foundation's *Healthy Active by Design* framework reports that residents with a larger neighbourhood parks within 1600 m engage in 150 minutes more recreational walking per week than those with smaller parks (National Heart Foundation of Australia, 2017). Research links physical activity in or near green space to important health outcomes including obesity reduction, lower blood pressure and extended life spans (Davern et al., 2017). Sufficient provision of POS including parks and reserves, sporting facilities, community gardens and greenways is important in supporting opportunities for being active.

TALC recommends the development of a specific Public Open Spaces Code which includes detailed provisions on POS within the Tasmanian planning system.

Urban Greening

A growing body of evidence demonstrates that urban green spaces, such as parks, playgrounds, and residential greenery, help keep cities cool, act as places of recreation, support physical activity and improve mental health (Byrne, 2021, National Heart Foundation of Australia, 2019, Davern et al., 2017).

TALC notes a lack of opportunities to encourage green infrastructure under the SPPs. TALC's Discussion Paper - *Tasmania's Planning System – Opportunities for Health and Wellbeing* demonstrated difficulties in providing green spaces under the SPPs through a case study of Brighton Council's *Greening Brighton Strategy* (the Strategy). The Strategy aims to increase trees across Brighton's urban areas through strategic tree planting, including in private developments and subdivisions.

Implementation of the Strategy under the SPPs is extremely difficult, given the provisions do not promote urban greening at all. There are no landscaping requirements for units, commercial developments, streets, or vegetation retention (except if priority vegetation). To address the limitations of the SPPs, Council tried to introduce a Landscaping Specific Area Plan as part of its Local Provisions Schedule (LPS), but it was rejected by the Tasmanian Planning Commission. This case study demonstrates the roadblocks created by the SPPs for local government in providing green spaces.

Research indicates that urban greenery including trees, vegetation and green surfaces (eg roofs and facades) can act as mechanisms for cooling within cities, helping mitigate the urban heat island effect and climate change (Davern et al., 2017). Urban greenery can reduce temperatures by 1- 4 °C (Davern et al., 2017).

TALC recommends the SPPs include provisions for urban greening such as landscaping requirements for multiple dwellings and commercial or industrial use, street trees, vegetation and green surfaces, and green POS.

Multiple Dwelling Units

Multiple dwelling units are generally smaller and have less private open space thus increasing demand for quality POS provision. Multiple dwelling units are also often inward facing and have poor passive surveillance to street frontages. They have no public land and when developed on larger sites often block potential connectivity to surrounding land. Body Corporates can be problematic on larger sites and include ongoing costs for the owner that are effectively passed on by the developer in choosing strata over subdivision.

A local example of increasing multiple dwelling units can be seen in Brighton Council on large sites as opposed to subdivisions. It can be assumed that in part this is to do with avoiding POS contribution fees and other subdivision costs (eg utility connections). This impacts on the liveability of these residential areas as they lack access to POS, connectivity through active and public transport and reduced passive surveillance.

TALC recommends the SPPs include provisions which encourage subdivision instead of strata where possible and ensure there is equity in dwelling density settings, POS contributions, improved passive surveillance and connectivity.

Social inclusion

The *Joint Select Committee Inquiry Into Preventative Health Report* identified social inclusion as a key social determinant that impacts on health (Parliament of Tasmania, 2016). The report highlighted the importance of a focus on implementation of measures increasing social inclusion across all government agencies (Parliament of Tasmania, 2016).

The way density is designed should account for the varying needs of different population groups. Designing and locating safe, affordable, well-connected, higher density housing options is important for different age groups to be able to access the housing market appropriate for their lifestyle and situation (The Department for Communities and Social Inclusion, 2013). Providing a diversity of housing options increases the likelihood that people of lower socioeconomic backgrounds have convenient access to public transport, health services, schools and employment opportunities (The Department for Communities and Social Inclusion, 2013). Ensuring people can work close to where they live will provide more equitable access to employment and services.

The quality of the public realm influences whether people feel safe and comfortable in that area as well as opportunities for social interaction, particularly for women and children. Design of the public

realm supports social inclusion through taking into account how that space operates during different times of the day, with different demographics using it, and across all seasons of the year (Hulse et al., 2011).

Feeling unsafe in public spaces has a significant impact on whether residents, specifically women, the elderly and young children are prepared to use them. Designing spaces which support activities attract more people and promote the perception that they are orderly and peaceful, can be important for social groups in enhancing active living opportunities, and support overall community liveability (Hulse et al., 2011).

It is important to consider the role of the built environment on mobility limitations and disability to ensure accessible movement networks are created and maintained. This will support older adults to age in place and improve quality of life through the encouragement of participation in physical activity, exposure to the natural environment, and social interaction with friends and neighbours (Hulse et al., 2011).

Access to local opportunities for physical activity for exercise, recreation or active transport supports social inclusion and builds a sense of community connectedness beneficial to health and wellbeing (National Heart Foundation of Australia, 2019, National Heart Foundation of Australia, 2017). The Heart Foundation's *Healthy Active by Design* resource asserts that 'an essential part of good governance is embedding a socially inclusive and respectful approach to older people into policies and processes' (National Heart Foundation of Australia, 2017). This principle could equally be applied to how the SPPs impact all social determinants of health. The design of the places we live, work and play must be inclusive of all community members.

The SPPs can act as a mechanism to enhance social inclusion by providing safe, affordable, well-connected, higher density housing options, access to public open/green space, safe and enjoyable active travel networks to a variety of destinations with a focus on equity and inclusion (Heart Foundation, 2016, National Heart Foundation of Australia, 2019, Hulse et al., 2011).

6. Are there any issues that have previously been raised on the SPPs that you agree with or disagree with?

Liveable Streets Code

TALC is aware of and supports the Heart Foundation's previous recommendation of the development of a Liveable Streets Code in their 2016 *Representation to the final draft State Planning Provisions* (Heart Foundation, 2016). A Liveable Streets code, or similar, would provide measurable standards to the assessment of permit applications (Heart Foundation, 2016).

In addition, a Liveable Streets Code would support active travel through provisions that include standards for footpaths suitable for walking and requirements for safe cycling infrastructure.

Specifically, TALC recommends such a code address the following issues:

- Resolve confusing provisions over streets and roads; and
- Remove the exemption status from planning scheme permit requirements for upgrading of streets/roads to allow active travel to be realised.

C2.0 Parking and Sustainable Transport Code

Under section C2.0 'general comments' in the *Summary of Issues Previously Raised on the SPPs* document, TALC agrees with the comment that car parking space requirements are excessive and do not encourage other forms of sustainable transport (e.g. public transport and active transport) and impacts on liveability.

TALC recommends revising the Parking and Sustainable Transport Code to comprehensively treat 'sustainable transport' as a component of active travel.

TALC is aware of and supports Bicycle Network Tasmania's recommendations for the provision of bike parking for both visitors and employees, provision of safe and secure bike parking, end of trip facilities as well as introduction of provisions for bike parking in apartment buildings.

Workplace health

The Heart Foundation's 'Blueprint for an Active Australia outlines evidence on the importance of being active in the workplace.

The workplace is increasingly being recognised (nationally and internationally) as a priority high reach setting for health behaviour interventions, extending from a labour-based approach to a public health 'healthy workers' approach (National Heart Foundation of Australia, 2019).

In general, a physically active workforce can improve physical and mental health, reduce absenteeism and increase productivity, thereby providing important benefits to individuals and workplaces (National Heart Foundation of Australia, 2019). Workplaces should see the implementation of physical activity programs as a strategic business enhancement opportunity (National Heart Foundation of Australia, 2019).

TALC is aware of and supports the Heart Foundation's previous detailed recommendations related to workplace health in their 2016 *Representation to the final draft State Planning Provisions* (Heart Foundation, 2016). The representation asserts that workplaces can 'support increased levels of physical activity through the design of a building's circulation system, encouragement of stair use, the provision of end-of-trip facilities (such a secure bicycle storage and change facilities), and there is convenient and safe access to public transport' (Heart Foundation, 2016). In addition, 'safe access to workplaces by active travel is enhanced where buildings provide for natural surveillance of outside spaces and the street' (Heart Foundation, 2016).

The SPPs provide a mechanism for supporting healthy workplaces through provisions that address these barriers and enablers to physical activity in the workplace and during commutes. TALC recommends reviewing provisions related to workplaces to enhance physical activity in line with recommendations previously made by the Heart Foundation in 2016 (Heart Foundation, 2016).

Food Security

Whilst TALC's primary interest in the SPP review is in reference to active living, the importance of a food system that provides access to healthy and affordable food locally is acknowledged. A more-accessible urban environment in which active travel can be used to access healthy local food provides a range of health, wellbeing and environmental benefits (Department of Agriculture Water and the Environment, 2021).

The *Joint Select Committee Inquiry Into Preventative Health Report* specifically references access to food under finding 30 'it is important that people have access to healthy affordable food' (Parliament of Tasmania, 2016).

TALC is aware of the Heart Foundation's extensive recommendations relating to food security outlined in their *Representation to the final draft State Planning Provisions 2016* (Heart Foundation, 2016). Whilst comments to this level of detail are out of scope for this submission, TALC is supportive of the Heart Foundation's food security recommendations.

7. Are there any of the issues summarised in the Review of Tasmania's Residential Development Standards – Issues Paper that you agree or disagree with?

3.2 Planning Directive No. 4.1 and the SPPs

In reference to the revision of prescriptions for north facing windows: TALC recommends this directive is revisited and considered in tandem with other energy efficient aspects of building design. While a north facing window is not a discrete measure of success, it is one element that contributes to energy performance of a dwelling alongside other measures.

4.3 Detailed comments on residential development standards

TALC recommends redrafting of Residential Development Standards to reference open space in relation to access, dimensions, permeable surfaces, green areas, privacy, and solar access. Providing direct access to open space from habitable rooms can encourage biophilic design and connection with nature, enhancing the indoor-outdoor relationship. Incorporating these principles within urban

infill environments and higher density residential developments enhance liveability and active living (Department of Agriculture Water and the Environment, 2021).

4.3.6 Standards for garage and carport opening widths

TALC recommends in the case of multiple dwellings and group developments, consideration be given to laneways, rear access, and grouping of driveways to reduce the number of crossings and maximise pedestrian access.

4.3.8 Frontage fences

Fence height and transparency contributes towards crime prevention through environmental design by allowing sightlines between habitable rooms and the street ('eyes on the street') (Australian Institute of Criminology, 2012). This supports active living through enabling people to transverse public spaces at different times of the day with passive surveillance in turn reducing crime (Australian Institute of Criminology, 2012).

4.4 Other issues

Tandem or jockey car parking spaces are not supportive of active living unless in a policy environment supportive of electric vehicles. TALC recommends individual parking spaces should be reduced, and public transport and other active forms of travel prioritised.

Summary of TALC recommendations for SPP review

1. Consider how the Tasmanian Planning Policies will be developed and integrated with existing relevant policies and planned policies (eg Sustainability Strategy, Wellbeing Framework and Review of Local Government).
2. Reference health and wellbeing outcomes in the SPPs including:
 - 2.1. Clause 2.1 purpose to state how the RMPS objectives give effect to health and wellbeing.
 - 2.2. Inclusion in the purpose and the objectives for each zone, use standard, development standard, and codes the desired health and wellbeing outcomes from the implementation of the specific provision.
 - 2.3. Detail the mechanisms by which the SPPs will further the Schedule 1 Objectives related to health and wellbeing.
3. Insert use and development standards focusing on community led housing models for increasing residential density.
4. Include standards for the provision of POS and littoral and riparian reserves.
5. Improve provisions for active transport which provide:
 - 5.1. Permeability and connectivity of streets and paths;
 - 5.2. Limited dead end cul-de-sacs; and
 - 5.3. Varying street widths and alignment to suit the street function.
6. Review provisions around site and building designs including:
 - 6.1. Requirements for north facing windows;
 - 6.2. Requirements for private open space to be accessed directly from living areas; and
 - 6.3. Requirements for landscaping
7. Review of provisions for subdivision design including:
 - 7.1. Re-instate design standards as per the Interim Planning Schemes into the Residential Zones in the SPPs; and
 - 7.2. Urgently review General Residential Zone Development and Subdivision standards from the SPPs with liveability and health and well-being at front of mind.
8. Development of a specific Public Open Spaces Code which includes detailed provisions on POS within the Tasmanian planning system.
9. Revise provisions related to urban greenery including:
 - 9.1. Landscaping requirements for multiple dwellings and commercial or industrial use;
 - 9.2. Require street trees in new subdivisions; and
 - 9.3. Provisions for access to open green space.
10. Revise provisions related to multiple dwelling units to:
 - 10.1. Encourage subdivision instead of strata where possible;
 - 10.2. Ensure equity in dwelling density settings;

- 10.3.Ensure POS contributions; and
- 10.4.Improve passive surveillance and connectivity.
- 11. Social Inclusion - consider how the SPPs can promote social inclusion.
- 12. Development of a Liveable Streets Code in line with the Heart Foundation's 2016 *Representation to the final draft State Planning Provisions* (Heart Foundation, 2016).
- 13. Review of the Parking and Sustainable Transport Code to:
 - 13.1.Comprehensively treat 'sustainable transport' as a component of active travel; and
 - 13.2.Include provisions for safe and secure bike parking, end of trip facilities as well as introduction of provisions for bike parking in apartment buildings.
- 14. Workplace health and wellbeing - reviewing provisions related to workplaces to enhance physical activity in line with recommendations previously made by the Heart Foundation in 2016 (Heart Foundation, 2016).
- 15. Food security – review of the Heart Foundation's extensive recommendations relating to food security outlined in their *Representation to the final draft State Planning Provisions 2016* (Heart Foundation, 2016).
- 16. Further review of the Residential Development Standards including:
 - 16.1.provision of POS;
 - 16.2.Provisions for laneways, rear access, and grouping of driveways to maximise pedestrian access in multiple dwellings and group developments;
 - 16.3.Requirements for parking spaces and provisions for secure bicycle parking;
 - 16.4.Provision of north facing windows;
 - 16.5.Consideration of crime prevention through environmental design principles; and
 - 16.6.Prioritising active transport modes and limiting individual car parking spaces.

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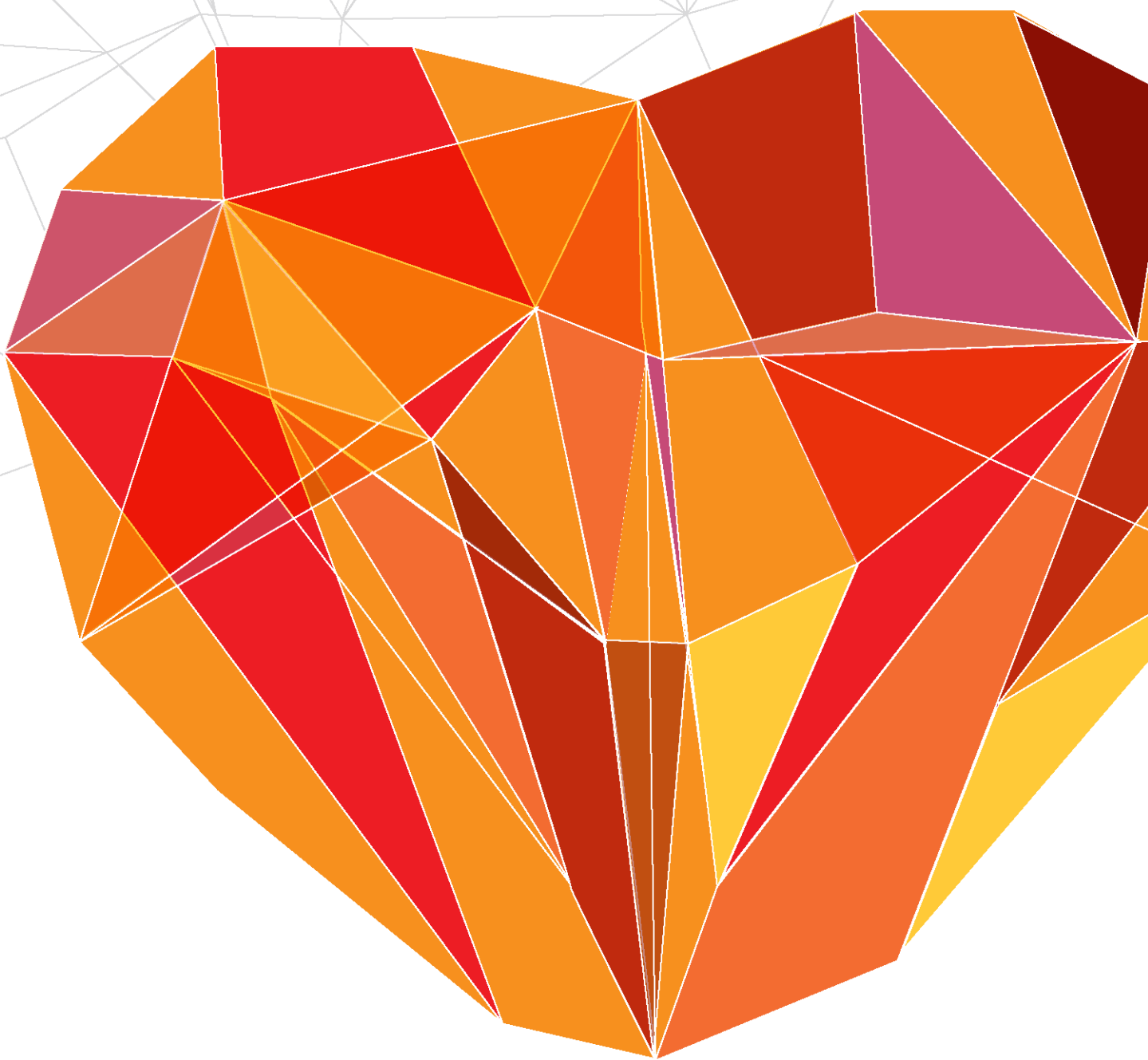
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Heart Foundation representation to the final
draft State Planning Provisions 7 March 2016

18 May 2016



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Glossary

AS	acceptable solution
JSCPH	Joint Select Committee Inquiry into Preventative Health
LPS	Local Provisions Schedules
LUPAA	<i>Land Use Planning and Approvals Act 1993</i>
PAL State Policy	State Policy on the Protection of Agricultural Land 2009
PAN	Planning Advisory Note
PC	performance criteria
RMPS	Resource Management and Planning System
SPPs	State Planning Provisions

A. Introduction

The Heart Foundation welcomes the opportunity to submit our representation to the Final Draft State Planning Provisions 7 March 2016 (SPPs).

The object of the representation is to make *health and wellbeing* a key outcome from the operation of the future Tasmanian Planning Scheme.

The rationale and supporting evidence for the recommended amendments is contained in the substantive part of the representation.

Annexure 2 contains the Heart Foundation's recommended amendments to the SPPs in chronological clause number order.

Principal interest of the Heart Foundation

The principal interest of the Heart Foundation is to have the SPPs for the Tasmanian Planning Scheme enhance (and not hinder) physical activity and access to healthy food for community health and wellbeing.

Therefore the Heart Foundation seeks to have *health and wellbeing* a priority outcome from land use planning as regulated through the proposed Tasmanian Planning Scheme.

Why focus on health and wellbeing?

Healthy communities are central to why we plan. Yet there is considerable evidence that our cities and towns are not assisting in improving population health and wellbeing.

Planning schemes primarily concern use and development on land that forms the built environment.

The built environment means the structures and places in which we live, work, shop, learn, travel and play, including land uses, transportation systems and design features; all relevant matters for the proposed Tasmanian Planning Scheme to address.

The link between the built environment and health and wellbeing is well established. The built environment can be an influential determinant on the rate of death and suffering from chronic disease including heart, stroke and blood vessel disease, along with a range of other chronic diseases prevalent in the Tasmanian community.

Planning that delivers thoughtfully designed and built environments can contribute to reduced or deferred incidence of chronic disease and reduce inequities. For instance, provisions in planning schemes relating to density and transport can contribute to realising the health benefits from walking and cycling.

The Tasmanian Planning Scheme needs to be explicit in articulating how the Schedule 1 objectives of LUPAA are furthered with health and wellbeing a clearly identified subject of its provisions.¹

State Planning Provision's documents

Documents relevant to this representation:

- Draft State Planning Provisions 7 March 2016 (SPPs)
- Terms of Reference issued by The Minister for Planning and Local Government, the Hon. Peter Gutwein 18 December 2015
- *Land Use Planning and Approvals Act 1993* (LUPAA)
- Explanatory Document for the draft of the State Planning Provisions of the Tasmanian Planning Scheme 7 March 2016 (Explanatory Document)

¹ Adapted from Heart Foundation submissions on the *Land Use Planning and Approvals Amendment Tasmanian Planning Scheme) Bill 2015*

Key documents and evidence informing this representation

Schedule 1 of the Resource Management and Planning System (RMPS) with specific reference to LUPAA Schedule 1 Part 2 states the objective:

*'(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'*

Primary evidence in support of furthering the LUPAA objective for health and wellbeing and in support of this representation is drawn from the following:

1. The report of the [Joint Select Committee Inquiry into Preventative Health](#) (JSCPH)² that amongst its findings and recommendations are the following:

Executive summary (page 2)

'The Committee recognises the link between health and the built environment. Liveability principles must be embedded in all Government policy decisions relating to the built environment including but not limited to transport, infrastructure and land use planning.'

Recommendation 3 (k) in relation to a preventative health strategy (page 4):

- (k) the importance of active lifestyles, healthy eating and physical activity to improve the health and wellbeing of Tasmanians.

Recommendation 4 (page 4)

4. The Government's health and wellbeing policies are reflected in the Tasmanian Planning System and transport infrastructure policy.
 - a. Government adopts a state-wide planning policy that ensures liveability principles are embodied in all planning decisions;
 - b. Government ensures transport infrastructure planning and policy decisions embody liveability principles; and
 - c. Provisions in the new state-wide planning scheme give consideration to active transport links (e.g. walking and cycling), especially within and between urban communities.

Findings (page 8):

22. The built environment is a significant contributor to improving longer term health and wellbeing outcomes.
23. There is a need to recognise the link between health and the built environment, and this needs to be embodied into State policy and the Tasmanian Planning System.

2. Heart Foundation "Healthy by Design" [Healthy by Design: A guide to planning and designing environments for active living in Tasmania](#)
3. Heart Foundation "The Blueprint" [Blueprint for an active Australia: Key government and community actions required to increase population levels of physical activity in Australia-2014-2017](#)
4. Heart Foundation "Draft for a State Policy for Healthy Spaces and Places" and supporting documentation [Heart Foundation \(Tasmania\) draft State Policy for Healthy Spaces and Places and the Supporting Advocacy Document](#)
5. Heart Foundation "Healthy Active by Design" [Healthy Active by Design](#)

² Parliament of Tasmania 2016

Definitions

The following terms as used in this representation are defined below:

active living means a way of life that integrates physical activity into daily routines.

active travel (transport) means travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling and may allow for integration of multi-modal transport in the course of a day.

health means a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.

built environment means the structures and places in which we live, work, shop, learn, travel and play, including land uses, transportation systems and design features.

food security means the ability of individuals, households and communities to physically and economically access food that is healthy, sustainable, affordable and culturally appropriate. The domains of food security include supply, demand, utilisation and access (financial and physical).

Principles underpinning the representation

The representation is based on the following health, wellbeing and the built environment principles which form the tests for the examination of the draft SPPs and ultimately whether the SPPs further the objectives of LUPAA and satisfy the criteria under ss. 11, 14 and 15 of LUPAA.

1. Active living: integrating activity into daily routines.
2. Active travel: travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling.
3. Provision of public open space and reserves for aesthetic, environmental, health and economic benefits.
4. Mixed density housing to satisfy life cycle requirements and for walkable neighbourhoods.
5. Compatible mix of land uses to promote active travel
6. Food security and access to healthy food.
7. Buildings and site design actively promotes physical activity.

State Policy

The Heart Foundation's consideration of the draft SPPs is in the vacuum of little policy direction from the State Government in terms of outcomes being sought. The Tasmanian Planning Scheme is responsive to State Policy made under the *State Policies and Projects Act 1993* and not Government policy. The existing State Policies assist in this regard, but are limited in scope and say little about the aspirations for the Tasmanian towns and cities where the bulk of the population live, work, shop, learn, travel and play. A State Policy in the form of the draft *State Policy for Healthy Spaces and Places* as advocated by the Heart Foundation³ would give the necessary policy context that has the imprimatur of Parliament for application to the SPPs. Therefore this representation needs to be presumptive in advocating the policy, the evidence and deduce the changes required to the SPPs to further the Objectives of the RMPS, particularly in the context of promoting the LUPAA Part 2 Objective, *'the health and wellbeing of all Tasmanians...'*

³ See [Heart Foundation \(Tasmania\) draft State Policy for Healthy Spaces and Places](#) and the [Supporting Advocacy Document](#)

About the Heart Foundation

The National Heart Foundation of Australia (Tasmania Division) is a company limited by guarantee. The business is managed by the Chief Executive Officer (CEO) who reports to the Tasmanian Board of Directors. The Board has the responsibility for determining strategy and the corporate governance of the Tasmanian business.

The organisation known as the National Heart Foundation of Australia is a federation of related entities operating together under the provisions of a Federation Agreement. Those entities are the National Heart Foundation of Australia ACN 008 419 761 (National); and the separate National Heart Foundation entities operating in each of the States and Territories of Australia. In 2009 the National Heart Foundation celebrated its fiftieth anniversary. The National Heart Foundation operates under a group services model.

Our purpose is reduce premature death and suffering from heart, stroke and blood disease.

We are currently implementing our five year strategy For all Hearts: Making a difference to Australia's heart health (For all Hearts). For all Hearts focuses our work on four key goals:

- Healthy Hearts
- Heart Care
- Health Equity
- Heart Foundation Research

We will deliver on our strategy through financial strength, our people, advocacy, data and evaluation, reputation and relevance, innovation, integration, business systems and governance.

The Tasmanian Strategic Plan has been developed to align with For all Hearts to provide a strategic focus for the work of the Heart Foundation in Tasmania. Our goal is to deliver the best possible outcomes under the For all Hearts goals within the specific size and cohorts of the Tasmanian population; the local Tasmanian context; and the operational constraints and resources available within the relatively small Tasmanian Division.

The Heart Foundation thanks the Minister for the opportunity to provide this submission and would welcome the opportunity to discuss our submission further.

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B. Elements for health and wellbeing for the State Planning Provisions (Rationale and Recommendations)

Clause 2.0

1. Purpose requires a clear set of objectives for use and development of land based on how the LUPAA objectives are furthered and how consistency is found with State Policies.
2. Purpose should include the following objectives:
 - Use and development of land encourages and supports active living for improved health outcomes.
 - Use and development of land encourages and supports active travel for improved health outcomes.
 - Public open spaces and reserves provide a well distributed network of walkable and attractive spaces strategic to local communities for their aesthetic, environmental, health and economic benefits.
 - Mixed density housing and housing that satisfies life-cycle requirements is encouraged to enhance the scope for active living and active travel.
 - Compatible land uses are co-located to promote active travel to, and between different activities.
 - The use or development of land supports a resilient, localised, healthy and sustainable food system.
 - Work places support physical activity through convenient and safe accesses providing for natural surveillance of outside spaces and the street.

Planning Scheme Purpose

The purpose of what is, presumably, to become the Tasmanian Planning Scheme is stated at Clause 2.1 Planning Scheme Purpose. The purpose is stated in terms of:

- Furthering the RMPS objectives
- Consistency with State Policies
- Implementation of regional land use strategies

LUPAA requires a planning scheme to further the objectives, to be consistent with State Policy and for SPPs to be consistent with regional land use strategies. Clause 2.1 as it stands simply repeats the legislative requirements and does not give any indication to how or why subsequent SPPs are included or how they achieve the requirements specified in LUPAA. The Explanatory Document does not assist our understanding, nor why an equivalent clause to 3.0.1 Planning Scheme Objectives in Planning Directive No. 1 is not included. The draft SPPs varies from the structural diagram for the Tasmanian Planning Scheme that had 'purpose and objectives' as part of the State Provisions⁴.

The Heart Foundation submits that the zone and code purposes and objectives for each standard do not substitute for a clear set of purpose statements for use and development of land at the front end of the

⁴ See *The Tasmanian Planning Scheme Legislative Framework* Tasmanian Government March 2015

Tasmanian Planning Scheme based on how the LUPAA objectives are furthered and how consistency is found with State Policies.

Specifically the Heart Foundation seeks to have the Tasmanian Planning Scheme prescribe objectives for the use and development of land (the 'why do we do it' statements) that embody a structure that is based on health and wellbeing outcomes. Such objectives should set the 'head powers' for subsequent provisions affecting applications for permits, guide subsequent amendments to the SPPs and the settings for the Local Provisions Schedules (LPS).

Objectives oriented to promoting and protecting health and wellbeing should be established with reference to the following principles:

- use and development standards that facilitate mixed land use and mixed density housing in cities and towns to support walkable neighbourhoods.
- use and development standards that facilitate equitable access through active travel that involves travel modes involving physical activity such as walking, cycling, and public transport. There is an emphasis on pedestrian and cyclist connectivity and permeability.
- use and development standards that improve the use, attractiveness and efficiency of the public domain including public streets, public spaces and places through facilitating active living and active travel.
- use and development standards that facilitate food security and access to healthy food.
- use and development standards that require the provision of public open space strategic to local communities for aesthetic, environmental, health and economic benefits.
- use and development standards that facilitate equitable access for buildings and design of sites where there is public access. There is suitable provision for pedestrian and cyclist access and not just requirements for vehicle access and parking.

This representation makes recommendations for the inclusion 'up-front' objectives as part of the examination of subsequent provisions.

Recommendation 1

That there be included in the State Planning Provisions a clear set of objectives for use and development of land at Clause 2.0 based on how the LUPAA objectives are furthered and how consistency is found with State Policies.

1. Active living: integrating activity into daily routines

1.1 Policy

Use and development affecting the structure of cities and towns encourages and supports active living as a normal and preferred activity for improved health outcomes.

1.2 Evidence

The Blueprint for an Active Australia⁵ assembles the evidence on the importance of being active in the workplace. The Blueprint asserts:

*Reshaping the built environments in which most Australians live, work, learn and recreate can significantly increase daily physical activity levels. Community and neighbourhood design impacts on local walking, cycling and public transport use, as well as on recreational walking and physical activity*⁶

The findings of the JSCPH included⁷:

22. The built environment is a significant contributor to improving longer term health and wellbeing outcomes

23. There is a need to recognise the link between health and the built environment, and this needs to be embodied into State policy and the Tasmanian Planning System.

1.3 State Planning Provisions relating to active living

SPPs for active living concern setting an objective at 2.0 Planning Scheme Purpose, and a review of zone purpose statements and zone standards.

Active living also strongly relates to the assignment of the zones to land parcels for the LPS and the guidance provided in the Explanatory Document, both outside the scope of representations on the SPPs but, nevertheless, commented upon.

1.4 Purpose

SPPs section 2.1 Planning Scheme Purpose insert the following objective:

Use and development of land encourages and supports active living for improved health outcomes.

1.5 Interpretation

Amenity is defined as:

means, in relation to a locality, place or building, any quality, condition or factor that makes or contributes to making the locality, place or building harmonious, pleasant or enjoyable.

⁵ See Blueprint for an active Australia Action area 1 for references on active living and the built environment

⁶ Blueprint for an active Australia page 15

⁷ Parliament of Tasmania 2016 page 8.

This definition lacks the reason for a concern for amenity, which is for the health and wellbeing of the users of the locality or place. The definition should be amended as follows:

means, in relation to a locality, place or building, any quality, condition or factor that makes or contributes to making the locality, place or building harmonious, pleasant or enjoyable and adds to the health and wellbeing of the users of the locality, place or building.

Insert additional interpretations as follows:

active living means a way of life that integrates physical activity into daily routines.

active travel means travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling and may allow for integration of multi-modal transport in the course of a day.

1.6 Zones

8.1 General Residential zone - purpose

The draft zone purpose contains terms that are not helpful, omits statements on quality, but supports compatible mixed use. The amendments and reasons are shown below:

The purpose of the General Residential zone is:

8.1.1 To provide for residential use or development that accommodates a range of dwelling types at suburban densities, where full infrastructure services are available or can be provided.

The reference to 'suburban densities' is not helpful and should be deleted. It is contended that the standards for lot sizes and dwelling densities for the General Residential zone are higher than the community would perceive as being a suburban density. The reference to a range of dwelling types is valid and consistent with deleting 'suburban densities'. An additional amendment is to add 'reticulated' to the purpose statement. The addition of 'reticulated' is to separate the type of infrastructure referred to in 8.1.1 from 8.1.2 and accords with the commentary in the Explanatory Document (page 35).

Clause 8.1.1 should be amended as follows:

8.1.1 To provide for residential use or development that accommodates a range of dwelling types ~~at suburban densities~~, where full reticulated infrastructure services are available or can be provided.

8.1.2 To provide for the efficient utilisation of available and planned social, transport and other service infrastructure.

This purpose is valid in that it recognises there is a range of infrastructure required for housing areas.

8.1.3 To provide for compatible non-residential use that:

(a) primarily serves the local community; and

(b) does not cause an unreasonable loss of amenity, through noise, activity outside of business hours, traffic generation and movement, or other off site impacts.

This purpose is valid being consistent with providing for community needs ideally within walking or cycling distances of residences.

8.1.4 To ensure that non-residential use does not unreasonably displace or limit Residential use.

This purpose should be deleted because of the unquantifiable ‘*unreasonably*’. The use table and use and development standards should be sufficient to prevent ‘*unreasonably displace*’.

Clause 8.1.4 should be deleted:

~~8.1.4 To ensure that non-residential use does not unreasonably displace or limit Residential use~~

In addition it would be helpful if the purpose for the General Residential zone suggested something of a qualitative focus for improved townscape. Insert (new) clause at 8.1.4 as follows:

8.1.4 To ensure the use and development of land promotes the health, safety and amenity of residential areas.

8.3.1 General Residential zone - Use Standards for discretionary uses.

The objective of this standard is stated as:

To ensure that all discretionary uses, do not cause an unreasonable loss of amenity.

The focus of the clause should be changed from ‘*unreasonable*’ to ‘*compatible*’ so that discretionary uses are required to be relevant to the residential use. This contrasts with the purpose as drafted which could allow, within the available discretionary use classes, a use unrelated to residential use but simply does not cause a loss of amenity. The restated objective is consistent with the use of terms ‘*compatible*’ and ‘*amenity*’ for the zone purpose at 8.1.3 and that residential is the primary use for the zone. The objective at clause 8.3.1 should be restated in the positive as follows:

8.3.1 To ensure that all discretionary uses are compatible with residential use

9.1 Inner Residential zone - Purpose

Clause 9.1.3(c) states ‘*does not unreasonably displace or limit residential use.*’ For reasons given for the deletion of clause 8.1.4, this clause should similarly be deleted.

Clause 9.1.3(c) should be deleted:

~~9.1.3(c) does not unreasonably displace or limit residential use.~~

Turning to the commentary on the allocation of the Inner Residential zone in the Explanatory Document under ‘*zone purpose*’, there are conflicting statements (page 39) that should be deleted:

The Zone has limited application within serviced residential areas,

...this Zone should be well utilised where appropriate.

Within the Inner Residential Zone there should be a reduced expectation on suburban residential amenity,...

The Explanatory Document also refers to ‘*reducing the footprint of urban sprawl and providing high quality residential living in close proximity to services and the city*’. With a focus on these outcomes the Inner Residential zone should not ‘*have limited application*’ or necessarily a reduction in residential amenity. The references to limited application and reduced amenity should be deleted from the Explanatory Document before this document becomes the basic guidance for the allocation of zones for the LP.

9.3.1 Inner Residential zone - Use Standards for discretionary uses

The objective of this standard is stated as:

To ensure that all uses listed as discretionary within the Use Table do not unreasonably impact on amenity.

For the reasons given for the recommended change to clause 8.3.1 this objective should be restated in the positive:

9.3.1 To ensure that all discretionary uses are compatible with residential use.

13.1 Urban Mixed Use zone - Zone Purpose

The Explanatory Document draws on the similarities of the Village and Mixed Use zones. The similarities should be extended as follows with an additional clause drawn from 12.1.2 for the Village zone, as follows:

The purpose of the Urban Mixed Use Zone is stated as:

13.1.1 To provide for a mix of residential, retail, community services and commercial activities in urban locations.

13.1.2 To provide for a diverse range of uses or developments that are of a type and scale that support and do not compromise the role of surrounding activity centres.

Add new clause 13.1.3 drawn from clause 12.1.2:

13.1.3 To provide amenity for residents appropriate to the mixed use characteristics of the Zone.

13.2 Urban Mixed Use zone - Use Table

Residential use in the Urban Mixed Use zone is limited to above ground floor level or to the rear of a premises. Residential use class as a stand-alone use is not available. Residential use should be added as discretionary with the qualification 'if not listed as permitted' as follows.

13.2 Use Table (Urban Mixed zone)

(Use class) Discretionary	Qualification
Residential	If not listed as permitted

13.3 Urban Mixed Use zone - Use Standards for all uses

The Urban Mixed Use zone objective should say something about amenity between different uses within the zone, not just for adjoining zones. Drawing on the objective for the Village zone at clause 12.3.1 the objectives for the standard at 13.3.1 should be omitted and the following substituted:

13.3.1 To ensure that non-Residential use:

- (a) is compatible with the adjoining uses;*
- (b) does not cause unreasonable loss of residential amenity; and*
- (c) does not cause unreasonable loss of amenity to adjoining residential zones.
(existing clause)*

1.7 Recommendations for amendments to the State Planning Provisions to facilitate active living

1. SPPs section 2.1 Planning Scheme Purpose, insert the following:

Use and development of land encourages and supports active living for improved health outcomes.

2. Clause 3.1.3 Interpretation insert and amend as follows:

amenity means, in relation to a locality, place or building, any quality, condition or factor that makes or contributes to making the locality, place or building harmonious, pleasant or enjoyable and adds to the health and wellbeing of the users of the locality, place or building.

active living means a way of life that integrates physical activity into daily routines.

active travel means travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling and may allow for integration of multi-modal transport in the course of a day.

3. Amend the purpose of the General Residential zone as follows:

8.1.1 To provide for residential use or development that accommodates a range of dwelling types at suburban densities, where full reticulated infrastructure services are available or can be provided.

~~*8.1.4 To ensure that non-residential use does not unreasonably displace or limit Residential use.*~~

8.1.4 To ensure the use and development of land promotes the health, safety and amenity of residential areas.

4. Omit the objective at clause 8.3.1 and substitute:

8.3.1 To ensure that all discretionary uses are compatible with residential use.

5. Amend the purpose of the Inner Residential zone to delete clause 9.1.3(c) as follows:

9.1.3(c) does not unreasonably displace or limit residential use.

6. Omit the objective at clause 9.3.1 and substitute:

9.3.1 To ensure that all discretionary uses are compatible with residential use.

7. Insert additional clause 13.1.3 for the purpose of the Urban Mixed Use zone as follows:

13.1.3 To provide amenity for residents appropriate to the mixed use characteristics of the zone.

8. Insert at clause 13.2 Use Table for the Urban Mixed zone the following:

(Use class) Discretionary	Qualification
Residential	If not listed as permitted

9. Omit the objective for the Urban Mixed Use zone at clause 13.3.1 and substitute the following:

13.3.1 To ensure that non-Residential use:

- (a) is compatible with the adjoining uses;*
- (b) does not cause unreasonable loss of residential amenity; and*
- (c) does not cause unreasonable loss of amenity to adjoining residential zones.*

2. Active travel: travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling.

2.1 Policy

Use and development affecting the structure of cities and towns encourages and supports active travel for improved health outcomes.

2.2 Evidence

The Blueprint for an Active Australia⁸ assembles the evidence on the importance of creating built environments that support active living. The Blueprint asserts:

*Reshaping the built environments in which most Australians live, work, learn and recreate can significantly increase daily physical activity levels. Community and neighbourhood design impacts on local walking, cycling and public transport use, as well as on recreational walking and physical activity.*⁹

The recommendations and findings of the JSCPH referred to active transport, including¹⁰:

4.c. Provisions in the new state-wide planning scheme give consideration to active transport links (e.g. walking and cycling), especially within and between urban communities.

The State Government has adopted the *Positive Provision Policy for cycling infrastructure*.¹¹ The Policy primarily shifts the onus on the State Road Authority to show why cycling infrastructure should not be provided.

Planning Advisory Note (PAN) 11 Integration of Land Use Planning and Transport in Planning Schemes¹² contends:

Integration of land use planning and transport is a major means for furthering sustainable development, securing a pleasant, efficient and safe environment, and protecting public infrastructure in accordance with Schedule 1 Part 1 Objectives and Part 2 Objectives (f) and (h) of the Land Use Planning and Approvals Act 1993.

Planning schemes can play an important part in promoting more sustainable use of land and transport resources.

The resource 'Streets for People, Compendium for Australian Practice' developed by the Government of South Australia, Heart Foundation and others, provides a comprehensive resource on the design of street that focus on user requirements.¹³

Currently, despite numerous documents defining the planning context for streets such provisions have been absent in planning instruments. The absence of provisions relating to streets have meant various guidelines have filled the void¹⁴. These guidelines have generally been focussed on engineering standards which have been motor vehicle centric and have done little to promote the broader community function of streets as places for people, including suitable provision for walking, cycling and

⁸ See *Blueprint for an active Australia*, Action area 1 for references on active living and the built environment

⁹ *Blueprint for an active Australia* page 15

¹⁰ *Parliament of Tasmania 2016* page 8

¹¹ *DIER Positive Provision Policy for cycling infrastructure* October 2013, adopted policy as stated in the draft *Climate Change Action Plan 2016-2021*

¹² *Planning Advisory Note 11 Tasmanian Planning Commission* September 2009. PAN 11 is a document to have regard to as specified in the Minister's Terms of Reference for the draft *State Planning Provisions*, December 2015.

¹³ *Streets for People Compendium for South Australian Practice: Government of South Australia, Heart Foundation and others* 2012.

¹⁴ See for instance *LGAT Tasmanian Subdivision Guidelines* October 2013 and *Tasmanian Standard Drawings*.

public transport. It is contended that functioning streets are a major determinant of health and wellbeing as well as the economic value of adjoining properties.

2.3 State Planning Provisions relating to active travel

SPPs for active travel concern setting an objective at 2.0 Planning Scheme Purpose, a review of zone purpose statements and zone standards and an advocacy for a Liveable Streets code.

The challenge is to have the SPPs and LPS translate health and wellbeing into statutory provisions and standards where they affect the design of streets and particularly where the use and development for roads and streets have hitherto mostly not been the concern of planning schemes.

2.4 Purpose

SPPs section 2.1 Planning Scheme Purpose insert the following:

Use and development of land encourages and supports active travel for improved health outcomes.

2.5 Interpretation

Road: The interpretation for 'road' needs to include 'street' to be consistent with the application of 'street' in the various standards for the SPPs. Alternatively there is a need for separate interpretations 'road' and 'street'. In this regard the *Local Government (Building and Miscellaneous Provisions) Act 1993* is instructive. That Act separates 'road' from 'street' but with 'street' being a sub-set of road.

The interpretation for 'road' should be amended to include 'street' as follows:

road: means land over which the general public has permanent right of passage, including the whole width between abutting property boundaries, all footpaths and the like, and all bridges over which such a road passes and as the context requires road includes street.

As concepts such as 'streetscape' (a defined term in the SPPs), 'complete streets', 'walkable streets', etc. do not similarly apply to roads, and to refocus on the function of urban streets, separate road and street definitions are required. Possible definition splits could be urban/rural or by state/local government road authority or by road hierarchy.

The State Road Hierarchy¹⁵ provides a potential split between roads and streets with the State Hierarchy of Categories 1 – 4 being classed as road and all other roads classed as streets. A State roads, local streets separation is consistent with the structure of the Road and Rail Assets Code in the SPPs.

Amended interpretations to be inserted at Clause 3.1.3 are as follows:

road: means land over which the general public has permanent right of passage, including the whole width between abutting property boundaries, all footpaths and the like, and all bridges over which such a road passes and includes all State roads.

street: means a road that is not a State road.

Separate interpretations for 'road' and 'street' is preferred as it enables particular requirements of streets to be separately addressed.

2.6 Exemptions

The interpretation 'minor utilities' interfaces with the use class 'utilities'. Where minor utilities appears in a zone use table as a qualified 'no permit required' use this contrasts with the exemptions (see below) for 'minor infrastructure'. The implication is that for a no permit required use or development, there are

¹⁵ Roads for our Future - State Road Hierarchy Department of State Growth Tasmania, undated.

additional tests through provisions of the planning scheme whereas for exemptions nothing in the planning scheme applies.

There is therefore a need to clarify the application of the SPPs to roads and streets through a review of interpretation, exemptions and use class definitions and, in addition, to amend the exemptions such that the provision and upgrading of roads and streets is not *exempt* or '*no permit required*' use or development.

The exemption for '*minor infrastructure*' covers '*provision ... of footpaths, cycle paths...*'. In comparison, the exemption for '*road works*' includes footpaths. Whilst the listed items in the two exemptions are presumably inclusive rather than exclusive lists, nevertheless the interpretations need to be reviewed such that the design and planning of roads, footpaths, cycle paths etc are not exempt from the provisions of the planning scheme and permits arising. The capacity for a planning scheme assessment is required for new road and street infrastructure, including upgrading, discrete from the exemption for maintenance and repair.

The fundamental position is that design and planning as in upgrading and initial provision should not be exempt as new road and street infrastructure is critical to planning, including realising the strong nexus between transport and land use.

Turning to the exemption for minor infrastructure this covers the provision, maintenance and modification of footpaths, cycle paths, playground equipment, seating, shelters, bus stops and bus shelters, street lighting, telephone booths, public toilets, post boxes, cycle racks, fire hydrants, drinking fountains, rubbish bins, public art, associated signs and the like on public land. The exemption should be modified to delete the provision of foot paths and cycle paths.

With the above changes, works involving provision and upgrading of road, street and path infrastructure will be a matter for the SPPs as determined by the zoning and codes.

Also to be noted is that clause 7.2.1 *Development for Existing Discretionary Uses* may change the status of development for a road where there is no change of use or intensification of an existing use.

Amendments to the exemptions to separate '*provision*' from '*maintenance and repair*' as well as a definitional separation between '*road*' and '*street*' are as follows:

Use or Development	Qualifications
road works	<p>Maintenance and repair of roads and <u>streets</u> upgrading by or on behalf of the road authority which may extend up to 3m outside the road reserve including:</p> <ul style="list-style-type: none"> (a) widening or narrowing of existing carriageways; (b) making, placing or upgrading kerbs, gutters, footpaths, shoulders, roadsides, traffic control devices, line markings, street lighting, safety barriers, signs, fencing and landscaping unless subject to the Local Historic Heritage Code; or (c) repair of bridges, or replacement of bridges of similar size in the same or adjacent location.

Use or Development	Qualifications
minor infrastructure	<p>(a) Provision, Maintenance and modification of footpaths, cycle paths.</p> <p>(b) Provision, maintenance and modification of playground equipment, seating, shelters, bus stops and bus shelters, street lighting, telephone booths, public toilets, post boxes, cycle racks, fire hydrants, drinking fountains, rubbish bins, public art, associated signs and the like on public land.</p>

2.7 Zones

The draft SPPs provide standards for roads as development associated with subdivision in the General Residential, Inner Residential, Low Density Residential zones and a truncated standard in the Village zone. The remaining zones particularly the Urban Mixed Use, and Business and Commercial zones make no provisions for roads.

The Heart Foundation contends that to realise the intrinsic value of roads and streets as they contribute to equitable access, economic, environmental and amenity values and health benefits to be gained the simple association with subdivision must be removed. This can be starting with the General Residential Zone, as follows:

Delete clause 8.6.2 Roads except for standard A2/P2.

Relocate standard 8.6.2 A2/P2 to clause 8.6.1 where it is a better fit as the subject is '*lot orientation*' not '*roads*'.

Insert (new) standard as clause 8.7 being a modification from existing clause 8.6.2 as follows:

8.7 Development Standards for Streets

Objective	<p>To ensure that the arrangement of new <u>development for roads streets within a subdivision</u> provides for:</p> <p>(a) a legible road hierarchy that sets the function of streets based on through traffic, the requirements for public transport, the adjoining land use and the connectivity and permeability for pedestrian networks and cycle ways;</p> <p>(b) safe, convenient and efficient connections to assist accessibility and mobility of the community;</p> <p>(c) the adequate accommodation of vehicular, pedestrian, cycling and public transport traffic; and</p> <p>(d) the efficient subdivision development of the entirety of the land and of surrounding land; and</p> <p>(e) the efficient ultimate development of the entirety of the land and of surrounding land; and the integration of land use and transport.</p>
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Acceptable Solutions	Performance Criteria
<p>A1 There are no acceptable solutions. The subdivision includes no new roads.</p>	<p>P1 The arrangement and construction of roads <u>Development for streets within a subdivision</u> must satisfy all of the following:</p> <ul style="list-style-type: none"> (a) the route and standard of roads <u>streets</u> accords with any relevant road network plan adopted by the Planning Authority; (b) the appropriate and reasonable future subdivision of the entirety of any balance lot is not compromised; (c) the future subdivision of any adjoining or adjacent land with subdivision potential is facilitated through the provision of connector roads and pedestrian paths, where appropriate, to common boundaries; (d) an acceptable level of access, safety, convenience and legibility is provided <u>for all street users</u> through a consistent road function hierarchy; (e) connectivity with the neighbourhood road <u>street</u> network <u>through streets and paths</u> is maximised <u>maximized</u>. <u>Cul-de-sac and other non-through streets are minimized</u>; (f) the travel distance <u>for walking and cycling</u> between key destinations such as shops and services is minimised; (g) walking, cycling and the efficient movement of public transport <u>and provision of public transport infrastructure</u> is facilitated; (h) provision is made for bicycle infrastructure on new arterial and collector roads in accordance with Austroads Guide to Road Design Part 6A as amended; <u>and</u> (i) any adjacent existing grid pattern of streets is extended, where there are no significant topographical constraints.

Based on the amendments sought for clause 8.6.2 and to insert new clause 8.7, the same provisions for streets should be duplicated for the following zones:

Zone	Existing clause	New clauses	Notes
Inner Residential	9.6.2	9.7	Zone currently contains standards as per the General Residential zone.
Low Density Residential	10.6.2	10.7	Zone currently contains standards as per the General Residential zone.
Rural Living	11.5.2	11.6	The performance criteria are expanded from the draft SPPs to reflect the residential intent for the zone.

Zone	Existing clause	New clauses	Notes
Village	12.5.22	12.6	The performance criteria are expanded from the draft SPPs to reflect the residential intent for the zone.
Urban Mixed Use	No provision	13.6	Provisions extended to the Urban Mixed Use zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Local Business	No provision	14.6	Provisions extended to the Local Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
General Business	No provision	15.6	Provisions extended to the General Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Central Business	No provision	16.6	Provisions extended to the Central Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Commercial	No provision	17.6	Provisions extended to the Commercial zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Light Industrial	No provision	18.6	Provisions extended to the Local Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.

2.8 Liveable Streets Code

In addition to, or as alternative, the preferred position is for provisions for streets to be included in a Liveable Streets code. Such a code would add measurable standards to the assessment of permit applications. An outline for a Liveable Streets code is included at Annexure 1 as at this stage such a code requires further development and testing. For this representation the concept of a Liveable Streets code is advocated as a foreshadowed addition to the SPPs.

2.9 Recommendations for amendments to the State Planning Provisions to promote active travel

1. SPPs section 2.1 Planning Scheme Purpose insert the following:

Use and development of land encourages and supports active travel for improved health outcomes.

2. Amend the interpretation for 'road' and to insert an interpretation for 'street' as follows:

road: means land over which the general public has permanent right of passage, including the whole width between abutting property boundaries, all footpaths and the like, and all bridges over which such a road passes and includes all State roads.

street: means a road that is not a State road.

3. Amend the exemption for 'road works' and 'minor infrastructure' as follows:

Use or Development	Qualifications
road works	Maintenance and repair of roads and streets upgrading by or on behalf of the road authority which may extend up to 3m outside the road reserve including: <ol style="list-style-type: none"> (a) widening or narrowing of existing carriageways; (b) making, placing or upgrading kerbs, gutters, footpaths, shoulders, roadsides, traffic control devices, line markings, street lighting, safety barriers, signs, fencing and landscaping unless subject to the Local Historic Heritage Code; or (c) repair of bridges, or replacement of bridges of similar size in the same or adjacent location.
minor infrastructure	<ol style="list-style-type: none"> (a) Provision, Maintenance and modification of footpaths, cycle paths. (b) Provision, maintenance and modification of playground equipment, seating, shelters, bus stops and bus shelters, street lighting, telephone booths, public toilets, post boxes, cycle racks, fire hydrants, drinking fountains, rubbish bins, public art, associated signs and the like on public land.

4. Amend the General Residential Zone to provide for streets, as follows:

- (a) Delete clause 8.6.2 Roads except for standard A2/P2.
- (b) Relocate standard 8.6.2 A2/P2 to clause 8.6.1.
- (c) Insert (new) standard for streets as clause 8.7 being a modification from existing clause 8.6.2 as follows:

8.7 Development Standards for Streets

Objective:	To ensure that the arrangement of new <u>development for roads streets</u> within a subdivision provides for:
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	<ul style="list-style-type: none"> (a) <u>a legible road hierarchy that sets the function of streets based on through traffic, the requirements for public transport, the adjoining land use and the connectivity and permeability for pedestrian networks and cycle ways;</u> (b) safe, convenient and efficient connections to assist accessibility and mobility of the community; (c) the adequate accommodation of vehicular, pedestrian, cycling and public transport traffic; and (d) the efficient subdivision development of the entirety of the land and of surrounding land; <u>and</u> (e) the efficient ultimate development of the entirety of the land and of surrounding land; and the integration of land use and transport.
Acceptable Solutions	Performance Criteria
<p>A1</p> <p><u>There are no acceptable solutions. The subdivision includes no new roads.</u></p>	<p>P1</p> <p>The arrangement and construction of roads Development for streets within a subdivision must satisfy all of the following:</p> <ul style="list-style-type: none"> (a) the route and standard of roads <u>streets</u> accords with any relevant road network plan adopted by the Planning Authority; (b) the appropriate and reasonable future subdivision of the entirety of any balance lot is not compromised; (c) the future subdivision of any adjoining or adjacent land with subdivision potential is facilitated through the provision of connector roads and pedestrian paths, where appropriate, to common boundaries; (d) an acceptable level of access, safety, convenience and legibility is provided <u>for all street users</u> through a consistent road function hierarchy; (e) connectivity with the neighbourhood road <u>street network through streets and paths</u> is maximised <u>maximized</u>. <u>Cul-de-sac and other non-through streets are minimized;</u> (f) the travel distance <u>for walking and cycling</u> between key destinations such as shops and services is minimised; (g) walking, cycling and the efficient movement of public transport <u>and provision of public transport infrastructure</u> is facilitated; (h) provision is made for bicycle infrastructure on new arterial and collector roads in accordance with Austroads Guide to Road Design Part 6A as amended; <u>and</u> (i) any adjacent existing grid pattern of streets is extended, where there are no significant topographical constraints.

5. Amend the following zones to be consistent with the provisions proposed for clause 8.6.2 and new clause 8.7 as follows:

Zone	Existing Clauses	New Clauses	Notes
Inner Residential	9.6.2	9.7	Zone currently contains standards as per the General Residential zone.
Low Density Residential	10.6.2	10.7	Zone currently contains standards as per the General Residential zone.
Rural Living	11.5.2	11.6	The performance criteria are expanded from the draft SPPs to reflect the residential intent for the zone.
Village	12.5.22	12.6	The performance criteria are expanded from the draft SPPs to reflect the residential intent for the zone.
Urban Mixed Use	No provision	13.6	Provisions extended to the Urban Mixed Use zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Local Business	No provision	14.6	Provisions extended to the Local Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
General Business	No provision	15.6	Provisions extended to the General Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Central Business	No provision	16.6	Provisions extended to the Central Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Commercial	No provision	17.6	Provisions extended to the Commercial zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Light Industrial	No provision	18.6	Provisions extended to the Local Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.

6. Foreshadow the inclusion of a future Liveable Streets Code.

3. Provision of public open space and reserves for aesthetic, environmental, health and economic benefits.

3.1 Policy

Parks, reserves and other public spaces impact positively on health. Green public spaces can encourage a range of physical as well as challenging activities and provide opportunities for social interaction, food growing and improved environmental quality.

All public spaces and places are part of the public realm. Streets form some 80% of the public realm in cities and towns. Streets provide opportunities as a component of the public open space to deliver environmental improvement (eg street trees for improved air quality, to enhance amenity and add to the value of adjoining properties). Streets are the main component for informal physical activity e.g. walking, shopping socialising.

3.2 Evidence

A considerable body of literature exists on the role and provision of parks and green open spaces and its impact upon and correlation with increased physical activity.

The evidence on the health benefits of public open space suggests there are a range of factors that contribute to their effectiveness and impact for encouraging physical activity and healthy eating behaviours. Factors include access to parks and public open space (proximity and size), park quality, aesthetics and attractiveness, children's play areas in parks and community gardens.¹⁶

3.3 State Planning Provisions relating to public open space and reserves

SPPs for public open space concern use classes and their allocation to zones including the Open Space zone. Absent from the Draft SPPs is the planning framework for public open space and reserves that relate to and support the provisions for taking public open space in the *Local Government (Building and Miscellaneous Provisions) Act 1993*.

3.4 Purpose

SPPs section 2.1 Planning Scheme Purpose insert the following objective:

Public open spaces and reserves provide a well distributed network of walkable and attractive spaces strategic to local communities for their aesthetic, environmental, health and economic benefits.

3.5 Interpretations

Interpretations relevant to public open space are:

Public open space. This is a rather limited interpretation of public open space based on the *Local Government (Building and Miscellaneous Provisions) Act 1993*.

Streetscape. The quality of the street is important in seeing streets as part of the recreation-physical activity environment.

¹⁶ See Heart Foundation 'Healthy Active by Design' a web based resource at <http://www.healthyactivebydesign.com.au/evidence-2>

3.6 Use classes

Use classes relevant to public open space are:

Passive recreation

Sports and recreation: whilst providing facilities for physical activity, structures that limit access and focus on spectators limit the health value to be gained from public open space.

3.7 Zones

The use class passive recreation where appearing in zones as no permit required is supported.

The use class sports and recreation where appearing in zones as discretionary is supported.

The Development Standards for Subdivision in zones omits reference to the provision of public open space. Whilst the provisions for public open space at the time of subdivision are enabled by the *Local Government (Building and Miscellaneous Provisions) Act 1993* these provisions do not cover the planning for public open space.

Standards in the SPPs are required for the provision of public open space and riparian and littoral reserves as contemplated by s.83(1A) of the *Local Government (Building and Miscellaneous Provisions) Act 1993*.

The creation of riparian and littoral reserves is consistent with a principle of the *State Coastal Policy 1996* to recognise 'the importance of public access to and along the coast consistent with protection of natural coastal values, systems and processes' and as necessary to give priority to coastal dependent use and development¹⁷.

Provisions and standards are required for public open space and riparian and littoral reserves as part of the subdivision process with an additional standard at clauses 8.6 and equivalent provisions in all other zones except the Port and Marine zone and the Utilities zone as follows:

x.6.2, x.5.2 public open space and reserves (clause numbering as applicable for each zone)

Objective:	To ensure subdivision delivers a well distributed network of walkable and attractive public open spaces and reserves strategic to local communities.	
Acceptable Solutions		Performance Criteria
A1 Subdivision provides a minimum land area of 5% for public open space.		P1 Payment instead of public open space is taken where: <ul style="list-style-type: none"> (a) a strategic plan for public open space and reserves provides for the acquisition of public open space at alternative sites in the vicinity of the subdivision; or (b) a strategic plan for public open space and reserves specifies requirements for the improvement on existing public open space land in the vicinity of the subdivision.

¹⁷ *State Coastal Policy 1996* clause 2.1.6.

A2 (a) Subdivision provides a minimum width of riparian reserve of 30m from the bank of a water course (non-tidal) for the length of the common boundary with the water course.	P2 (a) A riparian reserve of less than 30m is provided or dispensed with where there is a common boundary with a minor water course; and (b) A riparian reserve is not required to link to adjoining reserves, or (c) A riparian reserve is not required as part of a strategic plan for public open space and reserves.
A3 (a) Subdivision provides a minimum width of littoral reserve of 30m from the bank of a river or coast for the length of the common boundary with the river or coast.	P3 (a) The requirement to provide a littoral reserve of 30m may only be reduced or dispensed with where existing buildings or features do not allow for the full or partial reserve width to be provided; or the area is required for coastal dependent activities.

3.8 Recommendations for amendments to the State Planning Provisions to provide public open spaces and reserves

1. Amend SPP section 2.1 Planning Scheme Purpose to insert the following:

Public open spaces and reserves provide a well distributed network of walkable and attractive spaces strategic to local communities for their aesthetic, environmental, health and economic benefits.

2. Insert provisions and standards for public open space and riparian and littoral reserves as part of the subdivision process clauses 8.6 and equivalent provisions in all other zones except the Port and Marine zone and the Utilities zone as follows:

x.6.2, x.5.2 public open space (clause numbering as applicable for each zone)

Objective:	To ensure subdivision delivers a well distributed network of walkable and attractive public open spaces and reserves strategic to local communities.	
Acceptable Solutions		Performance Criteria
A1 Subdivision provides a minimum land area of 5% for public open space.		P1 Payment instead of public open space is taken where: <ul style="list-style-type: none"> (a) a strategic plan for public open space and reserves provides for the acquisition of public open space at alternative sites in the vicinity of the subdivision; or (b) a strategic plan for public open space and reserves specifies requirements for the improvement on existing public open space land in the vicinity of the subdivision.

<p>A2</p> <p>(a) Subdivision provides a minimum width of riparian reserve of 30m from the bank of a water course (non-tidal) for the length of the common boundary with the water course.</p>	<p>P2</p> <p>(a) A riparian reserve of less the 30m is provided or dispensed with where there is a common boundary with a minor water course; and</p> <p>(b) A riparian reserve is not required to link to adjoining reserves, or</p> <p>(c) A riparian reserve is not required as part of a strategic plan for public open space and reserves.</p>
<p>A3</p> <p>(a) Subdivision provides a minimum width of littoral reserve of 30m from the bank of a river or coast for the length of the common boundary with the river or coast.</p>	<p>P3</p> <p>(a) The requirement to provide a littoral reserve of 30m may only be reduced or dispensed with where existing buildings or features do not allow for the full or partial reserve width to be provided; or the area is required for coastal dependent activities.</p>

4. Mixed density housing to satisfy resident life cycle requirements and for walkable neighbourhoods

4.1 Policy

Mixed density housing is facilitated to provide a wider choice of housing, enhance the development of compact cities, accommodates life cycle requirements and promotes walkable neighbourhoods.

The benefits of a range of housing types at higher densities in local communities contrasts with low density settlement patterns that do not support active travel and can raise patterns of car dependency that are not health promoting. In addition mixed density housing engenders walkable neighbourhoods and supports the provision of local shops and facilities to serve daily needs.

The opportunity to have housing satisfy life-cycle requirements will allow residents to remain in their neighbourhood as age and circumstances change their housing requirements.

4.2 Evidence

The Blueprint for an Active Australia¹⁸ assembles the evidence on the importance of creating built environments that support active living. The Blueprint asserts:

Providing diverse housing in walkable environments can help older adults to 'age in place'. Safe neighbourhoods with connected street networks and local shops, services and recreational facilities are associated with more walking in older adults, and may protect against a decline in physical activity over time.

Emerging evidence suggests that urban sprawl is also associated with coronary heart disease in women; living in more walkable neighbourhoods is associated with lower cardiovascular disease risk factors such as obesity and type 2 diabetes mellitus (men only).

There appears to be growing consumer demand for more walkable neighbourhoods.

Heart Foundation research projects 'Does Density Matter The role of density in creating walkable neighbourhoods'¹⁹, 'Low density development: Impacts on physical activity and associated health outcomes'²⁰ and 'Increasing density in Australia: maximising the health benefits and minimising the harm'²¹ canvas the evidence that higher density housing, increases the ability to walk to destinations together with the associated health benefits.

4.3 State Planning Provisions relating to mixed density housing

SPPs for mixed density housing concern setting an objective at 2.0 Planning Scheme Purpose, a review of zone purpose statements and zone standards and an advocacy for a Liveable Streets code (see Annexure 1 Draft for a Liveable Streets code).

¹⁸ See Blueprint for an active Australia Action area 1 for references on active living and the built environment

¹⁹ See Udell T, Daly M, Johnson B, Tolley Dr R Does Density Matter 'Does Density Matter The role of density in creating walkable neighbourhoods' National Heart Foundation 2014

²⁰ See Giles-Corti B, Hooper P, Foster S, Koohsari MJ, Francis J 'Low density development: impacts on physical activity and associates health outcomes' National Heart Foundation 2014. The report found, on the available evidence, a minimum net density threshold of 20 dwellings per hectare (18 dwellings per gross hectare) was required to encourage some transport-related walking. For viable public transport, densities of 35-43 net and 32-40 gross dwellings per hectare were required where based on dwelling occupancy rates of 2.6 persons per dwelling.

²¹ See Giles-Corti B, Ryhan K, and Foster S 'Increasing density in Australia: maximising the health benefits and minimising the harm' National Heart Foundation 2012

4.4 Purpose

SPPs section 2.1 Planning Scheme Purpose insert the following objective:

Mixed density housing and housing that satisfies life-cycle requirements is encouraged to enhance the scope for active living and active travel.

4.5 Assessment of an Application for Use or Development

SPPs Clause 6.2.6 Categorising Use or Development provides that:

... development which is for subdivision,... does not need to be categorised into one of the Use Classes.

The separation of land use from development for subdivisions means that lots are created without assessment of future use. Whilst the zoning determines the potential array of uses, draft clause 6.2.6 avoids the finer grained assessment arising from the certainty over intended use as nominated in the permit application. This is particularly relevant when dealing with medium density low-rise housing as in terrace housing with each house on a separate lot and where elements such as walls to boundaries, infrastructure services and vehicle access are critical to realising good design. In addition the interest only in the development for subdivision is inconsistent with assessment requirements in zones (eg 8.6.1 objective for lot design for the General Residential zone) that requires a lot to have the:

... area and dimensions appropriate for use ... in the Zone;

Then in the PC for 8.6.1 and equivalent PC in comparable standards for other zones we find a requirement to assess an application against the proposed use as follows:

Each lot, excluding for public open space, a riparian or littoral reserve or Utilities, must have sufficient useable area and dimensions suitable for its intended use having regard to:...

In most zones the available uses are many and varied setting an impossible assessment task to ensure objectives are satisfied.

To enhance the prospect of combined subdivision and housing development and to reduce the impossible task of assessing a permit, that requires a PC assessment against all the available uses in the zone then Clause 6.2 *Categorising Use or Development*, must be amended to delete 'subdivision' from sub-clause 6.2.6.

4.6 Zones

8.4.1 General Residential zone – Development Standards for Dwellings

Clause 8.4.1 Development standards, Residential density for multiple dwellings, P1(a) requires a:

residential density consistent with the density of existing development on established properties in the area

The Performance Criterion presupposes that existing density is appropriate for the intended purpose for the zone at clause 8.1.2 which requires '....efficient utilisation of available and planned social, transport and other service infrastructure'. The provision P1(a) is not only a difficult Performance Criteria (PC) to assess it also serves to prevent intensification of housing contrary to the zone purpose.

Clause 8.4.1 should be amended to delete P1(a) as follows:

P1

Multiple dwellings must only have a site area per dwelling that is less than 325m², if the development will not exceed the capacity of infrastructure services and:

- (a) ~~is consistent with the density of existing development on established properties in the area; or~~*
- (b) provides for a significant social or community benefit and is:*
 - (i) wholly or partly within 400m walking distance of a public transport stop; or*
 - (ii) wholly or partly within 400m walking distance of an Inner Residential Zone,*

Objectives such as: ‘consistent with the amenity and character of the area’ can serve to prevent intensification and renewal and lock assessments of applications into that which exists. The additional difficulty with such objectives is that it presupposes and reinforces that there is an existing amenity and character of a quality that should be respected. In the same vein statements such as ‘...consistent with the form and scale of residential development existing on established properties...’ requires the existing scale to be replicated, perhaps not always an appropriate requirement or result. The alternative is for objectives and clauses that promote improvement in residential environments that can be found with the intensification of dwellings.

Clauses in the General Residential zone that should be deleted for reasons of preventing intensification and that create uncertainty are as follows:

Clause	Provision showing parts for deletion
<i>Setbacks and building envelope for all dwellings</i> clause 8.4.2 A2(c)	if for a vacant site and there are existing dwellings on adjoining sites on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of the dwellings on the adjoining sites on the same street.
<i>Site coverage and private open space for all dwellings</i> clause 8.4.3 objective	‘To ensure that dwellings are consistent with the amenity and character of the area and provide:’
<i>Site coverage and private open space for all dwellings</i> clause 8.4.3 P1(a)	site coverage consistent with that existing on established properties in the area;
Non dwelling development clause 8.5.1 A1 (c)	if for a vacant site and there are existing dwellings on adjoining properties on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of those dwellings.
Non dwelling development clause 8.5.1 P3	A building that is not a dwelling, must be consistent with the form and scale of residential development existing on established properties in the area and have reasonable space for the planting of gardens and landscaping.

8.5.1 General Residential zone – Development Standards for non-dwellings

Clause 8.5.1 Non-dwelling development A1 requires street setbacks of 4.5m and 3.0m for a building that is not a dwelling. The purpose of the objective refers to ‘...all non-dwelling development is sympathetic to the form and scale of residential development and does not cause a loss of amenity.’ It is contended that a setback of itself does not deliver amenity. The real issue is the use of land within the setback. Land simply allocated to hardstand vehicle parking would do little to improving amenity. The Acceptable Solution (AS) should require the setback to be developed for gardens and landscaping. The corresponding PC can provide for alternatives such as car parking so long as the PC requirement for ‘compatible streetscape’ is satisfied.

Clause 8.5.1 Non-dwelling development A1 should be amended to omit existing sub-clause (c) (as proposed above) and to substitute: (c) developed for gardens and landscaping as follows:

8.5.1

Objective:	To ensure that all non-dwelling development is sympathetic to the form and scale of residential development and does not cause a loss of amenity.	
Acceptable Solutions		Performance Criteria
A1 A building that is not a dwelling, excluding for Food Services, local shop and excluding protrusions that extend not more than 0.6m into the frontage setback, must have a setback from a frontage that is: (a) not less than 4.5m, if the frontage is a primary frontage; (b) not less than 3.0m, if the frontage is not a primary frontage; <u>and</u> (c) <u>developed for gardens and landscaping.</u>		P1 A building that is not a dwelling must have a setback from a frontage that is compatible with the streetscape.

8.6.1 General Residential zone – Development Standards for subdivision

Clause 8.6.1 Lot design sets a minimum AS lot size (single dwelling density) for the General Residential zone at 450m². In contrast the AS dwelling density for multiple dwellings is 325m² (clause 8.4.1 A1). This places a disincentive AS on other forms of housing such as house/land packages on smaller lots such as terrace and other forms of low rise medium density housing that still fall in the use definition - ‘single dwelling’.

To not disadvantage higher density for single dwellings, provision could be made for integrated house/land development²² or alternatively have a single housing density standard as the AS such as 400m² then the issue is about housing and not minimum lot sizes divorced from what might go on the subdivided lot. In addition it would mean that lots in the 650m²+ (325m² by 2) range will not be under pressure for backyard strata housing.

A single house density approach is preferred and should still lead to achieving the minimum of 15 dwellings per hectare as suggested in the Explanatory Document (page 33)²³. A single housing AS density could best be achieved by making the AS dwelling density for the General Residential zone at 400m² and

²² See standards proposed in TASCORP Department of Environment and Land Management 1997.

²³ Development allowing nominal 5% public open space and 25% roads etc and a lot density at 450m² provides a net density = 15 du/ha. At 400m² = 17.5 du/ha).

the PC amended accordingly. It is also to be noted that the provisions for the Inner Residential and Village zones do not distinguish between AS densities for multiple dwellings and minimum lot areas for subdivision.

Clauses 8.4.1 A1 and P1 and 8.6.1 A1 should be amended to omit 325m² and 450m² respectively and substitute 400m² for all forms of housing.

Clauses 8.4.1 A1 and P1 and 8.6.1 A1 should be amended to omit 325m² and 450m² respectively and substitute 400m² for all forms of housing.

9.4.2 Inner Residential zone – Setback and building envelopes for all dwellings (and related provisions)

Clauses that serve to prevent intensification and renewal and lock assessments of applications into objectives concerning existing amenity and character as is advocated for the General Residential zone should be deleted as follows:

Clause	Provisions showing parts for deletion
<i>Setbacks and building envelope for all dwellings</i> clause 9.4.2 A1(c)	if for a vacant site and there are existing dwellings on adjoining sites on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of the dwellings on the adjoining sites on the same street.
<i>Site coverage and private open space for all dwellings</i> clause 9.4.3 objective	'To ensure that dwellings are consistent with the amenity and character of the area and provides provide.'
<i>Site coverage and private open space for all dwellings</i> clause 9.4.3 P1(a)	site coverage consistent with that existing on established properties in the area;
Non dwelling development clause 9.5.1 A1 (c)	if for a vacant site and there are existing dwellings on adjoining properties on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of the dwellings on the adjoining sites on the same street.
Non dwelling development clause 9.5.1 P3	Buildings must be consistent with the form and scale of residential development existing on established properties in the area and have a reasonable space for the planting of gardens and landscaping.

4.7 Recommendations for amendments to the State Planning Provisions to promote mixed density housing

1. SPPs section 2.1 Planning Scheme Purpose insert the following:

Mixed density housing and housing that satisfies life-cycle requirements is encouraged to enhance the scope for active living and active travel.

2. Delete 'subdivision' from clause 6.2.6 Categorising Use or Development.

3. Delete clause 8.4.1 P1(a) Development standards for multiple dwellings as follows:

P1

Multiple dwellings must only have a site area per dwelling that is less than 325m², if the development will not exceed the capacity of infrastructure services and:

- (a) ~~is consistent with the density of existing development on established properties in the area;~~
or
- (b) *provides for a significant social or community benefit and is:*
- (i) *wholly or partly within 400m walking distance of a public transport stop; or*
- (ii) *wholly or partly within 400m walking distance of an Inner Residential Zone,*

4. Delete clauses in the General Residential zone that prevent intensification and that create uncertainty as follows:

Clause	Provision showing parts for deletion
Setbacks and building envelope for all dwellings clause 8.4.2 A2(c)	if for a vacant site and there are existing dwellings on adjoining sites on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of the dwellings on the adjoining sites on the same street.
Site coverage and private open space for all dwellings clause 8.4.3 objective	'To ensure that dwellings are consistent with the amenity and character of the area and provide:'
Site coverage and private open space for all dwellings clause 8.4.3 P1(a)	site coverage consistent with that existing on established properties in the area;
Non dwelling development clause 8.5.1 A1 (c) omit and substitute	(c) if for a vacant site and there are existing dwellings on adjoining properties on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of those dwellings. (c) developed for gardens and landscaping
Non dwelling development clause 8.5.1 P3	A building that is not a dwelling, must be consistent with the form and scale of residential development existing on established properties in the area and have reasonable space for the planting of gardens and landscaping.

5. Amend Clauses 8.4.1 A1 and P1 and 8.6.1 A1 to omit 325m² and 450m² respectively and substitute 400m² for all forms of housing

6. Delete clauses in the Inner Residential zone that prevent intensification and that create uncertainty are as follows:

Clause	Provisions showing parts for deletion
<i>Setbacks and building envelope for all dwellings</i> clause 9.4.2 A2(c)	if for a vacant site and there are existing dwellings on adjoining sites on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of the dwellings on the adjoining sites on the same street.
<i>Site coverage and private open space for all dwellings</i> clause 9.4.3 objective	'To ensure that dwellings are consistent with the amenity and character of the area and provides provide.'
<i>Site coverage and private open space for all dwellings</i> clause 9.4.3 P1(a)	site coverage consistent with that existing on established properties in the area;
Non dwelling development clause 9.5.1 A1 (c)	if for a vacant site and there are existing dwellings on adjoining properties on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of the dwellings on the adjoining sites on the same street.
Non dwelling development clause 9.5.1 P3	Buildings must be consistent with the form and scale of residential development existing on established properties in the area and have a reasonable space for the planting of gardens and landscaping.

5. Compatible mix of land uses to promote active travel

5.1 Policy

A greater integration of compatible land uses can reduce the separation between where we live, work, shop, learn, travel and play and enhance the opportunities for active living and active travel.

A mix of compatible land uses; residences, shops, schools, offices and public open space sensitive to the local environment allows for convenient and proximate access to destinations and adds to the walkability of neighbourhoods. A mix of land uses can offer better access to healthy foods within walking distance of residents. Mixed land uses invite spaces and places to become destinations and, irrespective of size, centres of activity.

5.2 Evidence

Research evidence indicates that mixed land use (i.e., the presence of multiple destinations) is a key factor influencing neighbourhood walkability. There is a consistent and large body of cross-sectional evidence indicating that greater land use mixes (or numbers of destinations) and shorter distances to destinations (i.e., within close proximity from home) is associated with greater amounts of walking. Measures of land use mix are positively associated with walking for transport in adults, though evidence is more inconsistent for children and older adults. The research evidence suggests there are a range of factors that contribute to the effectiveness of mixed-use and its impact on encouraging walking and physical activity behaviours including access to destinations or land uses, access to schools, access to sport and recreation centres, density and connectivity.²⁴

5.3 State Planning Provisions relating to mixed land use

SPPs for mixed land use concern setting an objective at 2.0 Planning Scheme Purpose, and a review of zone purpose statements and zone standards covering amenity considerations for mixed use.

5.4 Purpose

SPP section 2.1 Planning Scheme Purpose insert the following objective:

Compatible land uses are co-located to promote active travel to, and between different activities.

5.5 Zones

The available use classes in the use table for each zone provide for a range of uses that should be compatible with the primary use for the zone. No issues are raised on the use classification in each zone.

14.3.1 Local Business zone - Use Standards – all uses

The objective for the standard confines the amenity issue to adjoining residential zones despite residential use being permitted and discretionary in the zone. In addition the zone purpose at 14.1.5 refers to 'encouraging residential ...use if it supports the viability of the activity centre...'. The objective for the standard should be amended as follows:

Clause 14.3.1

Objective:	To ensure that <u>non-residential</u> uses do not cause unreasonable loss of amenity to adjoining <u>residential uses and</u> residential Zones.
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²⁴ See Heart Foundation 'Healthy Active by Design' a web based resource at <http://www.healthyactivebydesign.com.au/evidence-2>

14.4.1 Local Business zone – Building height

At clause 14.4.1 building height, the objective should also cover residential amenity within the Local Business zone as follows:

Clause 14.4.1

Objective:	<p>To ensure building height:</p> <p>(a) contributes positively to the streetscape; and</p> <p>(b) does not cause an unreasonable loss of amenity to adjoining <u>residential uses and residential Zones</u>.</p>
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14.4.2 Local Business zone – Setbacks

At clause 14.4.2 Setbacks, the objective should also cover residential amenity within the Local Business zone as follows:

Clause 14.4.2

Objective:	<p>To ensure that building setback:</p> <p>(a) contributes positively to the streetscape; and</p> <p>(b) does not cause an unreasonable loss of amenity to adjoining <u>residential uses and residential Zones</u>.</p>
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Whilst similar provisions for residential use and development standards are applied in the General Business zone maintenance of residential amenity within the zone is probably unreasonable despite the intent of the zone.

5.6 Other matters – frontage windows business premises and Signs code

Clause 13.4.3 Design for the Urban Mixed Use zone and equivalent design standards in business and commercial zones for the acceptable solutions there are provisions for windows in ground floor facades. These provisions are supported as providing interest and variety that enhance walkability. However the merit of the provision for windowed facades is lost where the window is covered with advertising. The signs code helps in specifying a maximum window sign of not more than 25% of each window assembly. This representation supports provisions relating to windows in facades and provisions relating to limiting window signs.

5.7 Recommendations for amendments to the State Planning Provisions to facilitate mixed land use.

1. At Clause 2.1 insert the following purpose:
Compatible land uses are co-located to promote active travel to, and between different activities.
2. Amend clause 14.3.1 Local Business zone, Use Standards – all uses, follows:

Clause 14.3.1

Objective:	(a) To ensure that <u>non-residential</u> uses do not cause unreasonable loss of amenity to adjoining <u>residential uses and</u> residential Zones.
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3. Amend Clause 14.4.1 Local Business zone building height, as follows:

Clause 14.4.1

Objective:	To ensure building height: (b) contributes positively to the streetscape; and (c) does not cause an unreasonable loss of amenity to adjoining <u>residential uses and</u> residential Zones.
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4. Amend Clause 14.4.2 Local Business zone – Setbacks as follows:

Clause 14.4.2

Objective:	To ensure that building setback: (d) contributes positively to the streetscape; and (e) does not cause an unreasonable loss of amenity to adjoining <u>residential uses and</u> residential Zones.
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6. Food security and access to health food

6.1 Policy

Tasmanians at all times have food security through ready and equitable access to healthy food. The Heart Foundation contends that the Tasmanian Planning Scheme should support the three domains of food security; utilisation; supply; and access.

6.2 Evidence

Food security has both social and spatial dimensions. About 5 to 10% of Tasmanians do not have food security²⁵.

The Tasmanian Population Health Survey relating to access to food, found:²⁶

Reason why food of adequate quality or variety is not available	Persons ages 18 years and over
Foods are too expensive	22.4%
Cannot obtain food of the right quality	22.0%
Cannot obtain adequate variety of food	9.3%
Inadequate and unreliable transport makes it difficult to get to the shops	5.6%

The 2014 Tasmanian Healthy Food Access Basket Survey found inter alia²⁷:

Of the 353 shops that sell healthy food across Tasmania (this includes supermarkets, general stores and fruit and vegetables shops) only 19 are located in the areas that Tasmanians with the lowest household income (lowest 1/3) live. So 5% of shops are located where 30% of Tasmanians live.

Affordability varies across locations in Tasmania. Low income Tasmanians are most at risk of not being able to purchase healthy food. Depending on your household income and the shops available where you live it may take up to 40% of your income to eat according to the Commonwealth Governments Guide to Healthy Eating. Households relying on the Newstart payment are particularly vulnerable.

Additional evidence on food and in social and spatial contexts see:

- *Food Sensitive Planning and Urban Design*²⁸
- *Food for all Tasmanians a food security strategy*²⁹
- *Spatial Planning as a Tool for Improving Access to Healthy Food for the Residents of Clarence*³⁰

²⁵ Tasmanian Food Security Council Food Security in Tasmania fact Sheet July 2011. (OECD 10% of Australians do not have food security).

²⁶ Tasmanian Population Health Survey 2013; DHHS Public Health Services Epidemiology Unit.

²⁷ Murray S., Ahuja KDK., Auckland S., Ball MJ 2014 The 2014 Tasmanian Healthy Food Access Basket Survey. School of Health Sciences. University of Tasmania.

²⁸ Food Sensitive Planning and Urban Design. <https://www.vichealth.vic.gov.au/media-and-resources/publications/food-sensitive-planning-urban-design> David Lock Associates, University of Melbourne and Heart Foundation of Australia 2011.

²⁹ Tasmanian Food Security Council *Food for all Tasmanians A food security strategy* 2012

³⁰ Clarence City Council and Heart Foundation *Spatial Planning as a Tool for Improving Access to Healthy Food for the Residents of Clarence* December 2015

As peri-urban areas are critical for food production and to be consistent with the *State Policy for the Protection of Agricultural Land 2009* (PAL State Policy), the primary zoning must protect agricultural land for agricultural use. In reference to the PAL State Policy it is contended that the State Policy concerns the intrinsic value of agricultural land and its protection for agricultural use. The retention of agricultural land for agricultural use is part of food security as it provides the means for producing food, but does not directly concern the delivery of healthy, sustainable, and affordable food to Tasmanian communities. The PAL State Policy does not enter into the realm of urban agriculture such as community gardens that are specifically excluded by the definition of agriculture land, hence the request for an interpretation and use class qualification for *local food production or processing*. However whilst the PAL State Policy primarily concerns the intrinsic value of agricultural land and its protection for agricultural use an adaptive response to the criterion in the definition of agricultural land is required. An adaptive response is required because of the definition for agricultural land states, '*has not been zoned or developed for another use or would not be unduly restricted for agricultural use by its size, shape and proximity to adjoining non-agricultural uses*'.

The SPPs need to go beyond the limitations of the PAL State Policy to enable activities related to food production and access to be qualified use or development in most zones.

The following seeks to discover how the draft SPPs affect the production, distribution and access to (healthy) food for all zones. Food production can include mostly small scale production nominally no greater in scale than incidental to a non-agriculture use. Urban and peri-urban agriculture plays a significant role in local food production and the supply of fresh food.

6.3 SPPs relating to the production, distribution and access to (healthy) food

SPPs relating to food concern setting an objective at 2.0 Planning Scheme Purpose, and a review of zone purpose statements and zone standards particularly to facilitate food production and access from urban agriculture. The merit of separate Agriculture and Rural zones is questioned, primarily on the basis of the difficulty of defining the Tasmanian agriculture estate and to be consistent with the PAL State Policy.

6.4 Purpose

SPP section 2.1 Planning Scheme Purpose insert the following objective:

The use or development of land supports a resilient, localised, healthy and sustainable food system.

6.4 Interpretation

The qualified uses (sub-sets of use classes) as provided in the interpretation section of the SPPs that are relevant to food production and access to food are:

- agricultural land
- agricultural use
- animal saleyard
- aquaculture
- controlled environment agriculture (agricultural use within a built structure)
- crop production
- home based business (if amended to confirm that gross floor area of the dwelling does not limit whole site from being used for food production or processing, see below).
- local shop

marine farming shore facility
 market
 out building
 primary production sales
 prime agricultural land
 take away food premises
 winery

Additional interpretations or clarifications are required to represent local urban and peri-urban food production. Insert an interpretation for '*healthy food*' and '*local food production or processing*' and review to clarify the application of home-based business, as follows:

healthy food: means food which is required for a healthy and nutritious diet and is adequate, safe and culturally appropriate and sufficient to live an active healthy life.

local food production or processing: means food grown or reared on a site primarily for local consumption and where there has been minimum processing of the products.

A review of the interpretation for '*home-based business*' is required to confirm or amend accordingly the interpretation such that a home-based business for local food production or processing is not confined to just part of a dwelling and does include the whole site so long as the qualifications to the definition are met. Clearly local food production or processing cannot be confined to the dwelling and needs to extend to the whole site.

6.6 Exemptions

The following exemptions are supported with clarifications and amendments:

Home occupation exemption as it applies to all zones as proposed in the SPPs. As for the interpretation for home-based business (above) confirm or amend accordingly that home occupation includes food production or processing over the whole site and is not solely limited to '*no more than 40m² gross floor area of the dwelling*'. Clearly local food production or processing cannot be confined to the dwelling and needs to extend to the whole site.

Community gardens on a public land in all zones, but amended to reflect a broader application covering urban agriculture, as follows:

use or development in a road reserve or on public land	outdoor dining facilities, signboards, roadside vendors and stalls on a road that have been granted a licence under a relevant Council By-Law; or <u>urban agriculture including a community garden and a market</u> on a public land.
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Outbuildings and garden structures, as qualified, in all zones.

Outbuildings, as qualified, in rural zones.

Agricultural buildings and works, as qualified, in rural and agriculture zones.

6.7 Use classes

Use classes applicable to food security are:

food services (cafes, take-away etc)

general retail and hire (market, primary produce sales, shop, local shop etc)

resource processing (processing, packing etc of produce).

resource development (agricultural use etc)

transport depot and distribution (transport and distribution of food.)

6.8 Zones

8.0 to 29.0 Zones (all) and use classifications

Under the SPPs food production would, presumably be classified as 'agricultural use'³¹ in the use class 'resource development'. There is no reference to scale of operation unless qualified. Resource development is prohibited in most urban zones. Provisions that accommodate (small scale) agriculture are required to provide the opportunity for food production in urban areas. Presumably home-based business and home occupation will cover some small-scale food production. However where food production is classified as 'agricultural use' then, for instance, urban agriculture including community gardens (on land other than public land) and food production on vacant land would be prohibited in most urban zones.

Applicable use classes relating to food in zones (use classes as identified above) as proposed in the draft SPPs are displayed in the table below. Proposed changes shown in green in the table would enable local food production or processing to be permitted in a range of urban zones. In some respects the addition of local food production or processing mirrors the discretion for the use class '*resource processing*' in certain urban zones where it involves the processing of select foods, being '*a distillery, brewery or cidery*', but no other food processing is allowed.

To extend the availability of local food, the use for a market should be classified as permitted in the Community Purpose and Recreation zones, also shown in the following table.

Table: use classes relating to food in zones

Key to table: NP no permit, P permitted, D discretionary, (...) identifies qualifications related to the use, Uses not listed are prohibited.

Zones	Use classes and classification				
	Food services	General retail & hire	Resource development	Resource processing	Transport depot and distribution
General residential Low density residential	D (if not for take away food premises with a drive through facility)	D (if for a local shop)	P (If for local food production or processing)		

³¹ Agricultural use as defined in the State Policy for the Protection of Agriculture Land 2009:-'Agricultural use' means use of the land for propagating, cultivating or harvesting plants or for keeping and breeding of animals, excluding domestic animals and pets. It includes the handling, packing or storing of produce for dispatch to processors. It includes controlled environment agriculture and plantation forestry.

Zones	Use classes and classification				
Inner residential	D (if not for take away food premises with a drive through facility)	D			
Rural living zone	D (if for a gross floor area of no more than 200m ²)	D (if for: primary produce sales; sales related to resource development use or for a local shop)	P (If for local food production or processing) D (If not for an abattoir, animal saleyards or sawmilling)		
Village	P	P	P (If for local food production or processing)	D (If not for an abattoir, animal saleyards or sawmilling)	D
Urban mixed use	P	P	P (If for local food production or processing)	D (If for a distillery, brewery or cidery).	D if for public transport facility
Local business	NP	NP	P (If for local food production or processing)	D (If for a distillery, brewery or cidery)	D if for public transport facility or distribution of goods within the zone
General business	NP	NP	P (If for local food production or processing)	D (If for a distillery, brewery or cidery)	D if for public transport facility or distribution of goods within the zone
Central business	NP	NP	P (If for local food production or processing)	D (If for a distillery, brewery or cidery)	D if for public transport facility
Commercial	D	D	P (If for local food production or processing)	D (If for a distillery, brewery or cidery)	D

Zones	Use classes and classification				
Environmental living	D (max 200m ² gross floor area)		P (If for local food production or processing) D (not for intensive animal husbandry or plantation forestry)		
Light industrial	D	D (if for alterations or extensions to an existing use),	P (If for local food production or processing)	D	P
General industrial	D			P	P
Rural	D	D	NP	P	D
Agriculture	D	D	NP (restrictions on prime agric land). All other D	D	D for the transport and distribution of agricultural produce and equipment
Landscape conservation	D (If for a gross floor area of not more than 200m ²)	D (If associated with a Tourist Operation).	P (If for local food production or processing) D (If not for intensive animal husbandry or plantation forestry)		
Environmental management	P (if accord with reserve management plan), Otherwise D	P (if accord with reserve management plan), otherwise D	P (If for local food production or processing) Otherwise D	D	
Major Tourism	P (if not a take-away food premises), otherwise D	D	P (If for local food production or processing)	D (If for a distillery, brewery or cidery).	D
Port & marine	D	P (If for chandlers and other shipping and transport related goods.)		D (if for aquaculture)	P

Zones	Use classes and classification				
Utilities					P
Community Purpose		D P (if for a market)	P (If for local food production or processing)		
Recreation	D	P (if for a market) D (If: for clothing, equipment or souvenirs for a Sports and Recreation use; or (b) for a market.)	P (If for local food production or processing)		
Open space	D	D	P (If for local food production or processing)		D associated with wharf, water taxis, commuter or passenger ferry terminals

6.9 Zoning of non-urban land, the agricultural estate

20.1 Rural zone

The purpose of the Rural Zone is stated as:

To provide for a range of use or development that requires a rural location for operational, security or impact management reasons.

To provide for use or development of land where agricultural use is constrained or limited due to topographical, environmental or other site characteristics.

To ensure that use or development is of a scale and intensity that is appropriate for a rural area and does not compromise the function of surrounding settlements.

21.0 Agriculture zone

The purpose of the Agriculture zone is stated as:

To provide for the sustainable development of land for agricultural use.

To protect land for the sustainable development of agricultural use by minimising:

- (a) conflict with or interference from other uses; and*
- (b) non-agricultural use or development that precludes the return of the land to agricultural use.*

To provide for other use or development that supports the use of the land for agricultural use.

The Heart Foundation supports the purposes of the rural and agriculture zones except the need for the two zones appears an artificial construct.

The Explanatory Document contends: (pages 71 & 72)

Requirements for protecting agricultural land for agricultural uses are not applicable to the Rural Zone, as the PAL Policy will be implemented entirely through the Agriculture Zone.

In addition, a thorough review of the PAL Policy has also been undertaken to identify the Principles relevant to the new Agriculture Zone.

It is acknowledged that mapping of Tasmania's agricultural estate will be critical to support the recalibration of the two rural Zones as it will provide the necessary guidance for planning authorities to apply the Agriculture Zone.

The Rural Zone is intended for the rural areas of the State where the opportunities for agricultural use are generally constrained or limited as a consequence of the site characteristics. These are the areas that will support agricultural use but not at a scale and intensity that could be expected in the core agricultural areas. The core agricultural land will be contained within the Agriculture Zone.

In comparison, as quoted in the Explanatory Document (page 71) the Cradle Coast Region submitted:

The Significant Agricultural zone [sic] is not a viable substitute for the [Rural Resource Zone] because it has a very particular purpose for agricultural use on higher productivity land, and therefore excludes the broad scale variation and multiplicity of primary industries in the nature of aquaculture, extensive agriculture, forestry, and mining as occurs on rural land. It is also problematic in that it assumes a sufficient and cohesive spatial manifestation of land which a common and consistent high production value can be conveniently and practically mapped as a distinct productive unit, whereas the reality of the Tasmanian agricultural estate is that it is comprised of a mosaic of relatively small-scale and variable productive classifications. The zone also fails to accommodate the larger portion of the State's agricultural land which is comprised of lower productivity classes, but upon which the greater part of agricultural activity occurs to produce the majority of agricultural outputs.

The above quoted section from the Cradle Coast Region identifies the difficulty of differential zoning for our rural non-urban lands. The sentiments expressed have validity in the state-wide context.

It is contended the quoted section preceding the Cradle Coast submission and other like statements in the Explanatory Document are not consistent with the PAL State Policy. The Explanatory Document appears to be presuming or will encourage the presumption that agricultural land, as defined, is predominately 'prime land'. At least the Explanatory Document acknowledges the difficulty of establishing the Tasmania's agricultural estate. Where the agriculture estate is to be the proposed basis for determining which lands are zoned rural or agriculture.

To avoid either a patchwork of zoning as determined by the identified Tasmanian agricultural estate or significant areas being excluded from agriculture zoning to maintain the integrity of the two zones, the preferred position is for one rural or resource management zone. The concept of an agricultural estate could still be pursued as an overlay to the underlying zoning. Under a single zone scenario there is still a number of other zones available for lands with particular characteristics in non-urban areas, being the Landscape Conservation, Environmental Management and Recreation zones.

The next matter concerns residential use in the (draft) Agriculture zone. SPPs, clause 21.3 1 Use Standards P3 for a residential use is classified as discretionary and qualified at sub-section (a) which states:

(a) *be required as part of an agricultural use, having regard to:*

This standard appears to conflict with clause 6.2.2 that deals with categorizing uses ‘*where directly associated with and a subservient part...*’. Whilst sub-clause P3 applies an appropriate set of tests for residential use on agricultural land there does appear to be two entry points for approval of a residential use. The potential for residential use to be classified as subservient to, say resource development, where classified as ‘*no permit required*’ and residential use as a ‘*discretionary qualified use*’ should be clarified.

6.10 Recommendations for amendments to the State Planning Provisions to facilitate food security

1. SPP clause 2.0 Planning Scheme Purpose

Amend SPP section 2.1 Planning Scheme Purpose to insert the following:

‘The use or development of land supports a resilient, localised, healthy and sustainable food system.’

2. Clause 3.1.3 clarify and insert the following interpretations:

home-based business (confirm or amend accordingly the interpretation such that a home-based business for local food production or processing is not confined to just part of a dwelling and does include the whole site).

healthy food: means food which is required for a healthy and nutritious diet and is adequate, safe and culturally appropriate and sufficient to live an active healthy life.

local food production or processing: means food grown or reared on a site primarily for local consumption and where there has been minimum processing of the products.

3. Table 4.1 clarify and amend the following exemptions:

home occupation confirm or amend accordingly that home occupation includes food production or processing over the whole site and is not solely limited to ‘no more than 40m² gross floor area of the dwelling.

Amend the qualification to the exemption for use or development in a road reserve or on public land to broaden the reference to community garden as follows:

use or development in a road reserve or on public land	outdoor dining facilities, signboards, roadside vendors and stalls on a road that have been granted a licence under a relevant Council By-Law; or <u>urban agriculture including a community garden and a market</u> on a public land.
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4. Insert and clarify the use class 'resource development' with the qualification 'If for local food production or processing', as permitted use and development in the following zones:

Zone	Qualification
General Residential, Low Density Residential, Rural Living, Village, Urban Mixed Use, Local Business, General Business, Central Business, Commercial, Light Industrial, Environmental Living, Landscape Conservation, Environmental Management, Major Tourism, Community Purpose, Recreation, Open Space	P (If for local food production or processing)

5. Amend the qualifications for the use class 'general retail and hire' in the Community Purpose zone and Recreation zone to make a 'market' permitted as follows:

Zone	Qualification
Community Purpose	⊖ P (if for a market)
Recreation	P (if for a market) D (If for clothing, equipment or souvenirs for a Sports and Recreation use; or (b) for a market.)

6. Clause 21.3.1/P3(a) Agriculture zone – Use Standards (discretionary uses Residential use) clarify where it refers to a residential use 'must be part of an agricultural use...' compared with housing classified under clause 6.2.2 that deals with categorizing uses 'where directly associated with and a subservient part...'.
7. Amend the Rural and Agriculture zones by combining into a single Rural Resource zone and draft a code incorporating an overlay to spatially define the Tasmanian agricultural estate.

7. Buildings and site design actively promotes physical activity

7.1 Policy

Work places support increased levels of physical activity through the design of a building's circulation system, encouragement of stair use, the provision of end-of-trip facilities, (such a secure bicycle storage and change facilities) and there is convenient and safe access to public transport. Safe access to work places by active travel is enhanced where buildings provide for natural surveillance of outside spaces and the street.

It is submitted that the interface between buildings and health and wellbeing relative to the remit of the Tasmanian Planning Scheme should be found in the use classifications and use and development standards, particularly for urban based zones, and the assignment of business and commercial zones in areas of good transport access.

7.2 Evidence

Workplace and activity

The Blueprint for an Active Australia ³² assembles the evidence on the importance of being active in the workplace. The Blueprint asserts:

The workplace is increasingly being recognised (nationally and internationally) as a priority high-reach setting for health behaviour interventions, extending from a labour-based approach to a public health 'healthy workers' approach.

In general, a physically active workforce can improve physical and mental health, reduce absenteeism and increase productivity, thereby providing important benefits to individuals and workplaces. Workplaces should see the implementation of physical activity programs as a strategic business enhancement opportunity.

Car parking and activity

A planning requirement for car parking is emerging as an issue with concerns about the amount of urban space dedicated to storing cars during work times and then the space is vacant and essentially unproductive at other times. In essence car parking can dictate many decisions on use and development. The proposition is that car parking is a commercial interest of business owners rather than a community planning issue. Car parking can have major adverse impacts on amenity, the streetscape and walking, particularly through the number of crossings of footpaths found in the urban environment. Central business areas generally do not require parking as part of a permit application with often the onus being on the applicant to show reason for the provision of parking. Is it timely to take the same principle to other business and commercial areas?

A Victoria Walks review of car parking and walking found³³:

In 2009 the Department of Transport commissioned an international review of the literature regarding techniques to promote walking and cycling. This review found that the availability of free car parking was one of the key factors that promoted driving over other forms of transport (Krizek, Forsyth and Baum 2009).

A more recent review of international literature reached a similar conclusion. *"Hindsight shows that minimum parking requirements have had hugely negative consequences... Travel behaviour*

³² See Blueprint for an active Australia Action area 2 for references on health and the work place

³³ Victoria Walks: Car parking and walking perceptions of car parking <http://www.victoriawalks.org.au/parking/>

studies show a strong link between the availability and cost of parking and people's tendency to drive." (Donovan and Munro 2013, p.50)

The significance of car parking for walking in particular relates to the fact that, in addition to promoting vehicle use, when provided in the form of large scale ground level parking lots, it actively discourages walking. *"Not only does ample and free parking provide an easy excuse for auto travel, vast parking areas are also the bane of pedestrian travel."* (Krizek, Forsyth and Baum 2009, p.15).

Despite limited changes to Victorian parking requirements made in mid-2012, the Victoria Planning Provisions (VPPs) still require car parking beyond the levels that business would naturally supply, promoting vehicle use at the expense of other transport modes. A fundamental review of Victorian car parking requirements is needed.

Heart Foundation "Healthy Active by Design"³⁴ has assembled evidence relating to physical activity and car parking for big-box centres finding:

Big-box, car-park dominated retail shopping centres with large car park areas and all shops facing inside, increase car reliance whilst simultaneously constraining pedestrian activity through a failure to provide a pleasant or easy walking or cycling environment. This increases motivation to drive to the centre, even if people live within a close and comfortable walking distance. In contrast, more traditional, main-street centres, - where pedestrian-scaled, street-fronting mixed-use buildings with small setbacks and 'active' ground floor uses that extend onto the street (i.e., café seating areas, external shop displays) encourages walking and cycling access.

7.3 SPPs relating to building and site design

Provisions in the draft SPPs relevant to work place health primarily apply to business and commercial zones and the Parking and Sustainable Transport code.

7.4 Purpose

SPP section 2.1 Planning Scheme Purpose insert the following objective:

Work places support physical activity through convenient and safe accesses providing for natural surveillance of outside spaces and the street.

7.5 Zones

12.3.1 Village zone and other zones - External lighting standards

External lighting standards (eg clause 12.3.1 A2/P2 for the Village zone) need to address the adequacy of lighting for the 'public' areas for gaining access to a commercial premises and not to solely concern light spillage on to adjoining properties and zones. This requirement for appropriate external lighting for health and safety reasons is, however, covered with enhanced requirements in the 'Design' standards applying to the business/commercial zones.

13.4.3 Urban Mixed Use zone and other zones - Design

Design standards at clause 13.4.3 (Urban Mixed Use zone) and equivalent clauses in the other business and commercial zones cover access to and surveillance of pedestrian areas. These standards are supported particularly for the objective to the standard being:

³⁴ Heart Foundation "Healthy Active by Design" <http://www.healthyactivebydesign.com.au/evidence-1>

To ensure that building facades promote and maintain high levels of pedestrian interaction, amenity and safety.

Nevertheless the following amendments to clause 13.4.3 and equivalent clauses in the other business/commercial zones are necessary to enhance the objective for the standard and for work place health. Amend sub clause (a) as follows:

13.4.3 Design

Acceptable Solutions	Performance Criteria
A1 Buildings must be designed to satisfy all of the following: (a) <i>provide the <u>main</u> pedestrian entrance to the building that is visible <u>and accessible</u> from the road or publicly accessible areas of the site;</i>	

(ii) At A1(g) the option to provide an awning based on what is existing or on adjacent sites should be revised to make sun and rain protection mandatory along with an equivalent PC to require appropriate weather protection for the pedestrian areas. Proper provisions for weather protection of the public realm adds to walkability and consequently health benefits.

Amend sub clause (g) as follows:

Clause 13.4.3 Design

Acceptable Solutions	Performance Criteria
A1 (g) provide awnings over a public footpath if existing on the site or adjoining properties, <u>and to the pedestrian entrance to the building</u> excluding for a Residential use; and	P1 (g) provide awnings over a public footpath, excluding for a Residential use, unless: the site does not have existing awnings; there is no benefit for the streetscape or pedestrian amenity; or it is not possible to provide an awning due to physical constraints of the site or building; and

The draft SPPs standards for the Village zone do not cover design standards as is the case for the Urban Mixed Use zone (clause 13.4.3) and other commercial/business zoning. The Explanatory Document justification for this exclusion states:

There are no design standards within the Village Zone which reflects the use of the Zone in smaller rural settlements.

This justification is not acceptable. The fact that the zone is applied to smaller rural settlements misrepresents the need for good design and potential public interface with buildings and uses in villages together with the prospect of smaller rural settlements not always being small and rural. The design standards at clause 13.4.3 should be inserted for the Village zone at (new) clause 12.4.3 and existing clauses renumbered accordingly.

The amendments to the standards for design at 13.4.3 need to be repeated for equivalent clauses in the following zones: Local Business, General Business, Central Business and Commercial as well as for the Village zone.

17.4.2 Commercial zone and other zones - setbacks and design

The building setback for the Commercial zone at clause 17.4.2 has the AS (A1) at 5.5m setback. The corresponding performance criteria (P1) appears to imply the setback in the Commercial zone is to provide, primarily, for vehicle access and parking. The objective for the setback standard refers to:

- (a) *contributes positively to the streetscape; and*
- (b) *does not cause an unreasonable loss of amenity to adjoining residential Zones*

And then at clause 17.4.3, Design, there is a similar objective for streetscape. It is contended that assigning the frontage of a commercial site to vehicle access and parking is contrary to making a positive contribution to the streetscape.

The attraction of vehicle parking within the frontage setbacks of buildings is understood and will possibly continue to be the preferred position for building owners and occupiers. However a nil setback does not preclude a larger setback, but in doing so, particularly if the performance criteria are triggered as an alternative to A1 (b) and (c), then streetscape and pedestrian safety and amenity can be given proper consideration.

The preferred position is as for the General Business zone at clause 15.4.2/A1 with the setback for the Commercial zone to based on a nil setback. The performance criteria clause 17.4.2 /P1 can remain but with an addition to sub clause (c) of '*and amenity of pedestrian and other*'. The design standards will then add to the streetscape and pedestrian environment considerations as follows.

17.4.2 Setbacks

Acceptable Solutions	Performance Criteria
<p>A1</p> <p>Buildings must have a setback from a frontage of that is</p> <p>(a) not less than 5.5m built to the frontage; or</p> <p>(b) not less than existing buildings on the site or not more or less than the maximum and minimum setbacks of the buildings on adjoining properties.</p>	<p>P1</p> <p>Buildings must have a setback from a frontage that provides adequate space for vehicle access, parking and landscaping, having regard to:</p> <p>(a) the topography of the site;</p> <p>(b) the setback of buildings on adjacent properties; and</p> <p>(c) the safety of <u>pedestrian and other</u> road users.</p>

7.6 Codes

C2.0 Parking and Sustainable Transport code

The Parking and Sustainable Transport code (C2.0) has direct relevance to enhancing work place health and wellbeing.

Clause C2.1 Code Purpose, requires amending to better reflect the quest for sustainable transport and to reflect comments in the Explanatory Document that states at page 18:

Parking, access and sustainable transport are fundamental to the liveability of the Tasmanian community...

And

The provision of car parking for uses and developments can impact on the viability of public transport services in activity centres and reduce the area of land available for other uses potentially affecting the efficiency and characteristics of cities and towns. The ability for central business areas to be exempt from car parking requirements is an important policy consideration and has historically been included in many Planning Schemes. In these areas, an intensity of development is required which would be compromised if car parking was provided on every site. Accordingly a more strategic approach to parking in central business areas should be applied.

Sustainable transport is also an important factor in relation to facilitating public transport, cycling and walking.

The amendments the Heart Foundation seeks to the code purpose follow:

C2.1 Code Purpose

The purpose of the Parking and Sustainable Transport Code is:

- C2.1.1 To ensure that an appropriate level of parking facilities is provided to service use and development.
- C2.1.2 To ensure that the provision of infrastructure facilitates cycling, walking and public transport ~~are encouraged~~ transport in urban areas.
- C2.1.3 To ensure that access for pedestrians, cyclists and other low-powered vehicles ~~and cyclists~~ is safe and adequate.
- C2.1.4 To ensure that parking does not cause an unreasonable loss of amenity to a locality.
- C2.1.5 To ensure that parking spaces and accesses meet appropriate standards.
- C2.1.6 To provide for the implementation of parking precinct plans.

The above amendments to the code purpose are to focus the code on the provision of infrastructure for active travel; not to just 'encourage'.

Turning to policy, the need and merit for a parking code is questioned. The above quotes from the Explanatory Document raises the question for central business areas. Indeed the merit of a parking numbers standard should be reviewed for all areas. Apart from the difficulty of settling on suitable numbers for parking spaces for particular uses, parking spaces are expensive, intrude considerably on the urban fabric and can constitute avoidable regulation. The theory is that where parking is provided by the applicant of their own volition there will be greater rationality of parking provision and a better representation of costs over benefits. A potential benefit from a rational policy on car parking numbers is for greater physical activity from reducing the ability for door-to door car travel³⁵.

To follow this line, clauses C2.5.1, C2.5.2, C2.5.3, C2.5.5 and Table C2.1 covering car, bicycle and motor cycle parking would be deleted. Some consequential amendments would also be necessary where a standard refers to a requirement for a certain number of spaces as in clause C2.6.5 A1.1. In those instances to 'require' (as in number of spaces) should be omitted and 'provide' substituted as follows:

Uses that ~~require~~ provide 10 or more car parking spaces must

³⁵ Heart Foundation 'Healthy Active by Design' <http://www.healthactivebydesign.com.au/evidence-2>

And in clause C2.6.7/A1:

'Within the General Business Zone and Central Business Zone, bicycle parking for uses that ~~require~~ provide 5 or more bicycle spaces in Table C2.1 must:'

Turning to the Explanatory Document 16.0 Zone Application Framework (p100), the guidelines for the business and commercial zones are supported from a work place health perspective.

7.7 Recommendations for amendments to the State Planning Provisions to enhance work place health

1. SPP section 2.1 Planning Scheme Purpose insert the following:

Work places support physical activity through convenient and safe accesses providing for natural surveillance of outside spaces and the street.

2. Amend clause 13.4.3 Design as follows:

Acceptable Solutions	Performance Criteria
A1 Buildings must be designed to satisfy all of the following: (a) <i>provide the main pedestrian entrance to the building that is visible and accessible from the road or publicly accessible areas of the site;</i>	
A1 (a) provide awnings over a public footpath if existing on the site or adjoining properties, <u>and to the pedestrian entrance to the building</u> excluding for a Residential use; and	P1 (a) provide awnings over a public footpath, excluding for a Residential use, unless: (b) the site does not have existing awnings; (c) there is no benefit for the streetscape or pedestrian amenity; or (d) it is not possible to provide an awning due to physical constraints of the site or building; and

3. Apply and insert the amended design standards at clause 13.4.3 Urban Mixed Use zone to the Village zone at (new) clause 12.4.3 and existing clauses renumbered accordingly.
4. Apply the amended design standards of clause 13.4.3 to the Local Business, General Business, Central Business and Commercial zones.
5. Amend clause 17.4.2 A1/P1 as follows:

Acceptable Solutions	Performance Criteria
A1 Buildings must have a setback from a frontage of that is (a) not less than 5.5m built to the frontage; or	P1 Buildings must have a setback from a frontage that provides adequate space for vehicle

(b) not less than existing buildings on the site or not more or less than the maximum and minimum setbacks of the buildings on adjoining properties.	access, parking and landscaping, having regard to: (a) the topography of the site; (b) the setback of buildings on adjacent properties; and (c) the safety <u>of pedestrian and other</u> road users.
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6. Amend clause C2.1 for the Parking and Sustainable Transport Code as follows:

C2.1.2 To ensure that the provision of infrastructure facilitates cycling, walking and public transport ~~are encouraged~~ transport in urban areas.

C2.1.3 To ensure that access for pedestrians, cyclists and other low-powered vehicles ~~and~~ ~~cyclists~~ is safe and adequate.

7. Delete the numerical standards for parking provision at clauses C2.5.1, C2.5.2, C2.5.3, C2.5.5 and Table C2.1 of the Parking and Sustainable Transport Code.

8. In clause C2.6.5/A1.1 omit 'require' (as in number of spaces) and substitute 'provide' as follows:

'Uses that ~~require~~ provide 10 or more car parking spaces must'

9. In clause C2.6.7/A1 omit 'require' (as in number of spaces) and substitute 'provide' as follows:

'Within the General Business Zone and Central Business Zone, bicycle parking for uses that ~~require~~ provide 5 or more bicycle spaces in Table C2.1 must:'

C. Annexures

Annexure 1 - Draft for a Liveable Streets Code

Cx.0 Liveable Streets Code

Cx.1 Code Purpose

The Purpose of the Liveable Streets Code is:

To establish a legible street hierarchy that sets the function of streets based on through traffic, the requirements for public transport, the adjoining land use and provision of pedestrian networks and cycle ways.

To ensure that cycling, walking and public transport are supported as a means of transport in urban areas.

To establish the design criteria for streets that set the speed environment and amenity for new and retrofitted streets including recognising the public open space opportunities within the street environment.

To establish the design criteria for local streets that embody passive speed measures including, change of surface materials, limited visual length of street segments, and reduced carriage widths.

To establish the design criteria for streets to provide for connectivity and permeability for pedestrian and bicycle access.

To establish the design criteria for streets to provide for equitable access with features that are barrier free for people with disabilities.

To establish the design criteria for a minimum width and maximum cross-fall and the provision of a consistent, connecting walkable surface.

Cx.2 Application of this Code

This Code applies to development for new streets or a change of use or development (other than maintenance and repair) of existing streets for the General Residential, Low Density Residential, Rural Living, Village, Urban Mixed Use, Local Business, General Business, Central Business, Commercial, and Light Industrial zones.

Cx.3 Definition of Terms

Definitions inserted as required

Cx.4 Development Exempt from this Code

Cx.4.1 There are no exemptions from this Code.

Cx.5 Use Standards

Cx.5.1 Use standards inserted as required

Cx.6 Development Standards for Liveable Streets

Cx.6.1 Street hierarchy

Objective:	To establish a street hierarchy that sets the function of streets based on through traffic, the requirements for public transport, the adjoining land use and provision of pedestrian networks and cycle ways.
Acceptable Solutions	Performance Criteria
A1 Access to a higher speed street is within 500m from anywhere on the low speed street network. Street interruptions are placed at regular intervals of approximately 100m for 30km/h and 150m for 40km/h streets. The street hierarchy facilitates bus public transport where bus routes determine street widths and grades.	P1 To be drafted

Cx.6.2... Street Design Parameters

Objective:	To establish street design parameters that set the speed environment and amenity for new and retrofitted streets including recognising the public open space opportunities within the street environment. Paths are designed to standards that avoid exclusion for people with disabilities
Acceptable Solutions	Performance Criteria
A1 Local streets with a speed limit not exceeding 40km/h have a maximum carriage width of 5.6m. Paths satisfy AS1428 parts 1&2 to provide a continuous path of travel. Footpaths have a minimum cross falls of <2.5% (1:40) with no vertical drops or steps. Footpaths are provided on both sides of all streets. Street landscaping maintains clear sightlines on walking and cycling routes with low vegetation (<0 700mm) and/or trees with clear stems (up to 2.4m).	P1 Street/road reserves are of a width and alignment that can: provide for safe and convenient movement and parking of projected volumes of vehicles and other users. provide for footpaths, cycle lanes and shared-use paths for the safety and convenience of residents and visitors. allow vehicles to enter or reverse from an allotment or site in a single movement allowing for a car parked on the opposite side of the street. accommodate street tree planting, landscaping and street furniture. accommodate the location, construction and maintenance of stormwater drainage and public Utilities. accommodate service and emergency vehicles. traffic speeds and volumes are restricted where appropriate by limiting street length and/or the distance between bends and slow points.

	<p>sight distances are adequate for motorists at intersections, junctions, and at pedestrian and cyclist crossings to ensure the safety of all road users and pedestrians.</p> <p>existing dedicated cycling and walking routes are not compromised.</p> <p>sufficient on-street visitor car parking is provided for the number and size of allotments, taking account of:</p> <ul style="list-style-type: none"> (a) the size of proposed allotments and sites and opportunities for on-site parking (b) the availability and frequency of public and community transport
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Cx.6.3 Street connectivity and permeability

Objective:	Streets provide for connectivity and permeability for pedestrian and bicycle access through: small street block sizes; and paths that connect streets
Acceptable Solutions	Performance Criteria
A1 Walking and cycling paths are provided to link heads of culs de sac and dead-end streets to other streets.	P1 Streets facilitate the most direct route to local facilities for pedestrians and cyclists and enable footpaths, cycle lanes and shared-use paths to be provided of a safe and suitable width and reasonable longitudinal gradient.

Cx.6.4 Streets enhance walkability

Objective:	To enhance walkability through inviting, safe and secure streets and paths
Acceptable Solutions	Performance Criteria
A1 Footpaths are of minimum widths: generally > than 2m. (2m+ allows 2 wheelchairs to pass and for pram and dog walking) >3.5m for shopping strips. >3m along bus stops and near schools A >0.5m buffer eg a nature strip is provided between moving vehicles and pedestrians.	P1 Pedestrians are given priority of movement. There are limited interruptions to progress along footpaths and path width comfortably accommodates the number of pedestrians.

Cx.6.5 Streets enhance cycle-ability

Objective:	To enhance cycling for daily requirements, including journey to work or school through available safe and convenient routes.	
A1 Motorised vehicles and cyclists occupy shared street space for streets with <3000vpd & < 30kmph design speed environment. Separated bicycle facilities are provided where motorised vehicles exceed 3000vpd. Bicycle lanes are provided on higher order faster streets >40km/h & >5000vpd. Bicycle lanes are provided where it is strategic to provide bicycle routes and where there is high volumes of bicycles.	P1 To be drafted	

Cx.6.6 Streets enhance public transport

Objective:	To ensure that maintenance and repair of buildings and structures are undertaken to be sympathetic to and not detract from the local historic heritage significance of local heritage places.	
Acceptable Solutions	Performance Criteria	
A1 The preferred distance of housing to a bus stop is <400m The maximum distance from housing to a public transport route is 500m.	P1 Street width, construction and, grades facilitate bus public transport.	

Annexure 2 - Summary of Recommendations by Clause Number

The consolidated recommended amendments to the draft SPPs are presented below in chronological clause number order, where possible.

Clause 2.0

1. Purpose insert a clear set of objectives for use and development of land based on how the LUPAA objectives are furthered and how consistency is found with State Policies.
2. Purpose includes the following objectives:
 - Use and development of land encourages and supports active living for improved health outcomes.
 - Use and development of land encourages and supports active travel for improved health outcomes.
 - Public open spaces and reserves provide a well distributed network of walkable and attractive spaces strategic to local communities for their aesthetic, environmental, health and economic benefits.
 - Mixed density housing and housing that satisfies life-cycle requirements is encouraged to enhance the scope for active living and active travel.
 - Compatible land uses are co-located to promote active travel to, and between different activities.
 - The use or development of land supports a resilient, localised, healthy and sustainable food system.
 - Work places support physical activity through convenient and safe accesses providing for natural surveillance of outside spaces and the street.

Clause 3.1.3

3. Interpretation - amend, clarify and add to the interpretations as follows:

Term	Definition
active living	means a way of life that integrates physical activity into daily routines.
active travel	means travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling and may allow for integration of multi-modal transport in the course of a day.
amenity	means, in relation to a locality, place or building, any quality, condition or factor that makes or contributes to making the locality, place or building harmonious, pleasant or enjoyable <u>and adds to the health and wellbeing of the users of the locality, place or building.</u>
home based business	Confirm or amend accordingly the interpretation such that a home-based business for local food production or processing is not confined to just part of a dwelling and does include the whole site.

healthy food	means food which is required for a healthy and nutritious diet and is adequate, safe and culturally appropriate and sufficient to live an active healthy life.
local food production or processing	means food grown or reared on a site primarily for local consumption and where there has been minimum processing of the products.
road	means land over which the general public has permanent right of passage, including the whole width between abutting property boundaries, all footpaths and the like, and all bridges over which such a road passes <u>and includes all State roads.</u>
street	means a road that is not a State road.

Clause 4.0.1

4. Table 4.1 Exemptions - amend, clarify and add to the exemptions as follows:

Use or Development	Qualifications
home occupation	Confirm or amend accordingly that home occupation includes food production or processing over the whole site and is not solely limited to 'no more than 40m ² gross floor area of the dwelling'
road works	Maintenance and repair of roads and streets upgrading by or on behalf of the road authority which may extend up to 3m outside the road reserve including: <ul style="list-style-type: none"> (a) widening or narrowing of existing carriageways; (b) making, placing or upgrading kerbs, gutters, footpaths, shoulders, roadsides, traffic control devices, line markings, street lighting, safety barriers, signs, fencing and landscaping unless subject to the Local Historic Heritage Code; or (c) repair of bridges, or replacement of bridges of similar size in the same or adjacent location.
minor infrastructure	<ul style="list-style-type: none"> (a) Provision, Maintenance and modification of footpaths, cycle paths. (b) <u>Provision</u>, maintenance and modification of playground equipment, seating, shelters, bus stops and bus shelters, street lighting, telephone booths, public toilets, post boxes, cycle racks, fire hydrants, drinking fountains, rubbish bins, public art, associated signs and the like on public land.
use or development in a road reserve or on public land	outdoor dining facilities, signboards, roadside vendors and stalls on a road that have been granted a licence under a relevant Council By-Law; or <u>urban agriculture including a community garden and a market</u> on a public land.

Clause 6.2

5. Categorising use or development delete 'subdivision' from clause 6.2.6.

Clause 8.1

6. Amend, omit and substitute the purpose of the General Residential zone as follows:

8.1.1 To provide for residential use or development that accommodates a range of dwelling types at suburban densities, where full reticulated infrastructure services are available or can be provided.

~~*8.1.4 To ensure that non-residential use does not unreasonably displace or limit Residential use.*~~

8.1.4 To ensure the use and development of land promotes the health, safety and amenity of residential areas.

Clause 8.2

7. Use Table - General Residential zone and for other zones insert for the use class 'resource development' the qualification 'If for local food production or processing', as permitted use and development in the following zones:

Zone	Qualification
General Residential, Low Density Residential, Rural Living, Village, Urban Mixed Use, Local Business, General Business, Central Business, Commercial, Light Industrial, Environmental Living, Landscape Conservation, Environmental Management, Major Tourism, Community Purposes, Recreation, Open Space	P (If for local food production or processing)

Clause 8.3.1

8. General Residential zone – use standards discretionary uses, omit the objective and substitute:

8.3.1 To ensure that all discretionary uses are compatible with residential use.

Clause 8.4.1

9. General Residential zone - Development standards for multiple dwellings delete the performance criterion P1(a) as follows:

P1

Multiple dwellings must only have a site area per dwelling that is less than 325m², if the development will not exceed the capacity of infrastructure services and:

- (a) ~~is consistent with the density of existing development on established properties in the area; or~~
 (b) *provides for a significant social or community benefit and is:*
 (i) *wholly or partly within 400m walking distance of a public transport stop; or*
 (ii) *wholly or partly within 400m walking distance of an Inner Residential Zone,*

Clauses 8.4.1 A1 and P1 and 8.6.1 A1

10. General Residential zone omit 325m² and 450m² respectively and substitute 400m² for all forms of housing.

Clauses 8.4.2 A2(c) and others

11. General Residential zone delete or amend as follows:

Clause	Provision showing parts for deletion
<i>Setbacks and building envelope for all dwellings</i> Clause 8.4.2 A2(c)	if for a vacant site and there are existing dwellings on adjoining sites on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of the dwellings on the adjoining sites on the same street.
<i>Site coverage and private open space for all dwellings</i> Clause 8.4.3 objective	'To ensure that dwellings are consistent with the amenity and character of the area and provides:'
<i>Site coverage and private open space for all dwellings</i> Clause 8.4.3 P1(a)	site coverage consistent with that existing on established properties in the area;
Non dwelling development Clause 8.5.1 A1 (c)	(c) if for a vacant site and there are existing dwellings on adjoining properties on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of those dwellings. (c) developed for gardens and landscaping.
Non dwelling development Clause 8.5.1 P3	A building that is not a dwelling, must be consistent with the form and scale of residential development existing on established properties in the area and have reasonable space for the planting of gardens and landscaping.

Clause 8.6

12. Development Standards for subdivision and for other zones insert provisions and standards for public open space and riparian and littoral reserves at clause 8.6 and equivalent provisions in all other zones except the Port and Marine zone and the Utilities zone as follows:

x.6.2, x.5.2 public open space (clause numbering as applicable for each zone)

Objective:	To ensure subdivision delivers a well distributed network of walkable and attractive public open spaces and reserves strategic to local communities.	
Acceptable Solutions		Performance Criteria
A1 Subdivision provides a minimum land area of 5% for public open space.	P1 Payment instead of public open space is taken where: <ul style="list-style-type: none"> (a) a strategic plan for public open space and reserves provides for the acquisition of public open space at alternative sites in the vicinity of the subdivision; or (b) a strategic plan for public open space and reserves specifies requirements for the improvement on existing public open space land in the vicinity of 	
A2 (a) Subdivision provides a minimum width of riparian reserve of 30m from the bank of a water course (non-tidal) for the length of the common boundary with the water course.	P2 (a) A riparian reserve of less the 30m is provided or dispensed with where there is a common boundary with a minor water course; and (b) A riparian reserve is not required to link to adjoining reserves, or (c) A riparian reserve is not required as part of a strategic plan for public open space and reserves.	
A3 (a) Subdivision provides a minimum width of littoral reserve of 30m from the bank of a river or coast for the length of the common boundary with the river or coast.	P3 (a) The requirement to provide a littoral reserve of 30m may only be reduced or dispensed with where existing buildings or features do not allow for the full or partial reserve width to be provided; or the area is required for coastal dependent	

Clause 8.6 and others

13. General Residential Zone, amend to provide for streets, as follows:

- (a) Delete Clause 8.6.2 Roads except for standard A2/P2.
- (b) Relocate standard 8.6.2 A2/P2 to clause 8.6.1.
- (c) Insert (new) standard for streets as clause 8.7, being a modification from existing clause 8.6.2, as follows:

Development Standards for Streets

Objective	<p>To ensure that the arrangement of new development for roads <u>streets within a subdivision</u> provides for:</p> <ul style="list-style-type: none"> a) a legible road hierarchy that sets the function of streets based on through traffic, the requirements for public transport, the adjoining land use and the connectivity and permeability for pedestrian networks and cycle ways; b) safe, convenient and efficient connections to assist accessibility and mobility of the community; c) the adequate accommodation of vehicular, pedestrian, cycling and public transport traffic; and d) the efficient subdivision development of the entirety of the land and of surrounding land; and e) the efficient ultimate development of the entirety of the land and of surrounding land; and the integration of land use and transport.
Acceptable Solutions	Performance Criteria
<p>A1</p> <p>There are no acceptable solutions. The subdivision includes no new roads.</p>	<p>P1</p> <p>The arrangement and construction of roads <u>Development for streets within a subdivision</u> must satisfy all of the following:</p> <ul style="list-style-type: none"> (a) the route and standard of roads <u>streets</u> accords with any relevant road network plan adopted by the Planning Authority; (b) the appropriate and reasonable future subdivision of the entirety of any balance lot is not compromised; (c) the future subdivision of any adjoining or adjacent land with subdivision potential is facilitated through the provision of connector roads and pedestrian paths, where appropriate, to common boundaries; (d) an acceptable level of access, safety, convenience and legibility is provided <u>for all street users</u> through a consistent road function hierarchy; (e) connectivity with the neighbourhood road <u>street</u> network <u>through streets and paths</u> is maximised <u>maximized</u>. <u>Cul-de-sac and other non-through streets are minimized</u>; (f) the travel distance <u>for walking and cycling</u> between key destinations such as shops and services is minimised; (g) walking, cycling and the efficient movement of public transport <u>and provision of public transport infrastructure</u> is facilitated; (h) provision is made for bicycle infrastructure on new arterial and collector roads in accordance with Austroads Guide to Road Design Part 6A as amended; <u>and</u> (i) any adjacent existing grid pattern of streets is extended, where there are no significant topographical constraints.

Clauses to insert provisions for streets

14. Amend to provide for streets as per Clause 8.7 of the General Residential zone as follows:

Zone	Existing clauses	New clauses	Notes
Inner Residential	9.6.2	9.7	Zone currently contains standards as per the General Residential zone.
Low Density Residential	10.6.2	10.7	Zone currently contains standards as per the General Residential zone.
Rural Living	11.5.2	11.6	The performance criteria are expanded from the draft SPPs to reflect the residential intent for the zone.
Village	12.5.22	12.6	The performance criteria are expanded from the draft SPPs to reflect the residential intent for the zone.
Urban Mixed Use	No provision	13.6	Provisions extended to the Urban Mixed Use zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Local Business	No provision	14.6	Provisions extended to the Local Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
General Business	No provision	15.6	Provisions extended to the General Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Central Business	No provision	16.6	Provisions extended to the Central Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Commercial	No provision	17.6	Provisions extended to the Commercial zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.
Light Industrial	No provision	18.6	Provisions extended to the Local Business zone as there are no similar provisions in the draft SPPs. The standards have application to new streets as well as retrofitting existing streets.

Clause 9.1.3(c)

15. Inner Residential zone, delete as follows:

~~9.1.3(c) does not unreasonably displace or limit residential use.~~

Clause 9.3.1

16. Inner Residential zone omit the objective and substitute:

9.3.1 To ensure that all discretionary uses are compatible with residential use.

Clauses 9.4.2 A2(c) and others

17. Inner Residential zone delete or amend clauses as follows:

Clause	Provisions showing parts for deletion
Setbacks and building envelope for all dwellings clause 9.4.2 A1(c)	if for a vacant site and there are existing dwellings on adjoining sites on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of the dwellings on the adjoining sites on the same street.
<i>Site coverage and private open space for all dwellings</i> clause 9.4.3 objective	'To ensure that dwellings are consistent with the amenity and character of the area and provides provide.'
<i>Site coverage and private open space for all dwellings</i> clause 9.4.3 P1(a)	site coverage consistent with that existing on established properties in the area;
Non dwelling development clause 9.5.1 A1 (c)	if for a vacant site and there are existing dwellings on adjoining properties on the same street, not more than the greater, or less than the lesser, setback for the equivalent frontage of the dwellings on the adjoining sites on the same street.
Non dwelling development clause 9.5.1 P3	Buildings must be consistent with the form and scale of residential development existing on established properties in the area and have a reasonable space for the planting of gardens and landscaping.

Clause 13.1.3

18. Urban Mixed Use zone insert additional zone purpose as follows:

13.1.3 To provide amenity for residents appropriate to the mixed use characteristics of the Zone.

Clause 13.2

19. Urban Mixed Use zone, use Table insert the following:

(Use Class) Discretionary	Qualification
Residential	If not listed as permitted

Clause 13.3.1

20. Urban Mixed Use zone - Use Standards omit objective and substitute the following:

13.3.1 To ensure that non-Residential use:

- (a) is compatible with the adjoining uses;
- (b) does not cause unreasonable loss of residential amenity; and
- (c) to ensure that uses do not cause unreasonable loss of amenity to adjoining residential Zones.

Clause 13.4.3

21. Urban Mixed Use zone - Design amend provisions as follows:

Acceptable Solutions	Performance Criteria
A1 Buildings must be designed to satisfy all of the following: <i>(a) provide the main pedestrian entrance to the building that is visible and accessible from the road or publicly accessible areas of the site;</i>	
A1 (g) provide awnings over a public footpath if existing on the site or adjoining properties, and to the pedestrian entrance to the building excluding for a Residential use; and	P1 (g) provide awnings over a public footpath, excluding for a Residential use, unless: the site does not have existing awnings; there is no benefit for the streetscape or pedestrian amenity; or it is not possible to provide an awning due to physical constraints of the site or building; and

Clauses 13.4.3 and 12.4.3

22. Urban Mixed Use zone and Village zone, apply and insert the amended design standards at clause 13.4.3 to (new) clause 12.4.3 and existing clauses renumbered accordingly.

Clause 13.4.3 and others

23. Apply the amended design standards to the Local Business, General Business, Central Business and Commercial zones.

Clause 14.3.1

24. Local Business zone, Use Standards – all uses amend the objective as follows:

14.3.1

Objective:	To ensure that non-residential uses do not cause unreasonable loss of amenity to adjoining residential uses and residential Zones.
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Clause 14.4.1

25. Local Business zone, Development Standards – Building height amend the objective as follows:

14.4.1

Objective:	To ensure building height: (a) contributes positively to the streetscape; and (b) does not cause an unreasonable loss of amenity to adjoining <u>residential uses</u> <u>and</u> residential Zones.
-------------------	---

Clause 14.4.2

26. Local Business zone, Development Standards – Setbacks amend the objective as follows:

14.4.2

Objective:	To ensure that building setback: (a) contributes positively to the streetscape; and (b) does not cause an unreasonable loss of amenity to adjoining <u>residential uses</u> <u>and</u> residential Zones.
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Clause 17.4.2

27. Commercial zone, Development Standards – Setbacks amend A1/P1 as follows:

Acceptable Solutions	Performance Criteria
A1 Buildings must have a setback from a frontage of that is: (a) not less than 5.5m built to the frontage; or (b) not more or less than the maximum and minimum setbacks of the buildings on adjoining properties.	P1 Buildings must have a setback from a frontage that provides adequate space for vehicle access, parking and landscaping, having regard to: (a) the topography of the site; (b) the setback of buildings on adjacent properties; and (c) the safety of <u>pedestrian and other</u> road users.

Clause 21.3.1/P3(a)

28. Agriculture zone – Use Standards (discretionary uses Residential use) clarify where it refers to a residential use ‘must be part of an agricultural use...’ compared with housing classified under clause 6.2.2 that deals with categorizing uses ‘where directly associated with and a subservient part...’.

Clause 20.0 and 21.0

29. Amend the Rural and Agriculture zones by combining into a single Rural Resource zone and make provision for a code incorporating an overlay to spatially define the Tasmanian agricultural estate.

Clause 27.2

30. Community Purpose zone - Use Table and Clause 28.2 Recreation zone amend the qualifications for the use class ‘general retail and hire’ to make a ‘market’ permitted as follows:

Zone	Qualification
Community Purposes	D P (if for a market)
Recreation	P (if for a market) D (If for clothing, equipment or souvenirs for a Sports and Recreation use; or (b) for a market.)

Clause C2.1

31. Parking and Sustainable Transport Code amend the code purpose as follows:

C2.1.2 To ensure that the provision of infrastructure facilitates cycling, walking and public transport ~~are encouraged transport in urban areas.~~

C2.1.3 To ensure that access for pedestrians, cyclists and other low-powered vehicles ~~and cyclists is safe and adequate.~~

Clauses C2.5.1, C2.5.2, C2.5.3, C2.5.5 and Table C2.1 1

32. Parking and Sustainable Transport Code delete the numerical standards for parking provision.

Clause C2.6.5/A1.1

33. Parking and Sustainable Transport Code – Pedestrian Access omit ‘require’ (as in number of spaces) and substitute ‘provide’ as follows:

‘Uses that ~~require~~ provide 10 or more car parking spaces must’

Clause C2.6.7/A1

34. Parking and Sustainable Transport Code – Bicycle Parking and Storage Facilities

omit ‘require’ (as in number of spaces) and substitute ‘provide’ as follows:

‘Within the General Business Zone and Central Business Zone, bicycle parking for uses that ~~require~~ provide 5 or more bicycle spaces in Table C2.1 must:’

Liveable Streets Code

35. Make provision in the SPPs codes for a future Liveable Streets Code.

Explanatory Document

It is requested that the following conflicting statements (page 39) be deleted from the Explanatory Document for the Inner Residential zone under ‘zone purpose’, as follows:

~~‘The Zone has limited application within serviced residential areas’, and~~

~~‘...this Zone should be well utilised where appropriate.’~~

~~‘Within the Inner Residential Zone there should be a reduced expectation on suburban residential amenity,...’~~

Attention: Submission Manager

State Planning Office

Department of State Growth

GPO Box 536

Hobart Tasmania 7001

Via email – haveyoursay@stateplanning.tas.gov.au

13th March 2025

Submission – Urban Growth Boundary

Zoning Lauderdale 476 and 488 South Arm Highway

On behalf of The Harry Lambrakis Family Trust P/L, we provide this submission with respect to the ongoing consultation regarding the Southern Tasmania Regional Land Use Strategy - Urban Growth Boundary proposed update project.

This submission has been prepared to advocate for the inclusion of the entirety of land at 476 and 488 South Arm Road, Lauderdale, within an updated Urban Growth Boundary. The inclusion of this land is relevant to consideration of Clarence Area 5, as shown in the consultation paper. (*Image1*).

Image 1.

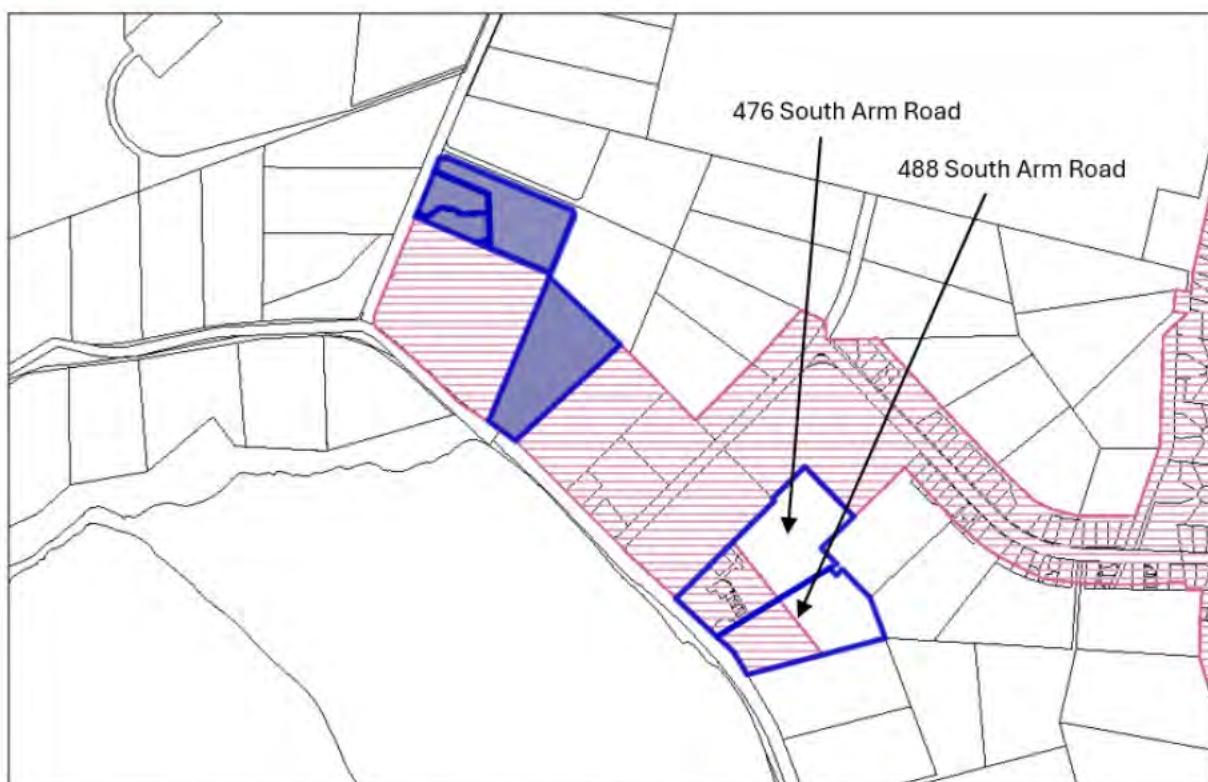


Image 1. Showing site (blue outline) relative to the current Urban Growth Boundary (purple hatching), and the proposed updated Urban Growth Boundary (blue fill).

Site and Context

The site is made of two parcels (CT127788/0, and CT 161348/1), both of which are partially within the Urban Growth Boundary. The site is within walking distance of the Lauderdale Primary School, Lauderdale Early Learning Centre, a retirement village, and other businesses within the activity centre. The site is fully served by both water and sewer.

Within the locality, the extent of the activity centre and subsequent application of business zones aligns to the current Urban Growth Boundary for two reasons. **Firstly**, that the Lauderdale Structure Plan followed the Urban Growth Boundary to identify the Commercial area, and **secondly**, that subsequent review of the Urban Growth Boundary since 2011 has had regard for the Lauderdale Structure Plan to inform any update within the area. This has had the effect of compounding the limitation of further urban development without sufficient review or affording a mechanism to consider the suitability of a different zone in the absence of any review.

The Lauderdale Structure Plan is significantly out of date, and an update to the Urban Growth Boundary to include the full extent of the site will afford examination of the suitability for rezoning at such time as the Lauderdale Structure Plan is updated, or alternatively allows for a site specific analysis to precede a full review of the Structure Plan which may not occur for some time. To not update the Urban Growth Boundary to include this land risks repeating its exclusion in any updated plan for reason that it is 'outside the Urban Growth Boundary' at the time a new structure plan is prepared, thereby repeating the problem.

Image 2.

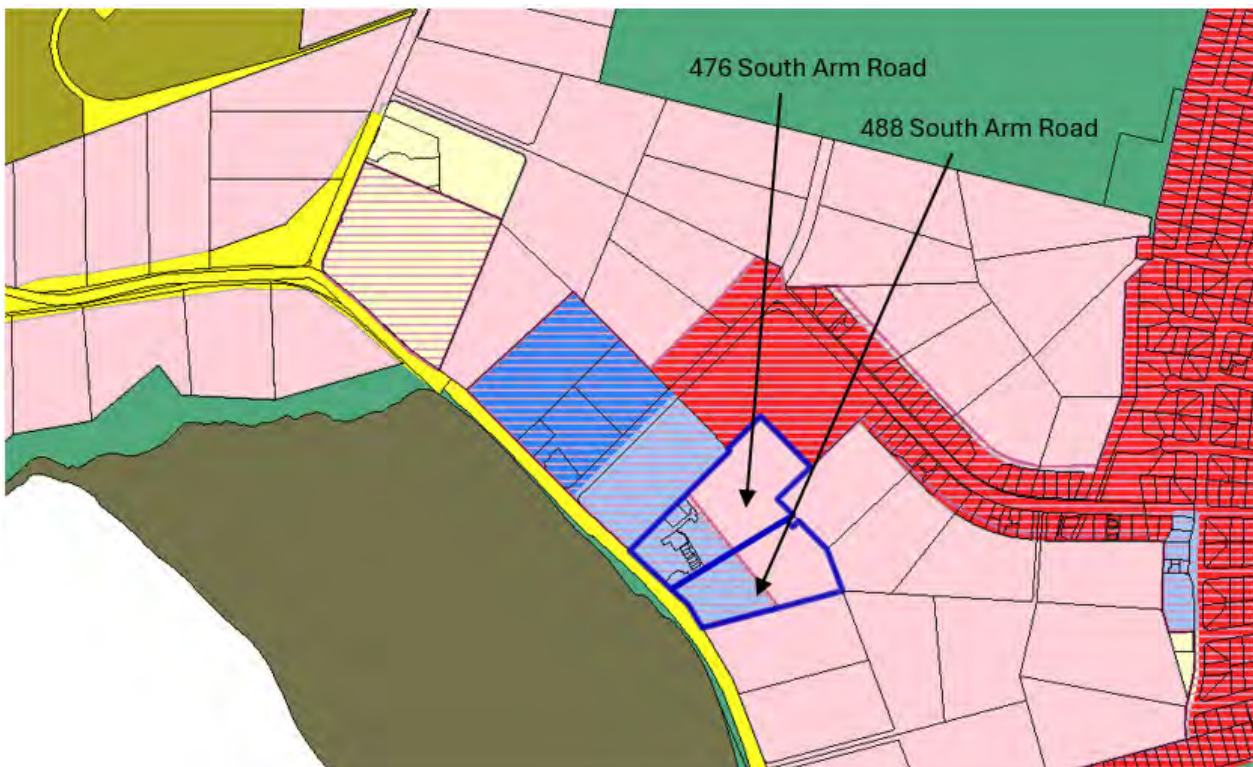


Image 2. Showing site (blue outline) relative to the current Urban Growth Boundary (purple hatching), and application of zones within the locality.

Image 3.



Image 3. Showing site (blue outline) relative to the Lauderdale Structure Plan – with areas informed by the Urban Growth Boundary.

Future development

Presently the land is split zoned between the Local Business Zone and the Rural Living Zone.

The application of a local business zone adjacent to a Rural Living zone is uncommon, particularly given the remaining land zoned Rural Living, is smaller than the minimum lot size for the zone.

In updating the Urban Growth Boundary to include the fullness of these titles further examination of this land will define a more suitable Local Business Zone, which would correct this zoning anomaly, and afford an expansion of the activity centre to serve the Lauderdale community.

Conclusion

The inclusion of the fullness of 476 and 488 South Arm Road is both supportable given its serviceability and proximity to existing urban development, as well as it having a clear role in facilitating uses which can contribute to a more vibrant activity centre.

The current Rural Residential Zone will alternatively remain underutilised and inappropriate given the sites context.

On behalf of Harry Lambrakis Trust P/L I thank you for this opportunity to provide comment in Submission – Urban Growth Strategy with respect to 476 and 488 South Arm Road, Lauderdale Tasmania 7021.

If you require further information or any clarification, please do not hesitate in contacting Edward Gauden on or by email,

Yours sincerely

[HARRY LAMBRAKIS FAMILY TRUST P/L](#)

ABN: 68 998 676833

Lauderdale Tasmania 7021

MC Planners Ref: 25039

13th March 2025

State Planning Office
Department of State Growth

Via email - haveyoursay@stateplanning.tas.gov.au

Attention: Anthony Reid

Dear Anthony,

SUBMISSION - URBAN GROWTH BOUNDARY UPDATE - 520 PASS ROAD MORNINGTON

MC Planners have been engaged by Matt and Alana Shady to prepare a submission in relation to the proposed update to the Urban Growth Boundary.

The site is partially included in the Clarence Area 3 (refer to Figure 1 below). This submission has been prepared to advocate for the area shown to be included within an updated Urban Growth Boundary as a logical extension of Mornington.

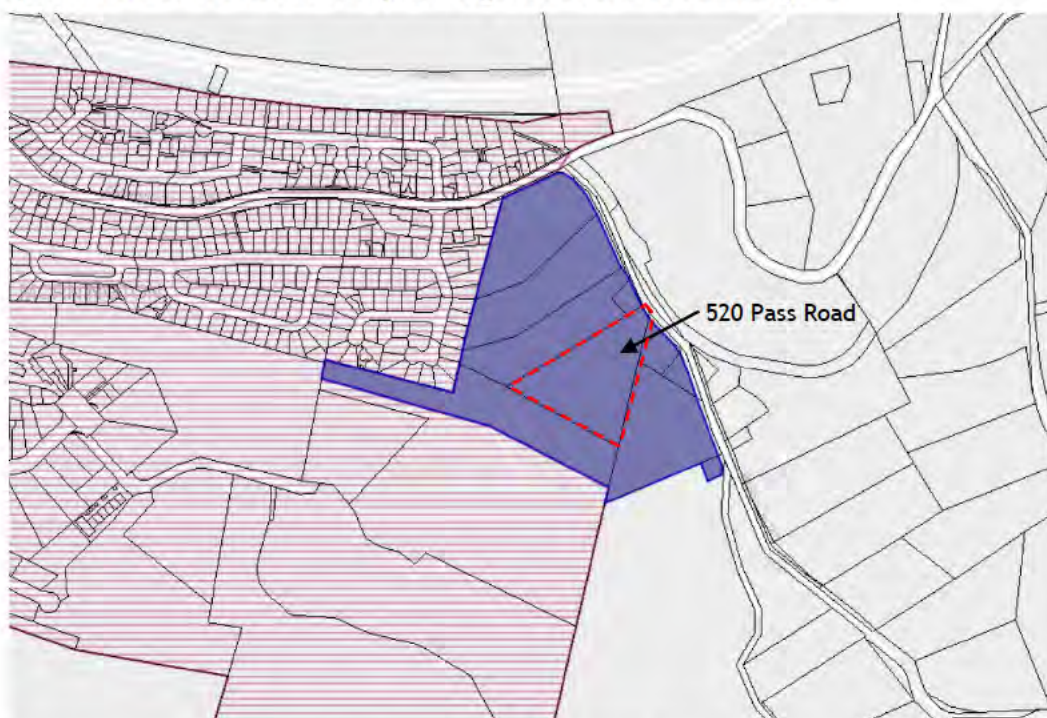


Figure 1. Site surrounds and Area 3 - Clarence, shown relative to the Urban Growth Boundary (Source STRLUS Urban Growth Boundary Update Consultation Paper: Feb 2025 - accessed 13th March 2025 - annotated).

The Site

The site is comprised of part of a single parcel (CT125712/1) to the south of Pass Road, which is not adjacent to the Urban Growth Boundary (see below). The area of site within the consultation paper is approximately 2.32 ha and has access directly onto Pass Road. It also adjoins a series of titles to the north which are themselves subject to a current rezoning application (including a regional Council park) with Clarence City Council. The titles in that current rezoning application (471 Cambridge Road and 528 and 540 Pass Road) are shown below and include road access from 528 Pass Road to the 520 Pass Road site anticipating future development to the south east.

The site currently adjoins rural residential development to the north, west and east, and the Mornington Waste Depot to the south. There is suburban development 85m to the west of the site that similarly adjoins the Mornington Waste Depot site.



Figure 2. Site surrounds and Area 3 - Clarence, shown relative to the Urban Growth Boundary (Sourced LISTmap accessed 13th March 2025 - annotated).

The site is also 2.9km from Warrane Primary School, 3.5km away from the Glebe Hill supermarket and 5.7 km away from Howrah Primary School and Kindergarten.

Services

The site is shown as water serviced land (blue) and is in proximity to sewer serviced land (purple). There is water infrastructure in Pass Road and sewer infrastructure in the vicinity of the site to the north. Connections to reticulated services are considered feasible, though detailed consideration would be required.



Figure 3. Site, water only (blue) and sewer and water (purple) and magenta sewer only serviced land (Sourced LISTmap accessed 13th March 2025 - annotated).

Lot Yield

Though the site is subject to Low landslip hazard band, Airport obstacle limitation area, Electricity transmission corridor, Priority vegetation area, Flood-prone areas and Bushfire-prone area overlays under the planning scheme, these are not considered to significantly impede the potential to develop at suburban densities.



Figure 4. Tasmanian Planning Scheme Code Overlays: Flood-prone areas (blue hatch), Priority vegetation area (green hatch) and Low landslip hazard band (light brown hatch) (Sourced LISTmap accessed 13th March 2025 - annotated).

As can be seen in Figure 4, the Low landslip hazard band only occurs in the upper parts of the site, the Priority vegetation area to the south east corner of the site and the Flood-prone area to a small overland flow path. The latter will be contained largely by the future road network. The vegetated Priority vegetation area may need to be retained, subject to a Natural Values Assessment, however there were no natural values found on neighbouring sites to the north which have been surveyed. The Bushfire-prone area applies to the whole site and will have limited impact on yield due to the width of Pass Road to the north east, the Hazard Management Area established to the north west and Low Threat housing areas to the east. No other code hazard overlays are considered to significantly impact the development of the site. There is an Attenuation area which will apply to the upper portions of the site due to the waste depot, but acoustic assessment on the neighbouring site have found impacts to be acceptable.

At 2.32ha, an estimate of lot yield of approximately 41 lots¹, accounting for roads. Requirements for vegetation retention and bushfire hazard setbacks make decrease this number, but it is unlikely public open space will be required on the site given the proximity of the proposed regional park. In any event, the site presents a significant opportunity for residential development in Mornington.

¹ Where lots are not constrained, the yield is obtained by: (Area/minimum lot size) = full yield x road factor (0.8).



Conclusion.

The proposed update to the Urban Growth Boundary is a welcome opportunity to allow for an increase in the supply of land which can be developed within Greater Hobart. Though further work for the review of the Southern Tasmania Regional Land Use Strategy is well overdue, the update will provide for growth opportunities whilst more comprehensive work is undertaken.

The land at 520 Pass Road has a demonstrated potential for urban development. The inclusion of the site within the updated Urban Growth Boundary is encouraged.

If you requires any further information or clarification with respect to this submission, please contact us by email at _____, or by phone on _____

Yours faithfully

MC PLANNERS PTY LTD

Mat Clark

DIRECTOR/PRINCIPAL PLANNER

14 March 2025

State Planning Office

Department of State Growth
email: haveyoursay@stateplanning.tas.gov.au

Dear Minister Ellis

REPRESENTATION TO MINISTER ON THE PROPOSED URBAN GROWTH BOUNDARY AMENDMENT – OPPORTUNITY FOR ADDITIONAL RESIDENCES ON TINDERBOX ROAD BLACKMANS BAY



Figure 1 Additional residential opportunities (The Land) in orange outline

The landowners of land at 71 Tinderbox Road, Blackmans Bay (CT 157127/1) [the Land] thank the minister for the opportunity to provide feedback on the proposed Urban Growth Boundary (UGB) amendment and seek consideration of extending the proposed UGB to include additional residential opportunities on Tinderbox Road.

Extending the boundary will enable the opportunity to subdivide and provide for additional residences and lifestyle opportunities on the Land, **leveraging value from existing public infrastructure investment** in the well-established and serviced family friendly suburb.

We are seeking an **addition to the proposed UGB**. The current omission of land on Tinderbox Road from the UGB has significant implications for future use and development potential and extension will provide expanded opportunities to meet residential demand as expressed in the intent of the Southern Tasmanian Regional Land Use Strategy (STRLUS).

The addition can be enabled through the application of the strategic directions described in STRLUS and specifically the included regional policy for Settlement and Residential Development (SRD) - SRD 2.12 (refer to Attachment 1).

Additional residential development is a specific ministerial charter priority directed by Premier Rockliff on 1 November 2024¹. By amending the boundary during this process, the Planning Authority has an immediate opportunity to support residential development and further enable minor adjustment of Kingborough Council planning zones² to extend the current boundary for (General Residential) land.

¹ https://www.premier.tas.gov.au/_data/assets/pdf_file/0020/403508/PREMIER-OUTGOING-Ellis-letter-of-portfolio-priorities.PDF

² As requested in recent representations to public presentation of proposed Council zone changes

The Land - 71 Tinderbox Road Blackmans Bay

The Land (as per Table 1, Figure 1 and Figure 2) is adjacent to the current UGB with land on the North, East and South East included within the existing UGB all which is currently zoned and used for General Residential. The Land is currently zoned 'Environmental Living' under the *Kingborough Interim Planning Scheme 2015*. This zone extent covers the entirety of the site/title identified in Table 1 and is clear and free of other development/uses on the title which is free of conflicting developments or uses. See Figure 2 for current location.

Table 1 – The Land existing details

Address	71 TINDERBOX RD BLACKMANS BAY TAS 7052
Owners	SVEN WILLIAM RAND & KIRSTEN ANNE MCTAGGART
Title	157127/1
Area	2.668 hectares
Urban Growth Boundary	Adjacent to current UGB
Planning Scheme Zone	Kingborough Interim Planning Scheme 2015 14.0 Environmental Living



Figure 2 Site (in red) – 71 Tinderbox Road (source: LISTmap)

The Land, 71 Tinderbox Road Blackmans Bay, is fully serviced and capable of an intensification for residential use. It is close to public transport and other supporting services.

The land will support a range of dwelling types, is serviceable and is an **efficient use of available social, transport and other service infrastructure** using the opportunity to **further leverage value from Council and government investment** in public infrastructure with **minimal to no detrimental public economic impacts**.

Development of the Land is fully consistent with the immediately adjacent properties and existing lifestyle residences within the highly desirable location.

The Land may support up to 27 additional residences³. As an illustrative example, Figure 3 shows that additional extension of the UGB may enable further residences on similarly situated land neighbouring the current UGB, subject to landowner intent and council support.

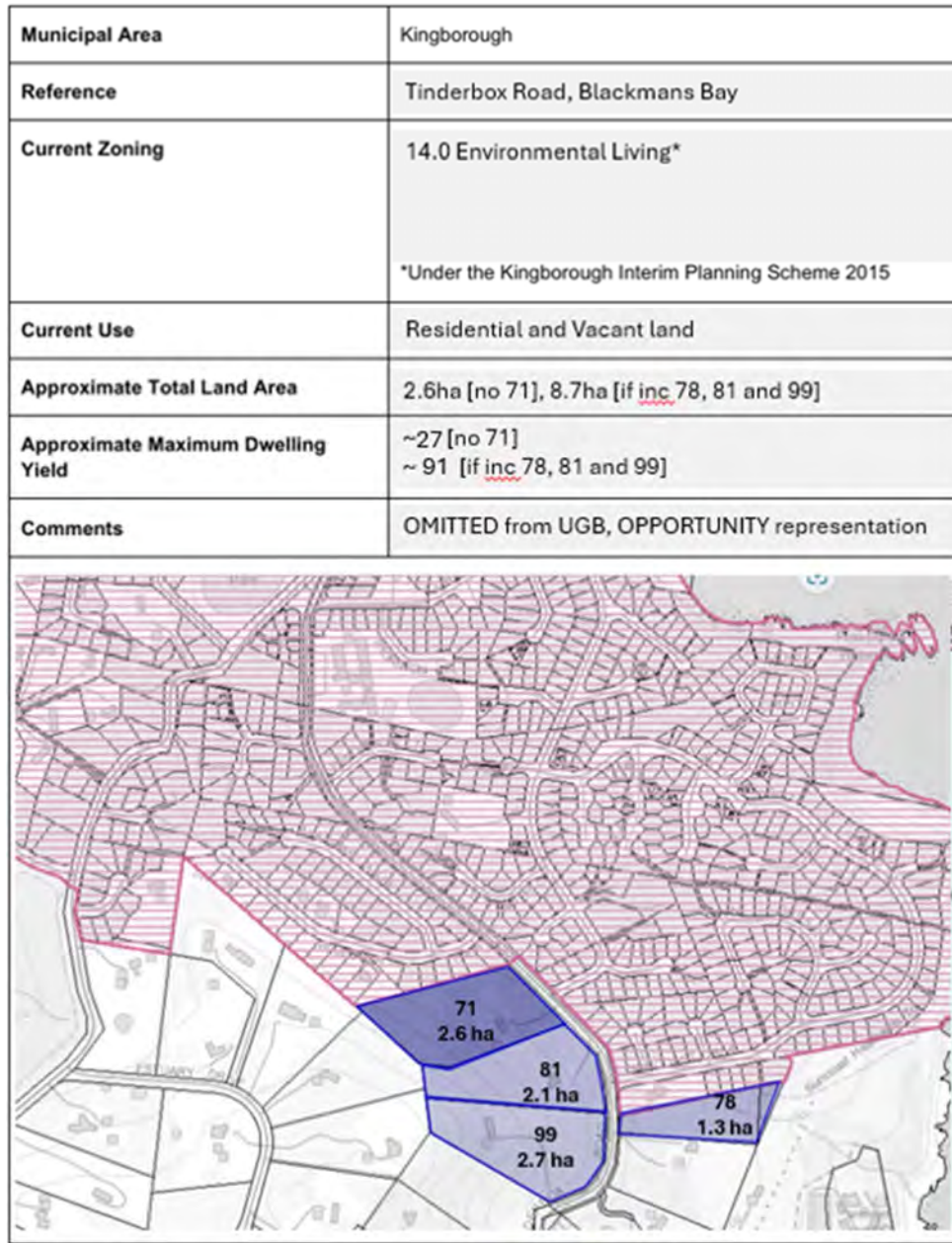


Figure 3. The Land adjacent to existing UGB

The site is adjacent to land that is/will be zoned General Residential and adjustment of the UGB will further enable rezoning it to General Residential allowing for natural growth along Tinderbox Road without unnecessarily disrupting the pattern of use or impacting natural and scenic values at other locations. The site currently supports residential use and any developments proposed in the area require an assessment of the scenic values, natural values, bushfire hazard and landslide hazard in accordance with local council planning criteria.

³ Proportionally based on adjacent lot sizes

Support for Urban Growth Boundary adjustment

The land is adjacent to land zoned General Residential, with multiple supporting reasons for the UGB to be extended for consistency, efficiency, to meet Ministerial strategic priorities and to enable the support of Local Council planning objectives:

1. Demand for Housing

- **Addressing Housing Shortages:** Given Tasmania's housing crisis, rezoning could help meet the demand for more residential lots, particularly in well-serviced areas

2. Strategic Urban Growth

- **Alignment with Urban Growth Policies:** rezoning would support local and state objectives for increasing housing supply in areas near existing services and amenities; and
- **Sustainability Goals:** Encouraging higher-density development near urban centres reduces urban sprawl and preserves rural and conservation areas.

3. Infrastructure and Services

- **Access to Infrastructure:** If your land has access to the same infrastructure (water, sewer, power, and transport) as the General Residential zone, it supports the argument for rezoning. The General Residential zone requires land to be fully serviced; and
- **Cost Efficiency for Local Government:** Negligible public expenditure to extend infrastructure to the Site (any costs to be borne by the landowner) making any residential development cost-effective and an efficient use of existing services.

4. Consistency in Land Use

- **Harmonization with Surrounding Development:** Adjacent zoning should align to create a cohesive urban environment. If your lot is used similarly to neighbouring General Residential lots, rezoning would reflect the existing use pattern and avoid spot zoning; and
- **Community Character:** Rezoning would ensure that the area maintains a consistent residential character, supporting similar housing types and densities.

5. Support of the Settlement and Residential Strategy (STRLUS)

- **Supports the Strategic Principles and Directions of STRLUS** - adopting a holistic integrated approach to support of strong and healthy liveable communities.
- the amendment can be **enabled through application of strategic direction in STRLUS** and specifically the included regional policy for Settlement and Residential Development (SRD) - SRD 2.12 (refer to Attachment 1).

Justification of the representation (and UGB extension)

Tasmania faces a severe **housing crisis**, characterised by rising rental prices, low vacancy rates and a growing social housing waitlist with an **explicit priority** directed to Minister Ellis for **construction of 2,500 new homes** every year. The government aims to build 10,000 affordable homes by 2032, yet demand continues to outpace supply. Addressing this requires rapid development of land close to amenities and accessible services. Strategic urban planning and partnerships with private and non-profit sectors are critical to accelerating housing availability and ensuring affordability. For in-depth analysis, the Tasmanian Housing Strategy⁴ provides comprehensive insights into ongoing initiatives.

The site offers a semi-rural lifestyle while still being **close to key services and amenities**.

The land is situated approximately 3.6 km from the Kingston shopping precinct, which includes major supermarkets, retail stores, and essential services like banks and a post office. Educational institutions nearby include Illawarra Primary School (0.3 km away) and St Aloysius Catholic College (2.5 km). For healthcare, the Kingston medical hub is within a short drive. Additionally, the area has good access to public transport that serves connections to surrounding suburbs and Hobart CBD.

Blackmans Bay is known for its scenic beauty and tranquil environment, making it a **desirable location for families and professionals seeking a balance between nature and convenience**.

The Regional Land Use Strategies seek to encourage urban consolidation, aiming to provide housing closer to existing infrastructure and amenities. Densification of residential use at this site **leverages the value of existing Council and Government investment in infrastructure** with limited to negligible requirement for additional public funding.

Any development on the site (including subdivision) would still be assessed against Local Council overlays including scenic values, natural values and bushfire hazard.

Conclusion

I urge Minister Ellis and the State Planning Authority to extend the Urban Growth Boundary to include the Land (71 Tinderbox Road, Blackmans Bay).

Doing so will support addressing the housing crisis by enabling additional residences to meet the need for housing and **leverage the value of existing Government and Council investment in infrastructure**.

We trust this satisfies the Ministers request however if further information or clarification is required with respect to this feedback, please contact me on _____ at _____

Yours sincerely

Sven Rand

on behalf of landowners Sven Rand and Kirsten McTaggart

enc Attachment 1: UGB amendment to support Settlement and Residential Development (SRD 2.12)

⁴ www.tasmanianhousingstrategy.tas.gov.au

Attachment 1. UGB amendment to support Settlement and Residential Development (SRD 2.12)

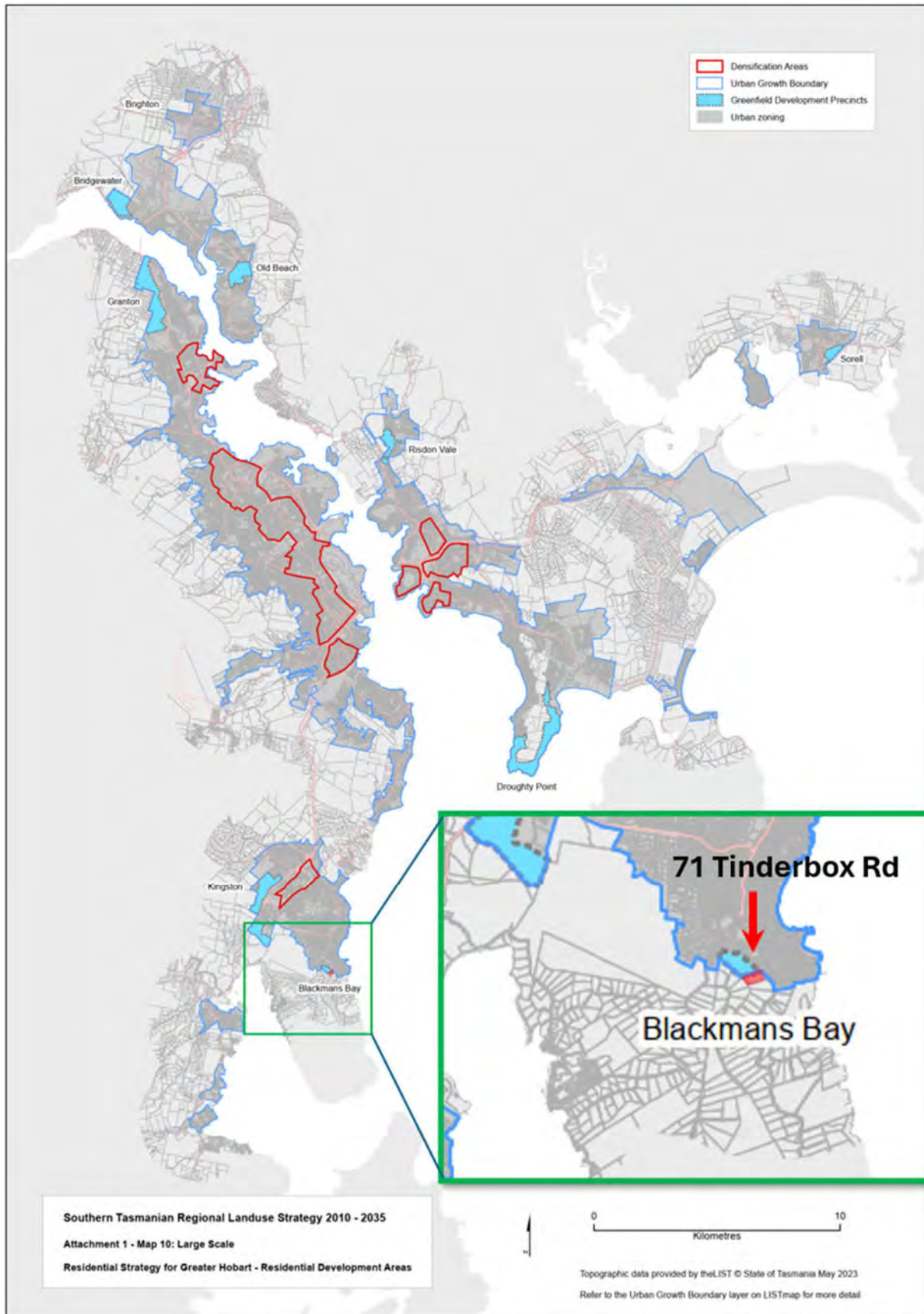


Figure 4 location of the Land on Map 10 Urban Growth Boundary

UGB amendment to support Settlement and Residential Development (SRD 2.12)

The following sections describe how amendment of the UGB to include land on Tinderbox Rd meets the intent of the Southern Tasmania Regional Land Use Strategy (STRLUS)⁵ and how settlement and regional development (SRD) policy guideline 2.12 enables the recommended amendment, where land has high merit for consideration to rezone for urban purposes.

As stated by the steering committee chair in the foreword to STRLUS

“...Planning on a ‘whole of region’ basis is necessary.... Regional planning also allows us to recognise and develop the advantages of each municipal area. Each locality has its own strengths to build upon, its own place within the region” Alderman Rob Valentine

One of the outcomes of the developed strategy has been the publication of the Urban Growth Boundary (Map 10) within which urban development was to be further expanded and encouraged.

The land at 71 Tinderbox Rd has been omitted from the UGB, however, the land

- is immediately adjacent to the boundary; and
- is a logical addition to the growth zone.

The STRLUS, as amended, came into operation on 17 May 2023. Amendments comprise changes to the Urban Growth Boundary on Map 10 and an amended Settlement and Residential Development Regional Policy SRD 2.12.

The amendment to Regional Policy SRD 2.12 provides greater clarity and enables Councils and the Tasmanian Planning Commission greater flexibility in considering the planning merit of proposals to rezone land for urban purposes that are outside, but immediately adjacent to, the Urban Growth Boundary (UGB).

We note that the Land is very similar to the precedent of land in the vicinity of Spring Farm estate recently included for densification (inset 3 in Figure 5 below)

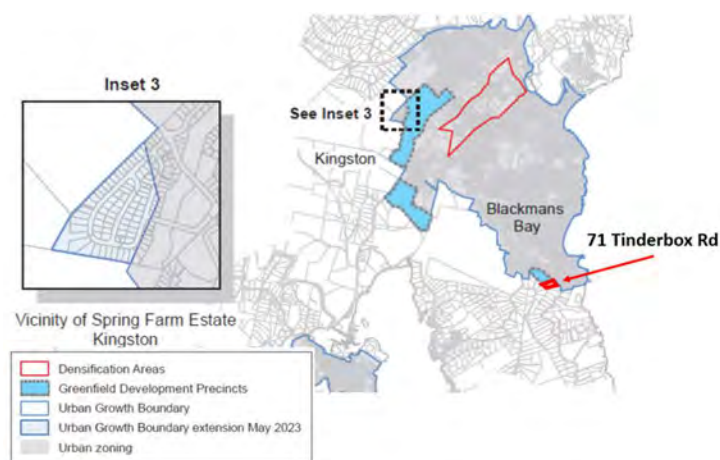


Figure 5 Extract of portion of Map 10 Urban Growth Zone Boundary map (STRLUS23), indicating immediate proximity of land to the existing UG Boundary

Enablement of extension of the UGB

Particularly relevant to this representation, the strategy includes the addition of Regional Policies for Settlement and

⁵ 2023 - Southern Tasmania Regional Landuse Strategy 2010-2035

Residential Development (SRD). Amended SRD 2.12 provides for consideration of urban development outside the UGB as follows;

SRD 2.12 *Notwithstanding SRD 2.2 and SRD 2.8, and having regard to the strategic intent of the Urban Growth Boundary under SRD 2 to manage and contain growth across greater Hobart, land outside the Urban Growth Boundary shown in Map 10 may be considered for urban development if it:*

- (a) shares a common boundary with land zoned for urban development within the Urban Growth Boundary and:
 - i. only provides for a small and logical extension, in the context of the immediate area, to land zoned for urban development beyond the Urban Growth Boundary; or*
 - ii. does not constitute a significant increase in land zoned for urban development in the context of the suburb, or the major or minor satellite as identified in Table 3, and is identified in a contemporary settlement strategy or structure plan produced or endorsed by the relevant planning authority; and**
- (b) can be supplied with reticulated water, sewerage and stormwater services; and*
- (c) can be accommodated by the existing transport system, does not reduce the level of service of the existing road network, and would provide for an efficient and connected extension of existing passenger and active transport services and networks; and*
- (d) results in minimal potential for land use conflicts with adjoining uses.*

Figure 6. SRD2.12 (page A-27 of STRLUS 2023 (Addendum))

As indicated in Figure 5 and Figure 4 the land at 71 Tinderbox Rd meets all criteria for inclusion in the UGB (Figure 6) as follows;

The Land

- shares a common boundary with the Urban Growth Boundary,
 - provides for a small logical extension; and
 - does not constitute a significant increase in land in the context of the suburb
- Can be supplied with reticulated water, sewerage and stormwater service which all currently run adjacent to the property boundary
- Can be accommodated within the existing transport system without reducing the level of service while providing an efficient and connected extension to the network; and
- Is fully consistent with adjoining uses (by and large residential in nature) and provides minimal potential for land use conflicts

Extending the UGB to the land is entirely compatible with the regional policy described above and fully supports regional intents.

Supporting the intent of the STRLUS 23

Extending the UGB to the site provides the opportunity to incorporate the principles and objectives of STRLUS 2023 within local strategic planning (the amended planning scheme).

“Realising good planning outcomes ... requires the integration of land use planning with the delivery of infrastructure and services, and other social, economic, and environmental policies.” (STRLUS 23)

The strategy document incorporates strategic directions which describe how the regional planning vision will be achieved. The strategic directions (SD) stated in the strategy include the following.

SD1 Adopting an Integrated Approach to Planning and Infrastructure

Ensure that new development makes use of excess capacity in existing infrastructure, rather than creating demand for new infrastructure in un-serviced areas. Many infrastructure-related problems could be minimised by locating new development to maximise the use of existing infrastructure in the short-medium term, and new infrastructure in the longer term.

SD2 Holistically Managing Residential Growth

Intended to ensure that residential land supply considers affordability and locational options. The aim is to provide the strategic planning environment needed to create a less dispersed settlement with a greater diversity of housing types and densities.

SD8 Supporting Strong and Healthy Communities

Ensuring opportunities for affordable housing in locations that, have good access to community services and education and health facilities.... integrating land use and social infrastructure planning, creating opportunities to improve the long-term health of the community through better urban design

SD10 Creating Liveable Communities (page 20 of STRLUS 20102 to 2035)

Liveability refers to the degree to which a place supports quality of life, health and well-being for the people who live, work or visit. ... areas that are attractive, safe, accessible to people with disabilities and provide a high standard of amenity through such things as public transport, well-designed open spaces, access to education and health services, recreational opportunities, air and water quality.

Inclusion within the UGB will enable

- (an) Intensification of residential dwellings adjacent to existing fully serviced developments which uses the available capacity of government investment in existing infrastructure
- Provides an opportunity to increase land supply in highly sought-after community locations in immediate proximity to existing settlements and services
- Contribution to enhanced long-term health and well-being of the community and its livability

From: Jabeks
Sent: Friday, 14 March 2025 10:09 AM
To: State Planning Office Your Say
Cc: steven.king@gcc.tas.gov.au; Moore, Michelle (DPaC); Behrakis, Simon (DPaC)
Subject: urban growth area Glenorchy
Attachments: 071 - LINCOLN - Concept - 27.03.2024_Reduced.pdf

To whom it may concern,

My husband and I have a parcel of land on the urban growth boundary in upper Glenorchy approximately 1.5 km from CBD which previous parcels have been cut off and developed but unfortunately we cannot develop further this almost inner city living opportunity as the urban growth boundary literally is the boundary between us and further development.

There is the potential as per attached drawings with a boundary adjustment for a further 10 to 15 dwellings where other development has taken place all around supplying vital accommodation for families close to schools and shopping and sports facilities.

We appreciate that you are not looking at Glenorchy as such but would implore your team to give consideration to this area.

For further information please contact Mr Leigh Lincoln either on this email address or phone or Mrs Cindy Lincoln

Kind regards

Leigh and Cindy Lincoln



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PROPOSED RE-ZONING

31 MERTON STREET, GLENORCHY, TAS 7050

CLIENT: LEIGH LINCOLN

STAGE: CONCEPT
COUNCIL: GLENORCHY CITY COUNCIL
TITLE REF: 146656 / 36
JOB No.: 071

CONCEPT PLAN - NOT FOR CONSTRUCTION OR APPROVALS.

A	ISSUED FOR CLIENT REVIEW	2024.03.22	ALL	CDP
REV	AMENDMENTS	DATE	SHEET	DRW

REVISION SCHEDULE

AREA SCHEDULE	
EXISTING SITE	15708m ²
PROPOSED BALANCE LOT	10700m ²
PROPOSED LOT 1	5008m ²
PROPOSED COMPLETE DWELLINGS (x10)	
PROPOSED ACCESS ROAD AREA	911.25m ²
PROPOSED FOOTPATHS & DRIVEWAYS	971.38m ²
TOTAL NEW IMPERVIOUS	729.58m ²
	2612.21m ²
SITE AREA LOT 1	5008m ²
SITE COVERAGE	52.2%
SITE ASSESSMENT	
ZONE:	LANDSCAPE CONSERVATION
OVERLAY(S):	BUSHFIRE-PRONE AREAS CODE NATURAL ASSETS CODE
WIND REGION:	A
SOIL CLASS:	TBA
TERRAIN CATEGORY:	TC2.5
SHIELDING CLASS:	PS
TOPOGRAPHIC CLASS:	T3
WIND CLASS:	N3
ALPINE AREA:	LESS THAN 900m AHD
CORROSION ENVIRONMENT:	>100m FROM BREAKING SURF
OTHER SUPPORTING DOCUMENTATION	
SOIL REPORT:	TO BE PROVIDED
BUSHFIRE HMP:	TO BE PROVIDED
STORM WATER (WSUD) DESIGN:	TO BE PROVIDED
STRUCTURAL ENG.:	TO BE PROVIDED
CIVIL ENGINEERING:	TO BE PROVIDED

SHEET LIST	
No.	SHEET NAME
A-01	COVER SHEET
A-02	EXITING SITE PLAN
A-03	LOCATION PLAN
A-04	SITE PLAN 1:500
A-05	THE MERTON 2
A-06	THE NEWCASTLE
A-07	3D PERSPECTIVE VIEWS 1
A-08	3D PERSPECTIVE VIEWS 1

SHEET REV.

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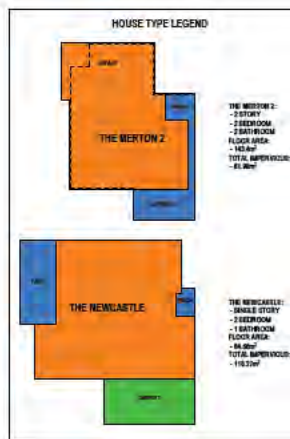


SITE LOCATION

PH: 0417858537
E: chrispooley0@gmail.com



THIS DWELLING IS BEING CONSTRUCTED IN A BAL-TBA RATED AREA



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SITE PLAN 1:500

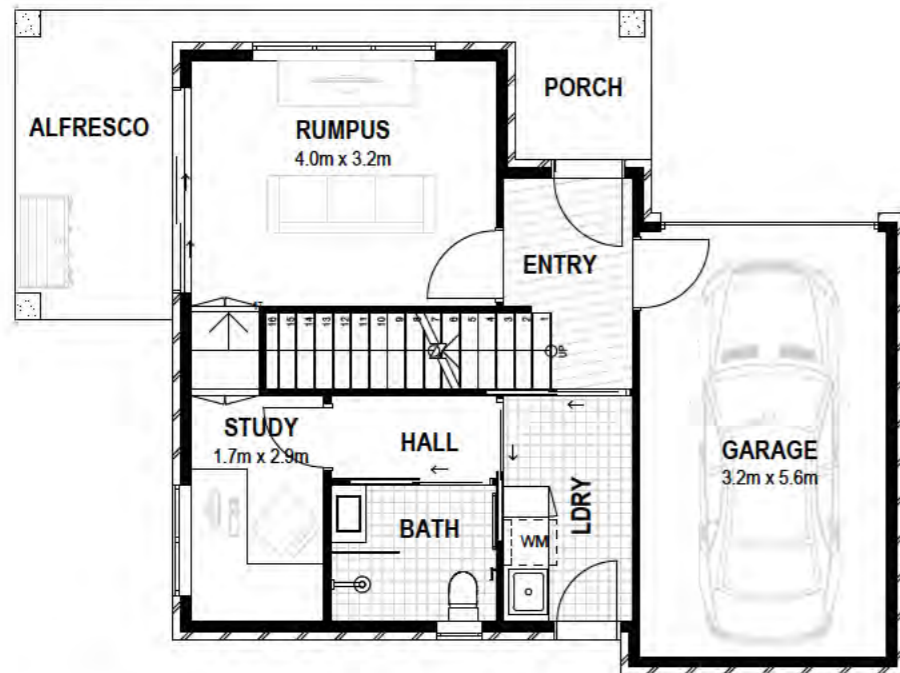
LEIGH LINCOLN

31 MERTON STREET, GLENORCHY, TAS 7050

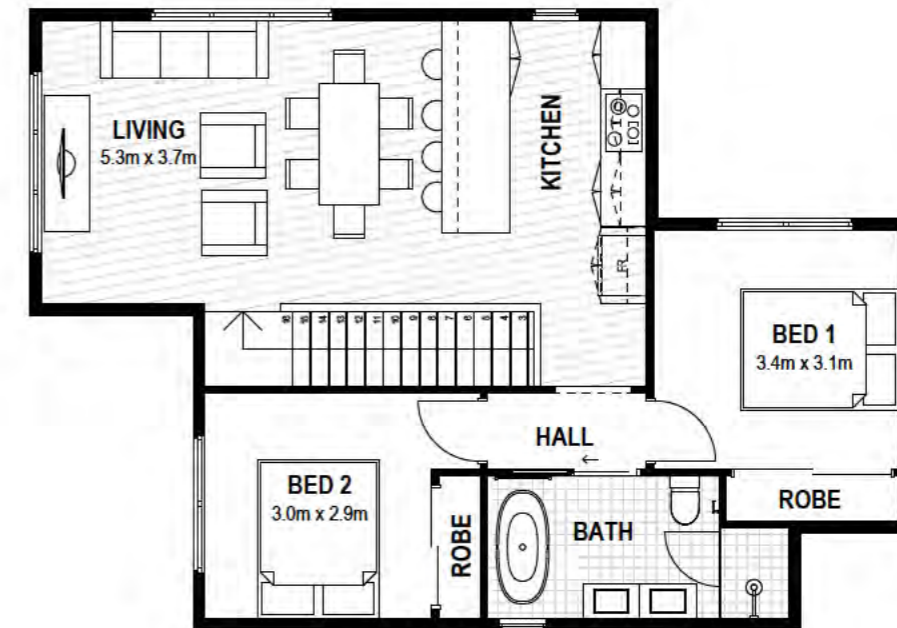
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JOB No: 071
 SCALES(s) @ A3: 1:500
SHEET No: A-04
 No. OF SHEETS: 8



GROUND FLOOR PLAN
67.9m²



FIRST FLOOR PLAN
75.5m²



3



2



1

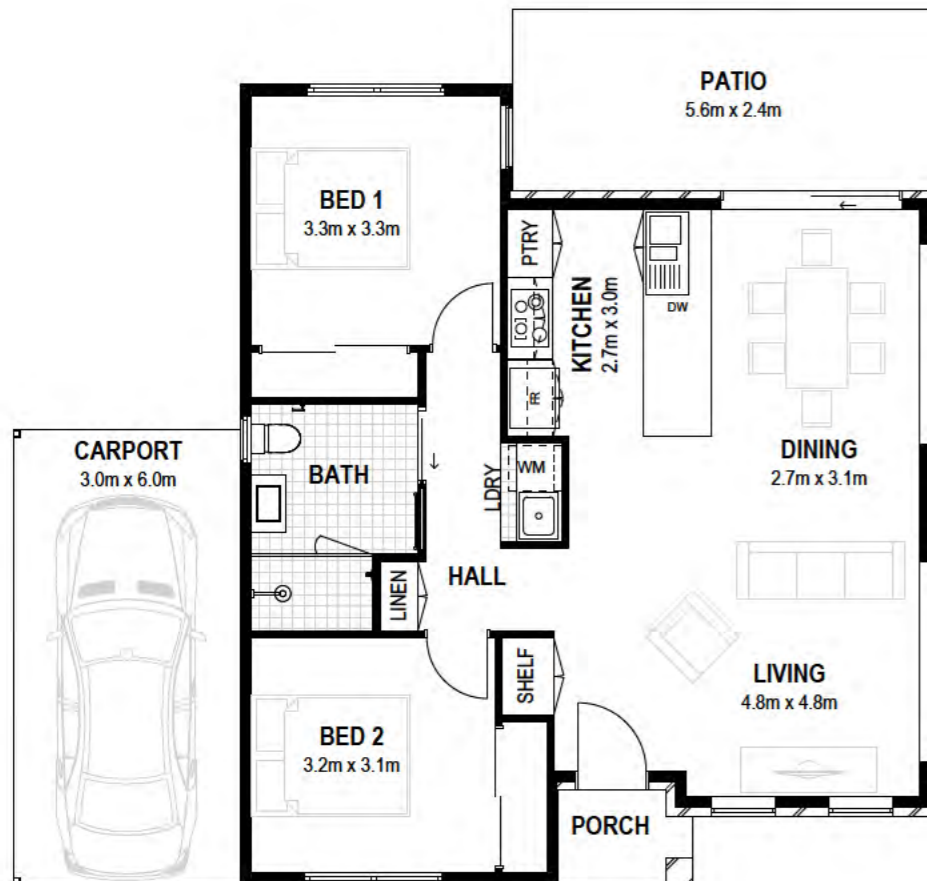
THE MERTON 2

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GROUND FLOOR PLAN

UNIT = 84.66m²

CARPORT = 18.00m²



2



1



1

THE NEWCASTLE

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3D PERSPECTIVE VIEWS 1

LEIGH LINCOLN

31 MERTON STREET, GLENORCHY, TAS 7050

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3D PERSPECTIVE VIEWS 1

LEIGH LINCOLN

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SHEET No: A-08
No. OF SHEETS: 8



City of **HOBART**

Enquiries to: Office of the CEO

☎: 6238 2727

✉: ceo@hobartcity.com.au

5 March 2025

Anthony Reid
Director
State Planning Office
Department of State Growth
GPO Box 536
HOBART TAS 7001

Dear Anthony,

STRLUS URBAN GROWTH BOUNDARY PROPOSED UPDATE

On behalf of the City, thank you for the opportunity to provide a submission on the proposed update to the Urban Growth Boundary contained within the Southern Tasmania Regional Land Use Strategy 2010-2035.

If the Minister for Planning determines the proposal prior to completion of the review of the Southern Tasmania Regional Land Use Strategy 2010-2035, then we request the following considerations be taken into account:

- a. Potential impacts of the proposal in light of the 30-Year Greater Hobart Plan project;
- b. The wider potential impact of the proposal on traffic into other municipal areas, particularly the Hobart CBD; and
- c. The potential cumulative impacts of extensions to the Urban Growth Boundary.

The City welcomes further opportunities to review the proposed changes should they arise, and we look forward to continued collaboration on the STRLUS review.

Yours sincerely,

(Michael Stretton)
CHIEF EXECUTIVE OFFICER

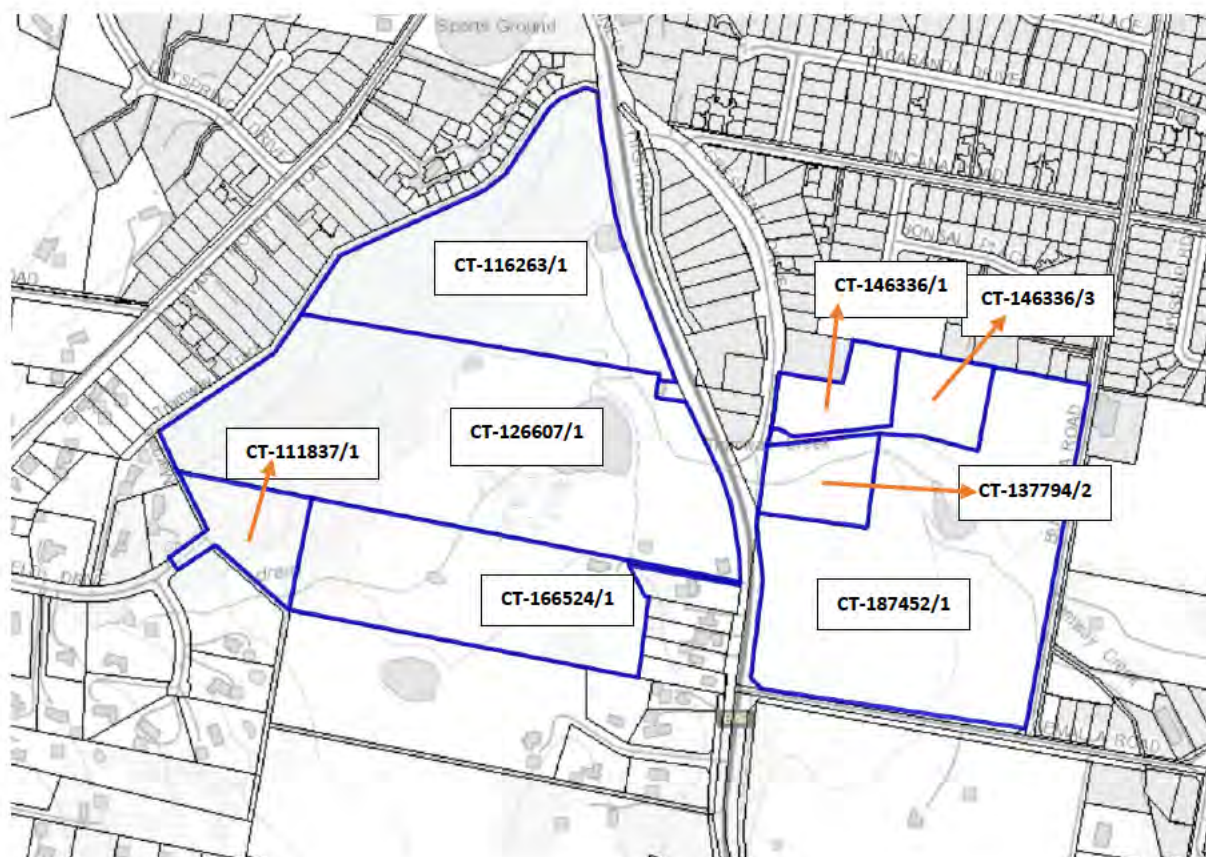
Hobart Town Hall
50 Macquarie Street
Hobart TAS 7000

Hobart Council Centre
16 Elizabeth Street
Hobart TAS 7000

City of Hobart
GPO Box 503
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T 03 6238 2711
F 03 6234 7109
E coh@hobartcity.com.au
W hobartcity.com.au

 CityofHobartOfficial
ABN 39 055 343 428
Hobart City Council



Representation regarding the Urban Growth Boundary (UGB) amendment as it relates to Lot 1 Channel Highway, Margate

RE: *STRLUS Urban Growth Boundary Update Consultation Paper*
(dated February 2025)

Gray Planning for Mr A Meredith and the Estate of Mr R Meredith

Version 2.0
14 March 2025



03 6288 8449
0439 342 696



danielle@grayplanning.com.au
224 Warwick St, West Hobart, Tas, 7000



grayplanning.com.au
ABN 99148920244

Gray Planning
224 Warwick Street
West Hobart TAS 7000

14 March 2025

State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

Via: haveyoursay@stateplanning.tas.gov.au

Dear Sir/Madam,

I make reference to the currently advertised *STRLUS Urban Growth Boundary Update Consultation Paper* dated February 2025 and attach a town planning representation with respect to the proposed amendment to the Urban Growth Boundary (UGB) as it relates to land owned by the Meredith family at Margate.

In the absence of relevant provisions of the Act for such applications, the representation has been prepared in accordance the information contained in Information Sheet *RLUS1 – Reviewing and Amending the Regional Land Use Strategies*.

This representation seeks further amendment of the Urban Growth Boundary so that the titles comprised in Lot 1 Channel Highway (CT-111837/1 and CT-166524/1) are also included within the proposed UGB to ensure that a holistic approach to the planning and strategic considerations of the Meredith land can be achieved in terms of its future use and development.

It is considered that the following representation provides all relevant information required for the State Planning Office to make an assessment and decision for an amendment to the UGB to include all Meredith owned land within the UGB.

However, should you have any questions about this representation or require any further information, please do not hesitate to contact me on 0439 342 696.



Yours faithfully

Danielle Gray B.Env.Des. MTP. MPIA

Principal Consultant, Gray Planning

On behalf of Mr A Meredith and the Estate of Mr Robin Meredith



03 6288 8449
0439 342 696



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1 Introduction

1.1 Purpose

The purpose of this representation is to seek the amendment of the Urban Growth Boundary (UGB) as it relates to Meredith owned land at Lot 1 Channel Highway (CT-111837/1) and 'Meredith's Orchard', Lot 1 Channel Highway (CT-166524/1). Specifically, this representation seeks the proposed amendment of the UGB boundary to be realigned to include these parcels as well as those currently proposed to be included at Lot 1 Channel Highway (CT-116263/1 and CT-126607/1), 21 Gemalla Road (CT-187452/1); and 26 Crescent Drive (CT-137794/2, CT-146336/3 and CT-146336/1).

The rationale behind this representation is to seek a change to the proposed UGB amendment to more readily enable the Meredith land west of the Channel Highway to be considered for a future holistic rezoning and subsequent development for residential purposes.

This representation has been prepared in accordance with advice received from Kingborough Council's Strategic Planner Mr Adriaan Stander and also in accordance with the information contained in Information Sheet *RLUS1 – Reviewing and Amending the Regional Land Use Strategies*, and other relevant strategic documents as outlined in this report.

1.2 Copyright

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This representation may only be used for the purposes for which it was commissioned by the Estate of Mr Robin Meredith and in accordance with the terms of engagement between Gray Planning and the Estate of Mr Robin Meredith.

Last updated: 14 March 2025

Report Author: Danielle Gray B.Env.Des MTP MPIA

Version 2.0

1.3 Statutory References

The Planning Instrument to which this application applies is the current *Kingborough Interim Planning Scheme 2015*.

The relevant Planning Authority is the Kingborough Council.



The representation does not seek to involve any Crown or LGA owned land.

1.4 Outline of the requested UGB Amendment

This representation to the proposed UGB amendment seeks a further adjustment to the Urban Growth Boundary (UGB) to also include land at Lot 1 Channel Highway (CT-111837/1) and 'Meredith's Orchard', Lot 1 Channel Highway (CT-166524/1).

The Meredith owned land is currently wholly zoned Rural Resource under the *Kingborough Interim Planning Scheme 2015*. The future desired zoning for the land as a whole is a General Residential zoning under the *Kingborough Interim Planning Scheme 2015* or the same residential zone under the upcoming Kingborough Local Provisions Schedule.

The Meredith owned land is shown outlined below in Figure 1.

The Meredith land is 36.86 hectares in total site area across eight titles as outlined below in Figure 1.

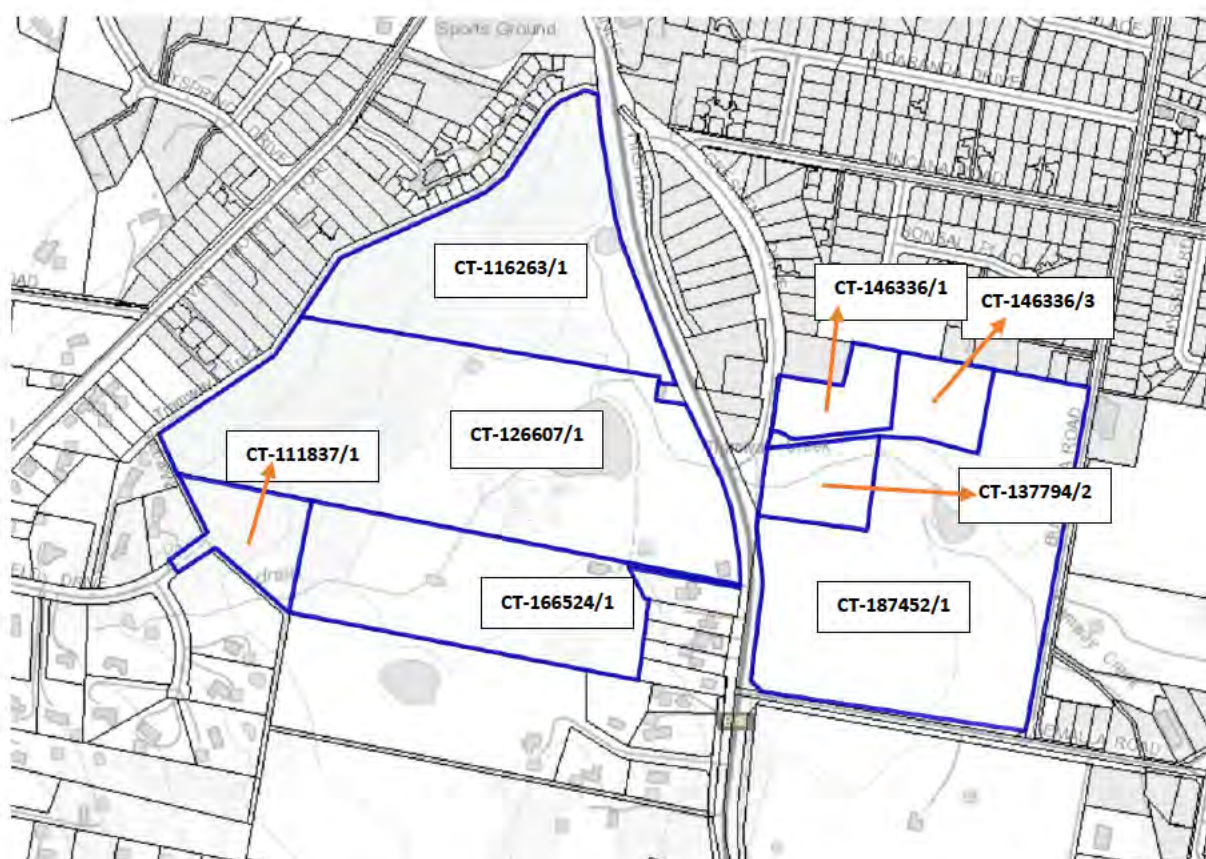


Figure 1. The Meredith owned land is shown outlined and is currently zoned Rural Resource. Source: TheLIST, sourced 9 March 2025, no nominated scale.



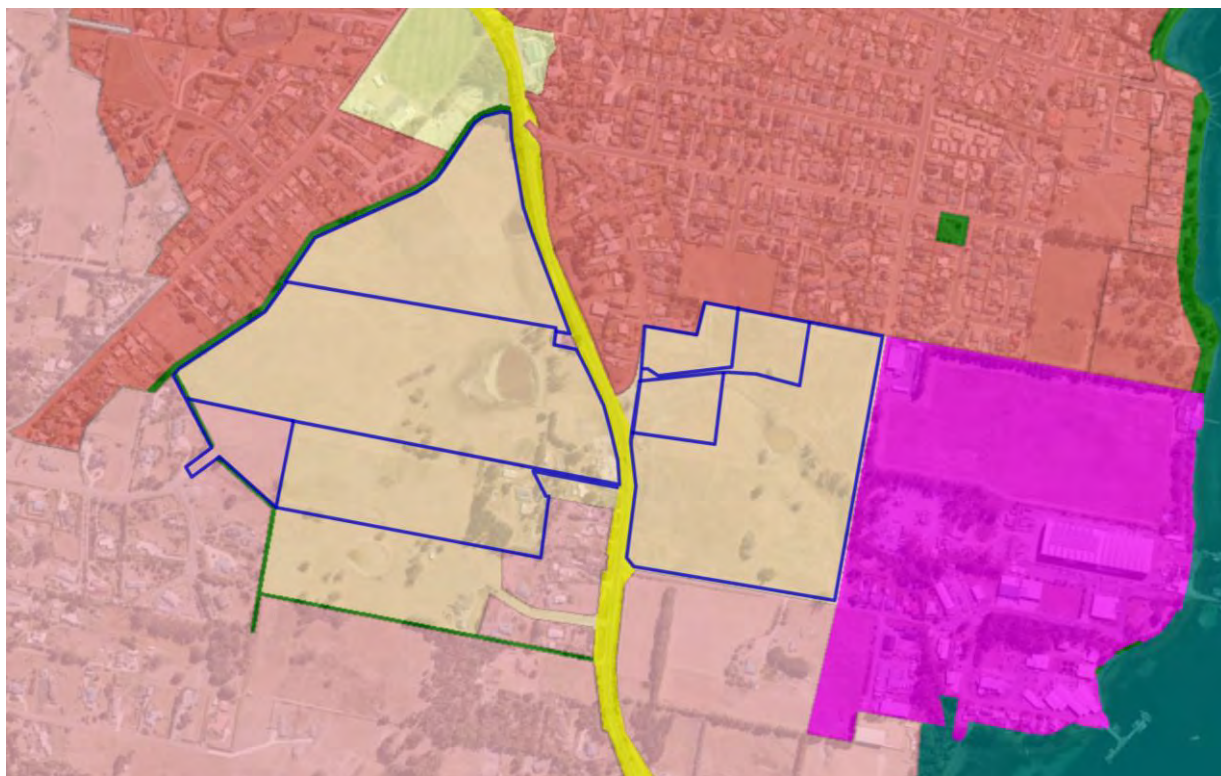


Figure 2. The current zoning of the Meredith land is shown outlined and zoned Rural Resource (beige). Other zonings include Rural Living (light pink), Light Industrial (pink) and Low Density Residential (red). Source: TheLIST, sourced 9 March 2025, no nominated scale.



2 The Subject Site

2.1 The Meredith land at Margate

The Meredith owned land is located at Lot 1 Channel Highway, 21 Gemalla Road and 26 Crescent Drive and is currently wholly zoned Rural Resource zone under the *Kingborough Interim Planning Scheme 2015* as shown in Figure 2.

The Meredith land measures 36.86 hectares in total area.

The Meredith land has vehicular access and frontage from Englefield Drive, adjacent to Glen Bower Court, Channel Highway, Bundalla Road, Gemalla Road and Crescent Drive.



Figure 3. The subject site comprising Lot 1 Channel Highway (western side of the Highway) and 21 Gemalla Road and 26 Crescent Drive (Eastern side of the Highway) shown outlined. The property contains Meredith's Orchard grocers (orange arrowed) and a single dwelling (yellow arrowed). Source: TheLIST, sourced 11 March 2025, no nominated scale.

Adjoining properties to the immediate north are zoned Low Density Residential while properties located west of Lot 1 Channel Highway are zoned Rural Living.

The Meredith land has been historically used for grazing by the current owner as well as pasture and hay cutting.

The land has no evidence of any agricultural use other than grazing and has not been used by the owners for any purposes other than a local business use (Meredith's Orchard) which is a small scale grocer retailer selling predominantly fruit and vegetables with grocery items.



In terms of the existing Meredith's Orchard business, this business located on CT-122607/1 has existing use rights for a **local business use class use**.

The only other use of the subject site is a dwelling and outbuildings located at CT-166534/1.

The subject site is otherwise substantially covered in pasture and is vacant.



2.2 The subject Certificates of Title

The titles for the subject site are Lot 1 Channel Highway (CT-111837/1) and 'Meredith's Orchard', Lot 1 Channel Highway (CT-166524/1, Lot 1 Channel Highway (CT-116263/1 and CT-126607/1), 21 Gemalla Road (CT-187452/1) and 26 Crescent Drive (CT-137794/2, CT-146336/3 and CT-146336/1).

The title plans for the subject site contain minor easements but are free from building areas or covenants that impact upon development.

There is a burdening easement on several titles with respect to rights of drainage and a right of way.

However, these easements would be considered as part of a future subdivision application and have no impact on an amendment of the Urban Growth Boundary.

Seven of the eight titles that make up the subject site are not subject to any registered agreements including Part 5 Agreements.

Title CT-126607/1 is subject to a Part 5 Agreement which restricts further commercial development with respect to Meredith's Orchard. The Part 5 Agreement restricting further commercial expansion of Meredith's Orchard business but does not have any impact upon, or implications for this representation seeking further amendment to the UGB to include all Meredith owned land at Margate.

None of the title restrictions (easements or Part 5) have any impediment to future residential use or subdivision of the land.



3 Photos of the Subject Site

The subject site has been inspected by the report author Danielle Gray of Gray Planning. The following images were taken on a site inspection in late 2022. The land remains unchanged from these images.



Image.1. Image taken within 1830 Channel Highway (western side of Channel Highway) looking south east. Source: Gray Planning, December 2022, no image modifications.



Image.2. Image taken within 1830 Channel Highway (western side of Channel Highway) looking east. Source: Gray Planning, December 2022, no image modifications.





Image.3. Image taken within 5 Gemalla Road (eastern side of Channel Highway) looking north east. Source: Gray Planning, December 2022, no image modifications.



Image.4. Image taken within 5 Gemalla Road (eastern side of Channel Highway) looking north. Source: Gray Planning, December 2022, no image modifications.



4 Representation intent

4.1 The proposed application of an amended UGB

This representation seeking to amend the UGB from that proposed by the SPO is intended to facilitate a future rezoning to a residential zone of the western side of Channel Highway to reflect existing residential development patterns immediately adjacent to the Meredith land. The UGB location being sought is one that also recognises and reflects the strategic intentions of the land which have been enshrined in Council strategic documents for over 20 years.

The intended future development would be for subdivision of the land. There is currently no formalised subdivision proposal plans available for the Meredith land as these plans are intended to be developed and then finalised after rezoning applications were approved.

Future subdivision of the Meredith land would be intended to provide residential lots that comply as far as possible with the Acceptable Solution minimum lot sizes, configuration and frontages prescribed under the State Planning Provisions for both ordinary and internal lots and to reflect existing residential development patterns immediately adjacent to the subject site as well as address any identified site constraints.



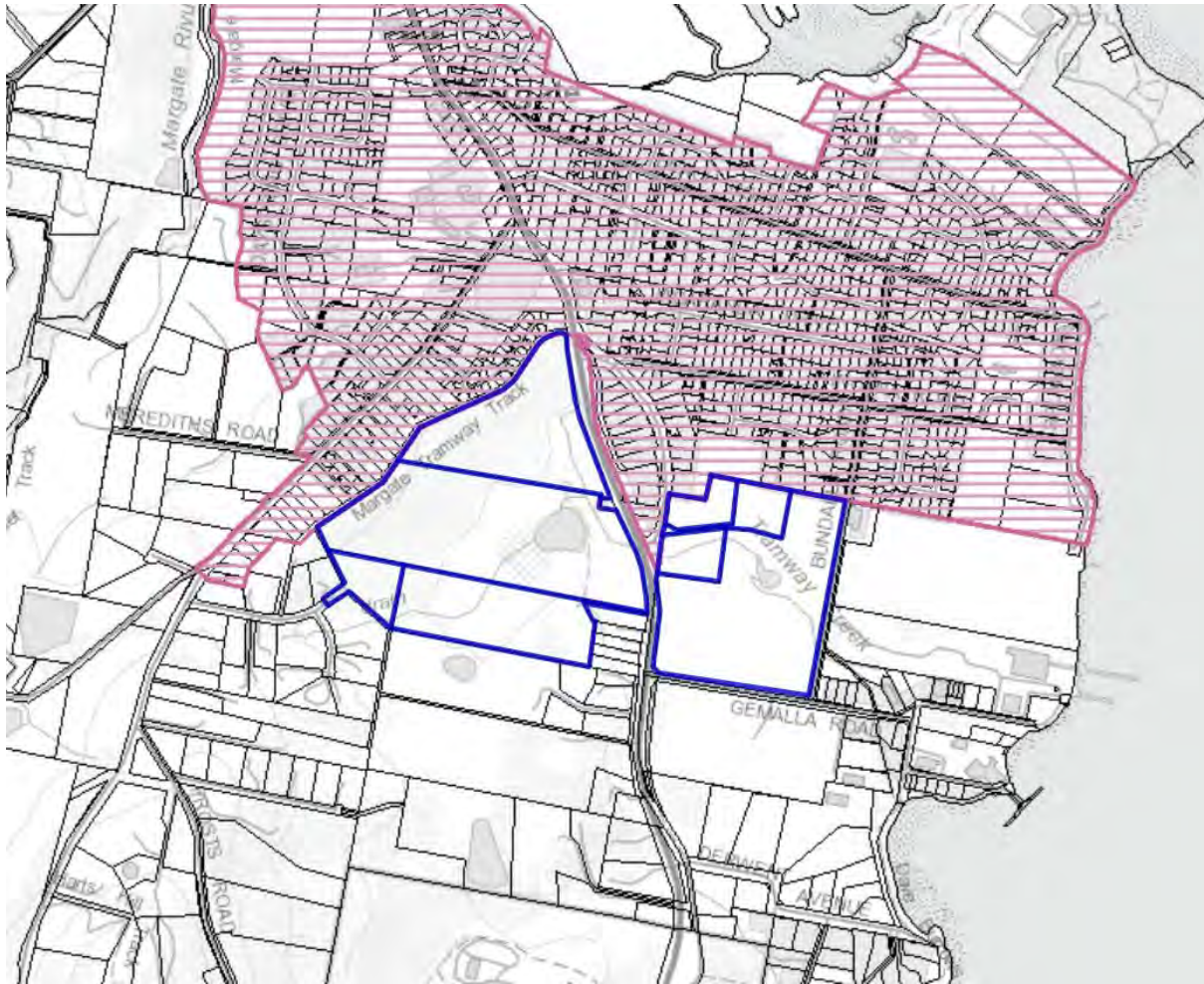


Figure 4. The subject site outlined. The shading represents properties located within the current extent of the Urban Growth Boundary contained in the Southern Tasmanian Regional Land Use Strategy (STRLUS). Source: TheLIST, sourced 11 March 2025, no nominated scale.

The proposed amendments to the UGB currently being advertised (page 20, *STRLUS Urban Growth Boundary Update Consultation Paper* dated February 2025) show the following extension of the UGB to pick up six of the eight titles of land owned by the Meredith family:



4.3 Kingborough

Figure 3 shows the areas for inclusion in the UGB at Kingborough.

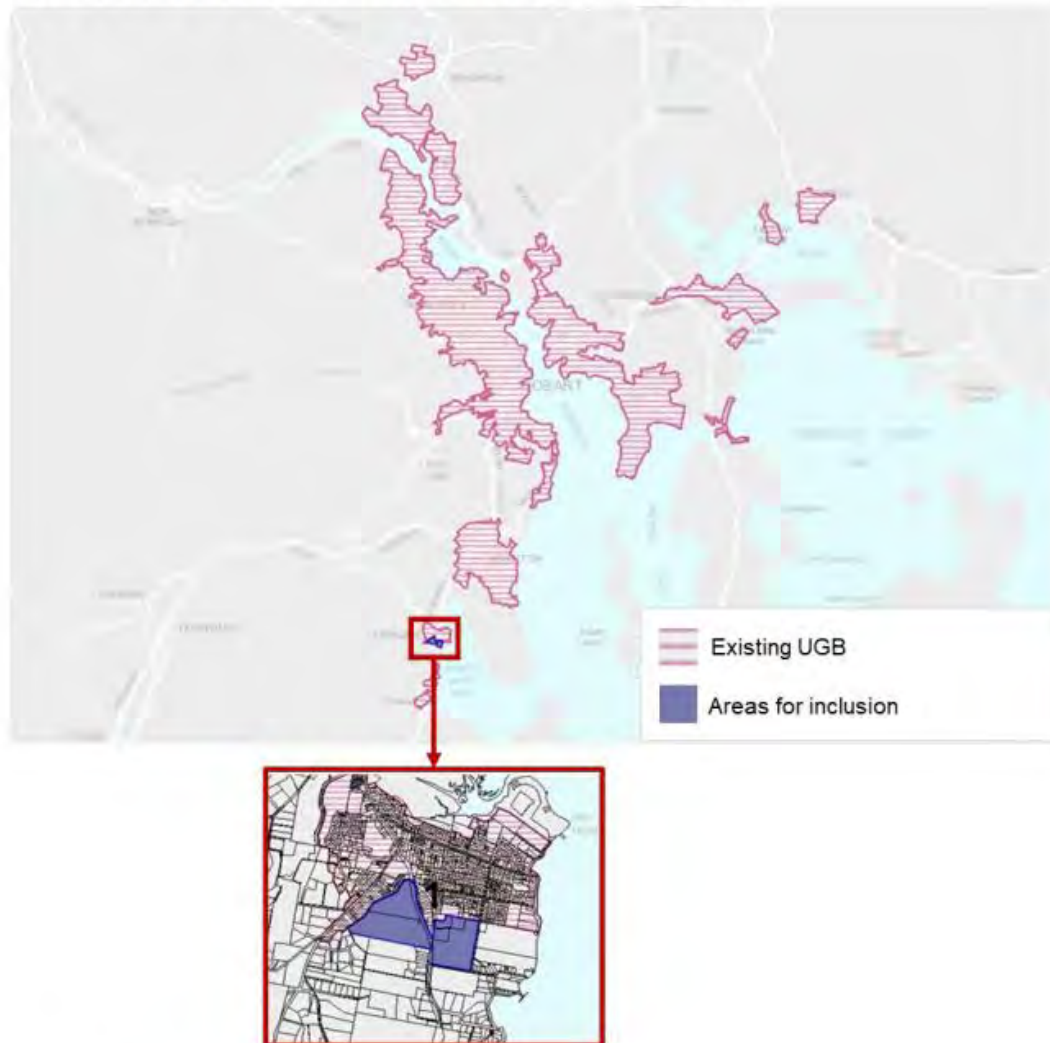


Figure 3. Areas for inclusion in the UGB at Kingborough.

The Meredith owned land comprising four titles on the eastern side of the Channel Highway is proposed to be wholly located within the UGB as proposed to be amended. These titles include:

- 21 Gemalla Road (CT-187452/1); and
- 26 Crescent Drive (CT-137794/2, CT-146336/3 and CT-146336/1).

The proposed amendment to the UGB unfortunately does not seek to include all Meredith owned land on the western side of Channel Highway.

Included within the proposed UGB are two titles only, these being:

- Lot 1 Channel Highway (CT-116263/1 and CT-126607/1).



The following land also owned by the Meredith family is not proposed to be located inside the UGB:

- Lot 1 Channel Highway (CT-111837/1) and
- 'Meredith's Orchard', Lot 1 Channel Highway (CT-166524/1).

This representation seeks to ensure that ALL titles of the Meredith land are contained within any changes to the UGB as part of the consultation paper currently being advertised by the SPO.

4.2 Existing Site Development

The Meredith land has multiple accesses. These include direct frontage onto Englefield Drive, adjacent to Glen Bower Court, Channel Highway, Bundalla Road, Gemalla Road and Crescent Drive.

Currently, the land on both sides of Channel Highway only has formal vehicular access onto Channel Highway for the existing dwelling and the Meredith's Orchard business.

The land is predominantly covered by rough pasture which is periodically cut for hay and is used for the grazing of cattle owned by the owners.

There are a few pockets of native vegetation in the form of individual trees in a pasture setting in the centre (west of Channel Highway) and east within the property (located near Bundalla Road).

The subject land has a relatively level gradient with an average slope generally flatter than 1 in 5.

The south western part of the site contains an existing dwelling constructed 7 years ago.

No development is currently proposed for the Meredith land at this point in time as all future development applications are dependent on a General Residential zone being first achieved. In turn, a General Residential zone being achieved depends in part to the location of the land in proximity to the UGB.

4.3 Surrounding Area Character

The surrounding area is characterised predominantly by residential development. To the north is residential development in Incana Road, Bonsai Place and Crescent Drive substantially subdivided and developed in the early 2000's. These lots are zoned Low Density Residential.

Land to the immediate north is characterised by residential development also zoned Low Density Residential. The ages of properties vary considerably from the late 19th century but the majority of residential development along Van Morey Road comprises mid to late 20th century and recent multiple dwelling infill.



Remnant native vegetation is present within the subject site and generally comprises individual Eucalyptus trees of varying ages and size.

An environmental report undertaken by Eco Tas for the eastern side of the Channel Highway supports a residential zoning for those titles. As the western side of the Highway has the same characteristics, it is wholly expected that the same position will apply to western titles also.

The Meredith land is characteristic of many larger lots in the rural areas of Kingborough that have no discernible agricultural use. The Meredith land is unique in that it is located immediately next door to urban density residential development.

The character of the area in the vicinity of the Meredith land is a mixture of low density and urban density residential lots that have been historically subdivided to provide urban residential living opportunities as part of the growing Margate township.

Larger lots surrounding these urban density residential properties are typically used for rural residential use on lots ranging in size from typically 1 to 2 hectares.

In the overall surrounding area, lot sizes vary considerably, and it cannot be said there is an average or typical lot size in the surrounding area.

Much of the surrounding area has been zoned either Rural Living or Low Density Residential and is proposed to be rezoned to General Residential under the recently advertised draft Kingborough LPS. It is considered the current Low Density Residential zoning has been applied to recognise and facilitate the growth of the Margate township as a significant township in the Kingborough municipality, only second to Kingston and Blackmans Bay itself in terms of the number of residents.

The Meredith land measures 36.86 hectares and as a result of its location directly adjoining neighbouring residential properties, the land has site constraints that preclude many agricultural uses. These constraints include a reasonably small area of cleared level land available for agricultural use fragmented over multiple titles and separated by the Channel Highway, existing residential use within the subject site and also directly adjacent to urban density residential use and development which restricts the range and intensity of viable agricultural use.

The primary land use in the immediately surrounding area is solely rural residential and urban residential.

There is also vacant light industrial land located to the east of the eastern Meredith titles, located off Bundalla and Gemalla Roads.

No commercial agricultural uses are evident on either the subject site or surrounding area.





Figure 5. The Meredith land shown outlined is located wholly to the immediate south of the Margate township. Source: TheLIST, sourced 11 March 2025, no nominated scale.



5 Town Planning Overview: zoning history and Kingborough Strategies

5.1 The Kingborough Land Use Strategy 2013

The 2013 Kingborough Land Use Strategy recognised that the land owned by the Meredith family provided a future residential expansion opportunity and specifically stated that the land *‘should not be alienated by a low density residential development’ and that ‘if it was zoned as low density residential or rural residential then an inefficient subdivision pattern would occur that would preclude any further intensification’.*

Furthermore, ***‘the longer term residential expansion opportunity here is on the current Meredith properties immediately south of Margate. The land (both sides of the Channel Highway) should not be alienated by a low density residential development.’***

‘Such holding zones would remain in place until such time as the developer is able to come forward with a more specific development proposal for the subject land. It is likely then that a Sec.43A application would then enable the rezoning and the subdivision proposal (a detailed precinct plan) to be approved concurrently. This provides a higher level of certainty in regard to the new General Residential zone boundaries.’

*‘Some properties immediately to the south of Margate are zoned Rural Resource and this reflects the existing farming activities that are conducted on these larger parcels. **In the longer term it is likely that this land will be developed for serviced residential subdivisions and be the next major expansion area for Margate. The Rural Resource Zone in this case is effectively a holding zone.** If it was zoned Low Density Residential or Rural Residential, then an inefficient subdivision pattern would occur that would preclude any future intensification.’*

5.2 The 1992 subdivision of 1830 Channel Highway

1992 Subdivision of the Meredith land

Historically when the development of Englefield Drive was approved in 1992, this approval was then formally adopted in the *Kingborough Planning Scheme 2000* as an ‘Alternative Solution’ and specifically noted as part of Planning Scheme ordinance (see (d) below).

A number of proposed lots and internal road networks were outlined on both CT- 111837/1 and CT- 166524/1 which are now proposed to be rezoned to a significantly lower density under the proposed Rural Living zone and located outside the UGB as currently advertised by the SPO. This citation of the Meredith’s currently valid subdivision permit and approved plan as an Alternative Solution in the 2000 Planning Scheme was omitted from the *Kingborough Interim Planning Scheme 2015* despite the Planning Scheme recognising that these titles (and others owned by the Meredith family) were better suited to more intensive residential development in the future than the Acceptable Solution provided.



- (d) in the case of subdivision of land located at Englefield Drive, Margate, an application is made for the further staged subdivision of land based on the outline plan of subdivision shown on approval SD 1944, 26/10/1992.



As identified in Council's previous Planning Schemes and recent Land Use Strategies, development of this Meredith land is needed to facilitate the expansion of the Margate township to the south and it is considered poor strategic planning to adopt a piecemeal and ad hoc approach to developing land long held in common ownership. The land in question has site conditions ideal for higher residential densities in the absence of site constraints such as gradient, servicing, heritage, access, large areas of priority vegetation or attenuation from any adjoining incompatible existing land use.

The Meredith family have owned their titles for in excess of 50 years as a consolidated property comprising multiple large titles and it is considered that Council and the Tasmanian Planning Commission should recognise the importance of applying the location of the Urban Growth Boundary to facilitate strategic planning objectives for Margate for the longer term development of property in a holistic approach.

Recent amendments made to the STRLUS that allows consideration of rezonings of land immediately adjacent to the Urban Growth Boundary would facilitate multiple titles within the Meredith land being able to be considered for a rezoning and subdivision. Indeed, the current rezoning application recently initiated by Kingborough Council relies on the application of SRD2.12 in order to be considered. However, the Meredith family have made



a decision to treat the land on either side of Channel Highway as a single entity to enable it to be developed consistently and in accordance with densification objectives in the STRLUS, rather than in a fragmented and ad hoc manner, title by title.

The proposed amendment of the UGB as advertised to only include six of the eight titles will frustrate this intention to treat the land holistically and avoid a fragmented approach.

5.3 History of zoning of the subject site and the Kingborough Land Use Strategy 2019

With the exception of one title (CT-111837/1 located at the end of Englefield Drive) the Meredith land is otherwise currently zoned wholly Rural Resource under the *Kingborough Interim Planning Scheme 2015*.

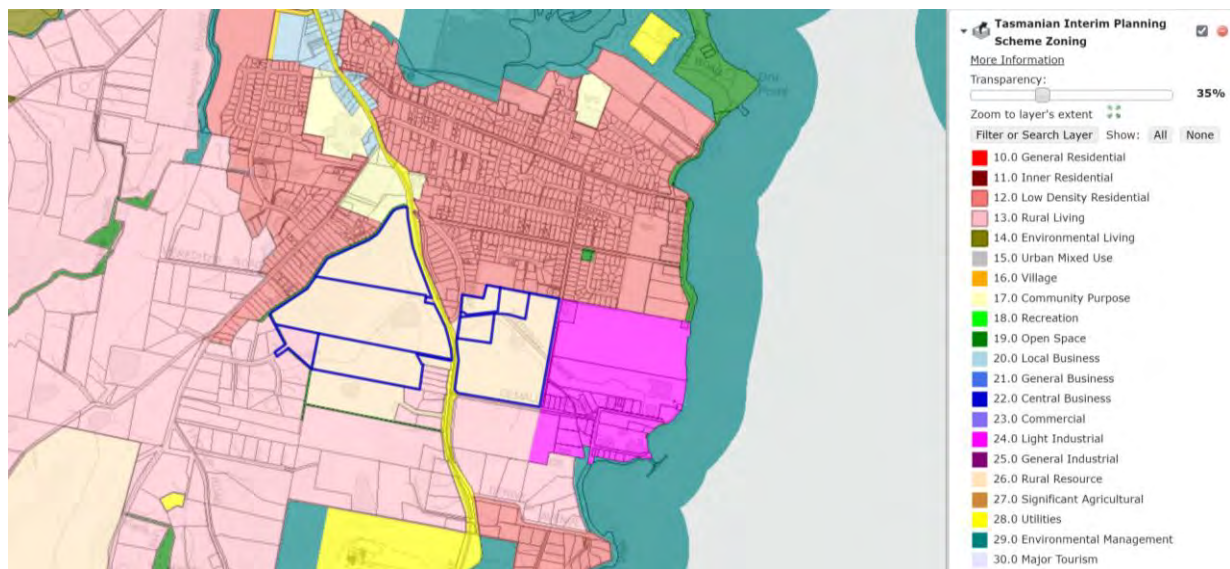


Figure 6. The subject site shown outlined within the township of Margate. Source: TheLIST, sourced 11 March 2025, no nominated scale.

The land was zoned Primary Industries under the *Kingborough Planning Scheme 2000*. This zoning was in reference to the large lot sizes and generally rural nature of the subject site which (as it remains) is currently undeveloped and contains pasture.

The *Kingborough Land Use Strategy* dated May 2019 initially mapped some of the subject site to be Future Urban zone. However, in the advertised draft LPS mapping, this was converted to a Rural zone due to feedback Council received from the TPC.

The transition to the current *Kingborough Interim Planning Scheme 2015* was a 'like for like' process in terms of zoning transition across to the Interim Planning Scheme from the KPS2000, as required by the Tasmanian Planning Commission. As a result, the subject site proceeded to a Rural Resource zoning under the current Interim Planning Scheme.



The urban residential area of Margate was zoned Residential under the *Kingborough Planning Scheme 2000* as this Planning Scheme contained a total of six (6) zones and only a single residential zone. There was, effectively, no other zone options for urban residential use and serviced and developed areas.

When Margate was zoned for transition to the Interim Planning Scheme, it was considered by Council that the most appropriate zoning for urban residential areas was Low Density Residential. This was a direct result of the lack of capacity in sewer infrastructure servicing Margate during that time.

Under the 2000 Planning Scheme and a Residential zoning, Margate saw an explosion of development from 2005 to 2015 that saw the expansion of the township to the east and south in the vicinity of Bundalla Road as well as new lots created off Dayspring Drive to the west of the township. This growth resulted in servicing issues and an inability to continue to be able to service ongoing residential growth in the township at that current rate.

As a result, Margate residential areas transitioned to the Interim Planning Scheme as Low Density Residential zoning for all urban sized lots on sewer infrastructure where capacity was extremely limited.

Previous limitations of servicing that had previously impeded further expansion of Margate have now been resolved with sewerage servicing for Margate now connected to the Blackmans Bay Treatment Plant.

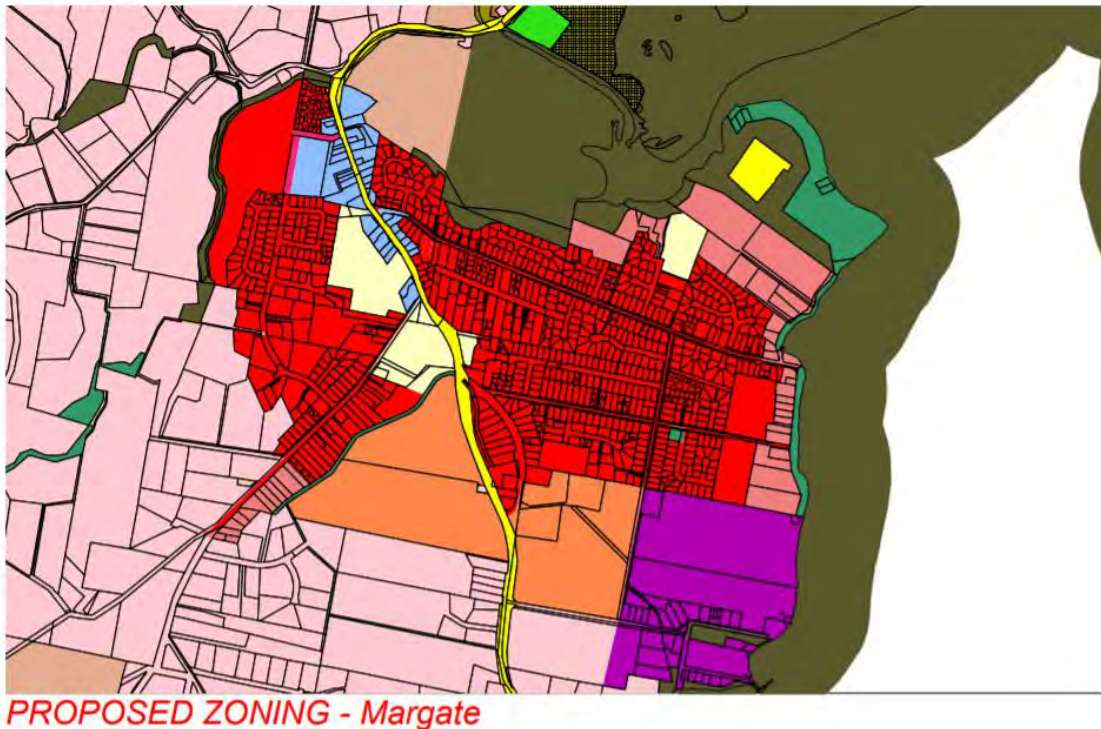
This Low Density Residential zoning remains but is intended to be changed to General Residential zoning under the draft LPS recently advertised by Council.

Under the *Kingborough Land Use Strategy 2019*, the majority of the Meredith was originally flagged to be rezoned to Future Urban as shown below:



5.5.4.3 Proposed Zoning

The proposed zoning for Margate is as shown on the map below:



This proposed Future Urban zoning under the 2019 Strategy confirms the strategic importance of the Meredith land in terms of future expansion of Margate that has been repeatedly highlighted by Council.

It should be further noted that correspondence from the Meredith family was sent to Council requesting all parcels of their land to be zoned Future Urban – see Appendices included as part of this representation.

The Meredith land has been held in a Rural Resource zone under the 2015 Interim Planning Scheme with the primary reason given by Council being inadequate servicing for the expansion of Margate. However, as previously noted this issue has now been resolved, paving the way for further residential development in Margate.

Failure to zone the entirety of the Meredith owned land as Future Urban effectively zones crucial individual titles with common ownership at a lower intensity (Rural Living) than Council has historically acknowledged which also includes the approval of the subdivision in 1992, for which a valid and 'live' permit still exists. The zoning of these crucial titles (CT-111837/1 and CT-166524/1) owned by the Meredith family at rural rather than residential level densities (Rural Living) put at risk the further development, as a whole entity, the properties held by the Meredith family and further puts these properties at risk of piecemeal development unable to be serviced with an access into the existing road network (avoiding Channel Highway).

It is considered that the entirety of the land held by the Meredith family must be dealt with as a consolidated property to better deal with site constraints, servicing, access and to



further ensure optimal use of what is one of the last remaining large future development sites held in long term common ownership in Margate and indeed Kingborough, to enable to expansion of the suburb. This representation seeks to ensure that happens.

5.4 Kingborough Land Use Strategy 2019 strategic directions

The future intended development of the Meredith land for residential expansion of Margate has very strong alignment with the *Kingborough Land Use Strategy 2019* including the following specific references to the subject site which propose a residential zoning or at the very least a Future Urban zoning as follows:

A medium term residential expansion opportunity exists on the current Meredith properties immediately south of Margate. Such land (on both sides of the Channel Highway) has been zoned Rural Resource (to reflect existing use and as a 'holding zone'). With the removal of the sewerage constraint, this land is proposed to be zoned as Future Urban and the Urban Growth Boundary in the STRLUS will need to be similarly adjusted.
(Page 68)

The development of this land will effectively be the only remaining future greenfield residential subdivision opportunity for Margate. (Page 69)

It is then likely in future that most of the affected land (the subject site) would be zoned as General Residential or Low Density Residential. (Page 182)

It is proposed that this extensive area (the subject site) be zoned as Future Urban. (Page 188)

The Strategy notes that 'It is appropriate that there should be sufficient land available to meet the demand for residential development for at least the next 10 years'. (Page 68)

It is asserted that the Huntingfield Estate for Housing Tasmania development together with the Meredith land would provide that desired 10 years of sufficient land supply, being approximately 5 years release for both properties.

The Strategy also notes (emphasis added) '*Beyond the next 5 years, the next larger residential developments are likely to occur on the Communities Tasmania land at Huntingfield, at Margate and to a lesser extent, at Snug, each of which can be zoned as Future Urban. All of this future residential growth will meet the needs of the municipality for the next 15 years – the original planning period for the STRLUS*' (Page 69)

It is considered that an amendment of the UGB to wholly contain all of the titles that comprise the subject site fully aligns with the intentions of the 2019 Strategy.

The eastern portion of the Meredith land has a common boundary with the existing UGB and became eligible for consideration against the May 2023 introduced SRD 2.12 of the STRLUS that has enabled a current rezoning application to be submitted to Kingborough Council that was recently initiated.



The rezoning application for land on the eastern side of the Channel Highway owned by the Meredith family was lodged with Council in early 2024 and progressed to the 20 January 2025 Kingborough Council agenda with an accompanying recommendation of approval for rezoning to 'General Residential' by Council's Senior Strategic Planner. This recommendation was unanimously supported by Councillors on 20th January 2025.

However, this outcome is unable to be achieved for the western titles owned by the Meredith family until the amendment of the UGB is undertaken to include all titles. It is further considered that SRD2.12 regarding adjacency to the UGB is not a magic bullet for rezoning and requires further additional consideration and adherence to associated criteria.

5.5 Initial draft Kingborough Local Provisions Schedule (LPS)

The initial draft of the Kingborough LPS specifically encouraged further residential land supply by enabling future greenfield residential development to occur. Margate is specifically mentioned. The only identified greenfield site in Margate is the subject site.

SRD 2.8	Aim for the residential zone in planning schemes to encompass a 10 to 15 year supply of greenfield residential land when calculated on a whole of settlement basis for Greater Hobart.	Zoning land as Future Urban at Huntingfield, Margate and Snug to enable future greenfield residential development to occur once existing developed areas are taken up. Based on the current take-up rates at Spring Farm, these additional areas will be needed to cater for the next 15 years of demand for such land.
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(Page 58 of draft LPS)

Strategy reference	Regional Policy	The Kingborough draft LPS and associated SPPs result in a scheme that is consistent with the regional policies and likely to further the outcomes by:
SRD 2.4	Recognise that the Urban Growth Boundary includes vacant land suitable for land release as greenfield development through residential rezoning as well as land suitable for other urban purposes including commercial, industrial, public parks, sporting and recreational facilities, hospitals, schools, major infrastructure, etc.	Zoning land within the Urban Growth Boundary to accommodate a broad range of urban uses. This includes some land that is vacant and is suitable for future greenfield residential development. However this is diminishing fast within Kingborough and it will be necessary to amend the Urban Growth Boundary to accommodate some additional greenfield development at Margate and Snug.

(Page 57 of draft LPS)

As previously mentioned within this report, this initial draft of the LPS flagged the subject site as being appropriately zoned as 'Future Urban zone', recognising the subject site as the primary greenfield site in Margate and apart from the Housing Department site at Huntingfield, the largest greenfield site in the LGA.



5.1.23 Future Urban Zone

The purpose of the land to which the Open Space Zone has been applied to in the Kingborough draft LPS is to identify land intended for future urban use and development (south of Huntingfield), and to ensure that development does not compromise the potential for future urban use and development of the land (parts of Margate and Snug).

Table 37: Zone application compliance – Future Urban Zone

Reference	Kingborough draft LPS application compliance
FUZ 1 The Future Urban Zone should be applied to land identified for future urban development to protect the land from use or development that may compromise its future development, consistent with the relevant regional land use strategy, or supported by more detailed local strategic analysis consistent with the relevant regional land use strategy and endorsed by the relevant council.	<p>The Future Urban Zone has been applied in the Kingborough draft LPS to the previously identified growth area in Huntingfield and to potential growth areas south of Margate and Snug (see Figure 77 to 79).</p> <p>The application of the Future Urban Zone at Margate and Snug is a result of increased wastewater treatment capacity and a high demand for new residential areas within the municipality.</p>

(Page 127 of draft LPS)

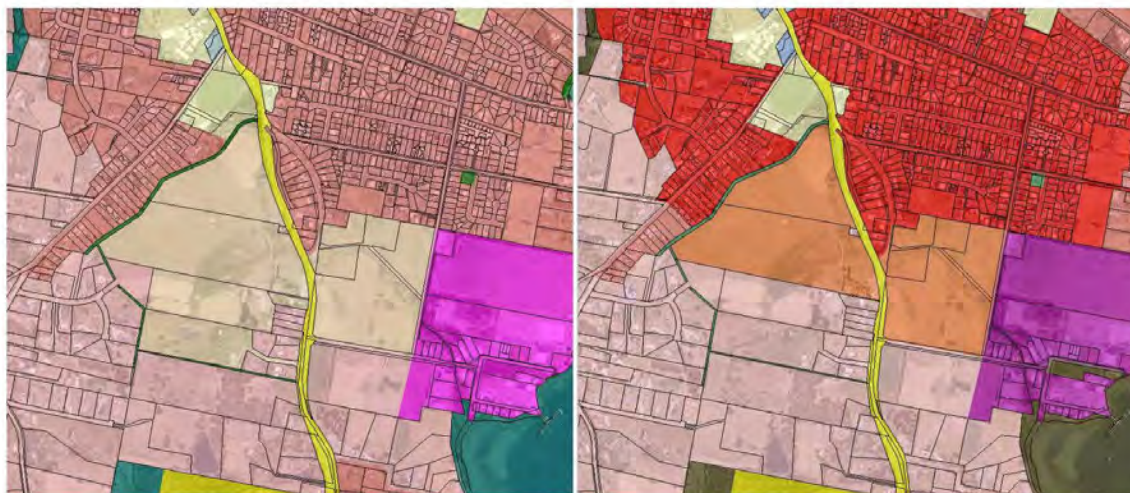


Figure 78: Future Urban Zone application – Margate

(Page 129, noting the above includes 6 of the 8 titles that make up the subject site)



5.6 Advertised draft Kingborough Local Provisions Schedule (LPS)

The draft Kingborough LPS that was eventually advertised by Council proposes a Rural zoning for the Meredith land.

For most of the titles that make up the subject site, this is considered to be a 'like for like' zone in the transition across to the Tasmanian Planning Scheme.

However, given the strategic importance of the subject site on both sides of Channel Highway, a Rural zone is disputed, particularly given most of Margate is proposed to transition across to General Residential zone.

However, for CT-111837/1 that forms part of Lot 1 Channel Highway (the western side of the Highway), the Rural Living zone has been lost and converted to a proposed Rural zone. This is further disputed as it will result in the loss of a residential prioritised zoning for this singular parcel.

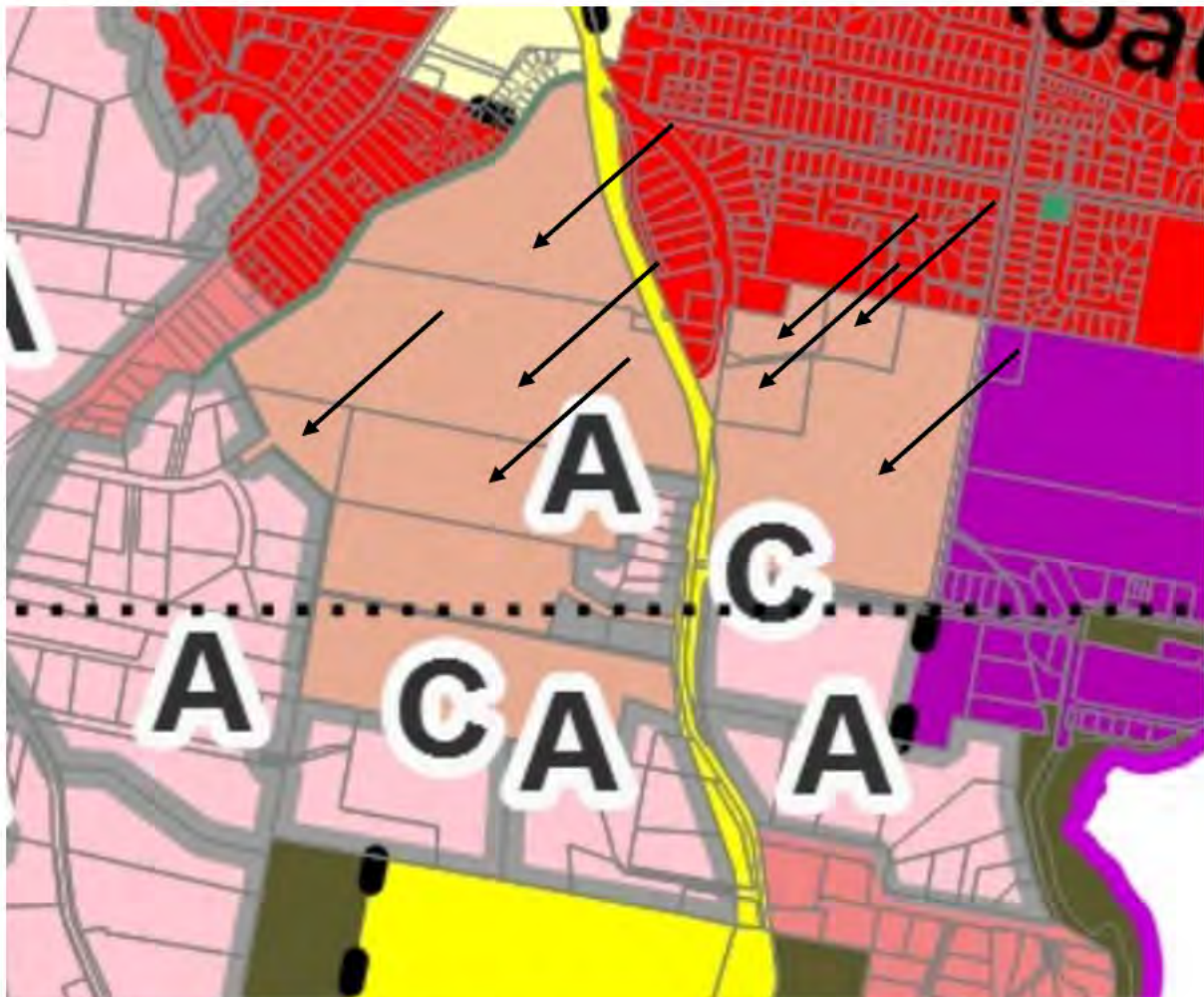


Figure.7. The subject site indicated with an arrow and located within the (beige) Rural zone under the proposed draft Kingborough LPS zone mapping recently advertised (advertising concluded 9 December 2024). The 'A' and 'C' lettering relates to land zoned Rural Living to the south of the Meredith land. Source: TPC, sourced December 2024. No nominated scale.



The TPC refused to agree to Kingborough Council's initial draft LPS mapping which was originally initiated to have the Meredith land being rezoned to Future Urban, a rezoning that referenced a long held strategic direction of Council's for the Meredith land to facilitate a much needed and logical expansion of Margate. Their rationale provided to Council was that the change in zoning was 'too great' and that the land was 'not in the UGB'.

Advice from Minster Ferguson to Mr Robin Meredith dated 30 June 2022 advised that Kingborough Council should initiate the process to amend the UGB.

In response, in August 2022 Kingborough Council refused to initiate any amendment to the UGB and placed this responsibility solely on the Meredith family. As a result, an application to amend the UGB was lodged by the Meredith family in December 2022. This application was subsequently withdrawn upon amendment of the STRLUS in May 2023 to Regional Policy SRD 2.12 to enable consideration of a separate rezoning application.

A representation on behalf of the Merdeith family was submitted to Council in December 2024 objecting to the proposed Rural zone in the draft Kingborough LPS.



6 Town Planning Overview: statewide Strategies and demand

6.1 Draft 30 year Great Hobart Plan

The future development of the Meredith land as a whole strongly aligns with the *Draft 30 Year Greater Hobart Plan* which includes commentary understood to be specific to the subject site as follows:

Kingborough – primarily infill in and around the Kingston CBD, greenfield at Huntingfield, and a mix of infill and greenfield in already identified future growth areas at Margate and Snug.

Advice was received from Minister Ferguson's office to Gray Planning on behalf of the Meredith family in September 2022 that:

To address this issue, I can advise that we have provided substantial financial support to the 'outer' Hobart councils of Brighton, Sorell, Huon Valley, Derwent Valley and Southern Midlands to undertake a 30-year residential demand and supply study. The 'Outer Hobart Residential Demand and Supply Study 2022' study area includes the above local government areas, plus those residential areas of the metropolitan councils that were not included in the Greater Hobart Plan, including Margate and Snug.

Once completed, data from the Study will be integrated with that from the Greater Hobart Plan to provide a comprehensive and up-to-date picture of residential demand and supply across greater Hobart and surrounds for the next 30 years.

The results of the Study, which will be made available to the public, are expected to inform a coordinated and strategic approach to adjusting the UGB to address anomalies and to provide areas for future urban growth. I understand that the preliminary data is expected to be received towards the end of 2022 and the Study completed in early 2023.

The amendment to the advertised UGB changes as sought in this representation is an important change at an LGA level, with this caused by the fact that Kingborough has no remaining identified or feasible greenfield land other than Huntingfield Estate currently being developed by the Housing Department. This situation is also confirmed in a SGS report engaged by the Meredith family as part of the recent rezoning application for their land on the eastern side of the Channel Highway.

The SGS report points to a need for all titles to be developed on both the east and west sides of the Highway for the Meredith land.

At a more regional level, the requested adjustment being sought to the advertised UGB amendment is minimal with the *30 Year Greater Hobart Plan Strategy for Growth and Change* indicating available greenfield land of approximately 9,000 dwellings across the Glenorchy and Clarence municipalities. The Meredith land (combined) would represent an immaterial increase in that figure and could supply approximately around 400-700 dwellings total on approximately around 400-500 lots.



6.2 Kingborough identified release areas for residential land supply and demand

The Tasmanian Government has a well-publicised population strategy in place to increase the population of Tasmania to 650 000 persons by 2050. According to Background Paper 4 of the Greater Hobart Committee, the first target of that strategy of 530 000 persons was achieved in December 2018, ahead of schedule. The next target is 570 000 persons by 2030.

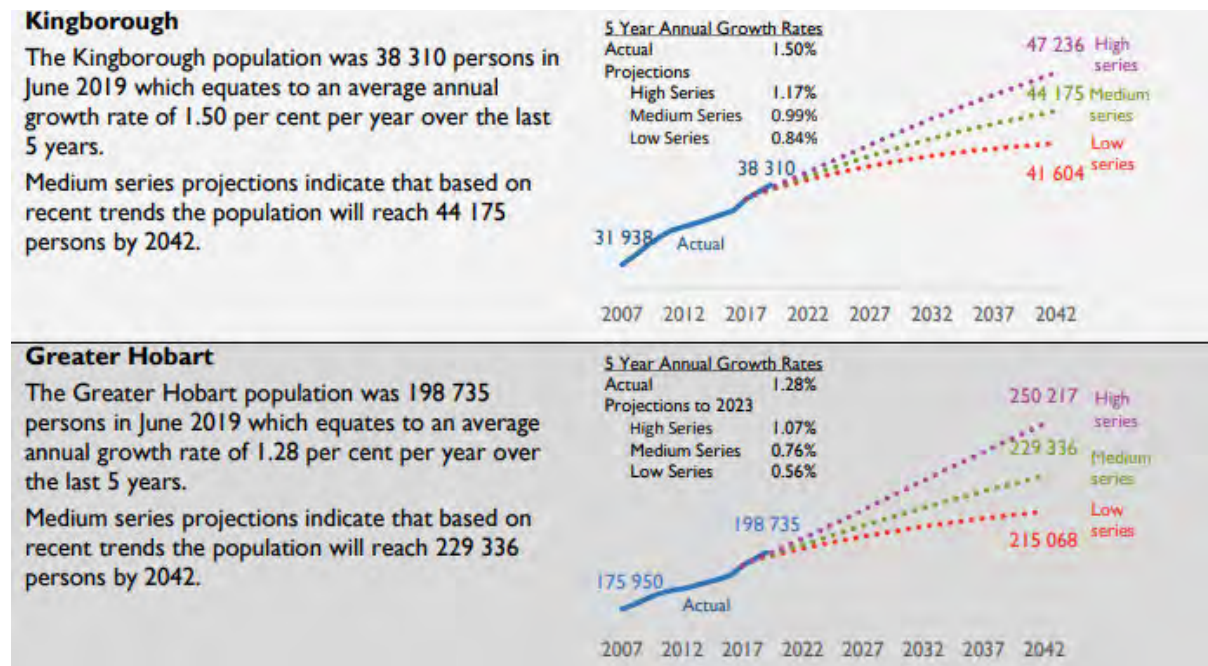
The 2021 Census data shows that the population of Kingborough has grown by an annualised rate of 2.36% and the Greater Hobart area has grown by an annualised rate of 2.22% over the five years from 2016 to 2021. These growth rates are more than double the high series projections forecast in 2019 by the Department of Treasury and Finance of 1.17% for Kingborough and 1.07% for Greater Hobart.

2021 Census Data

Kingborough			
Census Year	Total Persons	% change	Annualised population % change
2001	27,874		
2006	30,840	10.64%	2.13%
2011	33,893	9.90%	1.98%
2016	35,853	5.78%	1.16%
2021	40,082	11.80%	2.36%
Greater Hobart (Census) Area			
Census Year	Total Persons	% change	Annualised population % change
2001	190,161		
2006	200,525	5.45%	1.09%
2011	211,656	5.55%	1.11%
2016	222,356	5.06%	1.01%
2021	247,086	11.12%	2.22%



Department of Treasury and Finance 2019 Population Projections



Kingborough Council identified in its 2019 Land Use Strategy that the Department of Treasury and Finance's population projections for Kingborough may '*be lower than what actually occurs*' and '*the first impression is that the Kingborough projection is too low*'. The 2021 Census data mentioned above have ultimately proven Kingborough Council correct in this regard.

The Greater Hobart Committee's Strategy for Growth and Change document notes that '*Proactive action will be required by government (both state and local) to accelerate the availability of land for future residential development*'.

The Greater Hobart Committee's Strategy for Growth and Change notes (emphasis added) '*it is reasonable to assume that the growth rate may be greater than the Medium Series prediction, and it would be prudent to plan for a population growth rate closer to the High Series prediction*'.

Large developments of comparable size to the Meredith land include Spring Farm and Whitewater Park Estates both of which are expected to be fully developed by the end of this year. Huntingfield Estate is expected to provide a new source of supply for the next 4 years. It is noted that the design and layout of Huntingfield Estate is different to that of Spring Farm and Whitewater Park which may result in Huntingfield Estate being an unattractive option for some potential purchasers.

Other than the above mentioned properties, there are no other appropriately zoned greenfield opportunities available in Kingborough, indicating Kingborough will effectively run out of greenfield land for residential development within the next three to five years.



The Meredith land has been long recognised in Kingborough Council policy documents as one of very few sites remaining in Kingborough that is suitable for greenfield development, indicating supply will be significantly constrained in the medium to long term.

The Kingborough 2019 Land Use Strategy notes *'It will be necessary to identify the future residential release areas that could be considered appropriate around (and within) Margate for beyond the next 5-10 years. The most suitable areas are located immediately to the south of Margate – in fact they constitute the only real opportunity for larger scale development'*.

The Kingborough 2019 Land Use Strategy notes *'Margate is an attractive area for many residents because of its affordability relative to other areas closer to Hobart'* indicating demand for Margate is expected to remain robust.

In the 2019 Kingborough Land Use Strategy it was noted that *'There are now some substantial residential subdivisions at Spring Farm and Whitewater Farm, but new areas will need to come on line if STRLUS targets are to be met'*. Since 2019 the Spring Farm and Whitewater Farm subdivisions are now practically complete, with only one large greenfield site in Kingborough Councils pipeline being Huntingfield Estate.

The 2019 Kingborough Council Local Provisions Schedule Supporting Document recognised a diminishing supply of residential land and noted that vacant land available for residential development within Kingborough *'is diminishing fast within Kingborough and it will be necessary to amend the Urban Growth Boundary to accommodate some additional greenfield development at Margate and Snug'*.

The development of the long awaited shopping centre and supermarket in the Margate town centre, which has commenced construction and is within walking distance to these properties, is expected to further increase demand for dwellings in Margate in coming years.

Should the divergence between land/housing supply and demand continue then the current imbalance will only worsen and observable manifestations such as the housing crisis and record prices can only be expected to continue and worsen the longer this continues in the absence of action to the contrary.

Relying upon infill development to meet expected demand is fraught with danger given various factors that restrict the theoretical yield of infill development including street frontage of existing properties, size of blocks, location of existing house, servicing restrictions, access to finance and a willingness by the property owner to subdivide their own property.



Information on dwelling approvals provided by Council to Gray Planning in September 2022 states:

Dwelling approvals for the last 5 years:

- 230 dwellings
- 259 dwellings
- 321 dwellings
- 263 dwellings
- 370 dwellings

The current growth rate is expected to continue as there are some substantial residential developments expected during the next decade.

Spring Farm and Whitewater Park Estates are expected to be fully developed by the end of this year.

Huntingfield Estate (which will accommodate approximately 470 dwellings) is expected to be completed within the next 5 years.

Other than the above, there are no other appropriately zoned greenfield opportunities available in Kingborough.

The above figures and comments about available land supply in the Kingborough LGA align fully with information collated by Gray Planning in this representation.

6.3 REMPLAN and Margate land supply shortage

The request for all eight of the Meredith owned titles to be wholly contained within the UGB is further supported by the recent REMPLAN (Southern Regional Tasmania Residential Demand and Supply Study: Demand and Supply Report) dated February 2024.

This report was commissioned by the State Planning Office and repeatedly references the dire shortage of land supply in Margate in particular.

The following references in REMPLAN are provided:



Table ES-2 Forecast Planning Area population and land supply, SRT region

Planning Area	Demand				Supply exhausted (in years) ⁴		
	Population 2021	Forecast Pop 2046	AAGR ³	AADD ⁴	Theoretical	Practical	Practical (vacant)
Bridgewater	4,386	4,823	0.38	15	5	8	7
Brighton	3,700	5,266	1.42	36	18	16	7
Gagebrook	2,829	3,058	0.31	10	11	21	21
Old Beach	3,156	3,662	0.60	10	23	23	23
Brighton Balance	5,192	8,569	2.02	59	2	2	2
Bothwell	388	409	0.21	1	23	23	23
Central Highlands Balance	2,192	2,272	0.14	8	23	23	23
Cambridge	427	735	2.20	5	8	2	1
Lauderdale	2,512	2,698	0.29	4	8	14	8
Richmond	935	1,135	0.78	4	23	23	20
South Arm-Opossum Bay	1,358	1,549	0.53	7	12	12	12
Clarence Balance	12,390	15,712	0.95	57	4	5	4
New Norfolk	6,243	6,845	0.37	14	23	23	23
Derwent Valley Balance	4,871	5,697	0.63	22	21	20	17
Bicheno	913	1,234	1.21	15	23	23	10
Orford	639	768	0.74	9	23	23	23
Swansea	812	998	0.83	11	23	23	23
Triabunna	738	720	-0.10	2	23	23	23
GSB Balance	2,016	2,359	0.63	32	22	23	19
Cygnat	1,083	1,284	0.68	5	23	23	23
Dover	533	609	0.53	2	23	23	23
Franklin	268	319	0.70	2	23	23	23
Geeveston-Port Huon	1,356	1,600	0.66	7	23	23	23
Huonville	2,031	3,006	1.58	21	23	23	23
Ranelagh	917	1,038	0.50	4	23	23	4
Huon Valley Balance	12,621	15,173	0.74	61	17	15	15
Kettering	285	389	1.25	2	12	12	12
Margate	2,430	3,072	0.94	14	5	2	2
Snug	1,731	2,016	0.61	6	4	4	4
Kingborough Balance	11,324	13,171	0.61	49	17	16	16
Midway Point	3,429	4,010	0.63	13	23	23	21
Sorell	2,724	4,062	1.61	29	23	23	22
Southern Beaches	6,023	6,983	0.59	30	23	23	22
Sorell Balance	4,799	5,904	0.83	28	9	9	9
Bagdad	533	617	0.59	2	23	23	23
Campania	573	834	1.51	7	23	23	21
Kempton	383	400	0.17	1	23	23	23
Oatlands	576	668	0.59	1	23	23	23
Southern Midlands Balance	4,773	5,319	0.43	16	7	7	6
Eaglehawk Neck	397	453	0.53	3	23	23	23
Nubeena-White Beach	676	763	0.49	4	23	23	23
Tasman Balance	1,570	1,732	0.39	8	23	23	23

Source: REMPLAN Forecast, SRT GMEF compiled by REMPLAN based on data from Department of Natural Resources and Environment.

#Note that 22 years is the extent of the forecast period (starting in 2024 and running until 2046) and based on August 2023 data.

³Average Annual Growth Rate (AAGR) over the 2022-46 period.

⁴Average Annual Dwelling Demand (AADD) over the 2022-46 period.

(page IX, noting Margate has been flagged as red)

Conclusion

While demand and supply of residential land varies significantly across the SRT region, this analysis indicates that at a regional scale there is sufficient land to meet the forecast medium-term demand (should it be able to be brought to the market). However, when looking at the data at LGA or planning assessment area level, there are some areas where the forecast demand is expected to exceed supply in the short-term. These include:

- Cambridge: with less than 1 year's supply;
- Brighton Balance and Margate: each with around 2 years supply;
- Ranelagh, Snug and Clarence Balance: each with around 4 years supply; and
- Bridgewater, Brighton and Southern Midlands Balance: each with around 6 or 7 years supply.

(page X)

Kingborough (excl metro)	<ul style="list-style-type: none"> - Approximately 12 years supply is available across the LGA, with supply expected to be exhausted earlier in Margate (2yr), Snug (4yrs) and Kettering (12yrs). - Margate and Snug have been developed to relatively standard residential densities, despite being zoned Low Density Residential. As supply in this zone is based on the minimum lot size permissible (1,000sqm), the average yield is less than what has already been developed. Should these settlements be rezoned to General Residential, the land supply is likely to be slightly higher, but still not enough to satisfy demand. - Much of the Balance area supply is made up of parcels in the Environmental Living Zone, which caters to a specific segment of the market.
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(page XII)



Table 8 Forecast Planning Area population and land supply, SRT region (excl metro)

Planning Area	Demand		Supply Practical (vacant)		Supply exhausted (in years) ¹ (Less certain ————— More certain)		
	Population 2021	Forecast Pop 2046	2023	2046	Theoretical	Practical	Practical (vacant)
Bridgewater	4,386	4,823	134	-181	5	8	7
Brighton	3,700	5,266	339	-434	18	16	7
Gagebrook	2,829	3,058	203	-6	11	21	21
Old Beach	3,156	3,662	719	490	23	23	23
Brighton Balance	5,192	8,569	162	-1,232	2	2	2
Bothwell	388	409	36	25	23	23	23
Central Highlands Balance	2,192	2,272	1,071	887	23	23	23
Cambridge	427	735	9	-113	8	2	1
Lauderdale	2,512	2,698	33	-99	8	14	8
Richmond	935	1,135	80	-8	23	23	20
South Arm-Opossum Bay	1,358	1,549	95	-52	12	12	12
Clarence Balance	12,390	15,712	292	-971	4	5	4
New Norfolk	6,243	6,845	594	291	23	23	23
Derwent Valley Balance	4,871	5,697	401	-110	21	20	17
Bicheno	913	1,234	147	-180	23	23	10
Orford	639	768	242	46	23	23	23
Swansea	812	998	387	134	23	23	23
Triabunna	738	720	221	178	23	23	23
GSB Balance	2,016	2,359	598	-126	22	23	19
Cygnat	1,083	1,284	157	45	23	23	23
Dover	533	609	101	52	23	23	23
Franklin	268	319	46	5	23	23	23
Geeveston-Port Huon	1,356	1,600	178	20	23	23	23
Huonville	2,031	3,006	516	41	23	23	23
Ranelagh	917	1,038	30	-25	23	23	4
Huon Valley Balance	12,621	15,173	938	-401	17	15	15
Kettering	285	389	24	-21	12	12	12
Margate	2,430	3,072	35	-298	5	2	2
Snug	1,731	2,016	28	-118	4	4	4
Kingborough Balance	11,324	13,171	885	-243	17	15	15
Midway Point	3,429	4,010	250	-7	23	23	21
Sorell	2,724	4,062	636	0	23	23	22
Southern Beaches	6,023	6,983	589	-12	23	23	22
Sorell Balance	4,799	5,904	284	-303	9	9	9
Bagdad	533	617	189	143	23	23	23
Campania	573	834	137	-14	23	23	21
Kempton	383	400	74	59	23	23	23
Oatlands	576	668	67	39	23	23	23
Southern Midlands Balance	4,773	5,319	120	-241	7	7	6
Eaglehawk Neck	397	453	170	106	23	23	23
Nubeena-White Beach	676	763	628	553	23	23	23
Tasman Balance	1,570	1,732	501	336	23	23	23

Source: REMPLAN Forecast and REMPLAN GMEF

#Note that 23 years is the extent of the forecast period (starting in 2024 and running until 2046) and based on August 2023 data.

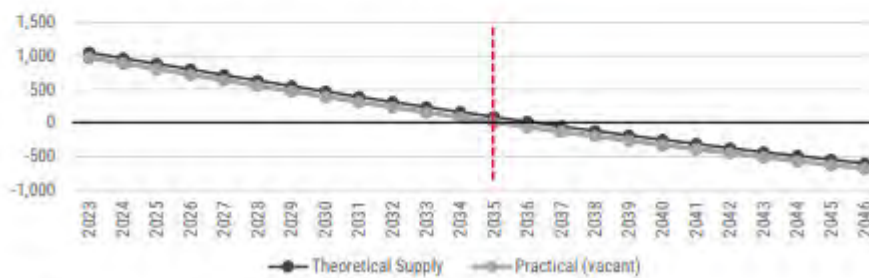
(page 27 noting Margate is flagged in red)



Kingborough will exhaust its current Practical (vacant) land supply in around 12 years.

Land supply shortages are more pronounced in Margate and Snug, where they have been developed at relatively standard residential densities, despite being zoned Low Density and only recently being connected to a much larger sewerage treatment plant. As mentioned earlier, the supply for these two settlements has been calculated on the minimum lot size allowable under the current planning controls, however even if it was calculated at the actual average yield it is unlikely to add too much to the supply, given the small number of vacant sites available. It is understood that changes to planning controls for both settlements are being considered to allow for greater densities. It is understood that additional growth areas are also being considered, which would need to be of sufficient size to cater for forecast demand.

Figure 23 Kingborough (excluding metro) land supply estimate



Source: REMPLAN GMEF

(page 34)

It is considered that the adjustment of the UBG to wholly contain all eight titles of the Meredith owned land would go a long way to addressing the dire shortage of available land for residential housing supply as confirmed in the REMPLAN report commissioned by the SPO. The REMPLAN report notes that supply was practically exhausted as of February 2024.

6.4 Potential future zoning of the subject site

It is considered that the most likely and appropriate future zoning of the majority of the Meredith land would be General Residential, given that is the zoning to be applied to immediately adjacent developed residential land to the north under the draft Kingborough LPS.



7 The subject site: constraints and opportunities

7.1 Servicing and transport implications

The recently constructed Snug to Margate walking/cycle path runs between the Meredith land.

Other walking trails run alongside the Meredith land boundaries, and it is anticipated that their connectivity would be improved with development of these properties.

There exist numerous available opportunities to enter onto the Channel Highway from these properties through existing intersections, including Gemalla Road, Crescent Drive, Englefield Drive via Van Morey Road, and Beach Road via Bundalla Road. The existing 60km/h speed limit is expected to be favourable to any appropriately designed intersection modifications that may be required.

It is further noted that inclusion of the Meredith land at Lot 1 Channel Highway (CT-111837/1) provides a direct link to Englefield Drive that is vital in the development of land owned by the Meredith family on the western side of Channel Highway. This is considered to be an important linkage and access that should not be lost as a result of CT-111837/1 not being residential zoned or within the UGB.

Kingborough Council has recently rebuilt and upgraded Gemalla Road and the Tasmanian Government has recently rebuilt and upgraded the portion of the Channel Highway passing these properties.

As previously advised to Kingborough Council, the Department of State Growth has indicated to Gray Planning and the developer in 2018 that they would not be supportive of a direct access onto Channel Highway, regardless of compliance with other applicable Planning Scheme standards at the time of an application submitted to Council for development of the land owned by the Merediths.

Therefore, any future access for a proposed subdivision of the subject site will need to be considered via Gemalla or Bundalla Road by the developer onto a Council maintained road for lots located to the east of Channel Highway and access from Englefield Drive for lots located to the west of Channel Highway.

It is also worth noting that the 7 year old advice received from State Growth did not consider discussions of Channel Highway upgrades or new infrastructure such as a roundabout to service a subdivision and did not include discussion of any particular proposal plan or concept layout of a subdivision.

It is the intention of the Meredith family to continue discussions with State Growth against a draft proposal plan prepared by surveyors once a decision is made to amend the UGB to facilitate a rezoning.



7.2 Potential Land Use Conflicts

The further amendment of the UGB to facilitate a rezoning of all titles on the western side of Channel Highway for the Meredith land will not create land use conflict on the following basis:

A future proposed zone change would relate only to a defined area of land comprising a cluster of parcels located within an area immediately south of the residential area of Margate in single common ownership. This UGB amendment request relates only to the subject site and will not open up any other properties owned by third parties.

The Meredith land is assessed as not being suitable for sustainable agriculture nor being a significant area of land when taking into account the areas of better quality land elsewhere south of Margate. It is noted that the Rural Resource zoned land that makes up the subject site is already heavily constrained by the encroachment of residential development to the immediate north that has substantially intensified in the last 20 years.

There is no likelihood of potential impact on agricultural use and land as there has been none identified in the surrounding area. This has been confirmed in a Land Capability Assessment by consultants GES.

Other adjacent properties in the surrounding area to the south and west are also zoned predominantly for residential purposes under Low Density Residential and Rural Living zones, which is a like for like use of the future use and development intended for the subject site.

There is Light Industrial land to the east of Bundalla Road. This is shown in the below Figure 8.

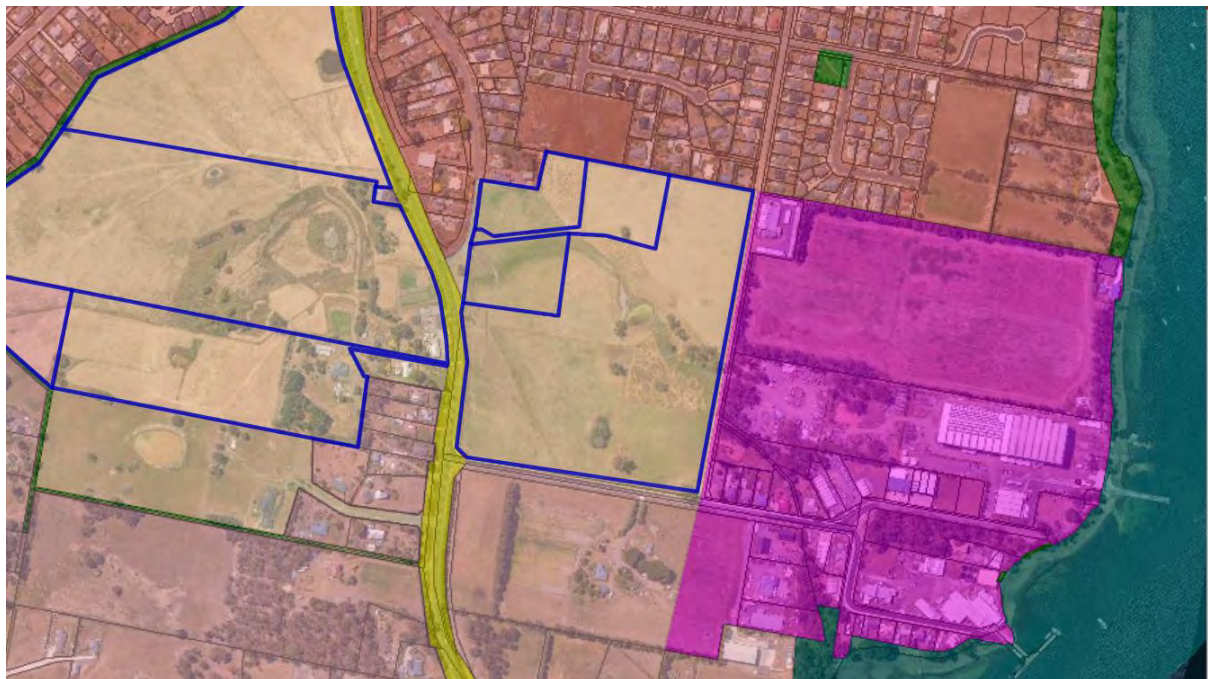


Figure 8. Part of the subject site shown outlined with adjacent Light Industrial zoned land shaded pink and located east of Bundalla Road. Source: TheLIST, sourced 12 March 2025, no nominated scale.



A significant portion of the Industrial land is currently vacant with no known live permits of approval for use or development of this land.

These vacant portions are arrowed (orange arrowed) below.

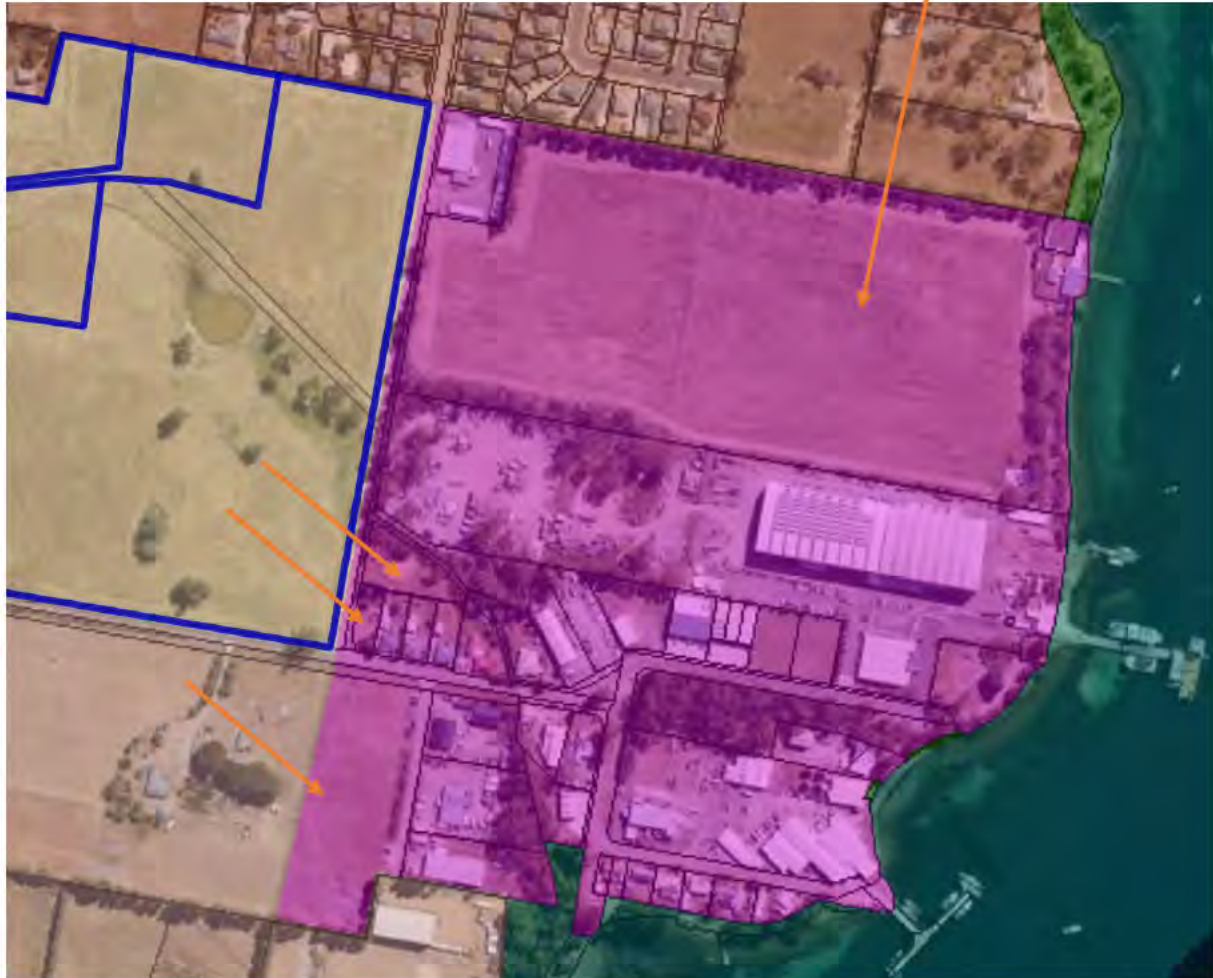


Figure 9. Vacant adjacent Light Industrial zoned land shaded pink and located east of Bundalla Road. Source: TheLIST, sourced 11 March 2025, no nominated scale.

These vacant parcels of Light Industrial zoned land are already adjacent to residential zoned land to the west.

It is noted that all of the Meredith land to the east of the Channel Highway is already proposed to be included in the UGB amendment as shown in the *STRLUS Urban Growth Boundary Update Consultation Paper* dated February 2025.

The western titles are located directly adjacent to residential land and development and all four titles at Lot 1 Channel Highway on the western side of the Highway would have no anticipated land use conflict likelihood.



Existing residential dwellings within the Light Industrial area have remained over the years despite the application of an Industrial zoning under the 1988 Planning Scheme which has continued through to the 2000 Planning Scheme and now the current 2015 Interim Planning Scheme.

It is considered that the coexistence of these existing residential uses has occurred without land use conflict for over 30 years.

Furthermore, to the north of the Meredith land there is residential use and development subdivided and developed in the early 2000's where there has been no known land use conflict occurring.

Any new use proposed on vacant Light Industrial zoned land would already be required to consider existing residential use and development in the surrounding area. The rezoning of the subject site to a residential zone would not create a new need to consider land use conflict.

It is considered that the most likely issue between future residential use and development of the subject site and the Light Industrial area is that of noise and to a lesser degree, odour, given the ship building uses on the foreshore of the Light Industrial zoned area.

The extent of any likely impact and most appropriate zoning would be considered in detail, in any case, as part of a future subdivision application of the Meredith land on the eastern side of the Channel Highway.

The issue of avoidance of land use conflict is also proposed to be dealt with by way of a proposed SAP in the current rezoning application for the Meredith land located on the eastern side of Channel Highway.



7.3 Land Capability, or otherwise, of the subject site

The Meredith land is mapped as 5 terms of Land Capability by DPIPW:

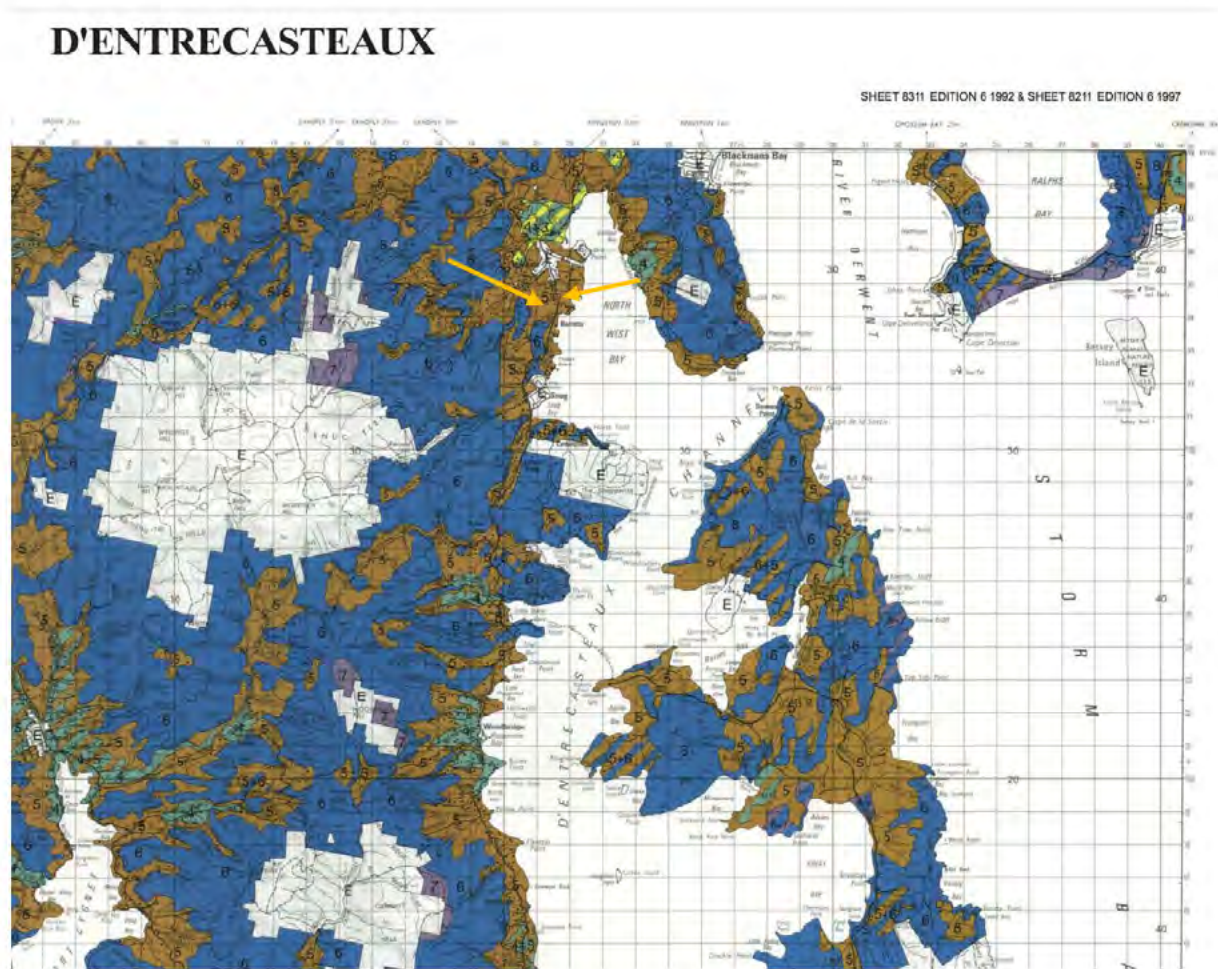


Figure 10. The Meredith land arrowed. The subject site is brown (5) (Land Capability map DPIPW). Source: TheLIST, sourced 11 March 2025, no nominated scale.

CLASS 5

This land is unsuitable for cropping, although some areas on easier slopes may be cultivated for pasture establishment or renewal and occasional fodder crops may be possible. The land may have slight to moderate limitations for pastoral use. The effects of limitations on the grazing potential may be reduced by applying appropriate soil conservation measures and land management practices.

It is considered that the Meredith land has a low ability to sustain commercial feasible grazing and low to nil suitability for cropping, solely based on its classification alone.

The Meredith land additionally has other constraints that restrict its ability for agricultural use including size of the property, immediately adjoining residential use of an urban density and existing residential use within the subject site itself.



An engineering assessment undertaken by Aldanmark as well as a Land Capability Assessment by consultants GES have confirmed the lack of agricultural potential for the Meredith land as well as its ability to connect to servicing infrastructure to facilitate urban residential development.



8 UGB Amendment, the Act and the STRLUS

8.1 Description of Proposed Application of the UGB sought

This representation seeks an adjustment to the advertised amendment to the Urban Growth Boundary so that the entirety of the Meredith land on both sides of the Channel Highway is located within the UGB.

This means amending the proposed UGB to also include land at Lot 1 Channel Highway (CT-111837/1) and 'Meredith's Orchard', Lot 1 Channel Highway (CT-166524/1).

8.2 Statutory Requirements of the Act

The Act does not include any provision for amendment of the Urban Growth Boundary that is contained in the three Tasmanian Land Use Strategies.

This representation has been prepared in accordance with advice received from Kingborough Council's Strategic Planner Mr Adriaan Stander and also in accordance with the information contained in Information Sheet *RLUS1 – Reviewing and Amending the Regional Land Use Strategies*.

8.3 Southern Tasmania Regional Land Use Strategy: Strategic Directions

The Southern Tasmanian Regional Land Use Strategy (STRLUS) provides strategic direction for the southern region which includes the Kingborough municipality.

The Meredith land is not currently within the Urban Growth Boundary (UGB) under the STRLUS.

However, most of the Meredith titles are located immediately south of the UGB with the UGB touching the northern title boundaries of all titles on the eastern side of Channel Highway. Two of the four western titles that make up the western side of the Highway comprising Lot 1 Channel Highway (CT-116263/1 and CT-126607/1) are also adjacent to the current UGB.

The Meredith land has been repeatedly identified as a greenfield area and specifically as one for densification as outlined under both the 2013 and 2019 Kingborough Strategies, previously highlighted within this report.

The current Interim Planning Scheme states, since at least 2015, that the Meredith land has been intended to be in the Urban Growth Boundary via the following as strategic whole parcels of land as a single entity as follows:



(a) Land immediately south of Margate which is to the east and west of the Channel Highway is earmarked for future residential development.	(a) The Rural Resource Zone is being utilised here as a holding zone that enables existing uses to continue up until that time that this land can be more intensively developed. This will in turn depend on such factors as sufficient wastewater treatment capacity and justifying an extension of the urban growth boundary for Margate.
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The request for all of the Meredith land to be included in the UGB amendment has been assessed against the following strategic direction of the STRLUS:

SD1: Adopting a more Integrated Approach to Planning and Infrastructure

This Strategy seeks to identify where different land use should be ideally located.

The entirety of the Meredith land is located immediately adjacent to existing fully serviced urban land zoned residential and developed for residential development. This neighbouring land is proposed to be zoned General Residential under the upcoming Kingborough LPS.

The subject site has been confirmed as being able to be adequately serviced as part of a preliminary servicing review of the land prepared by Aldanmark. This can be provided upon request by the SPO.

SD2: Holistically Managing Residential Growth

The Strategy presents a timely opportunity to plan for residential growth on a regional basis.

The Meredith land has been flagged as being land to allow for the future residential expansion of Margate for over 10 years by Kingborough Council.

SGS assessment of the most recent ABS data confirms there is the demand for residential lots that the rezoning and subdivision of the subject site would provide. The SGS report can be provided upon request to the SPO.

SD3: Creating a Network of Vibrant and Attractive Activity Centres

The Meredith land is within walking distance to the urban centre of Margate and its development would provide further residential options for the expansion of Margate, which is one of the fastest growing and in-demand urban areas of the Kingborough municipality.

SD4: Improving our Economic Infrastructure

A future proposed subdivision of the subject site would be intended to provide for enhanced accesses onto the Channel Highway, which is a significant road corridor in



southern Tasmania. The Meredith family would intend to continue their discussions with DSG.

SD5: Supporting our Productive Resources

The Meredith land contains Rural Resource land that is severely compromised due to adjacent residential development to the north of the subject site and on both sides of the Channel Highway. The two titles of Meredith land located outside the proposed amendment to the UGB have arguably the least agricultural potential of all, given their size, immediately adjacent residential use and current residential use within their title boundaries.

SD6: Increasing Responsiveness to our Natural Environment

The Meredith land contains a mapped watercourse that is effectively an agricultural ditch that traverses the subject site on the eastern side of the Highway and remnant native vegetation in the form of Eucalyptus trees in pasture and does not have any significant environmental values as confirmed in a Natural Values Assessment by Mr Mark Wapstra of EcoTas. This report can be provided to the SPO upon request.

SD7: Improving Management of our Water Resources

The Meredith land has already had positive preliminary servicing investigations undertaken by the owner's engineers with an Aldanmark report. This can be provided upon request.

SD8: Supporting Strong and Healthy Communities

The Meredith land is close to community services and immediately adjacent to a thriving urban settlement. As part of a future rezoning and subdivision application, the owners seek to provide multiple housing choices and opportunities in a fully serviced area that is close to community services.

SD9: Making the Region Nationally and Internationally Competitive

The Meredith land is located within one of the fastest growing urban centres in southern Tasmania and will provide further housing opportunities in a fully serviced locality on 20 minute's drive from the Hobart CBD.

SD10: Creating Liveable Communities

The Meredith land offers a significant opportunity to provide quality urban land to cater for various housing development options and is substantially free of constraints. The owners intend to undertake street planting as part of any future subdivision proposal to provide a more 'green' approach to residential subdivision development in order to enhance the environment offered to future residents.



8.4 Southern Tasmania Regional Land Use Strategy: Regional Policy Statements

The following comments are provided against applicable and relevant Regional Policy Statements:

5.1 Biodiversity and Geodiversity

The Meredith land does contain a Biodiversity overlay that recognises the presence of scattered remnant individual Eucalyptus in pasture.

The Meredith land is unlikely to reasonably provide habitat opportunities for native species. EcoTas have undertaken a natural values assessment of native vegetation that has confirmed there is no significant environmental values within the Meredith land.

BNV 1 Maintain and manage the region's biodiversity and ecosystems and their resilience to the impacts of climate change.

The owners intend to undertake street planting as part of any future subdivision and have an attitude and approach to undertaking a subdivision that provides public open space to facilitate the retention of as much remnant native vegetation as possible.

BNV 2 Protect threatened vegetation communities, flora and fauna species, habitat for threatened species and places important for building resilience and adaptation to climate change for these.

EcoTas have undertaken a natural values assessment of all native vegetation that has confirmed there is no significant environmental values within the Meredith land.

BNV 3 Protect the biodiversity and conservation values of the Reserve Estate.

The Meredith land is not adjacent to any Reserves.

BNV 4 Recognise the importance of non land use planning based organisations and their strategies and policies in managing, protecting and enhancing natural values.

EcoTas have undertaken a natural values assessment of all native vegetation that has confirmed there is no significant environmental values within the Meredith land.

BNV 5 Prevent the spread of declared weeds under the Weed Management Act 1999 and assist in their removal.

EcoTas have undertaken a natural values assessment of all native vegetation that has confirmed there is no significant environmental values within the Meredith land that has confirmed there are no declared weeds within the land.



BNV 6 Geodiversity.

The Meredith land does not have any mapped or identified geological, geomorphological, soil or karst features.

6.1 Water Resources

The Meredith land does contain a Waterway and Coastal Protection Area overlay that maps a watercourse that traverses the subject site on both sides of Channel Highway.

The subject site is not in a water catchment area.

WR 1 Protect and manage the ecological health, environmental values and water quality of surface and groundwater, including waterways, wetlands and estuaries

It is the intention of the owners to effectively manage the mapped watercourse and preliminary investigations are underway to determine its suitability for stormwater management as part of any subdivision proposal as well as identify the extent of watercourse that would be appropriate for retention in a public open space area as part of any subdivision.

WR 2 Manage wetlands and waterways for their water quality, scenic, biodiversity, tourism and recreational values.

It is the intention of the owners to effectively manage the mapped watercourse and preliminary investigations are underway to determine its suitability for stormwater management as part of any subdivision proposal as well as identify the extent of watercourse that would be appropriate for retention in a public open space area as part of any subdivision.

WR 3 Encourage the sustainable use of water to decrease pressure on water supplies and reduce long term cost of infrastructure provision

The owners have engaged engineers who have provided a positive preliminary investigation of servicing and infrastructure requirements for the development of the land.



7.1 The Coast

The Meredith land does not include any coastal land and is located within 475m of the Margate waterfront to the east.

8.1 Managing Risks and Hazards

The Meredith land has multiple mapped potential hazards including being mapped as Bushfire Prone although it does not accord with the Planning Scheme definition of such land.

The subject site is not identified as being contaminated and is not subject to any mapped or identified landslip or instability, erosion, salinity, inundation, acid sulphate or sea level rise.

MRH 1 Minimise the risk of loss of life and property from bushfires.

It is intended that early investigation of the actual bushfire risk will be undertaken by the owners once a positive decision is made regarding the amendment of the Urban Growth Boundary.

It should be noted that surrounding properties are developed for residential purposes and the Meredith land contains and is located near very limited vegetation. The Bushfire Prone Areas overlay is questioned as it applies to the Meredith land and surrounding properties as it does not meet the definition of what constitutes 'bushfire prone land'.

9.1 Cultural Values

The Meredith land has been checked for any identified aboriginal artefacts which confirmed an absence. The subject site is, at its closest, around 475m from the Margate waterfront and is unlikely to include any middens.

Further investigation will be undertaken with Aboriginal Heritage Tasmania as part of any future preliminary subdivision investigations.

The land has no Heritage Places and is not included as being within any Heritage Precinct. No potential items or artefacts of any historic or cultural heritage value have been identified as part of preliminary planning and heritage review of the Meredith land.

10.1 Recreation and Open Space

The Meredith land provides the opportunity for further links to be provided to the centre of Margate from along Channel Highway as well as provide for public open space opportunities within the subject site as part of a subdivision development.



As part of any future subdivision proposal, the owners would intend seeking input from Council recreational planners to explore the possibility of linking open space or pedestrian linkages.

ROS 1 Plan for an integrated open space and recreation system that responds to existing and emerging needs in the community and contributes to social inclusion, community connectivity, community health and well being, amenity, environmental sustainability and the economy

The future subdivision of the Meredith land would be expected to provide an unparalleled opportunity for the subject site to provide walking trails from southern Margate to link to the existing residential areas and onto the urban centre of the township.

11.1 Social Infrastructure

The Meredith land is located in close walking proximity to existing social and community services in Margate.

While the future development of the subject site would be intended to provide for residential housing development as opposed to services per se, the future development of the subject site is in walking distance to shops, Margate Primary School, Channel Christian School, banking, postal and retail.

12.1 Physical Infrastructure

The Meredith land has been the subject of a preliminary review of infrastructure and servicing opportunities. This is discussed in the Aldanmark report that can be provided upon request.

It is considered that further in depth and detailed analysis of physical infrastructure is inappropriate at an UGB amendment stage, given the location of the subject site an existing services area and substantial frontage onto Channel Highway.

Further investigations are intended to be undertaken as part of any subdivision planning.

13.1 Land Use and Transport Integration

The subject site is already serviced by public transport. The subject site straddles a major regional transport corridor – Channel Highway.

The STRLUS notes that: *All transport options must respond to demand.*

The future subdivision of the subject site will create further demand for enhanced public transport opportunities.



14.1 Tourism

The Meredith land will be intended for the further residential expansion of Margate to the south, as opposed to creating opportunities for tourism development and infrastructure.

15.1 Strategic Economic Opportunities

The Meredith land will be intended for the further residential expansion of Margate to the south, as opposed to creating opportunities for economic focussed development and opportunities.

16.1 Productive Resources

The Meredith land contains fragmented areas of pasture that is currently zoned Rural Resource under the Interim Planning Scheme. Given the encroachment and intensification of residential development immediately adjacent, it is considered that this pasture is significantly constrained and does not present any meaning agricultural opportunities.

The Meredith land and surrounding area are not mapped as being Significant Agricultural land as per map 5 of the STRLUS.

The lack of agricultural potential for the Meredith land has been confirmed in a Land Capability Assessment by consultants GES.

17.1 Industrial Activity

The Meredith land on the eastern side of Channel Highway is adjacent to vacant Light Industrial zoned land to the east.

Further assessment of likely constraints and impact would be subject to a future subdivision assessment and have also been considered as part of the current rezoning application recently initiated by Kingborough Council where a SAP is proposed for the eastern side of the Channel Highway as part of the this portion of the Meredith land to be rezoned to General Residential.

18.1 Activity Centres

The Meredith land is intended to provide for residential expansion of Margate to the south of the existing residential areas of the township.

No commercial or business zoning would be sought as part of any rezoning as it is considered wholly inappropriate and contrary to the nominated activity centres in Kingborough and southern Tasmania.



19.1 Settlement and Residential Development

The location, form, type and density of residential development is a significant land use planning issue and one which has pushed the need to prepare a representation to the proposed amendment of the Urban Growth Boundary to include the entirety of the subject site.

Demand and growth have been analysed in detail in an SGS report engaged by the owners.

This representation has highlighted multiple strategic mentions of the entirety of the Meredith land as a planned future site for increased residential growth south of Kingston.

The Meredith land is not in and has never been located within a shack settlement area.

The future development of the Meredith land site would not seek to provide for low density residential or rural residential development but rather, seek to provide appropriate densification in line with existing serviced urban development immediately adjacent to the subject site to the north.

SRD 1 Provide a sustainable and compact network of settlements with Greater Hobart at its core, that is capable of meeting projected demand.

This representation in response to the SPO's Consultation Paper to amend the Urban Growth Boundary seeks to assist to facilitate a future rezoning and subdivision of the Meredith land which is immediately adjacent to an existing settlement. However, on the western side of the Highway two of the Meredith titles (CT-111837/1 and CT-166524/1) are not adjacent to the current UGB and therefore cannot be considered for rezoning, even under SRD 2.12.

The settlement of Margate is one of the three biggest, and most in demand, residential areas in Kingborough.

Elsewhere, the Meredith land is already partially immediately adjacent to the Urban Growth Boundary and titles on the eastern side of Channel Highway have been recently considered for rezoning under the STRLUS based on their area being under 2 hectares and their location next to the Urban Growth Boundary in accordance with SRD 2.12.

As previously noted, it is considered practical to consider the Meredith land as an entity given its common characteristics as opposed to piecemeal treatment as individual titles. The Meredith family have repeatedly sought to treat their land as single entities on each side of the Highway and avoid a piecemeal approach. Failure to do so will result in a reduced capacity to provide appropriate and much needed land for residential expansion to the south of Margate.



8.5 Resource Management and Planning System Schedule 1 Objectives

The following RMPS objectives are considered below in detail with responses after each.

Part 1

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

Comment:

This representation relates to land which has been modified and cleared of original native vegetation in the first half of the 19th century.

There will be no significant impact from the future development of the land on natural physical resources or ecological processes.

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

Comment:

Including all Meredith owned land of common characteristics as established clustered groups of titles in the UGB will assist to facilitate the future development to provide for the fair, orderly and sustainable development by adding economic value to land of low quality grazing land that currently has little or no potential for sustainable agriculture. The UGB amendment to include all titles under the Meredith family ownership will pave the way for a relatively small (small in terms of the LGA overall) additional area of land to be appropriately considered for zoning for residential purposes that supports the regional strategy.

(c) to encourage public involvement in resources management and planning;

Comment:

The future rezoning process with respect to the amendment of planning scheme zone mapping will provide interested or affected third parties with the opportunity to make representations during public exhibition and also attend and participate in subsequent hearings enabling issues raised to be considered as part of the overall assessment and decision making process. This would occur post approval of an amendment to the UGB that includes all of the Meredith land, paving the way to enable consideration of a rezoning on the western side of Channel Highway. The rezoning process includes a public notification and hearings process for third parties to be involved in.

It is also noted that this representation has been prepared as part of a public notification process.



(d) to facilitate economic development in accordance with the objectives set out in paragraphs (a), (b) and (c):

Comment:

The intention of the owners is to facilitate economic development of an existing parcel of underutilised land in accordance with the objectives (a), (b) and (c) by enabling the future use and development of a site with suitable site characteristics and location for urban residential development within an existing fully serviced urban area.

(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.

Comment:

The UGB amendment process involves two tiers of government with public input as per the public notification process that this representation has been prepared in response to. A future rezoning process would enable interested third party stakeholders to be actively involved in the assessment and decision making process.

Part 2

(a) to require sound strategic planning and coordinated action by State and local government;

Comment:

The UGB amendment, future rezoning and development application process involves a dual tiered assessment process at both state and local government levels with public input.

(b) to establish a system of planning instruments to be the principle way of setting objectives, policies and controls for the use, development and protection of land;

Comment:

The UGB amendment as sought in this representation (that all Meredith land is included within the UGB) does not affect the established system of planning instruments.

(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;

Comment:

This representation has been prepared as a result of extensive investigations undertaken by Gray Planning since 2017 for the Meredith family into the social, economic, environmental and agricultural values of the Meredith land to ensure the future proposed use and development is appropriate against statutory and strategic planning requirements applicable to the land and surrounding area.



(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;

Comment:

This representation seeks approval for amendment to the UGB to facilitate the ability to consider a future rezoning of all Meredith owned western titles to an existing (General Residential) zone that is part of the available zones under the current Interim Planning Scheme. The application for rezoning and development has been considered against all applicable policies at local, regional and state levels.

It must be considered that currently, the location of the UGB does not enable full consideration of the Meredith land on the western side of the Highway, even under the recently amended SRD 2.12 which has enabled consideration of a rezoning for titles on the eastern side of the Highway.

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

Comment:

It is intended that the Meredith land on the western side of Channel Highway would be subject to a further amendment (rezoning) and development process under the Act which would in turn allow for the consideration of the development including an application for subdivision in association with a proposed amendment for rezoning.

Rezoning cannot happen without an amendment of the UGB. Failure to contain all Meredith land within the UGB could mean a piecemeal approach to the land and an inability to consider any access via Englefield Drive which is what has been intended since 1992 (to enable access to a subdivision onto Englefield Drive).

(f) to secure a pleasant, efficient and safe working environment for all Tasmanians and visitors to Tasmania;

Comment:

The Meredith land is located immediately adjacent to existing urban residential areas and any development of the land would reflect existing land use patterns.

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

Comment:

The Meredith land does not contain any area of noted significance.



(h) to 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;

Comment:

The future proposed development of the Meredith land would have no adverse impact on public infrastructure or public utilities but would include appropriate upgrades to infrastructure as required. A future rezoning and subdivision application would still have to demonstrate that will be no adverse impact on the local road network as a result of the proposed development and associated traffic generation as a specific requirement under the SPP for subdivision in the General Residential zone.

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

Comment:

This representation considers the land capability of the Meredith land having regard to the existing characteristics and qualities of the subject site and surrounding land use and characteristics. The current Rural Resource zoning is not reflected in the reality of the of the conditions, qualities and capabilities of the Meredith land.

8.6 State Policy: State Coastal Policy 1996

The Meredith land is approximately 475m to the coast at Margate (adjacent to the Esplanade to the east).

However, it is considered that future development would not have any detrimental impact on existing settlement patterns in the surrounding area and will have no impact directly or indirectly, on the coast itself.

It is considered the proposal does not present any objection under the *State Coastal Policy 1996*.



8.7 State Policy: State Coastal on Water Quality Management 1997

The objectives of this policy are:

- (a) focus water quality management on the achievement of water quality objectives which will maintain or enhance water quality and further the objectives of Tasmania's Resource Management and Planning System;*
- (b) ensure that diffuse source and point source pollution does not prejudice the achievement of water quality objectives and that pollutants discharged to waterways are reduced as far as is reasonable and practical by the use of best practice environmental management;*
- (c) ensure that efficient and effective water quality monitoring programs are carried out and that the responsibility for monitoring is shared by those who use and benefit from the resource, including polluters, who should bear an appropriate share of the costs arising from their activities, water resource managers and the community;*
- (d) facilitate and promote integrated catchment management through the achievement of objectives (a) to (c) above; and*
- (e) apply the precautionary principle to Part 4 of this Policy.*

The requested adjustment to the advertised amendment of the UGB in and of itself will not detrimentally affect any water resource in the area.

Any future development of the Meredith land would be followed by extensive investigations into stormwater management and environmental management.

The requested location of the UGB with respect to the Meredith land is itself not considered to present any objection to the objectives of the *State Policy on Water Quality Management 1997*.

8.8 State Policy: State Policy on the Protection of Agricultural Land 2009

The future development of the Meredith land will involve the conversion of rural land currently zoned Rural Resource to land to be used for urban density residential development.

As part of preparations for this representation, an assessment was undertaken against the *State Policy on the Protection of Agricultural Land 2009*.

The purpose of the Policy is:

To conserve and protect agricultural land so that it remains available for the sustainable development of agriculture, recognising the particular importance of prime agricultural land.

The majority (at least 95+%) of cleared pasture will still be available at the property for the ongoing and continued use of grazing in the short term.



In any case, the Meredith land is not 'prime agricultural land', as confirmed in a Land Capability Assessment by consultants GES.

The land is mapped as 5 in terms of Land Capability by DPIW which states:

CLASS 5

This land is unsuitable for cropping, although some areas on easier slopes may be cultivated for pasture establishment or renewal and occasional fodder crops may be possible. The land may have slight to moderate limitations for pastoral use. The effects of limitations on the grazing potential may be reduced by applying appropriate soil conservation measures and land management practices.

It is considered that the Meredith land should not be zoned a rural or agricultural zoning, based on its low to very low ability to sustain even grazing and low suitability for cropping.

The Meredith land additionally has other constraints that restrict its ability for agricultural use including size of the property, adjoining residential use and existing residential use within the subject site itself. This has been previously outlined in this representation.

The Objectives of the Policy are:

To enable the sustainable development of agriculture by minimising:

(a) conflict with or interference from other land uses; and

(b) non-agricultural use or development on agricultural land that precludes the return of that land to agricultural use.

The Meredith land has been inspected by Gray Planning on a number of occasions since 2017 and there have been no agricultural uses identified within 1km of the subject site. The dominant land use is urban density residential, followed by low/rural density residential and then light industrial land use.

There is considered no likelihood of any conflict or interference with agricultural land uses stemming from the future residential development of the subject site.

8.9 Tasmanian Planning Scheme and State Planning Provisions

The intention of the owners is to rezone the land in the future to a residential zone already contained in the State Planning Provisions. This is already partially underway for titles on the eastern side of the Highway.

Under the initial draft Kingborough LPS, the subject site was proposed to be predominantly zoned Future Urban. However, this has not eventuated for reasons outlined in this representation. The advertised draft LPS zoning to a Rural zone is in conflict with the long held strategic identification of the land for an extension of Margate.

It is further noted that the eastern side of the Highway (21 Gemalla Road and 26 Crescent Drive titles) has been recently initiated for a rezoning to General Residential. This application is expected to be submitted to the TPC for a hearing in the next 6 months.



9 Need for the adjustment to the UGB amendment and Conclusion

It is evident that unless an amendment of the Urban Growth Boundary occurs to the Meredith land that Kingborough will practically exhaust all remaining greenfield land suitable for development within the next three to five years, at most.

The Meredith land has long been recognised in Kingborough Council strategic planning policy documents as being one of few remaining sites suitable for greenfield development in the entire LGA and represents one of, if not the only, large suitable greenfield sites remaining in the entirety of Kingborough.

The Meredith family have demonstrated a long term willingness to work with Kingborough Council to ensure that land supply is efficiently sequenced with the Huntingfield Estate development, ensuring land supply into the foreseeable future.

The Meredith land is very well suited for future residential development being located directly adjacent to existing serviced urban density residential zoned and developed land and it is expected to provide a range of land options.

The land is well serviced by existing social and physical infrastructure in Margate and is in easy walking distance to most of this infrastructure.

It is noted that all eight titles have common topography, lack of identified constraints, land uses and land characteristics and there is no reason not to include all eight titles in the proposed amendment to the UGB as advertised by the SPO.

Recent developments at Spring Farm and Whitewater Park Estates have been in high demand and this demand for residential land in the Kingborough municipality is not expected to cease or slow down. In fact, statistics point to increasing demand, not a reduction in demand.

Prior to this consultation paper for amendment to the UGB, the STRLUS and the UGB have not been reviewed since 2011. The subject site has been identified as a future expansion of Margate for close to 20 years and the rigid application of the UGB for determining rezoning applications has resulted in the need for consideration of including more land that has been established as a suitable contender.

The concern with the currently advertised amendment is that it leaves out two of the eight titles owned by the Meredith family. It makes little sense to exclude these based on common characteristics, long term single ownership and the ability to consider the potential for some access onto a road (Englefield Drive) other than Channel Highway.

It is inexplicable why the Meredith land not proposed to be located inside the UGB has been left out of the UGB amendment as proposed in the *STRLUS Urban Growth Boundary Update Consultation Paper* dated February 2025.

Lot 1 Channel Highway (CT-111837/1) and 'Meredith's Orchard', Lot 1 Channel Highway (CT-166524/1) have common characteristics with land to be contained within the UGB at Lot 1



Channel Highway (CT-116263/1 and CT-126607/1) including land use, topography, lack of identified land use constraints and favourable orientation to both future servicing and access.

It is particularly important for these 'missed' lots to also be located within the UGB as any development of CT-116263 and CT-126607/1 will rely on access to Englefield Drive via CT-111837/1. On this basis, in and of itself, CT-111837/1 and CT-166524/1 must also be likewise located within the UGB to ensure that neighbouring properties can be accessed, and these properties, as a whole under common ownership, can be developed in a proposal that does not rely wholly on access via the Channel Highway.

A check of TheList or a site inspection confirms that the Englefield Road abruptly terminates into an intended future road connection in terms of physical works. Englefield Drive was designed and approved by Kingborough Council to facilitate a former subdivision of the Meredith land in 1992.

It must be considered that the land owned by the Meredith's at CT-116263/1 and CT-126607/1 being proposed to be located within the UGB effectively in turn requires CT-111837/1 and CT-166524/1 to be likewise located within the UGB in order to properly facilitate any future access and development of the property as a whole.

Given that CT-166524/1 is a property likewise held long term by the Meredith family and is also strategically and favourably located to be included as part of any future development of the expansion of Margate to the south (and could be accessed via Englefield Drive) it is also requested that the SPO re-examine their proposed placement of the UGB.

The consistent treatment of all parcels of Meredith owned land will ensure a consolidated and master planned future development of Margate to the south.

Council has acknowledged the strategic importance of the Meredith land in terms of future expansion of Margate and has been repeatedly highlighted this in multiple strategic documents including their 2019 Land Use Strategy.

While the government has recently undertaken amendments to the STRLUS to facilitate the development land outside of the UGB, unfortunately none provide comparable certainty as a location inside the UGB.

Importantly, the amendment of the UGB to include all titles under the Meredith family ownership will provide the owners with the confidence and justification to commit to significant expenditure to pursue a future rezoning and development application. The associated costs, particularly for a very large scale subdivision development that reflects the scale of the land available within the subject site is expected to be considerable. The property owners are not developers by profession and do not have considerable funds to pursue a rezoning unless there is some certainty injected into the process. This certainty would be provided by the inclusion of the entirety of their land within the UGB.

The significant amount of time expected to be involved in a land owner initiated amendment to the UGB followed by a rezoning and subdivision application means that development of the land is at least 5 years away. At which point, the Kingborough LGA would be expected to have run out of residential land supply. As a result, the amendment of the UGB which is currently the primary impediment to the development of the Meredith



land to the west of the Channel Highway must be considered as a matter of urgency to provide security of land supply for Kingborough in the short term.

It is hoped that if the Urban Growth Boundary is amended, as requested in this representation, the applicant would then commence more detailed consultation and investigative work including further ongoing consultation with Kingborough Council and affected stakeholders such as State Growth and Taswater.

Please do not hesitate to get in touch if you have any questions about this representation or require further information.

Yours faithfully

Danielle Gray B.Env.Des. MTP. MPIA

Principal Consultant, Gray Planning

On behalf of Mr A Meredith and the Estate of Mr Robin Meredith

Appendices overleaf: Relevant zoning correspondence made to Kingborough Council 2015 to 2019 (including December 2019 response from Council regarding the merit of including all titles in zoning considerations)





27 August 2015

The General Manager
Kingborough Council
Locked Bag 1
KINGSTON TAS 7050

Dear Sir,

**Representation to Kingborough Interim Planning Scheme 2015
Meredith Land, Channel Highway, Margate**

I am writing on behalf of our client, Mr Robin Meredith who is the owner of a large area of land of approximately 38 hectares contained with the following Certificate of Title boundaries (referred to as the subject land):

Title Reference	Address
116263/1	1830 Channel Highway
126607/1	1830 Channel Highway
111837/1	1830 Channel Highway
166524/1	1830 Channel Highway
166523/1	1830 Channel Highway
146336/1	Gemalla Road
146336/3	Gemalla Road
137794/2	Gemalla Road
146338/1	Gemalla Road
146337/1	Gemalla Road

e: enquiries@erasassociates.com.au m: 0409 787 515 a: PO Box 374, Lough Falley TAS 7008 abn: 67 141 9891 001



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Under the Kingborough Interim Planning Scheme 2015, the land has been zoned Rural Resource: with the exception of C.T. 11837/1 which is within the Rural Living Zone.

The subject land, along with one other land title at 1948 Channel Highway, is entirely surrounded by residential or industrial zoning. Its use for rural activities is therefore significantly limited.

It has no connectivity to other rural or agricultural land. It is also highly fettered by the adjoining properties with nearly all of the subject land being within 200 metres of a residential property.

It is therefore clear that the subject land has limited potential for ongoing rural use and has potential for conversion to residential land to support the growth of Margate.

The existing residential land supply within Margate is limited. The Kingborough Land Use Strategy states that within the existing zoned areas, a theoretical supply of approximately 140 lots exist. Based on growth across the last 10 years for Margate this represents a 3 to 4 year supply only.

It is recognised that at this point in time full servicing of the land is current constrained due to the capacity of the existing sewerage treatment plant at Dru Point. It is however understood that TasWater are currently preparing long term plans and it is expected that the treatment plant will be decommissioned with wastewater transported to an upgraded facility at Blackmans Bay by the end of 2016. This will not only address current non-compliance issues but ensure sufficient capacity to service up to approximately 800 new dwellings in Margate including within the subject land.

Reticulated water supply with sufficient capacity to accommodate residential development on the subject land is already available.

The Local Area Objectives under Clause 26.1.2 of the Kingborough Interim Planning Scheme 2015 is therefore supported.

It is noted that part of the subject land under the Kingborough Planning Scheme 2000 did allow for subdivision on part of the subject land (off Englefield Drive) pursuant to the Alternative Solution under Clause 8.4.2.1(d) which stated:

in the case of subdivision of land located at Englefield Drive, Margate, an application is made for the further staged subdivision of land based on the outline plan of subdivision shown on approval SD 1944, 26/10/1992.

This was however for Low Density Residential style lots.

It is further acknowledged that at present the subject land is outside of the Urban Growth Boundary articulated in the Southern Tasmania Regional Land Use Strategy and has therefore not been identified as a greenfield development precinct.

The Strategy is now 4 years old and it is expected that a review will commence within a 12 to 24 period.

Our client will therefore be submitting to the appropriate organisation at the time of a review that the subject land presents a logical choice as a greenfield development precinct in the next iteration of the Strategy.

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e:enquiries@erassociates.com.au m: 0409 787 715 a: PO Box 374, Lenah Valley TAS 7008 abn: 67 141 991 004



A future precinct structure plan that would form part of any future rezoning request would be able to provide detail on the provision of infrastructure, open space and layout, density and staging of lots. In particular it would ensure an orderly progression of land release through subdivision and provision of infrastructure in a way that ensures the zoned land does not exceed a 5 to 10 year supply and as well as providing a transition of densities that is consistent with the characteristics of existing surrounding residential lots.

In regards to progressing the conversion of the subject land over the medium to long term, on behalf of our client we advocate to Council the need to prepare and endorse a clear settlement plan for Margate to guide overall growth through spatial plan that is prepared in consultation with the community. Such a document would have significant benefit to the consideration of future directions for Margate when the Regional Land Use Strategy is reviewed.

Should you have any queries relating to the representation, please do not hesitate to contact me on 0409 787715 or emma@erassociates.com.au.

Yours sincerely,

Emma Riley, MPiA
Director & Principal Planner

p3

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The process now is that Kingborough Council will prepare all of the LPS documentation – and this is planned to be completed by about February/March 2018. It is to be then endorsed by Council and submitted to the Tasmanian Planning Commission. The Commission approves that it is suitable for public exhibition and then there is a 6 week exhibition period. Council compiles and reports on all submissions received and then provides this information to the Commission. The Commission then conducts public hearings into the proposed new planning scheme, prepares its report and provides this to the Minister (who gives the final approval). We don't know how long this process will take, bearing in mind that the Commission will be conducting the same process for all 29 councils in Tasmania and delays are predicted. I wouldn't expect Kingborough's new scheme to be approved much before the end of 2018.

As part of this LPS process we have started to review all of the existing land zonings within Kingborough. Unfortunately there are some major differences between the zones in the existing Kingborough Interim Planning Scheme 2015 and those that we are required to use in the State Planning Provisions – and so a straight translation is not possible. It is expected that the existing zonings, both within and around Margate, will be quite different.

In your case, it is proposed that the properties on either side of the Channel Highway be included within the Future Urban Zone. This is the first step in a process to rezone the properties for residential purposes. It is not possible to rezone all of the land as residential in the first instance, due to the following:

- The land is outside of the Urban Growth Boundary for Margate, as defined within the Southern Tasmanian Regional Land Use Strategy. Rezoning the land to residential would require a prior amendment to this Strategy as it is a statutory requirement that the planning scheme is consistent with it.
- A decision will need to be made on how the land is to be zoned within the title boundaries. For example, a choice will be made between the General Residential Zone and the Low Density Residential Zone and this will be determined by a number of on-site and surrounding factors, including the likely rezoning of some of the existing Low Density Residential areas within Margate itself and the desirability in retaining this zone on the outer fringes of Margate.
- Other factors will influence how the land is rezoned, such as the proximity of the adjoining industrial zoned land (noting the potential for future land uses to adversely impact on surrounding properties) and the internal physical features (eg the watercourse within the property). Public open space will need to be provided for such a large land subdivision and this will need to be appropriately located and zoned.
- Therefore the actual zoning boundaries may only be known after the subdivision design has been determined – possibly as part of a combined application for a rezoning and subdivision of land that has been previously zoned as Future Urban and is within Margate's designated Urban Growth Boundary.
- There may be other development constraints. For example the Department of State Growth has previously indicated some concerns about the impact of additional traffic being generated on the Channel Highway from new residential subdivisions at Margate and the need for such developments to upgrade the highway road junctions. There will also be TasWater servicing requirements to be met.



As indicated above, if Council is able to rezone this property as Urban Growth as part of the new scheme, this is only the first step in what then needs to be followed by more detailed investigations into how the land should be best developed. This is the responsibility of the landowner as developer and you would need to obtain expert advice in regard to both meeting the statutory approval processes and in the more detailed site investigations into the capability of the land for the proposed development and the ultimate design of that development.

The process to obtain all of the necessary approvals that enable your land to be zoned for a residential purpose is complex. The prospective development of this 13ha property on the eastern side of the Channel Highway constitutes a strategic land use decision that must be considered within the context of Margate as a whole. It should also be considered in relation to how other surrounding lands might be developed in the future, including your other properties on the western side of the highway (which may also be zoned as Urban Growth).

Council can only go so far in this regard. Strategic planning for Margate will be conducted as part of the preparation of the LPS – primarily by way of an updated version of the Kingborough Land Use Strategy and the structure plan for Margate contained therein. At this stage it is our intention to rezone the land to Urban Growth, but I must stress that this still does require the completion of the LPS and associated Land Use Strategy over the next few months.

Council's facilitated rezoning of your land would not be completed before the end of 2018, after which you would need to complete the abovementioned investigations and make an application for a further rezoning of the land – though you may choose to commence those detailed investigations well before then. It might be helpful to relate your prospective rezoning and development to other similar recent subdivisions in Kingborough – such as those that are currently occurring at Spring Farm and Whitewater Farm, on the southern edge of Kingston.

While I am sure you will obtain your own independent advice on the future development of your land, Council officers (either planning staff or myself) are quite happy to further discuss or clarify the information contained within this letter.

Yours sincerely,

TONY FERRIER
DEPUTY GENERAL MANAGER



Gray Planning

Solutions for Town Planning & Heritage



Danielle Gray, Principal Consultant
Gray Planning
224 Warwick Street
West Hobart TAS 7000

18 December 2019

Mr T Ferrier
Deputy General Manager
Kingborough Council
15 Channel Highway
KINGSTON TAS 7050

Dear Tony,

I refer to previous correspondence from our office to you dated 30 November 2019 that followed on from a meeting with Dianne Cowen of our office and Andrew Meredith on 26 October 2018 regarding future zoning and development of land at Margate.

As you are aware, Gray Planning is engaged to act on behalf of Mr Andrew Meredith and Mr Robin Meredith to manage enquiries they have in relation to land they own at Margate (1830 and 1832 Channel Highway Margate).

Background

As you are aware, to date we have made enquiries with the Department of State Growth and TasWater in relation to future development of the land on the corner of Gemalla Road and Channel Highway, Margate in terms of servicing and access.

As previously advised to Council, the Department of State Growth has indicated to Gray Planning that they would not be supportive of a direct access onto Channel Highway, regardless of compliance with other applicable Planning Scheme standards at the time of an application submitted to Council for development of the land owned by the Merediths. Therefore, any future access will need to be considered via Gemalla or Bundalla Road by the developer onto a Council maintained road for lots located to the east of Channel Highway and access from Englefield Drive for lots located to the west of Channel Highway.

I make reference to the *Kingborough Land Use Strategy* dated May 2019 and note that the Council has initially mapped some of the Meredith land to be Future Urban zone.

I also note that Council has confirmed that the previous limitations of servicing that has impeded further expansion of Margate have now been resolved with sewerage servicing for Margate now connected to the Blackmans Bay Treatment Plant (section 5.5.2.2, page 176).



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Proposed zoning of titles that comprise 1830 Channel Highway, Margate

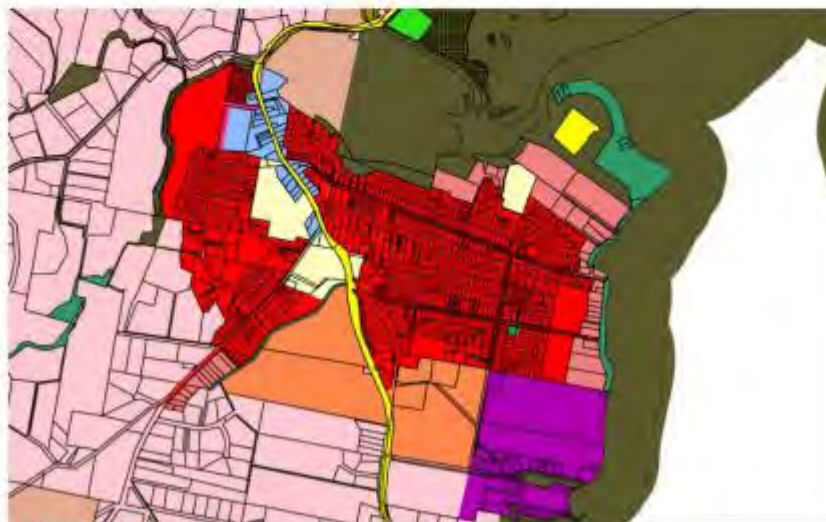
I also make reference to the proposed zoning of Margate in the Strategy:



Extent of land zoned as Rural Resource that could in future be zoned as Future Urban – this would include both sides of the Channel Highway.

5.5.4.3 Proposed Zoning

The proposed zoning for Margate is as shown on the map below:



PROPOSED ZONING - Margate



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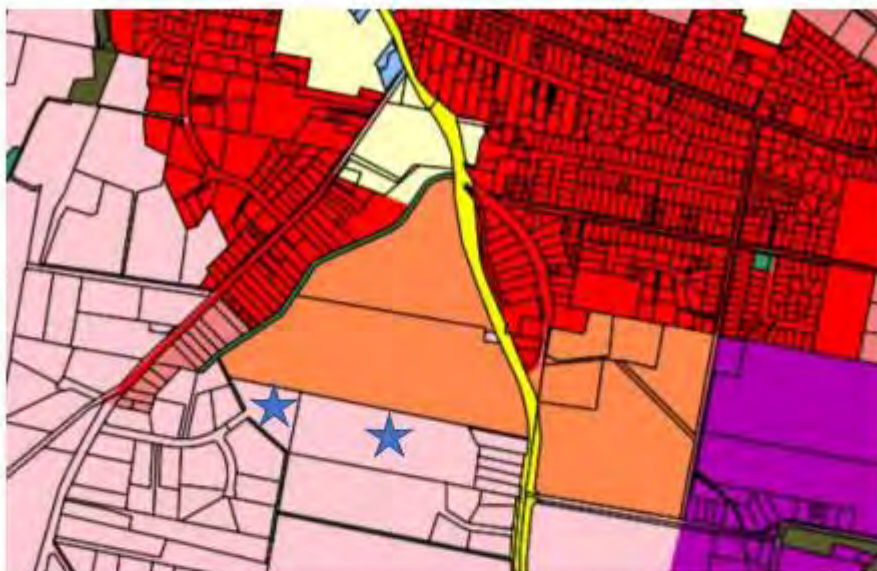
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I note the above two titles (CT- 111837/1 and CT- 166524/1 marked above with a blue star) have been proposed to be zoned as Rural Living and not Future Urban.

There is considerable concern that these two properties are not also proposed to be zoned Future Urban, particularly the triangular shaped parcel of land that has frontage onto Englefield Drive. This particular lot (CT-111837/1) is essential to be considered as part of any future development of lots to its immediate north (CT-116263 and CT-126607/1) in terms of access.

Department of State Growth advice of no further accesses or junctions onto Channel Highway and CT-111837/1 as sole access for further development of land owned by the Meredith family

As you are aware, the Department of State Growth have given consistent advice that they do not support any further accesses onto Channel Highway. Given the nature of Channel Highway, existing accesses and junctions in this area, this advice from State Growth is not surprising or unreasonable.

Therefore, any development of CT-116263 and CT-126607/1 will solely rely on access to Englefield Drive via CT-111837/1. On this basis, in and of itself, CT-111837/1 must also be zoned to Future Urban to ensure that neighbouring properties can be accessed and these properties can be developed at all.



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This lot has always been set aside to facilitate future access into the property owned by the Meredith family and a site inspection confirms that the Englefield Road abruptly terminates into an intended future road connection in terms of physical works.

It must be considered by Council that by zoning the land owned by the Meredith's at CT-116263 and CT-126607/1 forces CT-111837/1 to be likewise zoned in order to facilitate any future access and development.

Given that 166524/1 is a property likewise held long term by the Meredith family and is also strategically and favourably located to be included as part of any future development of the expansion of Margate to the south (and could be accessed via Englefield Drive) it is also requested that Council re-examine their proposed zoning of this property to be zoned Future Urban. This will ensure a consolidated and master planned future development of Margate to the south.

Council must also acknowledge that is a clear and consistent pattern since the approval of the 1992 subdivision approval of the Meredith owned land south of Van Morey Road where the strategic importance of the Meredith land in terms of future expansion of Margate has been highlighted by Council.

As a result, the land in question has been held in a Rural Resource zone under the 2015 Interim Planning Scheme. The primary reason given for Council was inadequate servicing for the expansion of Margate. However, as previously noted this issue has now been resolved, paving the way for further residential development in Margate.

Failure to zone the entirety of the Meredith owned land as Future Urban effectively zones crucial individual titles at a lower intensity (Rural Living) than Council has historically acknowledged which also includes the approval of the subdivision in 1992, for which a valid and 'live' permit still exists. The zoning of these crucial titles owned by the Meredith family at rural rather than residential level densities (Rural Living) puts at risk the further development, an a whole entity, the properties held by the Meredith family and further puts these properties at risk of piecemeal development unable to be serviced with an access into the existing road network (avoiding Channel Highway).

It is my view the land held by the Meredith family should be dealt with as a consolidated property to better deal with site constraints, servicing, access and to further ensure optimal use of what is one of the last remaining large future development sites held in long term common ownership in Margate to enable to expansion of the suburb.



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Kingborough Interim Planning Scheme 2015

The Local Area Objective and Desired Future Character Statements (26.1.2 and 23.1.3 as per below) of the 2015 Planning Scheme notes that part of Margate (including the Meredith land) is:

- Earmarked for future residential development; and
- The land is suitable to be more intensively developed; and
- **Future Development should not adversely compromise the longer term potential for a more intensive use; and**
- The land is anticipated to primarily be for residential development.

The proposed zoning of CT- 111837/1 and CT- 166524/1 as Rural Living will result in these properties being developed in a significantly lower intensity than the 2015 Planning Scheme had desired, noting that this Planning Scheme recognised that particular properties and areas of Margate are well suited to more intensive residential development.

Kingborough Land Use Strategy 2013

The 2013 Kingborough Land Use Strategy recognised that the land owned by the Meredith family provided a future residential expansion opportunity and specifically stated that the land *'should not be alienated by a low density residential development' and that 'if it was zoned as low density residential or rural residential then an inefficient subdivision pattern would occur that would preclude any further intensification'.*

Furthermore, *'the longer term residential expansion opportunity here is on the current Meredith properties immediately south of Margate. The land (both sides of the Channel Highway) should not be alienated by a low density residential development.'*

'Such holding zones would remain in place until such time as the developer is able to come forward with a more specific development proposal for the subject land. It is likely then that a Sec.43A application would then enable the rezoning and the subdivision proposal (a detailed precinct plan) to be approved concurrently. This provides a higher level of certainty in regard to the new General Residential zone boundaries.'

'Some properties immediately to the south of Margate are zoned Rural Resource and this reflects the existing farming activities that are conducted on these larger parcels. In the longer term it is likely that this land will be developed for serviced residential subdivisions and be the next major expansion area for Margate. The Rural Resource Zone in this case is effectively a holding zone. If it was zoned Low Density Residential or Rural Residential, then



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an inefficient subdivision pattern would occur that would preclude any future intensification.'

1992 Subdivision of the Meredith land

Historically when the development of Englefield Drive was approved in 1992, this approval was then formally adopted in the *Kingborough Planning Scheme 2000* as an 'Alternative Solution' and specifically noted as part of Planning Scheme ordinance (see (d) below).

A number of proposed lots and internal road networks were outlined on both CT- 111837/1 and CT- 166524/1 which are now proposed to be rezoned to a significantly lower density under the proposed Rural Living zone. This citation of the Meredith's currently valid subdivision permit and approved plan as an Alternative Solution in the 2000 Planning Scheme was omitted from the *Kingborough Interim Planning Scheme 2015* despite the Planning Scheme recognising that these titles (and others owned by the Meredith family) were better suited to more intensive residential development in the future than the Acceptable Solution provided.

- (d) in the case of subdivision of land located at Englefield Drive, Margate, an application is made for the further staged subdivision of land based on the outline plan of subdivision shown on approval SD 1944, 26/10/1992.



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Other issues

The Meredith land is separated from adjoining western properties by the Tramway walking track and would serve as an obvious transition from Rural Living zoned properties to the west of typically 2 ha developed lots sized to Residential zoned properties to the east which typically comprises currently developed lots at much higher residential densities.

It is further considered that the southern border of CT- 111837/1 and CT- 166524/1 also line up with the southern boundary of the Future Urban Growth zone of the property at Gemalla Road and residential sized developed lots on the western side of Channel Highway.

As identified in Council's previous Planning Schemes and recent Land Use Strategies, development of this Meredith land is needed to facilitate the expansion of the Margate township to the south and it is considered poor strategic planning to adopt a piecemeal and adhoc approach to developing land held in common ownership and with site conditions ideal for higher residential densities in the absence of site constraints such as gradient, servicing, priority vegetation or attenuation from any adjoining incompatible land use.

The Meredith family have owned their titles for in excess of 50 years as a consolidated property comprising multiple large titles and it is their view, as well as mine, that Council should recognise the importance of applying zones appropriate to facilitate strategic planning objectives for Margate for the longer term development of property in a holistic approach.

Summary

It is considered an undisputable fact that zoning CT-116263 and CT-126607/1 as Future Urban must also automatically result in CT-111837/1 being likewise zoned Future Urban in order that these northern lots have physical access that avoids Channel Highway.

It is requested that Council look at the planned future zoning of CT-111837/1 as a matter of urgency, given this particular lot's importance in providing the sole means of physical access into any future development CT-116263 and CT-126607/1.

It is also considered that Council reconsider the zoning of CT- 111837/1 and CT- 166524/1 to Rural Living as this constitutes a loss of development potential currently available to the owners and will also significantly jeopardise the development of their northern properties CT-116263 and CT-126607/1.

It would be appreciated if Council could respond in writing and advise how they intend to address the concerns outlined in this letter.

If you also wish to discuss the contents of this letter, please do not hesitate to contact the undersigned on 0439 342 696.



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Yours faithfully

Danielle Gray B.Env.Des. MTP. MPIA
Principal Consultant, Gray Planning



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19 December 2019

Our Ref: 5773731, 17.228

Ms Danielle Gray
Gray Planning
224 Warwick Street
WEST HOBART TAS 7000

Dear Danielle

MEREDITH PROPERTY MARGATE

I refer to your letter of 18 December 2019 in regard to the future zoning and development of land at 1830 & 1832 Channel Highway Margate.

Council endorsed the draft Kingborough Local Provisions Schedule at its meeting on 9 December 2019 and this was subsequently provided to the Tasmanian Planning Commission in accordance with Sec. 35(1) of the *Land Use Planning and Approvals Act 1993*. The Commission is currently reviewing the draft LPS.

In regard to the Department of State Growth's position on access from the Channel Highway, it is acknowledged that you had stated in your previous letter of 30 November 2018 that access on to the highway would not be supported. At the Commission hearing for the Interim Planning Scheme in 2016, the then position of the General Manager State Roads was that such access may be possible but would need to be fully funded by the developer (the DSG submission sought a developer contribution type scheme for highway upgrades). The complicating factor here is that there may be considerable constraints in the capacity of Englefield Drive and Van Morey Road (including the existing intersection with the Channel Highway) to accept the additional traffic generated by a major residential development within the Meredith property.

At this stage, it is probably best to leave all options open in regard to how the Meredith property might be developed. Limiting the access to Englefield Drive may severely limit the potential density of future development to the extent that it may have to be similar to that envisaged in the 1992 design shown within your letter. The Englefield Drive option also raises the likelihood of objections from existing residents and the potentially high costs to upgrade existing roads and intersections (possibly in excess of that required for a new Channel Highway access).

Your concerns that two land parcels (CT-111837/1 and CT-166524/1) have not been proposed to be zoned Future Urban is also acknowledged. Your argument has merit, although just because they are in single ownership does not necessarily mean they should be zoned the same. However, if they were all zoned as Future Urban, then the merits or otherwise could be examined when a subsequent planning scheme amendment was assessed. It might also be argued that the other neighbouring properties at 1830-1852 Channel Highway could also be included within the Future Urban Zone as well.

kingborough.tas.gov.au

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Unfortunately, Council cannot make any such change to the draft LPS now that it has been formally endorsed in its current form and submitted to the Commission. This is of course just the beginning of the statutory process and you could make a submission on behalf of your client that such changes be made to the proposed Future Urban Zone when the LPS is publicly advertised. Consideration will also need to be given to the Planning Policy Unit's requirements for amending the existing Urban Growth Boundary as defined within the Southern Tasmanian Regional Land Use Strategy (Information Sheet RLUS 1).

You mention in your letter that a "valid and 'live' permit still exists" for a subdivision of the Meredith property as approved in 1992. I have not been able to find a copy of this permit within Council's records (without yet applying to Archives). As you state, the Kingborough Planning Scheme 2000 did include at 8.4.2.1 an Alternative Solution that "Council may approve a subdivision" as shown in accordance with the concept design shown as part of the Englefield Drive subdivision plan (and as included in your letter). Council's file indicates that this concept design was requested to demonstrate how the adjoining land might be developed beyond Englefield Drive. This helped in the assessment of the Englefield Drive subdivision but was not an actual approval of the rural residential subdivision within the Meredith property.

This is how I have interpreted the situation based on what I have been able to find within Council's files and how the 2000 planning scheme was worded. Please let me know if there is information that is contrary to this.

I understand that your client would like to see all of his land be zoned as General Residential (on both sides of the Channel Highway) and be developed to its maximum potential under that zone. The surrounding road infrastructure may not be able to support that level of development. The 1992 conceptual subdivision is for a large lot subdivision similar to that within Englefield Drive. This would be an inefficient use of land that is relatively close to the centre of Margate. The ultimate solution may need to be somewhere in between and this is implied within the Kingborough Land Use Strategy (May 2019). The final zoning mix may include General Residential and Low Density zones (plus Recreation and/or Open Space as appropriate). An open mind should be kept in this regard and the necessary studies will need to be done to determine what is possible.

The draft LPS and the Kingborough Land Use Strategy recognise that the Meredith properties south of Margate are potentially very important for the future growth of this town. They are the only large parcels of land that are most suitable for future residential development. It is still to be determined what form this should take and it may help your client if some preliminary studies were done in this regard and which could then support any submissions to the draft LPS and a review of the Urban Growth Boundary.

In conclusion, your request to include CT-111837/1 and CT-166524/1 within the proposed Future Urban zone cannot be done straight away but such a submission, if made within the statutory exhibition period, will certainly be considered. It does seem quite reasonable in itself but as outlined herein there are a number of strategic issues that will need to be taken into account as the LPS process progresses further.

Yours sincerely

TONY FERRIER
DEPUTY GENERAL MANAGER



20 February 2025
State Planning Office
GPO Box 536
Hobart TAS 7001

Dear Sir or Madam,

RE: STRLUS Urban Growth Boundary Updates – Sorell Area 3, Arthur Highway Sorell

The Sorell East Landowners Group supports the inclusion of Area 3, Arthur Highway Sorell within the Urban Growth Boundary of the Southern Regional Land Use Strategy. The inclusion of this land is supported by the strategic planning work undertaken by the Sorell Council and is consistent with the themes of the Southern Tasmanian Regional Land Use Strategy State of Play Report.

Southern Tasmanian Regional Land Use Review

The STRLUS State of Play Report identifies the importance of satellite village settlements in the context of the Southern Region.

Sorell is the service center of the East. It plays an important role in providing goods and services to the primary production and tourism industries that drive the Eastern economy.

This land will assist in developing critical mass to the regional settlement area and enable increased self-sufficiency to the township. The expansion will allow Sorell to remain and improve economic sustainability.

In 2017 Sorell Council began work on a land supply strategy with a 20-year timeframe. The Land Supply Strategy 2019 Update Stage 3. The Master Plan, 2019 provides light industrial land for builders and contractors to have locally based business, and a school to provide further educational options and additional residential development of varying typology.

Sorell has grown significantly in recent years and a significant proportion of residents commute to Hobart suburbs for employment and education.

A new greenfield development precinct in an outlying village and satellite such as Sorell provides the following benefits:

- i) Regional employment nodes that continue to provide growth in employment opportunities within their own municipal boundaries;
- ii) Fully serviced village with supermarkets, medical centres, pharmacies, child care, schools, retail shops, legal, financial and other professional services making travel into Hobart CBD mostly unnecessary;
- iii) Proportionally more young families that consistently deliver natural population growth without reliance on immigration;

- iv) Young families having require a backyard that is often lacking with infill development;
- v) Close to Cambridge Homemaker Centre (5 minute drive from Sorell) and Hobart CBD (15 min drive from Sorell) to provide alternative employment opportunities and easy access to hospitals, university, concerts, events, city retail and more specialised shops and services if desired.
- vi) Sorell Causeway is already planned for construction at a cost of up to \$270+ million so it makes sense to take advantage of this connection;
- vii) Accommodating social and affordable housing and NDIS dwellings for local and immigrant couples, families, professionals and retirees.

Prior review of Sorell East Development Strategy

Based on their own strategic planning, Sorell Council included this area in their local provisions schedule in 2021, however the Tasmanian Planning Commission took the highly unusual step of recommending to the Planning Authority to include a Specific Area Plan to safeguard the future potential development of the site - Sorell Local Provisions Schedule approval [2022] TASPComm 38 (25 October 2022).

Greater Hobart Plan

It is important to note that the Greater Hobart Plan applies to land only within the Local Government Areas of Clarence, Glenorchy, Hobart and Kingborough and therefore should not be a consideration when planning for areas outside of the tightly defined Hobart 'metro' area. The Greater Hobart Plan is not considered a relevant document in terms of the Land Use Planning and Approvals Act. Accordingly the Minister should place little weight on it.

It is also important to be aware that the Southern Tasmanian Regional Land Use Strategy includes the Local Government Areas of Brighton and Sorell in the definition of Greater Hobart. The towns of Brighton and Sorell are important service centers and employment nodes for the surrounding areas and should be considered part of the Greater Hobart Area.

Put simply the Greater Hobart Act 2019 does not allow the Greater Hobart Plan to plan for areas outside of the four LGA's named in the Act. Respectfully, this plan seems to take a simplistic view that all growth and development should be within the four 'Metro' Councils and none should occur in the rest of the Southern Region. It is not appropriate for this position to be carried through into the STRLUS.

Productivity Commission Report into Australian Housing Construction

This report recommends that more housing urgently needs to be built across Australia.

Arthur Highway Sorell

Key elements of the Master Plan for this area include 11ha of light industrial land, an area identified for a school and significant open space to protect and provide public access to the Sorell Rivulet and Pittwater foreshore.

We note that the amount of housing the Update estimates as the approximate maximum yield (2951) far exceeds Sorell Council's strategic planning work or the expectations of the Sorell Land Owners Group. The work completed by the Sorell Council indicates that the land would yield approximately 835 dwellings.

Suitability of Sorell East:

- Preliminary planning has been undertaken by Taswater to rationalize the sewer system at Sorell. Taswater are aware of the strategic planning work undertaken by Sorell Council and has engaged with the Sorell East Land Owners group freely.
- The site is large enough to accommodate successful water sensitive design to ensure stormwater is treated before entering Pitt Water.
- The Master Plan prepared by the Sorell Council ensures an orderly road layout, with one access point onto the State Highway. As part of the Arthur Highway upgrade a roundabout has already been constructed providing one point of access to this area, as can be seen in the aerial photo below. This would indicate that the Department of State Growth and the Sorell Council come to an agreement that substantial access was required to provide access to the subject area.



Figure 1: Partial aerial photo of the site showing roundabout

- The area is not prime agricultural land. It has been field checked as Class 4 and is not considered significant in terms of local or regional agricultural use.
- The site is not within an irrigation district proclaimed by the Water Management Act 1999.
- There are no observations of threatened flora or fauna on the site.
- There are no areas mapped as prone to landslip.
- Drainage lines are mapped as flood prone areas. The Master Plan 2019 recognizes these areas and provides for open space to allow the drainage lines to remain in their natural form.
- A small area within the title of 3 Kidbrook Road is identified as Coastal erosion investigation area which is largely contained in the public open space in the Master Plan. Similarly, areas identified as future coastal refugia area is within the public open space.



Figure 2: Master Plan 2019

The extension of the Urban Growth Boundary to include Sorell Area 3, Arthur Highway is logical and prudent. The future development of this area is supported by the Sorrel Council as evident in the strategic planning work they have undertaken. The Sorell East Land owners Group supports the extension of the Urban Growth Boundary and can work together to achieve orderly and sustainable development of the area.

Yours faithfully

Dean Cocker
The JAC Group

Chris Ryan
Archdiocese of Hobart

Frank Morgan
Julfran Pty Ltd

Lestey Robert Gould
3 Kidbrook Rd

Representing the Sorell East Landowners Group

Proposed amendment to the Southern Tasmania Regional Land Use Strategy update to the Urban Growth Boundary

Dear Minister Ellis MP Minister for Housing, Planning,

I am writing to advocate for the expansion of the urban growth boundary (UGB) in Lauderdale as part of the Southern Tasmania Regional Land Use Strategy (STRLUS). This proposal aims to address the critical needs of our growing community and ensure sustainable development in the region.

1. Population Growth: Lauderdale's population is steadily increasing, and there is an urgent need to accommodate more residents within the UGB. Expanding the boundary will help prevent urban sprawl, keep the community intact, and support the town's growth trajectory.

2. Economic Development: Expanding the urban growth boundaries and addressing zoning anomalies could certainly be a game-changer for Lauderdale. Creating a commercial hub along South Arm Road could lead to a more vibrant and dynamic community, with increased economic activities and enhanced amenities.

key points in this proposal:

1. **Economic Benefits:** the commercial development will attract businesses, create jobs, and increase local revenue.
2. **Community Impact:** the positive effects on the local community, such as improved services, infrastructure, and quality of life.
3. **Logical Inclusions:** aligning the urban growth boundary with cadastral boundaries and logical inclusions can streamline planning processes and provide clarity for future developments.
4. Leaving the Urban Growth Boundary (UGB) unchanged could indeed stifle Lauderdale's potential for growth and development. Keeping the status quo means that current residents and future generations might miss out on opportunities for enhanced amenities, housing, and economic prospects.
- 5.

3. Efficient Land Use: Adjusting the UGB ensures more efficient use of existing infrastructure and land resources. This will reduce urban sprawl and help preserve green spaces, contributing to a sustainable and environmentally friendly development pattern.

4. Improved Services and Amenities: Expanding the UGB allows for better planning and provision of essential services and amenities, such as schools, healthcare, and recreational facilities. This will improve the quality of life for Lauderdale residents and make the town an even more attractive place to live.

5. Sustainable Development: Encouraging higher density development within the expanded UGB promotes sustainable living practices. This will reduce the carbon footprint and reliance on private transportation, contributing to environmental conservation.

6. Community Well-being: Promoting inclusive and well-planned neighbourhoods will enhance the overall well-being of the community. Expanding the UGB will facilitate the development of vibrant, connected neighbourhoods that foster social interaction and community spirit.

7. Housing Affordability: Without proper adjustment, the current UGB may contribute to a shortage of affordable housing. Expanding the boundary will help address this issue, ensuring that housing remains accessible and affordable for residents.

8. Infrastructure Efficiency: Existing infrastructure may be underutilized or misaligned with the community's needs. Expanding the UGB will optimize the use of infrastructure and reduce inefficiencies, leading to better resource management.

9. Community Representation: Residents may feel ignored or misrepresented if the UGB does not reflect the community's needs and aspirations. Expanding the boundary will ensure that the planning process is inclusive and responsive to community feedback.

10. Compatibility of Land Use: Rural zones are intended for agriculture, low-density housing, and open spaces, while residential zones are meant for higher-density living. Expanding the UGB will prevent conflicts in land use and ensure orderly development.

In conclusion, expanding the urban growth boundary in Lauderdale is essential for accommodating population growth, fostering economic development, and promoting sustainable living practices. It will enhance the quality of life for residents, improve infrastructure efficiency, and ensure that the town's development aligns with the community's needs and aspirations.

I urge the planning authorities to consider this proposal and take the necessary steps to expand the urban growth boundary in Lauderdale.

Clarence Council errors in mapping the Urban Growth Boundary.



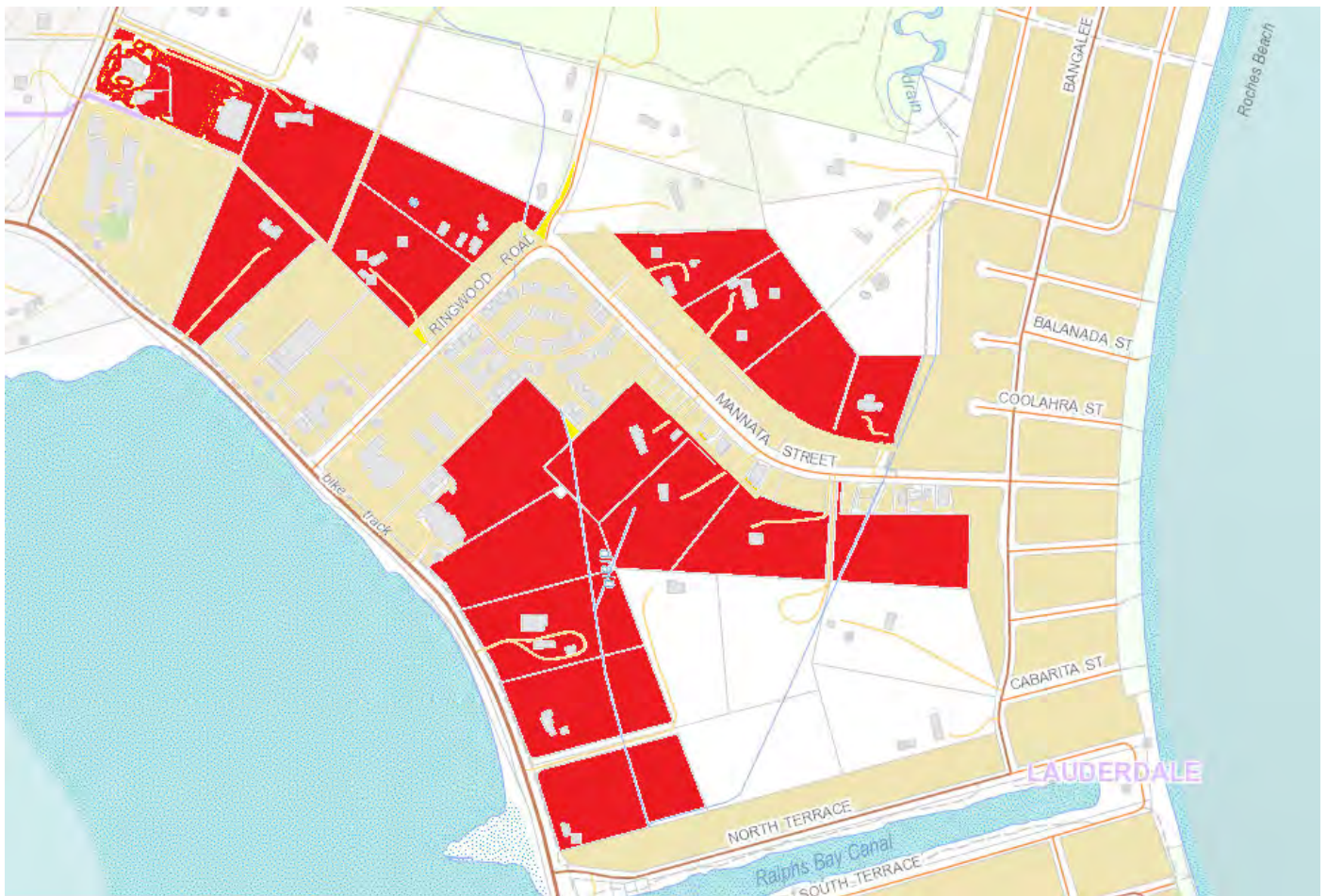
Existing mapping on "TheList" 2025 showing the misalignment of the UGB



Residential/ Rural Living Zone & UGB placed through residents Home. UGB incorrect Location, this should be corrected.



Yellow shading shows the correct placement of the UGB to the Cadastral Boundaries.



RED shading shows the logical inclusions of the UGB along South Arm Road Lauderdale promised by Clarence city Council over many years as well as the identified corrections to the UGB.

The Southern Tasmania Regional Land Use Strategy indeed aims to align the Urban Growth Boundary with established cadastral boundaries.

My proposed updates to the UGB in Lauderdale is part of a broader effort to provide more land for residential development.

- The Yellow shading mentioned above represents the correct placement of the UGB to the cadastral boundaries, ensuring compliance with the strategy.
- The Red shading indicates logical inclusions along South Arm Road, which have been promised by the Clarence City Council over many years.

By advocating for the UGB adjustment, I am pushing for progress that could bring significant benefits to the community. Expanding the boundary to include Central Lauderdale and align with logical inclusions makes sense, both strategically and practically. This would not only address the housing needs but also ensure the sustainable and balanced growth of the area.

Sincerely

Michael Figg



12 March 2025

State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

To whom it may concern,

RE: SUBMISSION TO THE SOUTHERN TASMANIAN REGIONAL LAND USE STRATEGY URBAN GROWTH BOUNDARY UPDATE 2025

1. Introduction

This submission is in response to the Southern Tasmanian Regional Land Use Strategy (STRLUS) Urban Growth Boundary (UGB) Update 2025 consultation. We respectfully request that the subject land located at Arthur Highway, Sorell (Folio of the Register 251707/1) be included within the updated UGB to facilitate residential development and critical social infrastructure.

This request is made on behalf of the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart (**Archdiocese**) and aligns with the objectives of STRLUS, the Tasmanian Planning Scheme, and the Land Use Planning and Approvals Act 1993. Our proposal demonstrates that the subject site is well-placed to accommodate projected population growth, enhance community infrastructure, and support sustainable land-use planning principles.

We provide an analysis of how this land can contribute to the region's housing supply, economic growth, and community well-being while ensuring sustainable development.

2. Strategic Justification for Inclusion

2.1 Demand for Residential Land and Community Growth

Sorell has experienced rapid and sustained population growth over the past decade, reinforcing its designation as a major satellite town under STRLUS. Given its strategic importance, sufficient land must be made available to accommodate this growth in a planned and sustainable manner.

Key considerations include:

- **Projected Housing Demand:** With Tasmania experiencing increasing housing pressures, the residential land supply must keep pace with demand. The proposed site will contribute meaningfully to this need.
- **Balanced Growth:** By strategically expanding the UGB, Sorell can balance greenfield development and infill housing, ensuring diverse and inclusive housing options.
- **Economic Stimulus:** Including this land will stimulate investment, create employment opportunities, and support local businesses.
- **Employment Creation:** The development will generate construction jobs, ongoing retail and service employment, and opportunities in the education and healthcare sectors.
- **Increased Local Spending:** With more residents moving into the area, there will be a natural increase in consumer spending in Sorell, supporting existing and new businesses.

Expanding the UGB in this location will ensure a supply of developable land for future housing and community infrastructure while upholding regional planning principles.

2.2 Infrastructure and Accessibility

One of the key considerations in expanding the UGB is the capacity of existing infrastructure to accommodate growth. The proposed site meets all major infrastructure and accessibility criteria:

- **Transport Networks:** The site is directly accessible from the Arthur Highway and has benefited from the Sorell Bypass, ensuring efficient vehicular movement and traffic flow.
- **Public Transport:** Sorell has an existing bus service connecting it to Greater Hobart, supporting the region's goal of promoting alternative transport modes and reducing car dependency.
- **Utilities and Services:** Existing water, sewer, and stormwater infrastructure is either available or can be readily extended to service the proposed development.
- **Social and Community Infrastructure:** The proposed development area includes provisions for a new K-12 school, a church, and commercial facilities, ensuring the community has access to essential services and social infrastructure. The responsibility to provide educational facilities to a growing community should not always lie with the government. A diverse community requires a range of academic options, and families currently choosing the Catholic/ Private Education system for their children need to send them to Richmond or Howrah.
- **Infrastructure Contributions:** Development of this site will contribute to infrastructure improvements, ensuring that any additional strain is mitigated through strategic investment in roads, utilities, and public services.

These factors align with STRLUS Policy SRD 2, which supports urban expansion in areas with appropriate infrastructure and service capacity.

2.3 Environmental and Sustainability Considerations

The proposal incorporates sustainability and environmental best practices to ensure a responsible approach to urban expansion:

- **Energy-Efficient Housing:** The development will incorporate sustainable building designs to reduce energy consumption and promote renewable energy use.
- **Water-Sensitive Urban Design:** Stormwater management strategies, such as retention basins and green infrastructure, will be implemented to mitigate runoff and protect local waterways.
- **Climate Resilience:** The proposal ensures adequate bushfire risks and flood mitigation planning, aligning with contemporary urban resilience strategies.
- **Green Space Integration:** Including parks, tree-lined streets, and recreational areas will enhance the environmental quality and liveability of the development.

2.4 Suitability of the Land for Development

The subject site is highly suitable for urban expansion based on the following factors:

- **Land Capability:** The land is predominantly classified as Class 4 and 5, indicating limited agricultural potential. Rezoning it for residential use will not compromise Tasmania's agricultural resources.
- **Environmental Considerations:** The site is free from major ecological constraints such as significant flora, fauna, or landscape protections. Environmental management plans can be implemented to mitigate any potential impacts.
- **Logical Urban Expansion:** The site is adjacent to existing urban development, making it a logical and contiguous extension of the urban growth boundary. This prevents fragmented development and ensures efficient land use.

2.5 Avoidance of Land Use Conflicts

Integrating this site into the UGB will provide clear advantages in land-use planning and conflict mitigation:

- Establishing a structured transition between urban and rural land uses.
- Preventing ad hoc development which can create infrastructure strain and land-use conflicts.
- Supporting a planned approach to residential expansion, ensuring compatibility with surrounding land uses.

3. Policy Alignment and Consistency with Regional Strategy

3.1 STRLUS Policy SRD 2.12 (Urban Growth Considerations)

Our proposal aligns with SRD 2.12, which allows for the consideration of land outside but adjacent to the UGB when it meets:

- Infrastructure and serviceability standards.
- Long-term residential demand with a logical urban extension.
- Compatibility with environmental and land-use planning principles.

The proposed land addition satisfies all these conditions and supports broader regional planning objectives.

3.2 Housing Affordability and Supply

The inclusion of this site in the UGB will:

- Increase housing supply, addressing Tasmania's growing housing affordability crisis.
- Promote diverse housing options, from affordable homes to mixed-density developments.
- Enhance community cohesion, providing essential services and amenities that reduce reliance on external infrastructure.
- Encourage homeownership opportunities for first-time buyers and low-income families.

4. Conclusion

We strongly advocate for the inclusion of the Arthur Highway land in the Urban Growth Boundary update to:

- Support planned and sustainable urban expansion in Sorell.
- Address critical housing shortages and promote affordable housing initiatives.
- Ensure efficient use of infrastructure, leveraging existing and future transport, utilities, and community services.
- Promote economic development and job creation in the region.
- Enhance environmental sustainability through responsible urban design.

By integrating this land into the UGB, the Tasmanian Planning Office and Sorell Council will support a strategic, well-coordinated approach to growth that aligns with state and regional planning objectives.

We welcome the opportunity for further discussion and collaboration to progress this request.

Yours sincerely

Chris Ryan
Executive Director – Administration and Finance

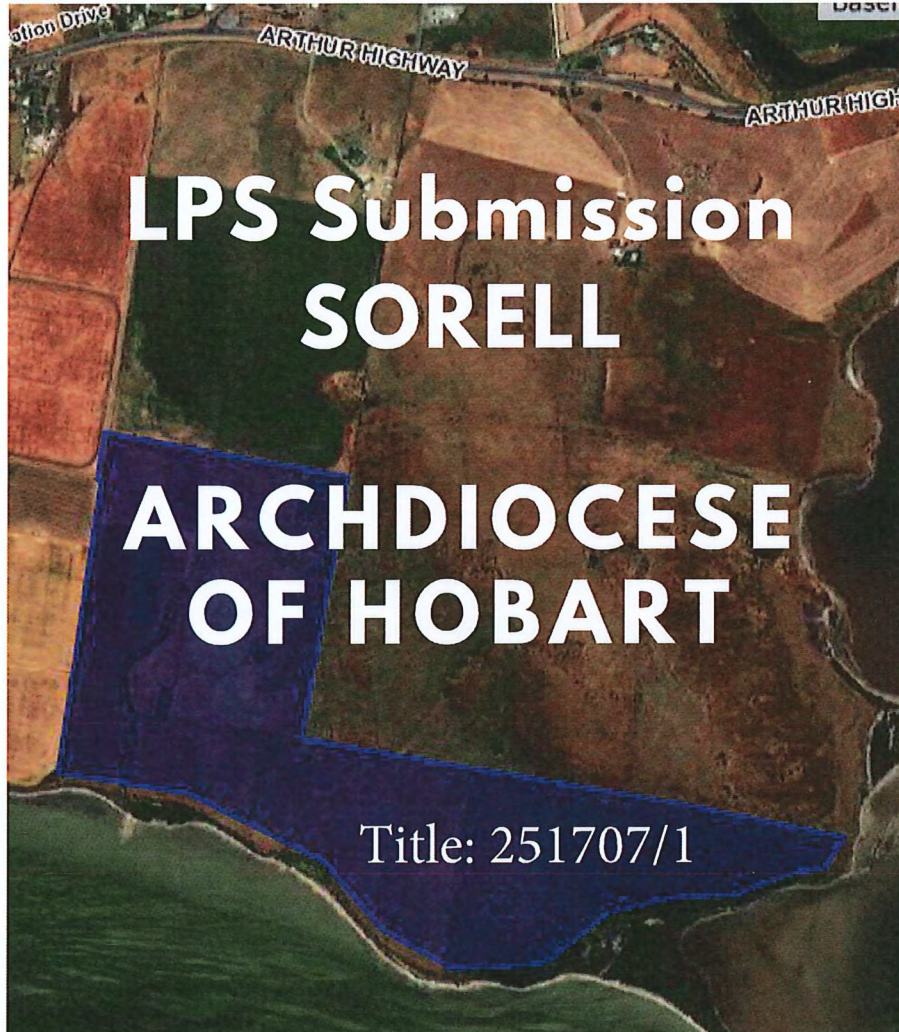


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August 2021
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1. Executive Summary

- 1.1 This submission seeks to propose that Sorell Council (the Council) alter the proposed application of the Agriculture Zone and instead applies either a mix of General Residential / Community Purpose zone or, the Future Urban Zone to the subject land identified by Title Reference 251707/1 and located off of the Arthur Highway in Sorell;
- 1.2 The land is currently zoned Rural Resource and proposed to be changed to the Agriculture zone through the Local Provision Schedule (LPS) process;
- 1.3 Page 84 of the Sorell Local Provisions Schedule identifies the subject land as suitable to be preserved for future residential development and recommends it is rezoned to Future Urban Zone. This aligns with the future use and development proposed for the site by the current owner.
- 1.4 Our client would seek to be able to 'use' and develop the site for *General Residential* and *Community Meeting and Education* purposes.
- 1.5 Given the close proximity to the township of Sorell and its location on the fringe of the Urban Growth Boundary (UGB) contained within the Southern Regional Land use Strategy (SRLUS), the proposal is not only strategically sound and consistent with the SRLUS but urgently required in order to meet the escalating demands for affordable housing and associated educational infrastructure;
- 1.6 The subject land is identified in the Sorell Land Supply Strategy (Stage 3 Masterplans – 2019 update) for future urban zoning, and while supported by the Council, the Tasmanian Planning Commission (TPC) did not support the zoning on review of the draft LPS; and
- 1.7 This submission opens the discussion between the landowner and the Tasmanian Planning Commission (TPC) regarding the altruistic intentions for the land. Participation in the LPS submission process allows the land owner to obtain detailed feedback from the TPC and identify the actions required to facilitate this much-needed land development project.

2 Introduction

- 2.1 The Archdiocese of Hobart (AoH) and its agencies are significant social and affordable housing providers within Tasmania. They currently manage over 2000 properties across the State. They are committed to addressing the urgent need for additional safe, stable and affordable housing by constructing another 400 new properties over the next few years. Their housing services also include rapid rehousing and transitional housing for highly vulnerable people needing urgent accommodation and support while working toward securing longer-term housing.
- 2.2 AoH services extend beyond the provision of the 'bricks and mortar' residential service. They also provide a comprehensive and responsive



tenancy management service and have a strong social commitment to enhancing the wellbeing of their tenants and the communities in which they work. (centacareevolve.com.au 9/8/21)

- 2.3 Being at the forefront of providing essential human services, AoH knows only too well the growing need and urgency for affordable housing. This issue across Tasmania is concentrated in Hobart, exacerbated by unprecedented house price increases resulting in driving rental prices up.
- 2.4 To address this, the AoH has acquired land in Sorell, which they seek to develop by providing additional affordable housing to be managed by Centacare Evolve Housing (CEH).
- 2.5 The intention is also to provide much needed social infrastructure by constructing a new school (Kinder through Year 12) and an associated Church.
- 2.6 Sorell was identified as the preferred location for this proposed project based on rapidly growing community needs, not only for housing but also for Catholic Education. The closest Catholic Education facility is located in Richmond, with classes finishing at Year 6.
- 2.7 There is currently no appropriately zoned land within or surrounding the Sorell township that is large enough to facilitate a human need project of this nature.
- 2.8 This submission seeks to demonstrate that the application of the General Residential / Community Purpose Zones, or a particular purpose zone (Future Urban Zone), would align with the strategic work Sorell Council has carried out for the municipal area.



3 Glossary

Term	Definition
Council	Sorell
TPC	Tasmanian Planning Commission
Archdiocese of Hobart	AoH
Guideline	Guideline No. 1 – Local Provisions Schedule Zone and Code Application (Tasmanian Planning Commission, 2018)
LPS	Local Provision Schedule
LGA	Local Government Area
The Scheme	Sorell Interim Planning Scheme 2015
TPS	Tasmanian Planning Scheme
UGB	Urban Growth Boundary
SRLUS	Southern Regional Land Use Strategy (2018)n
RSN	Regional Settlement Network
DSC	District Service Centre
CEH	Centacare Evolve Housing
SPP	State Planning Provisions
AZ	Agricultural Zone
RRZ	Rural Resource Zone
SLSS	Sorell Land Supply Strategy
FUZ	Future Urban Zone



4 Background

4.1 Subject Site

The subject site has a gazetted address of Arthur Highway, Sorell and is currently zoned Rural Resource under the Scheme.

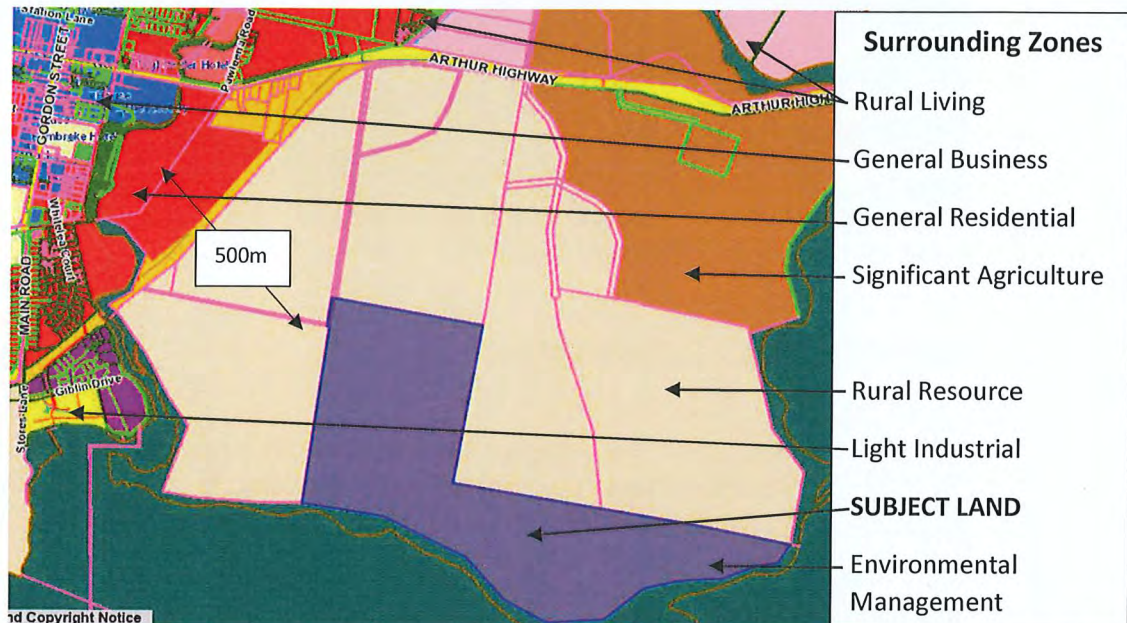


Figure 1: Zone map of subject land (highlighted in blue) and surrounds. Listmap 9/8/21

The title, 251707/1, is an irregular shaped parcel of land measuring approximately 63 ha, with over 1.8km of frontage to Pitt Water. Access to the site is provided by two rights of way (Row) from the Arthur Highway.

The immediate surrounding pattern of zoning and land use is rural with land to the north and west of the subject site used for feed cropping and land to the east/northeast previously used for grazing.

The land capability of the subject site is Class 5 (*unsuited to cropping with slight to moderate limitations for grazing*) and Class 4 (*land suited for grazing but limited to occasional cropping with a very restricted range of crops*). Land Capability layer – Listmap

The subject land is located within a 1km distance to the township of Sorell and approximately 500m to the closest General Residential zoned land.

Close proximity to one of the fastest-growing municipalities in Tasmania coupled with the restrictive nature of the soil type and capability places increasing land restrictions and potential for farming.

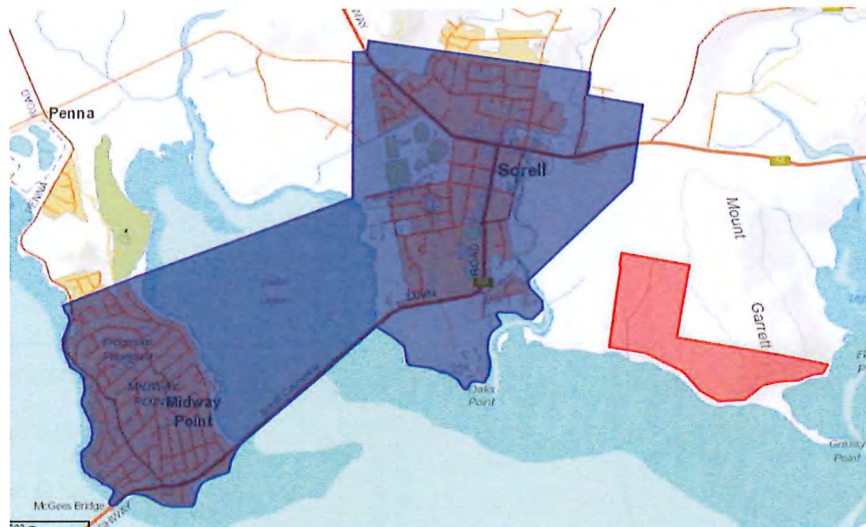


Figure 2: Site Plan – Extracted ListMap 9/8/21 – Subject site shown in red. Proximity to Sorell and Midway Point activity hubs

4.2 The landowners vision for the site

The primary focus for the subject land is to provide affordable housing to address 'housing stress', which is fast becoming a dire situation, particularly in Southern Tasmania. It is also proposed that the site house a Catholic School (kinder – Year 12) and Church facilities.

The landowners are taking a holistic approach to the site and its importance to a municipality, feeling the impact of being one of the fastest-growing Local Government Areas within Tasmania.

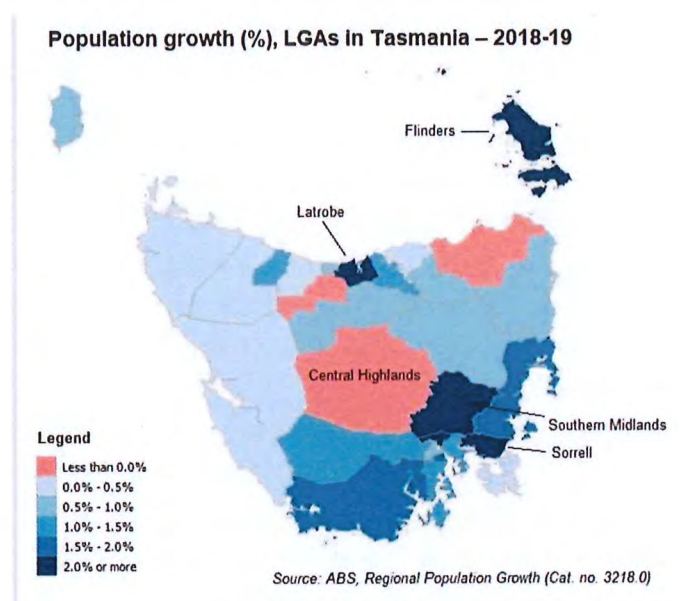


Figure 3: Population Growth (%) – ABS Regional Population Growth



	2017	2042	Population Gain	% change
Brighton	16,960	22,714	5,754	33.9
Sorell	14,771	19,666	4,895	33.1
Latrobe	11,109	13,762	2,653	23.9
Huon Valley	16,870	20,464	3,594	21.3
Hobart	52,785	63,280	10,495	19.9
Kingborough	37,133	44,175	7,042	19.0
Clarence	56,148	66,245	10,097	18.0
Glenorchy	47,214	55,636	8,422	17.8
West Tamar	23,530	26,882	3,352	14.2
Launceston	66,802	70,084	3,282	4.9
Northern Midlands	13,084	13,525	441	3.4
Derwent Valley	10,170	10,465	295	2.9
Flinders	957	978	21	2.2
Devonport	25,212	25,351	139	0.5

Table 2: Local Government Areas projected to grow to 2042, largest to smallest gain (%)

Source: Tasmanian Department of Treasury and Finance, Population Projections, 2019

Figure 4: Local Government Area projected growth – Dept. Treasury Population Projections 2019

The figures above are likely already outdated as we observe unprecedented population growth occurring in Tasmania in the wake of Covid-19. Traditionally the population growth in Tasmania was driven by immigration from overseas but a desire by those living in mainland Australia to relocate for lifestyle reasons has seen intercountry migration numbers far exceed those projected in 2019.

This migration pattern has also had the effect of driving up housing prices and associated rents, leading to increasing housing stress and homelessness, with wait lists for affordable and social housing at an all-time high.

4.3 The strategic Importance of the site for the managed growth of Sorell

The subject land appears in several of Councils strategic planning documents. Most importantly and relevant to this submission is the Sorell Land Supply Strategy Stage 2 and Stage 3.

The land, identified as R9 / R10, has been earmarked for:

R9: Rezoning to General Residential/ Future Urban; and

R10: Rezone Future Urban in Long Term



HERITAGE HOMES/STEADS TO BE RETAINED WITHIN PRIVATE OWNERSHIP

HIGHER ORDER ROAD NETWORK ALIGNMENTS SHOULD CAPTURE SIGHTLINES TO KEY BUILDINGS & LANDSCAPE VALUES TO ASSIST WITH WAYFINDING

PROVISION OF AN OPEN SPACE CORRIDOR ALONG THE WORKS FOOTPRINT TO ENCOURAGE DEVELOPMENT FROM ADJACENT AREAS, CORRIDOR TO BECOME A PUBLIC OPEN SPACE ASSET INCORPORATING A SHARED TRAIL

FUTURE DEVELOPMENT TO PROVIDE A PRIVATE ROAD TO OPEN SPACE CORRIDOR TO IMPROVE PRIVATE SURVEILLANCE

LOCAL ROAD NETWORK TO PROVIDE A GRID LIKE STREET PATTERN TO IMPROVE LEGIBILITY, THE USE OF SIGHTMENT BOXES SHOULD BE DISCOURAGED

A VISUAL LANDSCAPE ASSESSMENT MUST BE UNDERTAKEN TO CONFIRM THAT ANY FUTURE DEVELOPMENT WILL NOT ADVERSELY IMPACT THE LANDSCAPE CHARACTER OF THE AREA

LEGEND

- INVESTIGATION AREA
- RANGE OF RESIDENTIAL AREA (BY ZONE)
- CONVENTIONAL RESIDENTIAL AREA (BY ZONE)
- INCREASED DENSITY RESIDENTIAL AREA (BY ZONE)
- LOCAL PATH
- LOCAL PUBLIC OPEN SPACE
- POTENTIAL FUTURE URBAN AREA
- LAND SLIP AREA
- POTENTIAL FUTURE PRECINCT
- BRIDGE ACQUISITION
- HERITAGE BUILDING
- CONVENIENCE RETAIL
- PROPOSED BRIDGE ROAD (HIGHWAY)
- KEY LOCAL ROAD
- SOUND ATTENUATION BARRIER
- SHARED PATH/PUBLIC INFRASTRUCTURE (BRIDGE)
- SERVICING CONSTRAINT (SHADING CONTOURS)

INDICATIVE CONCEPT MASTERPLAN
SORELL - EASTERN CORRIDOR

PATCH.
DESIGN PLAN

Figure 6: Sorell Land Supply Strategy: Indicative Concept Master Plan by Patch Design Plan



This Masterplan plans the extension of Sorell township to the south-east and states that it is the *most suitable for urban development given its proximity to the town centre and presence of fewer constraints compared to other sites.* (page 12 SLSS)

Staging for the implementation of the land supply strategy involving the subject land is shown below. The accompanying notation within the report suggests that the Council should: **Stage 3 – Consider rezoning to General Residential or Future Urban now – If Council wish to provide a 20 rather than 15 year ongoing supply of residential land, this stage will provide approximately 225 lots which will take the supply to just under 20 years (1,265 lots.)** It also provides a school site which may be required within the next few years.

Stage 4 and Potential Future Urban Areas – As these sites provide the only long term growth direction for Sorell, they should be zoned as Future Urban or retained in their Rural Zoning until they are needed for urban growth.

(page 17 – Sorell Land Supply Strategy)

While the strategic approach provided within the SLSS is sound and understandable, there are practicalities for landowners and developers that need to be taken into consideration. Given our client has a single title that is partially contained within the identified Stage 3 and Stage 4, it would be their preference for the whole title to be rezoned simultaneously. This would provide for economies of scale when developing the site and limit land use conflict between the rural-urban transition zone (peri-urban).



Figure 7: Sorell Land Supply Strategy proposed staging relevant to subject land

The SLSS also highlights the need for additional educational facilities and nominates the subject land as the preferred site due to its close location to



the township and access provided by two major roads. The SLSS suggests the land would need to be purchased; however, our client has already identified that it is their goal/ intention to construct a school covering preparatory (Kindergarten) through to senior secondary (year 12)

4.4 Infrastructure Availability

As part of an area identified for residential growth and expansion, Council appears to be substantially progressed on their assessment of the infrastructure needed to facilitate and support the growth in this area. Our client would reasonably contribute to these upgrades (sewer, water, storm water, road network) to service their development.

Significant works are occurring on the Arthur Highway, facilitating the resulting increased road movements to and from the subject land.



Figure 8: Water Serviced Land
Obtained from Listmap 9/8/21

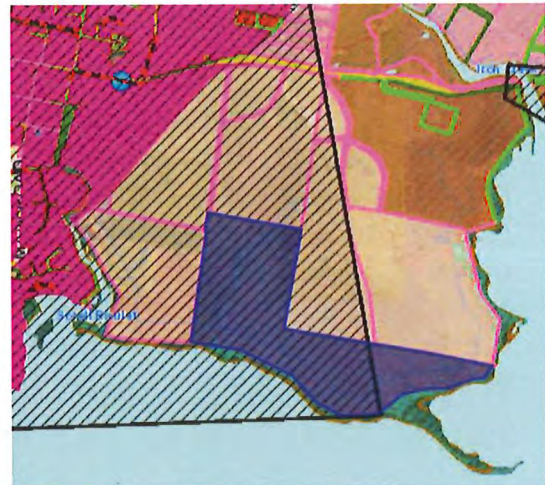


Figure 9: Sewer Serviced Land (capacity)

4.5 Urban Growth Boundary

The Southern Regional Land Use Strategy (SRLUS) is a guidance document for the southern Tasmanian Councils to refer to / comply with when developing and expanding residential growth.

References to the Sorell municipal area indicate that preference has been given to the town of Sorell to be the focus of residential expansion. The Settlement framework classifies Sorell as a 'Major Satellite of Greater Hobart with some greenfield development.'



The SRLUS provides an urban growth boundary (UGB) to control urban growth in a strategic manner. When assessing the subject area against a variety of strategic guidelines, including the UGB, the SLSS highlighted, as a key advantage, that both the land was adjoining (R9) and adjacent to (R10) the existing UGB. (pages 28 & 29)

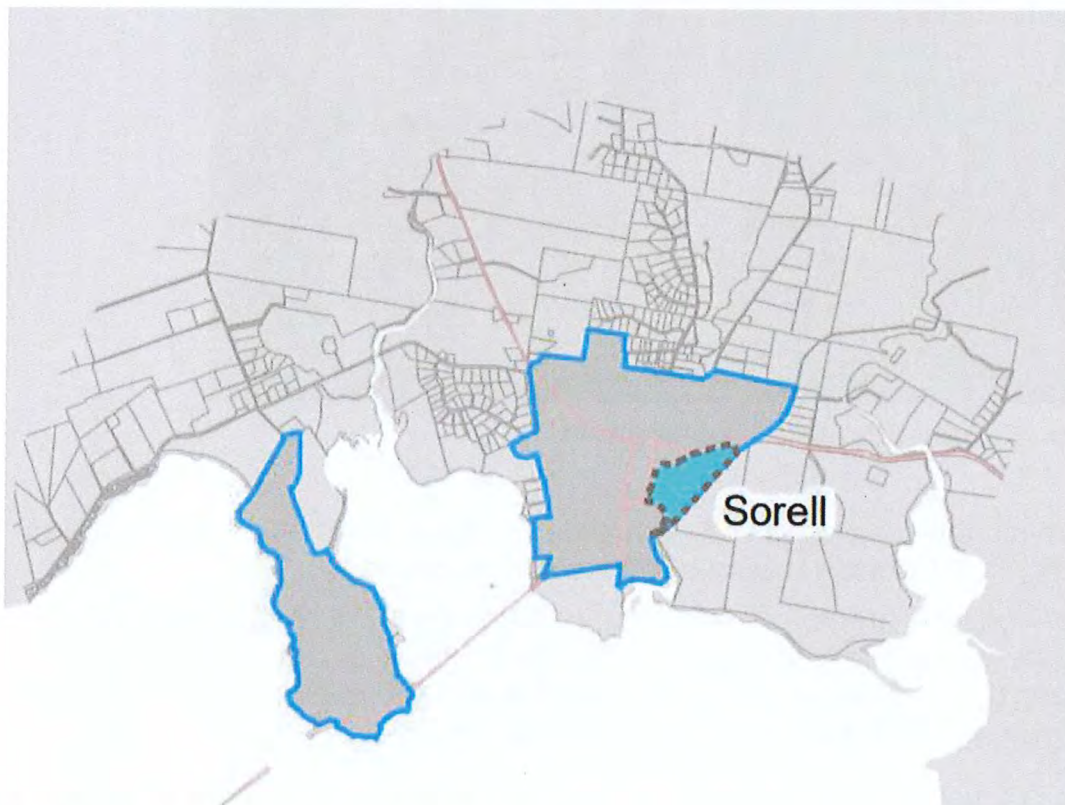


Figure 10: Urban Growth Boundary - SRLUS

4.6 Zoning application: Section 8A guidelines

The TPC produced the Section 8A Guideline No.1 Local Provision Schedule (LPS): zone and code application to assist Councils with applying zones and codes.

The subject land is proposed to be zoned Agriculture, which changes its current Rural Resource zoning. This appears to have occurred due to the application of the list layer '*Land Potentially Suitable for Agriculture Zone*'.

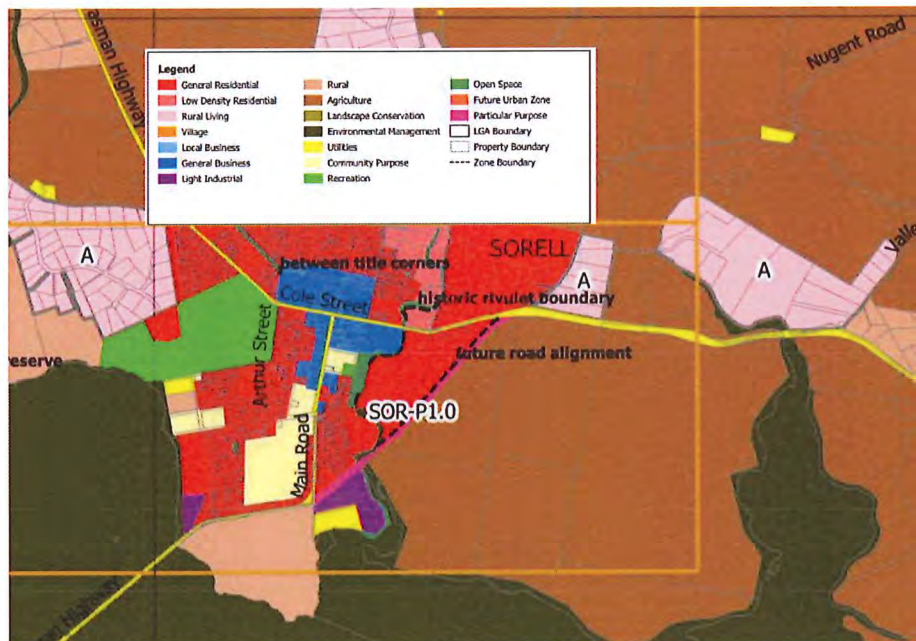


Figure 11 Proposed zoning of the subject land

However, the Zone application guidelines for the Agricultural zone state at **AZ1 (c)** that Councils should also take into account:

(c) any other strategic planning undertaken at a local or regional level consistent with relevant regional land use strategy, or supported by more detailed local strategic analysis consistent with the relevant regional land use strategy and endorsed by the relevant Council.

Sorell Council has undertaken an extensive amount of strategic work through the SLSS stages. The completed and endorsed *Land Supply and Demand Analysis (stage 1)*, *Assessment of Expansion Options (stage 2)* and the *Masterplans (stage 3)*, all identify the subject land to be strategically crucial for the future expansion of the Sorell township. Councils website indicates that the updated strategy is an essential supporting document to the LPS.

Clause **AZ2** states that land within the Significant Agriculture Zone in an interim planning scheme should be included in the Agriculture Zone unless considered for alternate zoning under AZ 6.

Clause **AZ 6** states that:

Land identified in the 'Land Potentially Suitable for Agriculture Zone' layer may be considered for alternate zoning if:

(a) local or regional strategic analysis has identified or justifies the need for an alternate consistent with the relevant regional land use strategy, or supported by more detailed local strategic analysis consistent with the relevant regional land use strategy and endorsed by the relevant Council;

(b) for the identification and protection of a strategically important naturally occurring resource that requires alternate zoning;



(c) for the identification and protection of significant natural values, such as priority vegetation areas as defined in the Natural Assets Code, which requires an alternate zoning, such as the Landscape Conservation Zone or Environmental Management Zone;

(d) for the identification, provision or protection of strategically important uses that require an alternate zone; or

(e) it can be demonstrated that:

(i) the land has limited or no potential for agricultural use and is not integral to the management of a larger farm holding that will be within the Agriculture Zone;

(ii) there are significant constraints to agricultural use occurring on the land; or

(iii) the Agriculture Zone is otherwise not appropriate for the land

It is our position that sub clause's (a), (d) and (e) are relevant to this submission.

(a) As mentioned above, Sorell Council have carried out an extensive body of work in response to unprecedented demand for housing and development within the municipal area. This work is extremely thorough and appears to have considered all possible options for positioning themselves correctly in preparation for current and future growth demands. This work has identified the subject land as being strategically important to facilitating that expansion, not only for housing but for much needed social infrastructure such as a school.

(d) While there are no strategically important uses currently occurring on the subject land, it is proposed that there will be in the near future. Securing a site large enough to construct a School that provides classes from Kindergarten through to Year 12, within walking distance to the town centre in one of the fastest-growing LGA's in Tasmania will become near impossible if the land is not set aside for that purpose now. Furthermore, under the Agriculture zone, resource development is a 'no permit required use' under the zoning, this creates the possibility that new agricultural uses might become established on these sites. Examples include intensive animal husbandry and marine farming shore facilities. The establishment of these types of uses would substantially restrict the residential development that could occur on adjoining properties.

(e) The subject land, and surrounding parcels of land earmarked to be zoned Agriculture, are a mix of Class 4 and Class 5. The agricultural capability for both is, by its own definition, limited

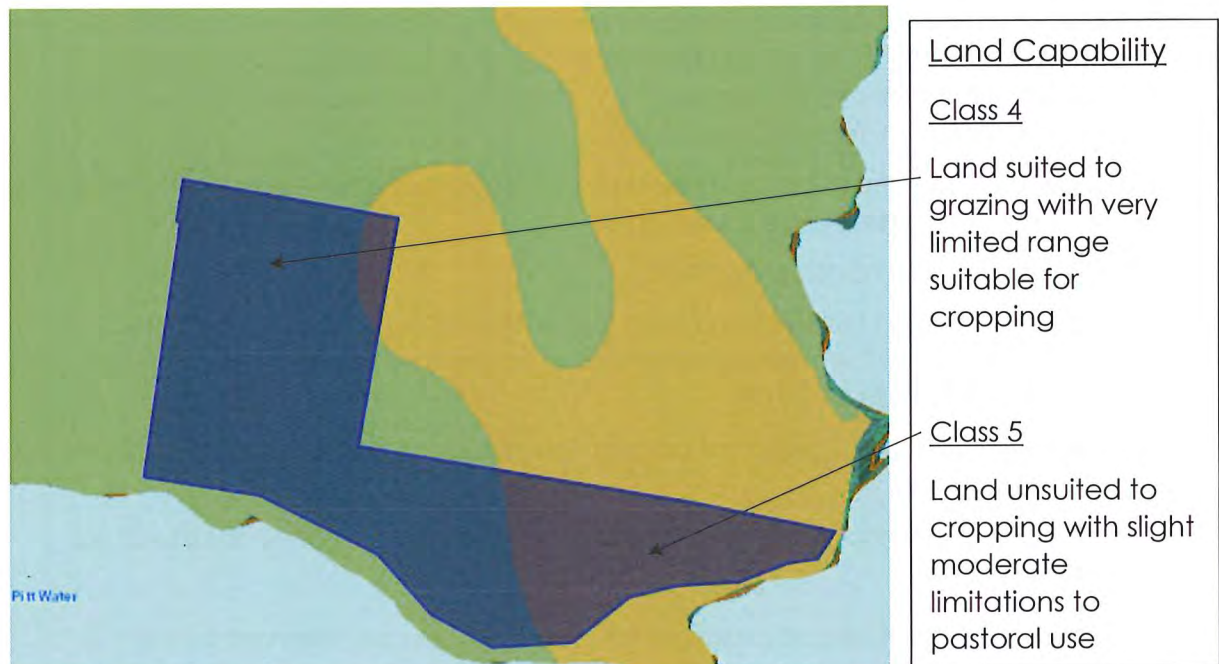


Figure 12: Land Capability of the subject site and surrounding Rural Land

5 Submission Summary

This submission has sought to establish the importance of the subject site for the future growth and necessary expansion of Sorell. Given Council's extensive strategic work, it is difficult to understand why the TPC did not support the land being zoned Future Urban Zone, which would align with and facilitate the Master Plans endorsed through the SLSS. That would secure the future development potential and would not potentially hinder it through using a zone that could facilitate use and development that would likely be incompatible and restrictive.

Would it not be prudent to preserve the area by applying the Future Urban Zone (FUZ)? This would then pave the way for the landowner to carry out any additional/ necessary strategic work and justification to pursue a future rezoning to facilitate the provision of much needed affordable housing and education.

The Section 8A guidelines indicate that the purpose of the FUZ is:

30.1.1 To identify land intended for future urban use and development; and

30.1.2 To ensure that development does not compromise the potential for future urban use and development of land.

30.1.3 To support the planned rezoning of land for urban use and development in sequence with the planned expansion of infrastructure.



Furthermore, the Zone application guidelines state:

FUZ 1: *The Future Urban Zone should be applied to land identified for future urban development to protect the land from use or development that may compromise its future development, consistent with the relevant regional land use strategy, or supported by more detailed local strategic analysis consistent with the relevant regional land use strategy and endorsed by the relevant Council.*

FUZ 2: *The Future Urban Zone should be applied to land within an interim planning scheme Particular Purpose Zone which provides for the identification of future urban land.*

FUZ 3 *The Future Urban Zone may be applied to land identified in an interim planning scheme code or specific area plan overlay which provides for future urban land.*

FUZ 4: *The Future Urban Zone may be applied to sites or areas that require further structure or master planning before its release for urban development.*

The application of the Future Urban Zone would:

FUZ 1: protect the land from use or development that may compromise its future development and is supported by the strategic analysis carried out by Council and provided through the SLSS

FUZ 2: The subject land has been identified as future urban land and should be zoned as such;

FUZ 3: The zone can be applied to the site even though future analysis and justification may be required, although there is already a Master Plan that provides a concept blue print for the site and surrounding land.



State Planning Office, Department of State Growth
Level 6 – 144 Macquarie Street | GPO Box 536, Hobart TAS 7001

TasPIN makes this submission in response to the Minister's request for an update to the Urban Growth Boundary (UGB) within the Southern Tasmanian Regional Land Use Strategy (STRLUS). Development taken out of a well-planned strategic context undermines the Tasmanian resource management and planning system of Tasmania and does not support the objectives of the system, as detailed in Schedule 1 of LUPAA.

TasPIN is concerned that the UGB expansion proposals cut across the current review of STRLUS and are occurring in the absence of the Tasmanian Planning Policies which are yet to be finalised.

TasPIN strongly endorses these statements from STRLUS The State of Play Report on P 64 Section 5.2.2. supporting the view that the 2011 UGB satisfies urban growth requirements for future needs.

The intended outcomes of the STRLUS and Greater Hobart Plan to increase the proportion of housing in infill areas remain relevant. Focusing on implementation of policies aimed at increasing the proportion of infill housing, providing more diverse housing types and sizes, and locating new homes close to services and infrastructure will assist with progress towards achieving the targets.

Analysis undertaken for the State of Play Report indicates there is sufficient capacity within the Urban Growth Boundary to accommodate the new homes that will be required over the next 25 years.

Table 16 on P25 of the STRLUS Urban Growth Boundary Update: Consultation Paper

summarises the approximate maximum dwelling yield that may result from this UGB update. It does not factor in dwelling yield that may result from residential infill development or the conversion of Future Urban-zoned land in the UGB for residential purposes

Most of the extensions to the UGB in this Consultation have been Identified through the STRLUS comprehensive review process and do not involve large scale changes to the existing UGB. TasPIN considered the changes with regard to the following points:

- infrastructure capacity (road, water, sewer, electricity, telecommunications),
- access to services such as health, education and public transport,
- natural values, environmental, landscape and heritage values, and natural hazards.

TasPIN does not support the proposals for Mannata Street, Lauderdale or Richardsons Road, Sandford because they expose Council and future residents to risk from coastal inundation and the Sandford site includes risk of potentially contaminated land, flood-prone hazard and waterway protection, priority vegetation and landslip hazard. They would not ensure that the opportunities and challenges from the STRLUS The State of Play Report *Region shaper #3 page 72* are realised.

- Communities across Southern Tasmania are safe and resilient to natural hazards and climate change.
- The boundaries of Greater Hobart's urban area and growth in towns and villages considers and mitigates risks from natural hazards including bushfire, flooding and landslip.
- Potential changes in the Region's climate including temperatures, rainfall patterns and sea level rise inform decisions on where and what types of growth occur, and risks to existing communities.

TasPIN supports the proposals for extension of the UGB because they are logical small adjustments to the existing boundary and consolidate the urban area. We expect that adjustments like protecting the Two Rivulets Park at Rokeby would be protected at Council level where the rezoning of land within the areas identified would be subject to all other requirements being met for a planning scheme amendment, including all other applicable STRLUS policies, State Policies and other requirements of the Land Use Planning and Approvals Act 1993 (the Act).

However there are real concerns in the expansion of Margate, Sorell and Brighton. The infrastructure supports seem to be satisfied but with major expansions of residential areas there needs to be provision of health, education, retail and public transport. Our concerns, that this will not deliver affordable housing, are supported by the document in our 3rd dot point below.

Additional points for the Minister's consideration:

- No demonstrated need for expansion of UGB – recent land supply studies indicate there is sufficient land within existing UGB to meet expected population demand. Hobart's spatial footprint is already too big for its population and this just increases costs.
- TasPIN is concerned that in a rush to satisfy a shortage of affordable housing the solution is seen to be releasing more land without ensuring that infrastructure and services can accommodate that growth, that the particular land is suitable for housing, or that the ensuing development will actually be affordable.
- Evidence in Australia is clear that the market does not provide affordable housing. Developments on urban fringes are not affordable because distance from employment opportunities and services are on-going operating costs to the resident. Several issues are raised in this article. <https://theconversation.com/affordable-housing-is-not-just-about-the-purchase-price-75859>
- Strategic Planning is essential and must be considerate of broader needs than housing e.g industrial zones near labour sources.
- It is vital that medium density guidelines are adopted.
- Ensuring resilience in the face of climate change requires well-constructed houses that are not dependent on expensive air-conditioning.
- The issue is one of bringing it to the market and for that we need:
 1. Headworks Charges Policy – so the first developer is not disadvantaged as per the Local Government Association of Tasmania report https://www.lgat.tas.gov.au/_data/assets/pdf_file/0030/1139691/LGAT-Infrastructure-Contributions-Discussion-Paper-11-April-2022.pdf
 2. Create incentives to develop land rather than enabling a planning permit to remain live without substantial commencement for 8 years. The gradual extension of approvals time limits before substantial commencement has led to land banking. Permits should expect substantial commencement within 2 years.
 3. Create incentives to densify the existing residential footprint to create a greater return for physical and social infrastructure investments., i.e. reduce the per capita cost of such infrastructure.

Margaret Taylor

On behalf of TasPIN

14 March 2025
Reference: 2223-050

State Planning Office
Department of State Growth
Level 6, 144 Macquarie Street
HOBART TAS 7001

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

Dear Sir/Madam,

**BASKERVILLE ROAD, OLD BEACH
EXTENSION TO URBAN GROWTH BOUNDARY**

ERA Planning and Environment (ERA) continue to act for the landowners at 10 Alannah Court, Old Beach (CT 184468/11) in relation to a change in zoning from General Residential and Rural to entirely General Residential.

It is understood that the Minister for Housing, Planning and Consumer Affairs (the Minister) has requested an update to the Urban Growth Boundary (UGB) within the Southern Tasmanian Regional Land Use Strategy (STRLUS). Potential changes to the boundary include land identified through the STRLUS comprehensive review currently underway, as well as additional growth opportunities identified through other mechanisms.

A potential change identified in the STRLUS Urban Growth Boundary Update, Consultation Paper is shown in Figure 1. In addition to 10 Alanah Court (CT 184468/11) this cluster includes:

- 31A Shelmore Drive (CT 171249/1)
- 89 Baskerville Road, (CT 49158/1 and CT 59909/1)
- 99 Baskerville Road (CT 174868/1)

This land (the subject site) is located within two zones: General Residential zone (this only applies to CT 184468/11 and CT 171249/1) and Rural zone, under the *Tasmanian Planning Scheme – Brighton* (the applicable planning scheme).

The proposed change to the UGB captures a land area totalling 23.8 ha. This area was identified in the Brighton Structure Plan 2018 (BSP) which identified urban growth investigation area overlays to land to the west of Brighton and east of Gagebrook and Old Beach, due to insufficient land within the UGB to accommodate Brighton's long term housing needs. In particular, the subject site was identified as a site for further investigation for eventual rezoning to the Particular Purpose Urban Growth Zone. The Old Beach Quarry site was specifically identified as being a potential suitable location for future residential growth:

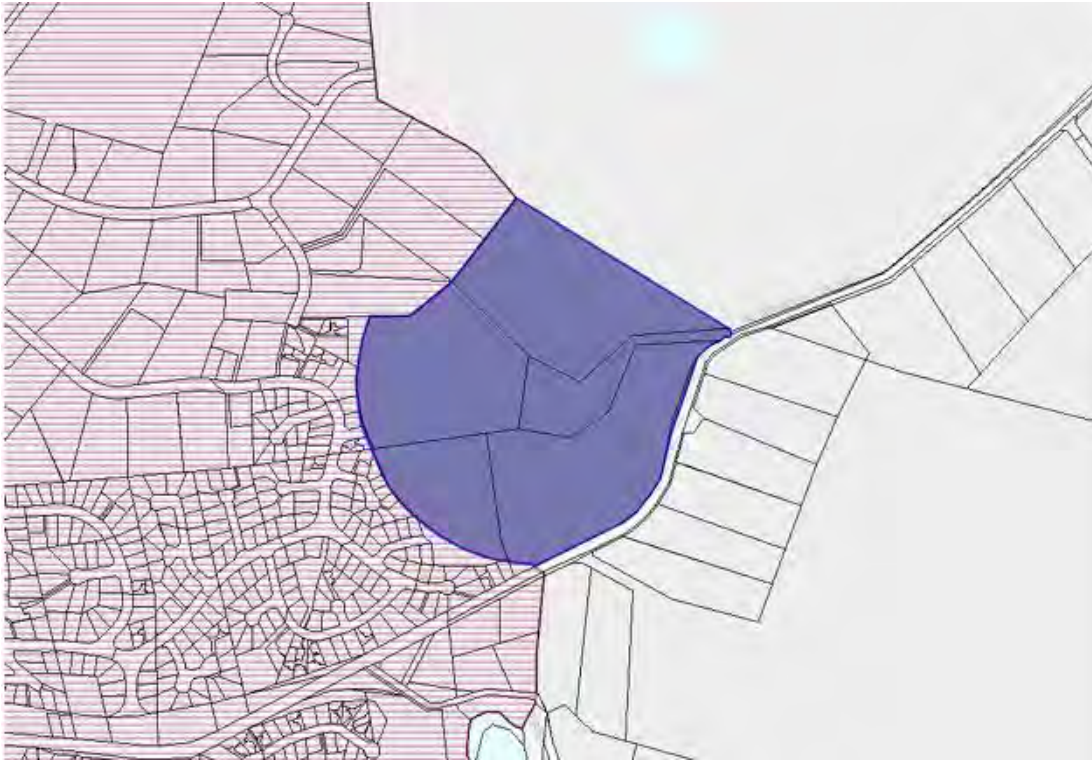


Figure 1 Land shaded in blue, identified as Area 4 in the UGB review

The strategic need for additional residential land in the area was also identified in the Old Beach Zoning Review prepared in 2022, which identified the Brighton local government area (LGA) as experiencing strong population growth, increasing pressure on residential land supply. The Department of Treasury and Finance (Treasury projections) in 2019 predicted that this growth will continue, with the Brighton LGA expected to be the fastest growing in Tasmania with an expected population growth of 33.4%, or 5,754 people between 2017 and 2042 under the medium growth scenario. This trend was also examined in the BSP, which expects 2,708 new dwellings will be required in the LGA by 2033, with half of this demand being in Old Beach.

All lots within the subject land are currently serviced by reticulated water, sewerage, and stormwater, or are capable of being serviced. The only key constraint to their redevelopment is the current condition and capacity of the East Derwent Highway. It is recognised that the highway may not be capable of absorbing the associated additional traffic if all land in Area 4, was rezoned. As recognised in the STRLUS Urban Growth Boundary Update, Consultation Paper, the capacity to rezone land, following the lands inclusion into the UGB will be subject to all other requirements being met for a planning scheme amendment, including STRLUS policies, State Policies and other requirements of the *Land Use Planning and Approvals Act 1993*. This will by necessity include consideration of the East Derwent Highway and any upgrades planned or required.

On behalf of the landowners of 10 Alanah Court (CT 184468/11), 31A Shelmore Drive (CT 171249/1) and 89 Baskerville Road, (CT 49158/1 and CT 59909/1), I can confirm their support of including the land into the UGB.

I can be contacted on 0429 359 636 or at clare@eraplanning.com.au if additional information is required.

Yours sincerely,

Clare Hester
Manager Planning

13th March 2025

State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

Emailed to: haveyoursay@stateplanning.tas.gov.au

To the State Planning Office,

**STRLUS UGB Update
53 Mannata Street, Lauderdale**

I write on behalf of my client James Polanowski, owner of 53 Mannata Street, Lauderdale (CT 167480/7), to provide a submission on the Southern Tasmanian Regional Land Use Strategy (STRLUS) 2010-2035 Urban Growth Boundary (UGB) Update.

The property is approximately 1.6ha in area. The land is shown below in Figure 2. The front part of the land is within the General Residential Zone and already within the UGB. The balance of the land is within the Rural Living Zone and outside of the UGB.

The owners have engaged Flussig Engineers to prepare a Flood Hazard Report and Stormwater Management Plan for the land together with a proposed subdivision lot layout. The two (2) reports by Flussig Engineering are included as Appendix A to this submission. The subdivision layout plan is shown below in Figure 1.

My clients request that the State Planning Office consider and discuss this submission and include the land in the updates to the UGB. The reports by Flussig provide detailed hydrology assessment and provide compelling evidence that the onsite drainage can be managed through design and construction. It is my client's intention to have the UGB extended over their land and to then prepare an application to rezone and subdivide the land under the General Residential Zone.

Should the owner then be able to rezone and subdivide the land under the *Land Use Planning and Approvals Act 1993* then, per Appendix A, the land could provide for 13 new lots in Lauderdale where demand for land and dwellings is high but supply is low.

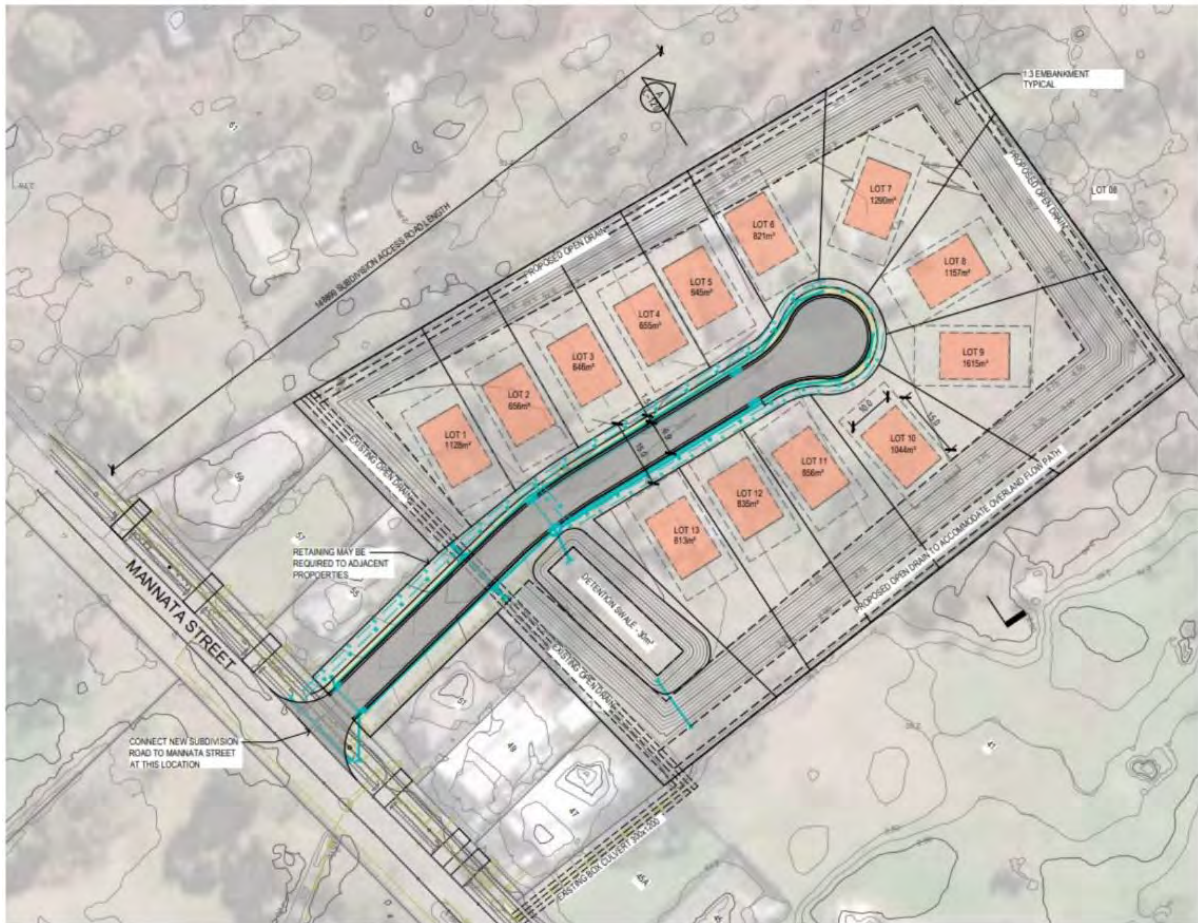


Figure 1: Proposed Subdivision Plan for 53 Mannata Street (Source: theLIST Mapping Services)

Land Description

The land is an internal lot that sits behind the Mannata Street residential properties currently in the General Residential Zone. The land is flat with a slight fall towards Mannata Street. There are numerous established trees on the land, which forms part of the garden around the existing house and outbuildings on the land.

The land, per the enclosed Appendix B *Property Report*, is subject to the Coastal Inundation Hazard Code, Safeguarding of Airports Code and the Flood-Prone Hazard Areas Code. There are no mapped threatened vegetation communities or listed threatened flora or fauna on the land (Source: theLIST Mapping Services).



Figure 2: 53 Mannata Street showing UGB, General Residential Zone and nearby retirement living development (Source: theLIST Mapping Services)

The land adjoins the Mannata Street residential area and other rural residential lots.

Under the *Tasmanian Planning Scheme – Clarence*, the land, under the Rural Living Zone, cannot be subdivided into multiple lots.

Residential Demand and Supply (Lauderdale)

The Southern Regional Tasmania Residential Demand and Supply Study: Demand and Supply Report 2024 (SRTRDSS) has been prepared as a key input into updating STRLUS. The STRDSS has indicated residential supply will be exhausted in Clarence (excluding the metro area) within 6 years and within 8 years in the Lauderdale suburb (See Figure 3).

The Greater Hobart Plan Area Residential Demand and Supply Study, 2024 was also prepared to consolidate the data from the SRTRDSS with data from “metropolitan” Hobart. When considering the entire Clarence LGA, demand will outstrip supply by 1,466 dwellings by 2046.

One of the key variables in the data of the two residential demand and supply reports is that there is varying level of confidence that available land will be brought to market. The owners of 53 Mannata Street are motivated to prepare an application rezone and subdivide this land. Per Appendix A they have already prepared a subdivision lot layout design, stormwater management plan and flood study for the land. All of which is critical to demonstrating the land can be developed under the Planning Scheme.

Table ES-2 Forecast Planning Area population and land supply, SRT region

Planning Area	Demand				Supply exhausted (in years) ^a		
	Population 2021	Forecast Pop 2046	AAGR*	AADD*	Theoretical	Practical	Practical (vacant)
Bridgewater	4,386	4,823	0.38	15	5	8	7
Brighton	3,700	5,266	1.42	36	18	16	7
Gagebrook	2,829	3,058	0.31	10	11	21	21
Old Beach	3,156	3,662	0.60	10	23	23	23
Brighton Balance	5,192	8,569	2.02	59	2	2	2
Bothwell	388	409	0.21	1	23	23	23
Central Highlands Balance	2,192	2,272	0.14	8	23	23	23
Cambridge	427	735	2.20	5	8	2	1
Lauderdale	2,512	2,698	0.29	4	8	14	8
Richmond	935	1,135	0.78	4	23	23	20
South Arm-Opossum Bay	1,358	1,549	0.53	7	12	12	12
Clarence Balance	12,390	15,712	0.95	57	4	5	4

Figure 3: Lauderdale dwelling demand (Source: Remplan 2024, Southern Regional Tasmania Residential Demand and Supply Study: Demand And Supply Report)

Merits of UGB Extension

The land, per the plans supplied by Flussig Engineers, has the potential to accommodate 13 lots (and develop an estimated 13 dwellings). The land is suitable for further residential development for the following reasons:

- The land is within 800m walking distance of shops, public open space, Lauderdale Primary School, Lauderdale church, beaches and integrated walking trails.
- 400m of bus stops (Metro bus routes)



Figure 4: 800m Walking Distance of 53 Mannata Street, Lauderdale (Source: theLIST Mapping Services)

- The land can be serviced for sewer and water (subject to planning and design detail)
- Stormwater and low-lying flood prone areas can be managed (subject to planning and design)
- Access is via an established road network with pedestrian access on Mannata Street and to surrounding areas.
- Limited clearance of vegetation is required for subdivision and standing trees may be retained if not within building envelopes, service locations or pose risk to occupants.
- Fill or other design solutions may be required to address the Coastal Hazards together with professional reporting.

Proposed UGB Expansion

Per Figure 5 below, it is proposed that the UGB be extended over the balance of 53 Mannata Street, Lauderdale.



Figure 5: 53 Mannata Street, Lauderdale UGB Expansion (Source: theLIST Mapping Services)

Conclusion

This submission has provided a written overview and diagrams to describe the land at 53 Mannata Street, Lauderdale as potentially suitable for inclusion in an updated Urban Growth Boundary for

the area. The land is within an established residential area and is a small and logical extension to the UGB.

The owner has already prepared subdivision plans and detailed flood and stormwater management plans for the land and is motivated to prepare an application to rezone and subdivide the land as soon as the UGB is extended.

It is my opinion that an extended UGB is suitable for this land and further design and site planning would be addressed through the usual assessment process.

If you have any enquiries about this submission or would like to discuss further then please contact me on 0458 892 183 or email david.cundall@formplanning.com.au

Sincerely,

David Cundall
Director
BA, GradDipEnvPlg, DipPM, MPIA

Encl.

Appendix A – 53 Mannata Street, Lauderdale Stormwater Management Plan, Flussig Engineers & 53 Mannata Street, Lauderdale Flood Report, Flussig Engineers

Appendix B – Property Report for 53 Mannata Street, Lauderdale (Source: PlanBuild)

Document Disclaimers

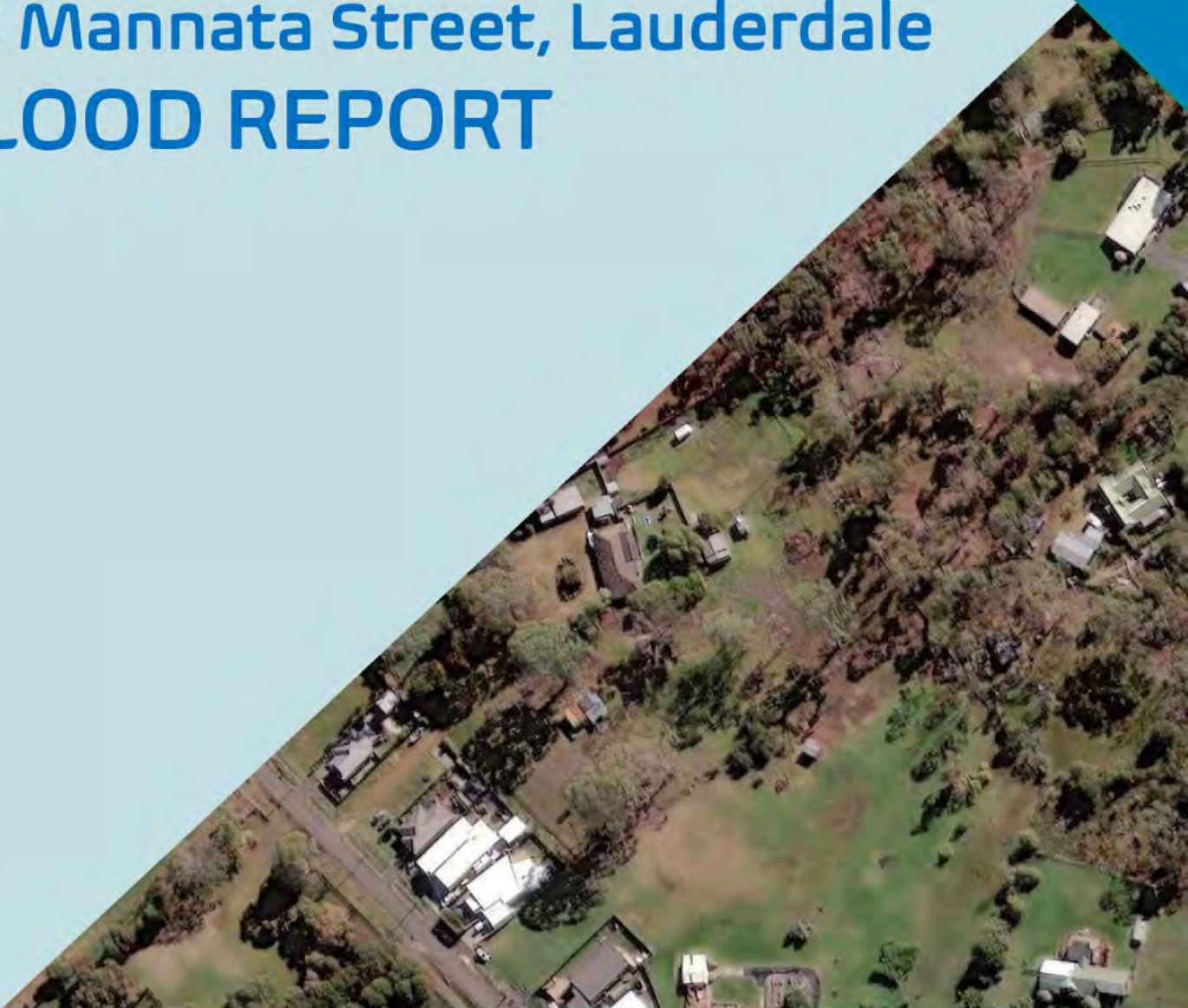
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06th March 2023

FE_HOB_23015

53 Mannata Street, Lauderdale FLOOD REPORT



Prepared for: In the Pipeline Ltd

flüssig
ENGINEERS


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Document Information

Title	Client	Document Number	Project Manager
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Document Initial Revision

REVISION 00	Staff Name	Signature	Date
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Reviewed by	John Holmes <i>Senior Engineer</i>		03/03/2023
Authorised by	Max W. Möller <i>Principal Hydraulic Engineer</i>		06/03/2023

Rev No.	Description	Prepared by	Authorised by	Date

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Acronyms

AEP: Annual Exceedance Probability
 ARR: Australian Rainfall and Runoff
 CC: Climate Change
 TPS: Tasmanian Planning Scheme
 DEM: Digital Elevation Model

1. Introduction

Flüssig Engineers has been engaged by **In the Pipeline Ltd** to undertake a site-specific flood hazard report for the site at 53 Mannata Street, Lauderdale in the **Clarence City Council** municipality. The purpose of this report is to determine the hydraulic characteristics on the existing and post-development scenarios and the flood hazard for the 1% AEP plus climate change (CC).

1.1 Development

The proposed site location is at 53 Mannata Street, Lauderdale, located in the municipality of the **Clarence City Council**. The site is an approximately 1.62 ha lot with a proposed staged 13 residential lot subdivision development. This development triggers the inundation code as the development falls within Clarence City Council, flood prone area.

1.2 Objectives and Scope

This flood analysis has been written to meet the standards of the Tasmanian Planning Scheme - Clarence (TPS), with the intent of understanding the development risk with respect to riverine and coastal inundation. The objectives of this study are:

- Provide an assessment of the site's flood characteristics under estimated sea level heights for 1% AEP storm events.
- Provide comparison of flooding for post-development against acceptable solution and performance criteria.
- Provide flood mitigation recommendations for a potential future development, where appropriate.

1.3 Limitations

This study is limited to the objectives of the engagement by the client, the availability and reliability of data, and including the following:

- The flood model is limited to a 1% AEP + CC worst case temporal design storm.
- All parameters have been derived from best practice manuals and available relevant studies (if applicable) in the area.
- All provided data by the client or government bodies for the purpose of this study is deemed fit for purpose.
- The study is to determine the effects of the new development on flooding behaviour and should not be used as a full flood study into the area without further assessment.

1.4 Relevant Planning Scheme Requirements

Table 1. TPS Planning Scheme Requirements

Planning Scheme Code	Objective	Document Reference
C11.7.1 That subdivision within a coastal inundation hazard area does not create an opportunity for use or development that cannot achieve and maintain a tolerable risk from coastal inundation.	Each lot, or a lot proposed in a plan of subdivision within a coastal inundation hazard area must not create an opportunity for use or development that cannot achieve and maintain a tolerable risk.	Section 4

2. Model Build

2.1 Overview of Catchment

The contributing catchment for the site at 53 Mannata Street, Lauderdale is approximately 556 ha. The land use of the catchment is zoned predominantly Rural Living, Landscape Conservation and General Residential, with the immediate areas surrounding the specific site being proposed General Residential. The site is currently zoned Rural Living but will be rezoned as General Residential.

Figure 1 below outlines the approximate contributing catchment for the site at 53 Mannata Street, Lauderdale.

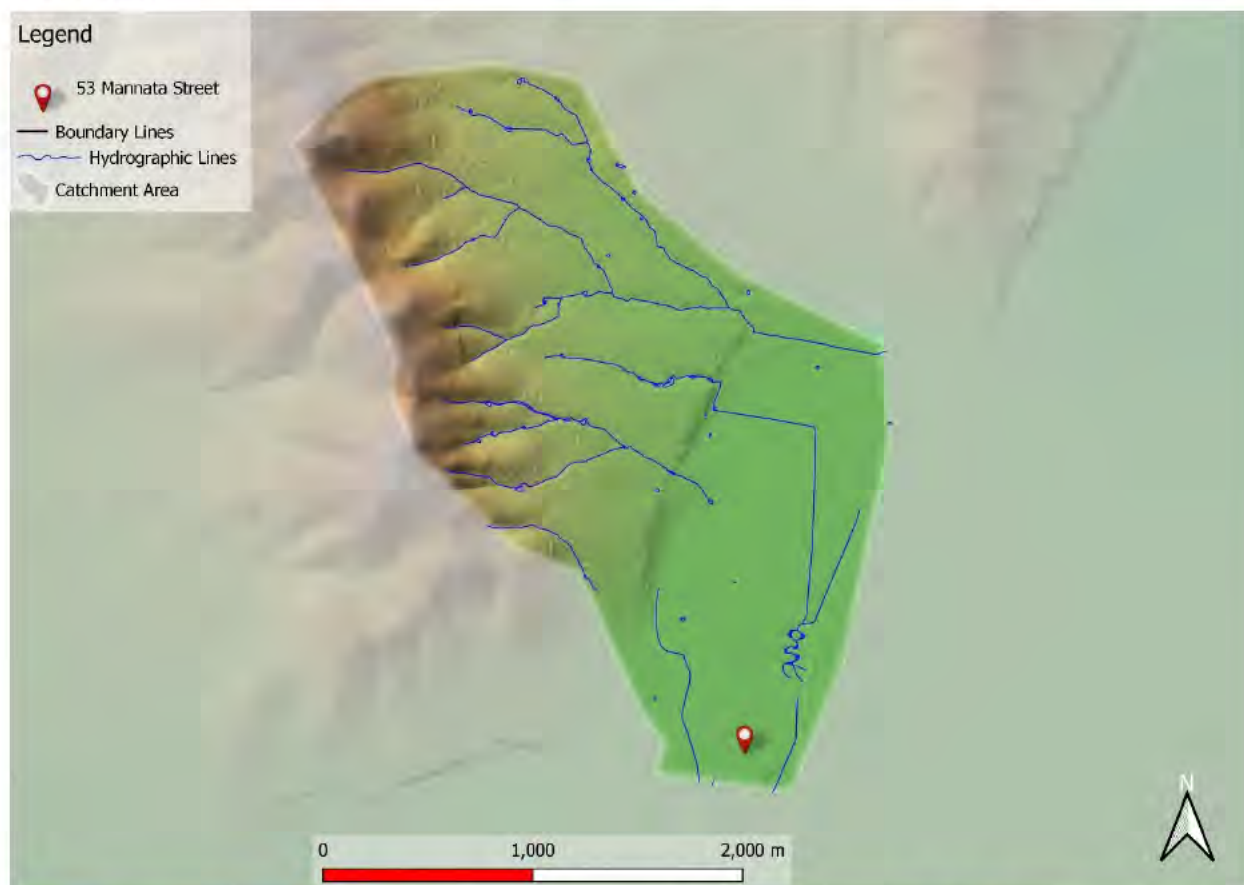


Figure 1. Contributing Catchment for the site at 53 Mannata Street, Lauderdale

2.2 Hydrology

The following Table 2 states the adopted hydrological parameters for the RAFTS catchment, derived from best practice documents.

Table 2. Parameters for RAFTS catchment

Catchment Area (ha)	Initial Loss Perv/imp (mm)	Continuing Loss Perv/imp (mm/hr)	Manning's N pervious	Manning's N impervious	Non-linearity factor
556	27/1	4.0/0.0	0.045	0.02	-0.285

2.2.1 Design Rainfall Events

Figure 2 shows the box and whisker output for the 1% model run. The model shows that the 1% AEP 4.5 hr-minute storm temporal pattern 2 was the worst-case storm. Therefore, this storm event was used within the hydraulic model.

Comparison of Storm Ensembles of different durations for AEP = 1%

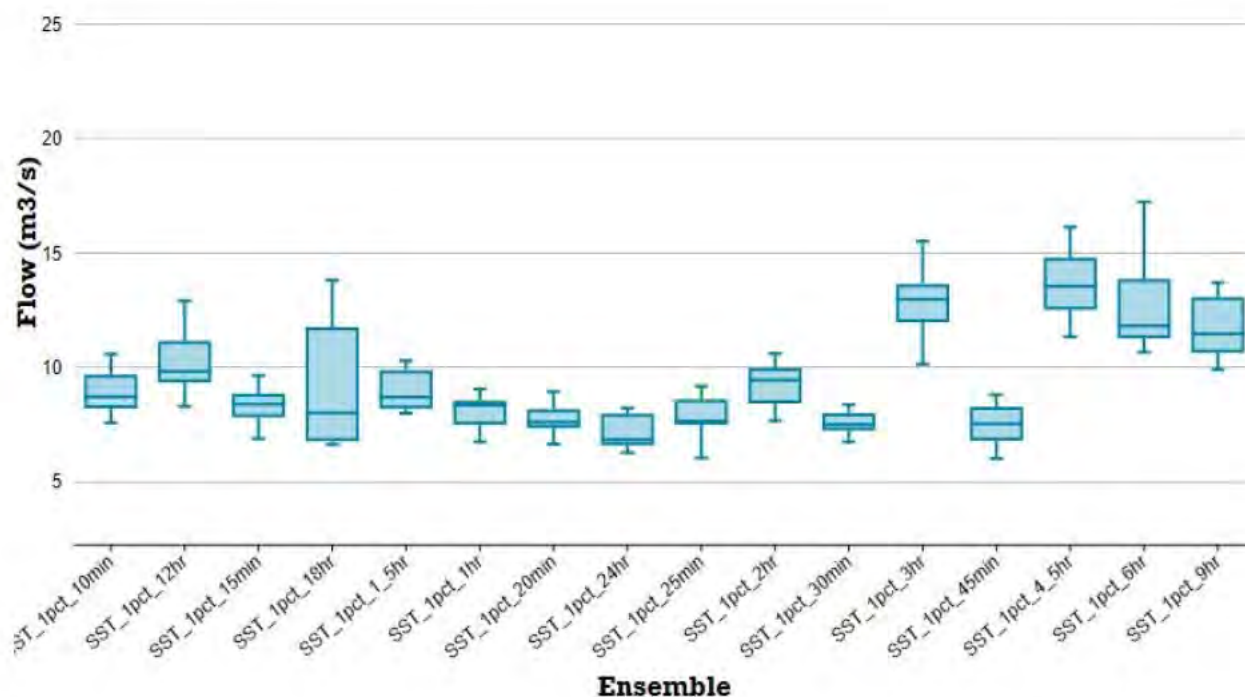


Figure 2. 1% AEP Box and Whisker Plot

2.2.2 Climate Change

As per ARR 2019 Guidelines, for an increase in rainfall due to climate change at 2100, it is recommended the use of RCP 8.5. Table 3 shows the ARR 8.5 increase compared to the revised increase of 14.6%. Therefore, the ARR 8.5 increase of 16.3% was adopted in the model.

Table 3. Climate Change Increases

Climate Zone	CFT increase @ 2100	ARR 8.5 increase @ 2100
South-East Tasmania	14.6 %	16.3 %

2.2.3 Calibration/Validation

This catchment has no stream gauge to calibrate the model against a real-world storm event. Similarly, there is little historical information available, and limited available past flood analysis undertaken to validate against the flows obtained in the model.

2.3 Hydraulics

A 1D-2D hydraulic model was created to determine the flood level through the target area.

2.3.1 Extents and topography

The development site is situated in the south-east of the catchment. The catchment originates from Meehan Range, more specifically between Acton Hill and Stanfields Hill to the north west, approximately 248 mAHd higher than the site location and the mainstream with an average gradient of approximately 6.8 %. The average gradient around the immediate surrounding of the site location is 0.5 %.

2.3.2 Estimated sea level heights.

For this site, the risk of coastal inundation combined with riverine inundation is probable. A study undertaken by Clarence City Council found the estimated sea level heights for the 1% AEP in 2050 and 2100 in the Rokeby area which is shown in Table 4

Table 4. Estimated Sea level heights for 1% AEP events (values in mAHD)

Scenario	Present sea level height	2050 estimated sea level height	2100 estimated sea level height
1% AEP	1.8	2.1	2.7

Using this data, a 2100 estimated sea level height for the 1% AEP event was combined with a 1% AEP rainfall event.

2.3.3 Survey

The 2D surface model was taken from a combination of LiDAR 2019 to create a 1m and cell size DEM. For the purposes of this report, 1m cells are enough to capture accurate flow paths. The DEM with hill shading can be seen below (Figure 3).



Figure 3. 1m DEM (hillshade) of 53 Mannata Street, Lauderdale.

2.3.4 Roughness (Manning's n)

Table 5 shows Manning's values used in the model. Values for this layer were derived from the ARR 2019 Guidelines.

Table 5. Manning's Coefficients (ARR 2019)

Land Use	Roads	Open Channel	Rural	Residential	Parks	Buildings	Piped Infrastructure
Manning's n	0.018	0.035	0.04	0.045	0.05	0.3	0.013

2.3.5 Walls

All significant fences and retaining structures were included as 2D linear wall structures within the 2D model. Fences were modelled 300 mm above the ground level.

2.3.6 Buildings

Buildings were represented as mesh polygons with a high Manning's n value within the model. Buildings with unknown floor levels were set with a minimum 300 mm above ground. This method allows for flow through the building if the flood levels/pressure become great enough. The aim is to mimic flow through passageways such as doors, windows, hallways etc.

2.3.7 Stormwater Infrastructure

All downstream stormwater infrastructure was included within the model to provide insight into the downstream capacity of the stormwater system. The pit/pipes were sourced through Clarence City Council data, 'Before you Dig Australia' and site visits including infrastructure location, size, type, and invert levels (where applicable). Where data was missing, this was inferred from surrounding data and where invert levels were missing, a 600mm cover was applied.

2.3.8 Pit Inlets

As this is a 1D/2D model, user defined inlet equation was adopted for varying pit sizes.

$$Q = ay^b$$

Where:

Q = flow

a = constant defined in User Equation A value field

y = depth of flow at inlet

b = constant defined in User Equation B value field

2.4 Development Runoff

Stormwater runoff from the development site has been assessed under pre- and post-development models to determine the potential impact the development at 53 Mannata Street has on the immediate local flows. As per planning guidelines it is a requirement that this does not have a negative impact from pre to post development.

Site characteristics for the pre- and post-development model are summarised in Table 6.

Table 6. Site characteristics

Land Use	Pre-Development		Post-Development	
	Area m ²	% Total	Area m ²	% Total
Total Pervious	561	3.5	1,667	11.5
Total Impervious	15,661	96.5	14,555	88.5

4. Model Results

The result of 1% AEP + CC were run through the pre-development scenario to analyse the changes to flooding onsite and to surrounding properties.

4.1 Flood depth and extent

It can be seen from the pre-development model runs Figure 4, that the overland flow path runs from Mannata Street and Balook Street. It should be noted that the immediate surrounding areas including the site are located in a flat terrain. Figure 4 shows the existing lot with a dwelling along with the pre-development flood extents.

Flooding with depths under 350 mm affects most areas of the lot, particularly the south-eastern section of the lot. The maximum flood depth within the site occurs at the site outlet at 450 mm where the existing open drain flows into an existing 300 x 1200 box culvert.

The post-development run (Figure 5) shows the influence the proposed development has on the flood extents within the lot. Flood extents and depths have reduced significantly within the lots and the proposed roadway due to the inclusion of a detention pond and drainage system to divert the overland flow away from the proposed lots. The maximum flood depths within the proposed roadway are under 50 mm. The recommended subdivision fill pad along with piped infrastructure effectively accommodates the 1% AEP overland flow path.

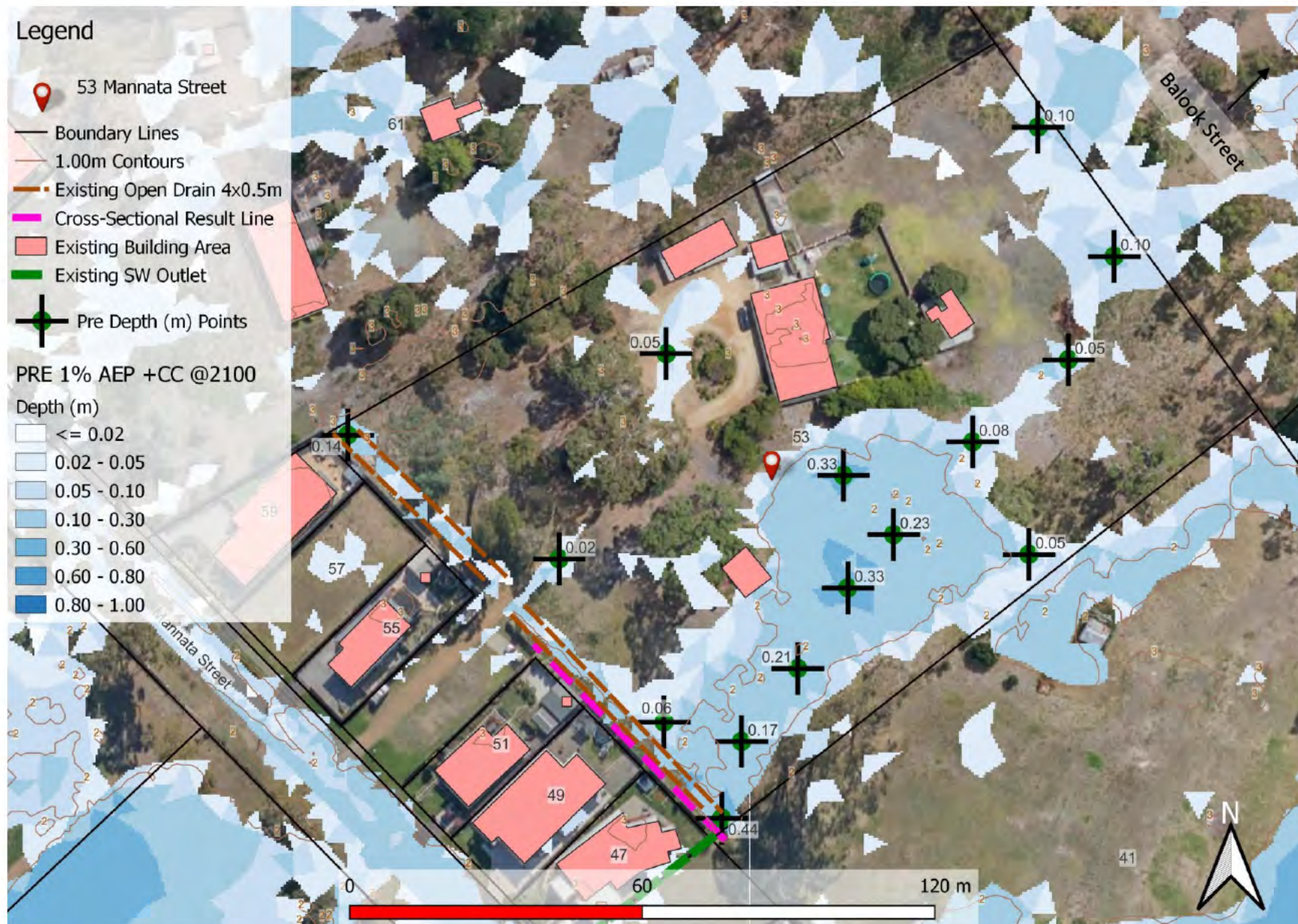


Figure 4. Pre-Development 1%+CC Flood Depths and extents

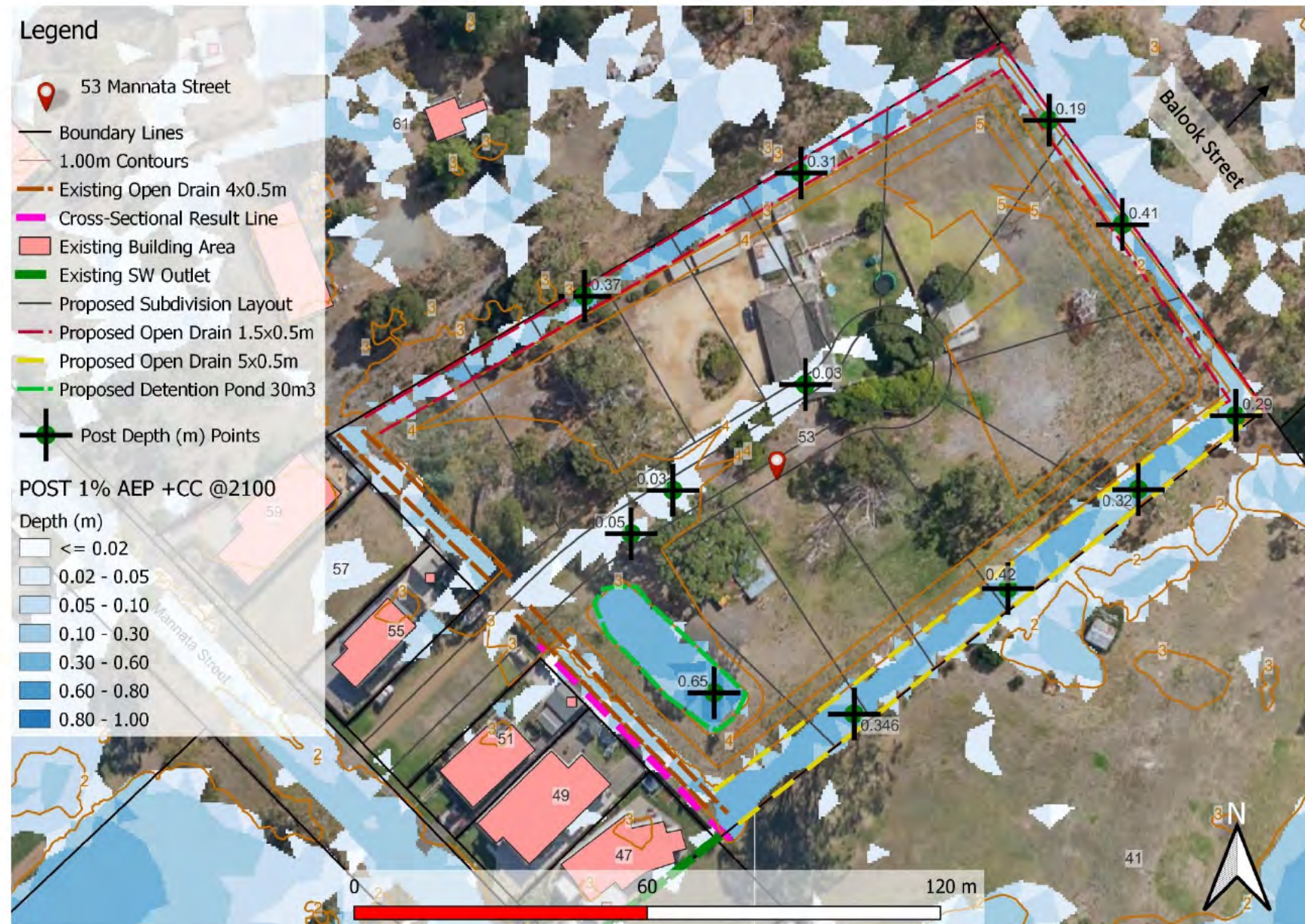


Figure 5. Post Development 1%+CC Flood Depth and extents

4.2 Displacement of Overland Flow on Third Party Property

Post-development flows in Figure 5 show that when compared against pre-development in Figure 4, there is no observed increase in flood depths and extents on neighbouring lots. Furthermore, the hazard rating (H1) shows no increase on neighbouring infrastructure between the pre and post development scenarios.

It is therefore deemed that the post development model does not adversely affect flood flow through surrounding properties.

4.3 Development Effects on Stormwater Discharge

Figure 6 below shows the discharge hydrograph from the property boundary for the overland flow through the development area. The graph was captured in the model for both pre- and post-development runs and combined in graph format to demonstrate the change in net discharge and velocity. It demonstrates an increase in velocity of 0.02 m/s with discharge showing no increase in the post development scenario.

The changes in velocity and discharge are minimal and could be attributed to model sensitivity.

It is therefore deemed that the post development model **does not increase net discharge**.

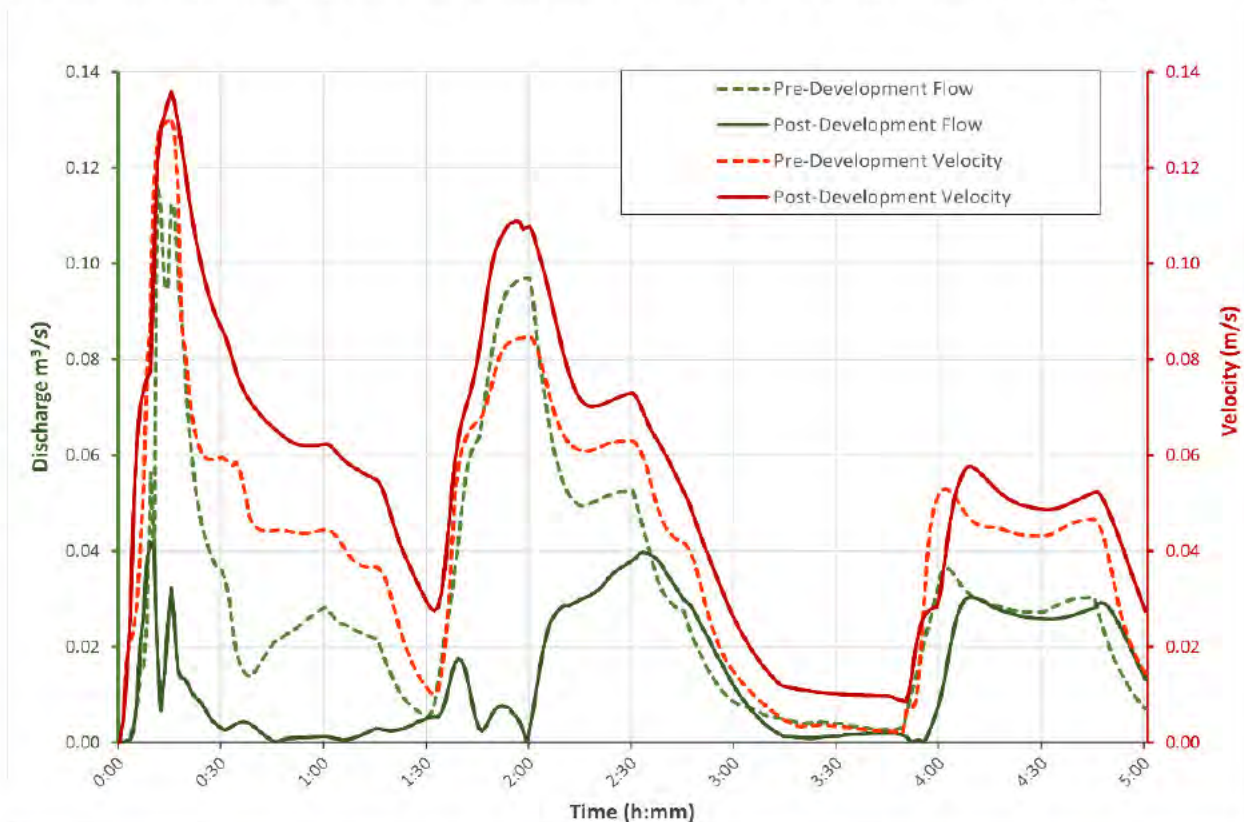


Figure 6. Pre and Post development net discharge and velocity 1% AEP + CC at 53 Mannata Street

4.4 Model Summary

Table 7. Pre-development and post-development at the cross-sectional line within the lot

	Pre-development	Post-development	Net Change
Depth (m)	0.45	0.51	0.06
Velocity (m/s)	0.13	0.14	0.01
Discharge (m³/s)	0.12	0.04	-0.07

5. Flood Hazard

Under existing conditions prior to development, the proposed location of the subdivision is subject to be inundated to < 0.45 m flood depth and < 0.13 m/s velocity the cross sectional results line. This places the hazard rating as adopted by Australian Flood Resilience and Design Handbook as a maximum H1 – *Generally safe for people, vehicles and buildings* as shown in Appendix A – Hazard maps. There is a localised area of H2- *unsafe for small vehicles* near the south-eastern boundary of lot, however this area is small and is not present in the post-development scenario.

The post-development scenario only sees the depth at the cross section increase by 0.06 m and the velocity showing a minor increase of 0.01 m/s.

The maximum hazard rating within the site (excluding the open drains and the detention swale) reduces significantly. Hazard extents in the post-development scenario is only limited to the proposed road extents with a maximum hazard rating of H1. The hazard ratings at the open drains and the detention pond increase up to H3 - *unsafe for people and vehicles* due to their depths. Furthermore, the post-development model does not show any noticeable increase in the extents of the hazard rating to surrounding infrastructure.

Therefore, it can be concluded that the proposed development **does not increase the level of risk within the site and surrounding infrastructure.**

As this study does not extend to the public access roads we cannot comment on the accessibility to the site, only within the site. Therefore, this report would advise that residents and visitors remain inside in the event of a flood unless instructed by emergency services.

A summary of the hazard ratings is shown in Figure 7.

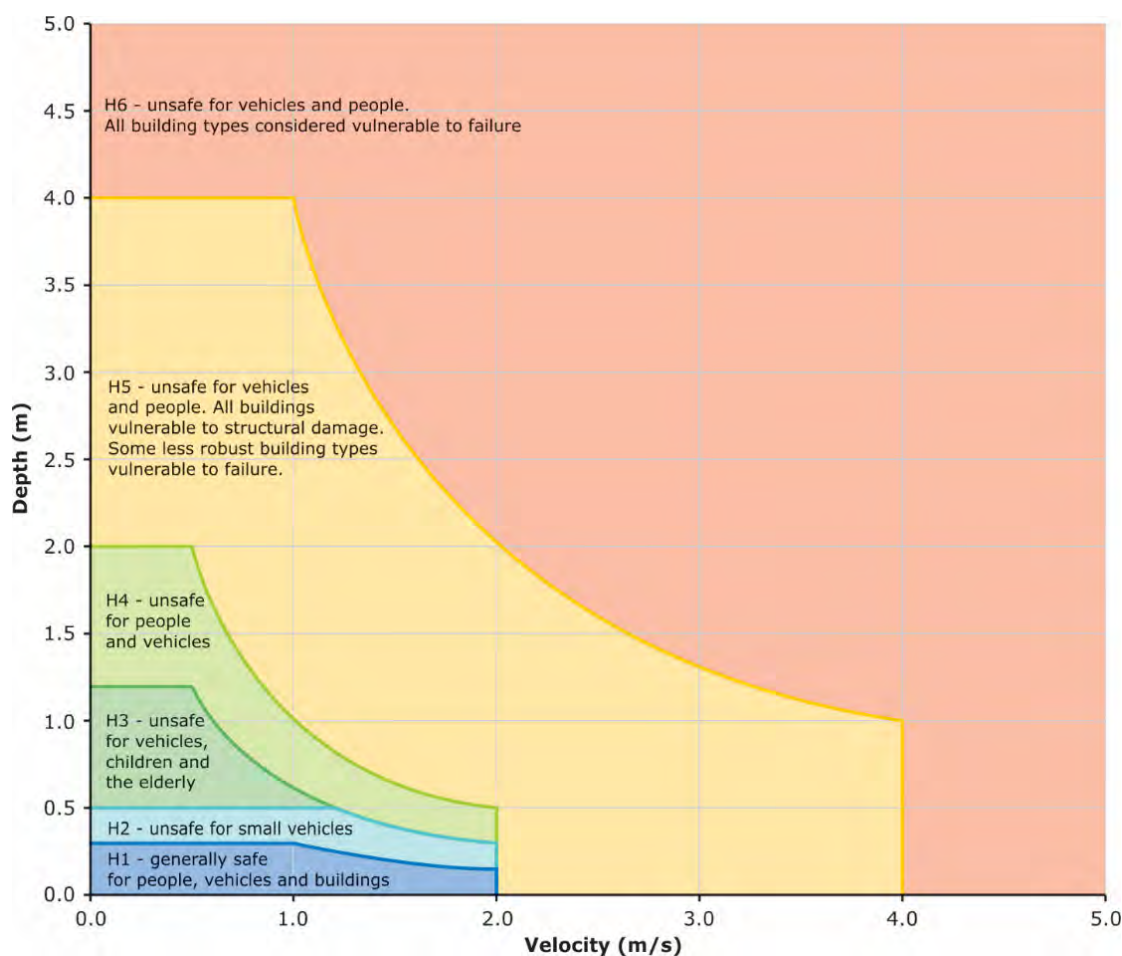


Figure 7. Hazard Categories Australian Disaster and Resilience Handbook

5.1 Tolerable Risk

The lot at 53 Mannata Street, Lauderdale is susceptible to a relatively shallow, slow-moving flood plain flow, with the majority of the immediate surrounding region classified as (H1) hazard rating in the 1% AEP + climate change event except for a minor localised area of hazard rating H2. Following the development, hazard rating extents have reduced significantly within the lots with a maximum hazard rating of H1.

Velocities and depths, although relatively small, still present some risks from erosion and debris movement. It is recommended that all future structures undertake a hydrostatic/ hydrodynamic analysis to ensure suitability.

Table 8. Report summary against TPS (Clarence) C11.7.1

C11.7.1 Subdivision within a coastal inundation hazard area			
Objectives: That subdivision within a coastal inundation hazard area does not create an opportunity for use or development that cannot achieve and maintain a tolerable risk from coastal inundation.			
Performance Criteria			
P1		P1	
Each lot, or a lot proposed in a plan of subdivision within a coastal inundation hazard area must not create an opportunity for use or development that cannot achieve and maintain a tolerable risk from coastal inundation, having regard to;		Response from flood report	
(a)	any increase in risk from coastal inundation for adjacent land;	(a)	No increase in risk from coastal inundation for adjacent land
(b)	the level of risk to use or development arising from an increased reliance on public infrastructure;	(b)	N/A
(c)	the need to minimise future remediation works;	(c)	Future remediation works not required as the 1% AEP overland flow is channelled through the proposed open drains.
(d)	any loss or substantial compromise, by coastal inundation, of access to the lot on or off site;	(d)	No compromise for lot access within the subdivision
(e)	the need to locate building areas outside the coastal inundation hazard area;	(e)	N/A
(f)	the advice contained in a coastal inundation hazard report.	(f)	Refer to this report and recommendations.

6. Conclusion

The Flood Hazard Report for the 53 Mannata Street, Lauderdale development site has reviewed the potential development flood scenario.

The following conclusions were derived in this report:

1. A comparison of the post-development peak flows for the 1% AEP and storm surge event at 2100 were undertaken to address C11.7.1 of the TPS - Clarence Coastal Inundation Hazard Code.
2. Minor increase of 0.06 m of flood depth at the property boundary from pre-development to post-development scenario.
3. Peak discharge sees a small decrease from pre- to post-development, riverine flood scenarios.
4. Velocity shows a minor increase of 0.01 m/s change between pre- and post-development, riverine flood scenarios.
5. Hazard from flooding within the lot remain at the majority category of H1 for both pre and post development scenarios, except for a minor localised area with hazard rating H2. Hazard rating and extent does not increase in the post-development scenario.

7. Recommendations

Flüssig Engineers therefore recommends the following engineering design be adopted for the development and future use to ensure the works meets the Inundation Code:

1. The new subdivision to provide an unobstructed overland flow path corridors toward the existing watercourses to accommodate the 1% AEP flood scenario.
2. Subdivision fill pad to be in accordance with Flüssig Engineers' civil concept drawings.
3. A new 0.5 m deep, 1.5 m wide open drain is to be constructed along the lot boundary adjoining 61 Mannata Street, according to Flüssig Engineers' civil concept drawings.
4. A new 0.5 m deep, 1.5 m wide open drain is to be constructed along the lot boundary adjoining 148 Balook Street, according to Flüssig Engineers' civil concept drawings.
5. A new 0.5 m deep, 5 m wide open drain is to be constructed along the lot boundary adjoining 41 Mannata Street, according to Flüssig Engineers' civil concept drawings.
6. All future proposed structures within the flood extent not shown within this report will require a separate design and report addressing their impacts.
7. All future proposed structures within the subdivision to have a minimum floor level of 3.00 mAHD. As per Flüssig Engineers' civil concept drawings, all minimum pad levels for the lots are above 3.00 mAHD.
8. The new road and services infrastructure to be designed to resist flood forces including debris.
9. Future use of lot areas to be limited to areas deemed safe under the ARR Disaster Manual categories.
10. Road and access use be limited to use deemed safe under the ARR Disaster manual categories.
11. An emergency evacuation plan be implemented as a precaution to flooding.

Under the requirements of this Flood Hazard Report, the proposed development will meet current acceptable solutions and performance criteria under the Tasmanian Planning Scheme – Clarence.

8. Limitations

Flüssig Engineers were engaged by **In the Pipeline Ltd** for the purpose of a site-specific Flood Hazard Report for the site at 53 Mannata Street, Lauderdale as per C11.0 of the Tasmanian Planning Scheme - Clarence 2021. This study is deemed suitable for purpose at the time of undertaking the study. If the conditions of the development should change, the plan will need to be reviewed against all changes.

This report is to be used in full and may not be used in part to support any other objective other than what has been outlined within, unless specific written approval to do otherwise is granted by Flüssig Engineers.

Flüssig Engineers accepts no responsibility for the accuracy of third-party documents supplied for the purpose of this flood report.

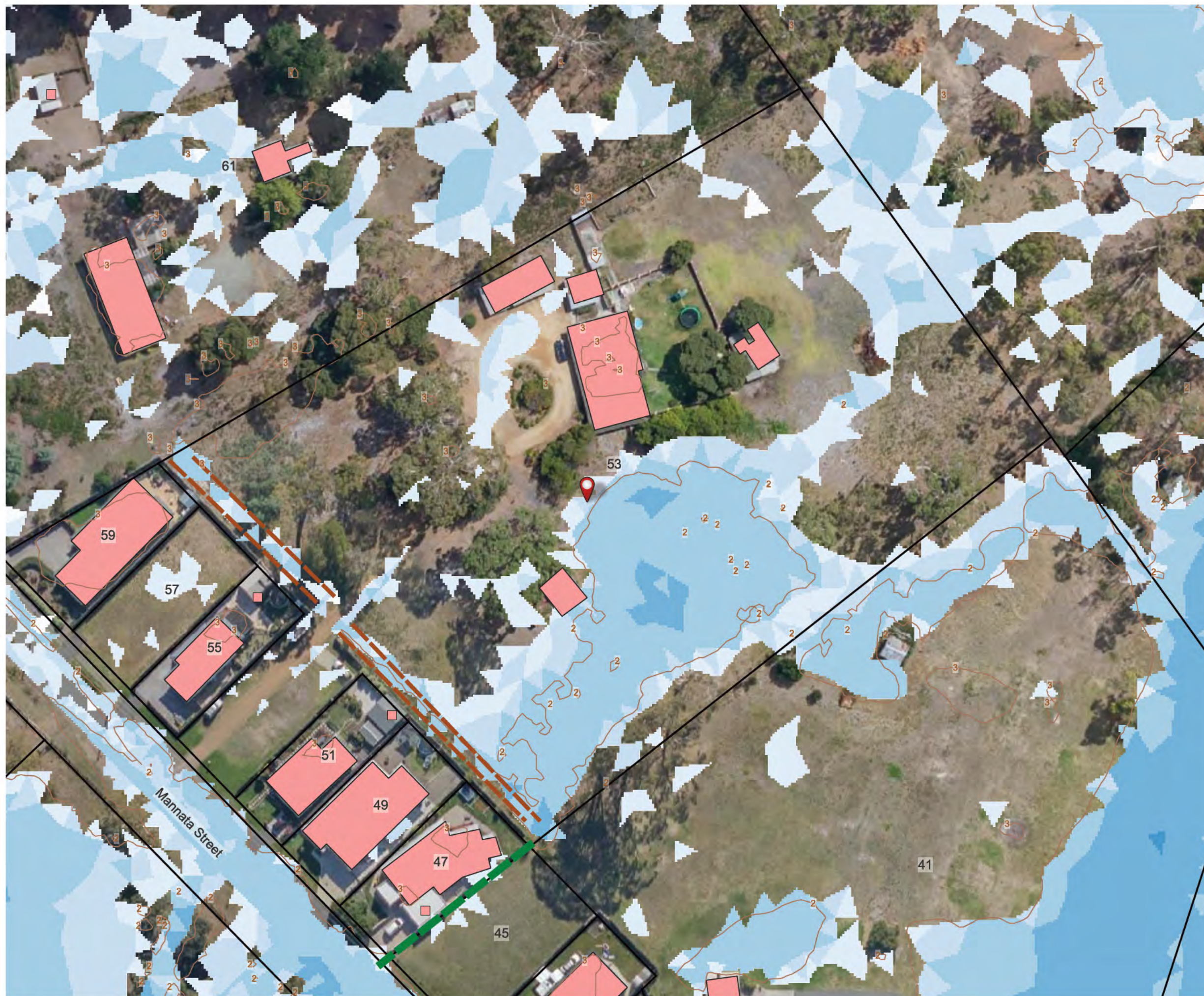
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10. Appendices

Appendix A Flood Maps

PRE 1% AEP + CC @2100



Legend

- 53 Mannata Street
- 1.00m Contours
- Boundary Lines
- Existing Building Area
- Existing SW Outlet
- Existing Open Drain 4x0.5m

PRE 1% AEP +CC @2100

Depth (m)

- <= 0.02
- 0.02 - 0.05
- 0.05 - 0.10
- 0.10 - 0.30
- 0.30 - 0.60
- 0.60 - 0.80
- 0.80 - 1.00
- 1.00 - 1.50
- > 1.50



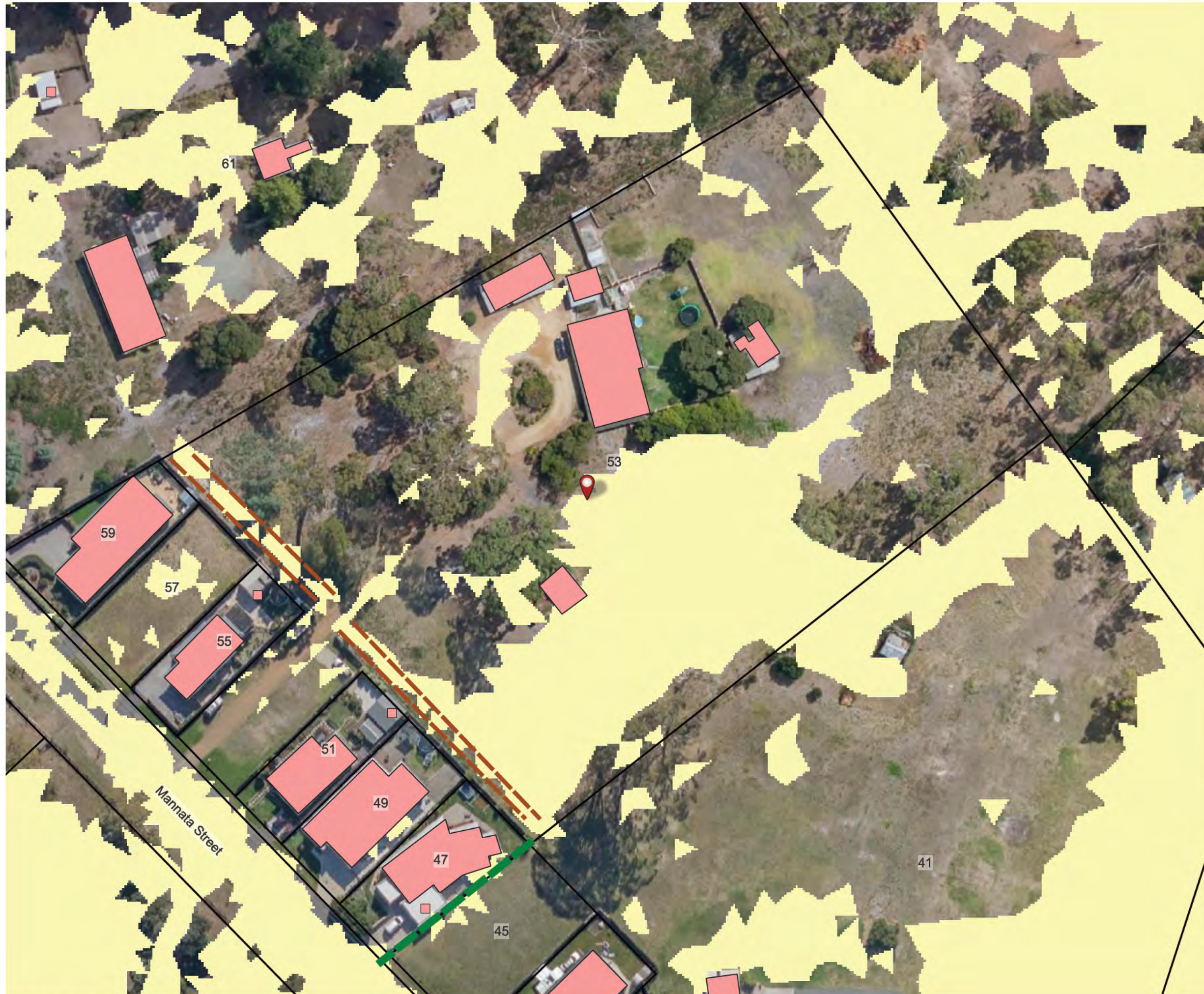
0 20 40 m



flüssig
ENGINEERS

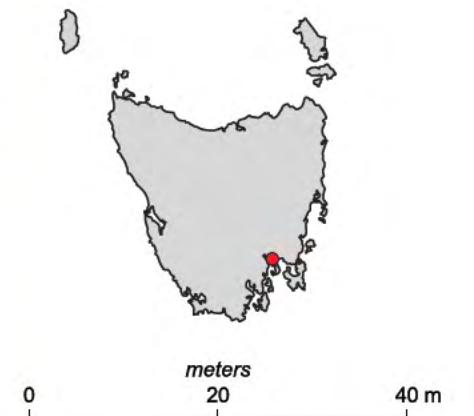
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TASMANIA

PRE 1% AEP + CC @2100



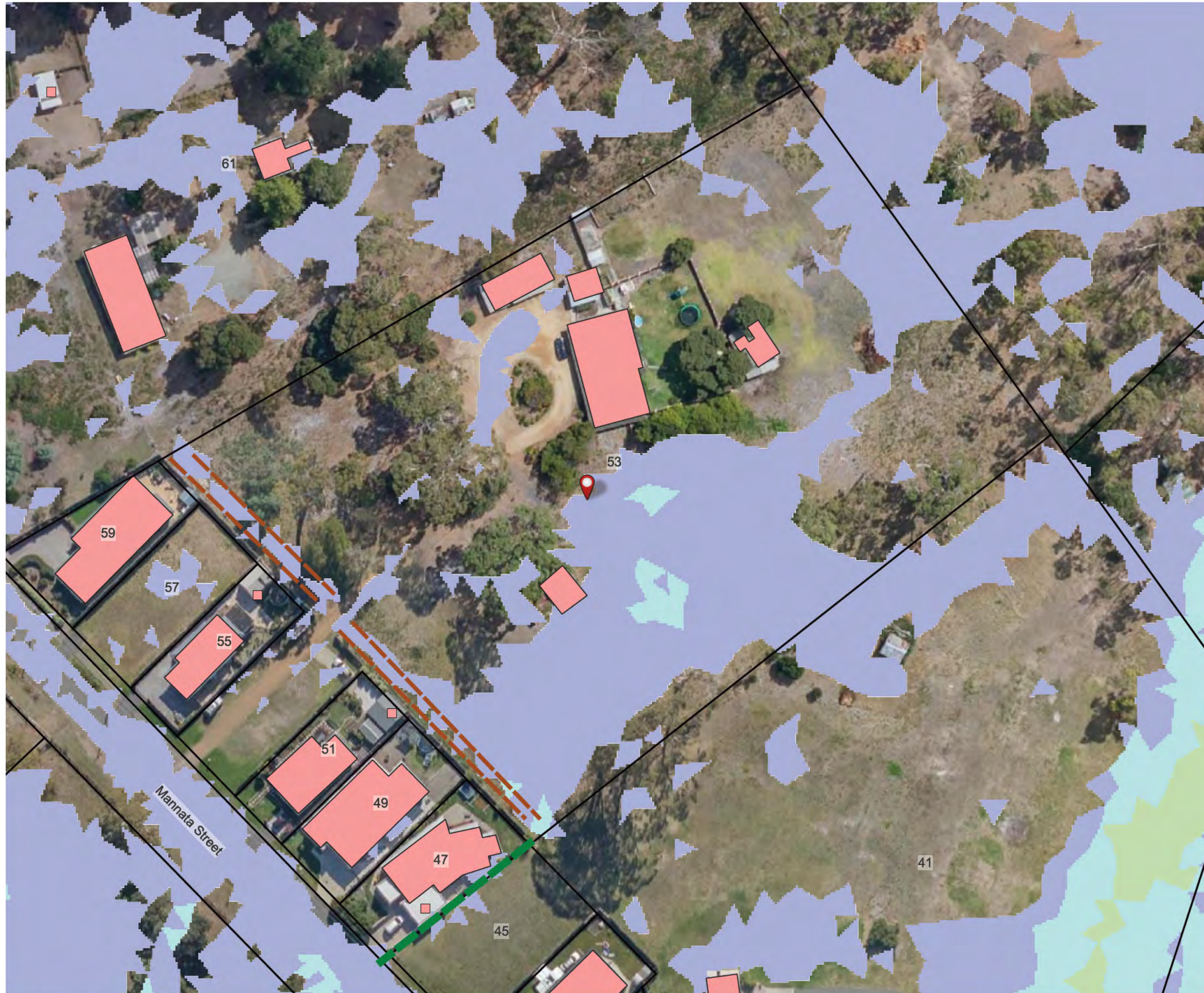
Legend

- 53 Mannata Street
- Boundary Lines
- Existing Building Area
- Existing SW Outlet
- Existing Open Drain 4x0.5m
- PRE 1% AEP +CC @2100**
- Velocity (m/s)**
 - ≤ 0.50
 - 0.50 - 1.00
 - 1.00 - 1.50
 - 1.50 - 2.00
 - > 2.00



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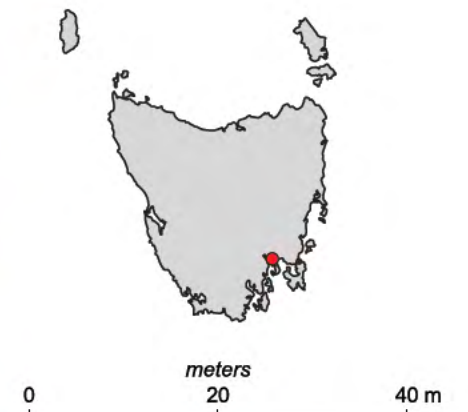


Legend

- 53 Mannata Street
- Boundary Lines
- Existing Building Area
- Existing SW Outlet
- Existing Open Drain 4x0.5m
- PRE 1% AEP +CC @2100

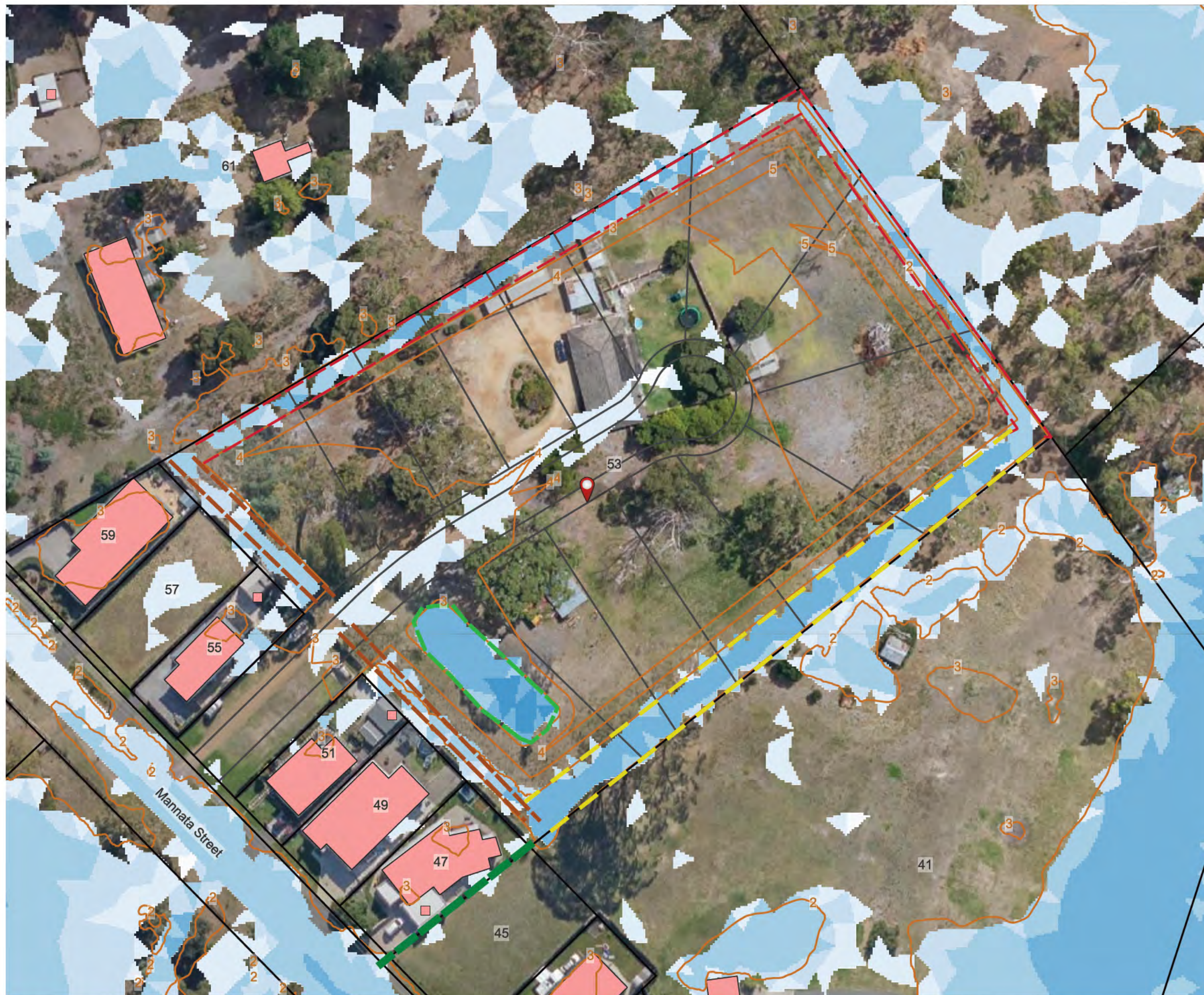
Hazard

- H1
- H2
- H3
- H4
- H5
- H6



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POST 1% AEP + CC @2100



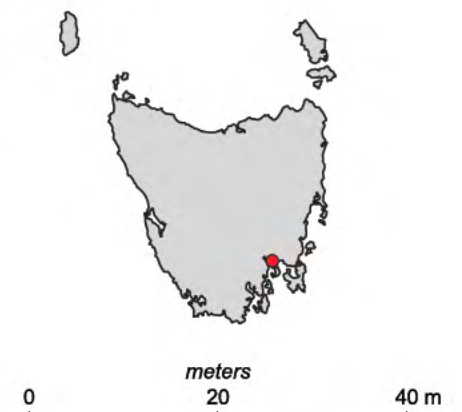
Legend

- 53 Mannata Street
- 1.00m Contours
- Boundary Lines
- Existing Building Area
- Existing SW Outlet
- Existing Open Drain 4x0.5m
- Proposed Detention Pond 30m3
- Proposed Open Drain 1.5x0.5m
- Proposed Open Drain 5x0.5m
- Proposed Subdivision Layout

POST 1% AEP + CC @2100

Depth (m)

- ≤ 0.02
- 0.02 - 0.05
- 0.05 - 0.10
- 0.10 - 0.30
- 0.30 - 0.60
- 0.60 - 0.80
- 0.80 - 1.00
- 1.00 - 1.50
- > 1.50



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POST 1% AEP + CC @2100



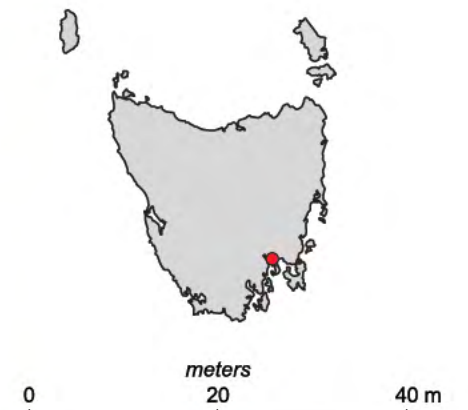
Legend

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- Boundary Lines
- Existing Building Area
- Existing SW Outlet
- Existing Open Drain 4x0.5m
- Proposed Detention Pond 30m3
- Proposed Open Drain 1.5x0.5m
- Proposed Open Drain 5x0.5m
- Proposed Subdivision Layout

POST 1% AEP +CC @2100

Velocity (m/s)

- <= 0.50
- 0.50 - 1.00
- 1.00 - 1.50
- 1.50 - 2.00
- > 2.00



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POST 1% AEP + CC @2100



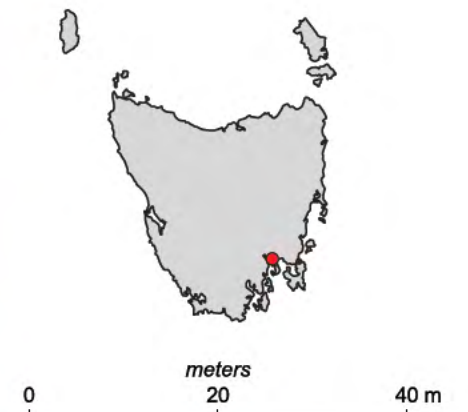
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- Proposed Open Drain 1.5x0.5m
- Proposed Open Drain 5x0.5m
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POST 1% AEP + CC @2100

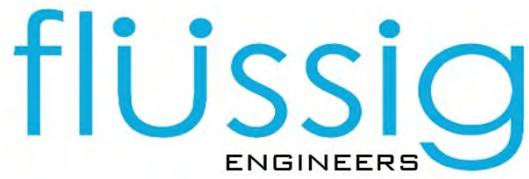
Hazard

- H1
- H2
- H3
- H4
- H5
- H6



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02nd March 2023
FE_23015

53 Mannata Street, Lauderdale STORMWATER MANAGEMENT PLAN



Prepared for: In The Pipeline Pty Ltd

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Document Initial Revision

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Document Revision History

Rev No.	Description	Reviewed by	Authorised by	Date

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1. Introduction

Flüssig Engineers have been engaged by **In the Pipeline Pty Ltd** to undertake a site-specific Stormwater Management Plan (SWMP) for the new commercial batch plant facility at 53 Mannata Street, Lauderdale including but not limited to, lot drainage analysis including stormwater drainage and MUSIC Modelling to stated stormwater quality standards. The purpose of this report is to determine the hydraulic characteristics and stormwater infrastructure capacity of a 5% AEP storm event and treatment on the existing and post-development scenarios.

1.1 Scope

This engagement includes:

1. Pre-construction drainage capacity at 5% AEP of existing design.
2. Pre-construction overland flow behaviour of existing stormwater design
3. Post-construction drainage capacity at 5% AEP of new design.
4. Post-construction overland flow behaviour of new stormwater design

2. Site Characteristics

2.1 Site Location

The proposed site location is at 53 Mannata Street, Lauderdale, located in the municipality of the **Clarence City Council**. The site is an approximately 1.62 ha lot with a proposed staged 13 residential lot subdivision development.

The site and its immediate areas are zoned Rural Living, with some areas of Landscape conservation, General Residential, Open Space, and Local Business zoning also in the surrounding region.



Figure 1. 53 Mannata Street, Lauderdale Development Site Location

2.2 Topography

53 Mannata Street, Lauderdale is approximately 1.62 ha in area, draining from approximately 250 mAHD to 5 mAHD.

As can be seen by the topography in Figure 2, the area slopes in a south-westerly direction towards Mannata Street.



Figure 2. DEM (hillshade) of lot area and surrounds

3. Proposal

3.1 Proposed Development

The proposed development consists of 13 residential lots including an internal asphalt access road connecting to Mannata Street on the south-western side of the lot. Design of the development was undertaken by Flüssig Engineers as shown in Figure 3.



Figure 3. Proposed Subdivision Design

3.2 Survey Data

All survey data was supplied by the client as a processed AutoCAD file. The provided data has been incorporated into various software to undertake the analysis.

4. Stormwater Quantity

4.1 Catchment Analysis

The catchment was modelled using RAFTS Hydrology software within Infoworks ICM. RAFTS software uses the Laurenson runoff-routing method to calculate runoff using the catchment properties including size, slope and % impervious. This method is accepted within ARR2019 for areas larger than a single dwelling lot.

4.2 Catchment Conditions

The development site at 53 Mannata Street, Lauderdale lies within a catchment area that extends from the north-western side of the lot to the channel south of the boundary of the site, with an overall catchment area of approximately 556 ha. The soils onsite are predominately podzols (sandy soils with organic matter) overlain on dolerite, sandstone, and mudstone. This allows for drainage directly to a stream or piped infrastructure.

4.3 Design Intensity Storms

Design storm durations and temporal pattern were calculated using Australian Rainfall and Runoff 2019 (ARR19) guidelines, running ten temporal pattern events through each duration to determine the

worst-case storm using the median temporal pattern. Figure 4 shows the box and whisker output for the 1% AEP model run. The model shows that the 1% AEP 4.5-hour storm event, temporal pattern 2 as the worst-case median storm.

Comparison of Storm Ensembles of different durations for AEP = 1%

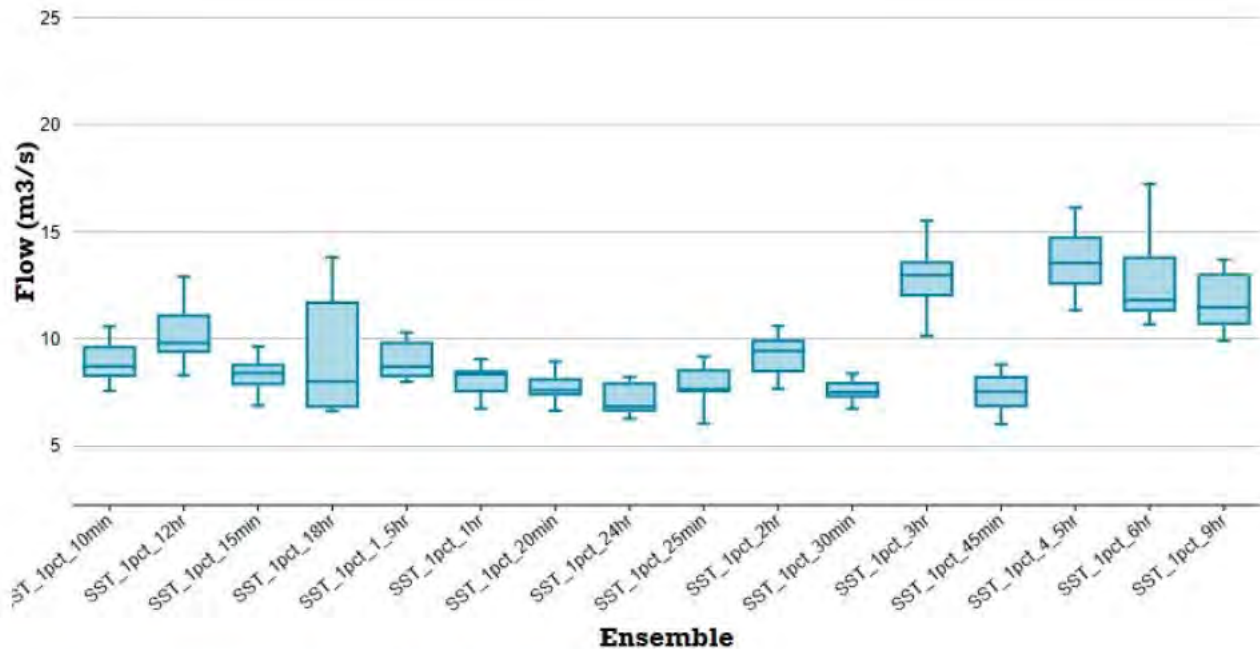


Figure 4. 1% Temporal Storms Box and Whisker Plot

4.4 Land use

Land use for the site, both pre- and post-development, were designed and derived from aerial imagery. Land use values are as follows in Table 1.

Table 1. Land Use Area

Land Use	Pre-Development		Post-Development	
	Area (m²)	% Total land	Area (m²)	% Total land
Total Impervious	561	3.5	1,667	11.5
Total Pervious	15,661	96.5	14,555	88.5

This is primarily a Rural Living zone at present. As this is a residential subdivision, lots were assumed based on permitting General Residential rezoning to the area, surrounding infrastructure and planning scheme allowance.

4.5 Manning's n and losses

Losses for this catchment were derived from ARR19 data hub. As per ARR2019, losses were taken at 60% of prescribed value to account for effective impervious area. See Table 2 for loss values.

Table 2. Runoff Coefficients

Surface	Initial losses (IL) mm	Continuing Losses (CL) mm/ hr
Pervious	30	3.1
Impervious	1	0

Manning's n values were taken directly from best practice manuals as shown in Table 3.

Table 3. Manning's N coefficients

Land Use	Manning's n
Swale Channel	0.025
Road	0.018
Gravel	0.025
Urban Yards	0.045
Buildings	0.3

4.6 Development Runoff

Stormwater runoff from the development site has been assessed under pre- and post-development models to determine the potential impact the development at 53 Mannata Street has on the immediate local flows. As per planning guidelines it is a requirement that this does not worsen from pre to post development.

Using the above parameters, the site was calculated using Infoworks ICM software and ARR2019 best practice manuals. Site characteristics for the pre- and post-development model are summarised in Table 4, where the existing house and driveway have been taken into account in pre-development, and the asphalt road inclusive in the post-development.

Table 4. Site Characteristics

Catchment	Area (ha)	Maximum Slope (%)	Total Land use pervious/ impervious (ha)	Storm duration and pattern
Pre-Development	1.62	0.5	1.56 / 0.06	5% 4.5-hour storm pattern 2
Post-Development	1.62	0.5	1.42 / 0.20	5% 4.5-hour storm pattern 2

5. Model Results

The pre- and post-development scenarios were calculated using Infoworks ICM software against the 5% and 1% AEP storm events. The storm durations were derived from the worst case median temporal pattern for these two events which were the temporal pattern 2, 4.5-hour durations.

The pre and post conditions can be seen in Figure 5 below showing the peak discharge. As is shown, there is an increase in peak discharge from pre to post development.

As per the Tasmanian Planning Scheme, the post-development allowable site discharge must not exceed the pre-development site discharge. As can be seen from Table 5, this is exceeded in the 5% AEP by a peak discharge of 0.036 m³/s, more than the allowable site discharge of 0.006 m³/s. Therefore, the site must detain the difference using an onsite stormwater detention (OSD) system.

Table 5. Discharge volume rates pre- and post-development scenarios

Design Event (AEP)	Discharge Volume (m ³ /s)			Required Detention (m ³)
	Pre-Development	Post-Development	Permissible Site Discharge	
5%	0.006	0.036	0.009	16.71

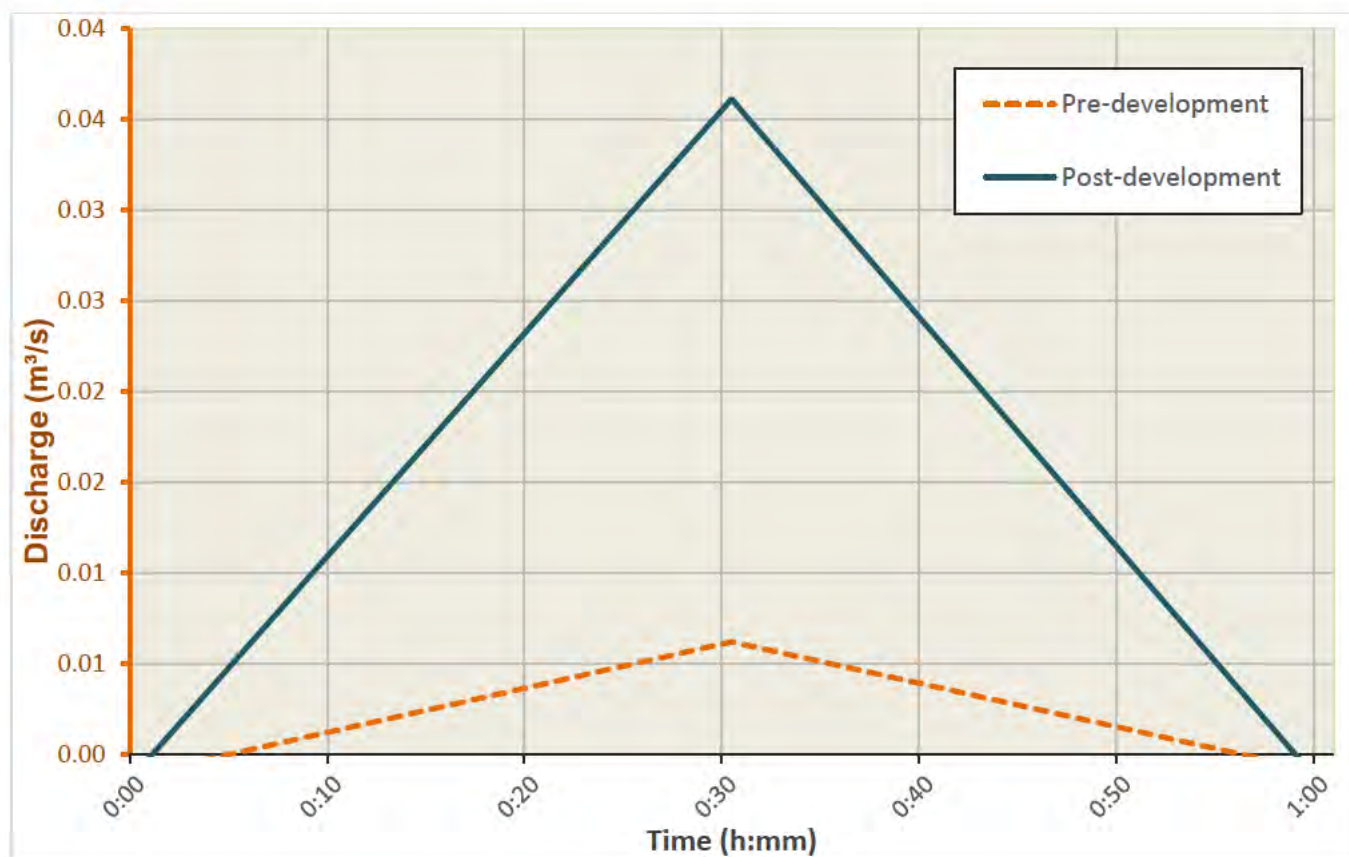


Figure 5. Site Discharge Curves Pre vs Post-Development

The required storage is the difference between the pre- and post-development curves shown in Figure 5 above. This area between the curve equates to a storage requirement which can be seen in Table 5. The site discharge increase due to development needs to be treated or otherwise agreed. The sections below outline the requirements for the new buildings and concrete areas.

5.1 Stormwater Detention

As shown in Table 5, the site discharge increase due to the development needs to be detained or otherwise agreed. The sections below outline the requirements for house and road storage.

5.1.1 Subdivision Detention

Stormwater from the residential subdivision including road surface is serviced by a network of drainage pipes and several stormwater pits. All stormwater drainage will run to the proposed 18 m³ detention pond located within the lot at the southern end of the subdivision.

As can be seen from Table 5, after allowance has been made to detain each future lots and road, the total volume discharged in the storm event still exceeds pre-development flows. Therefore, as per Table 5 the development would still require detaining 16.71 m³. Refer to "APPENDIX A Calculations".

All stormwater drainage will be directed to an onsite stormwater detention (OSD) system consisting of an 18 m³ detention pond positioned at the front end of the subdivision, and further into an existing open drain.

5.2 1% AEP Overland Flow Path (OFP)

As per Clarence City Council requirements, runoff for the 1% AEP is not required to be captured by infrastructure nor detained onsite in an OSD. However, the 1% AEP storm must be able to drain through

the site and not cause additional impedance on the neighbouring lots or future residents. Figure 6 below shows the pre-development overland flow path for the site in the event of a 1% AEP storm.

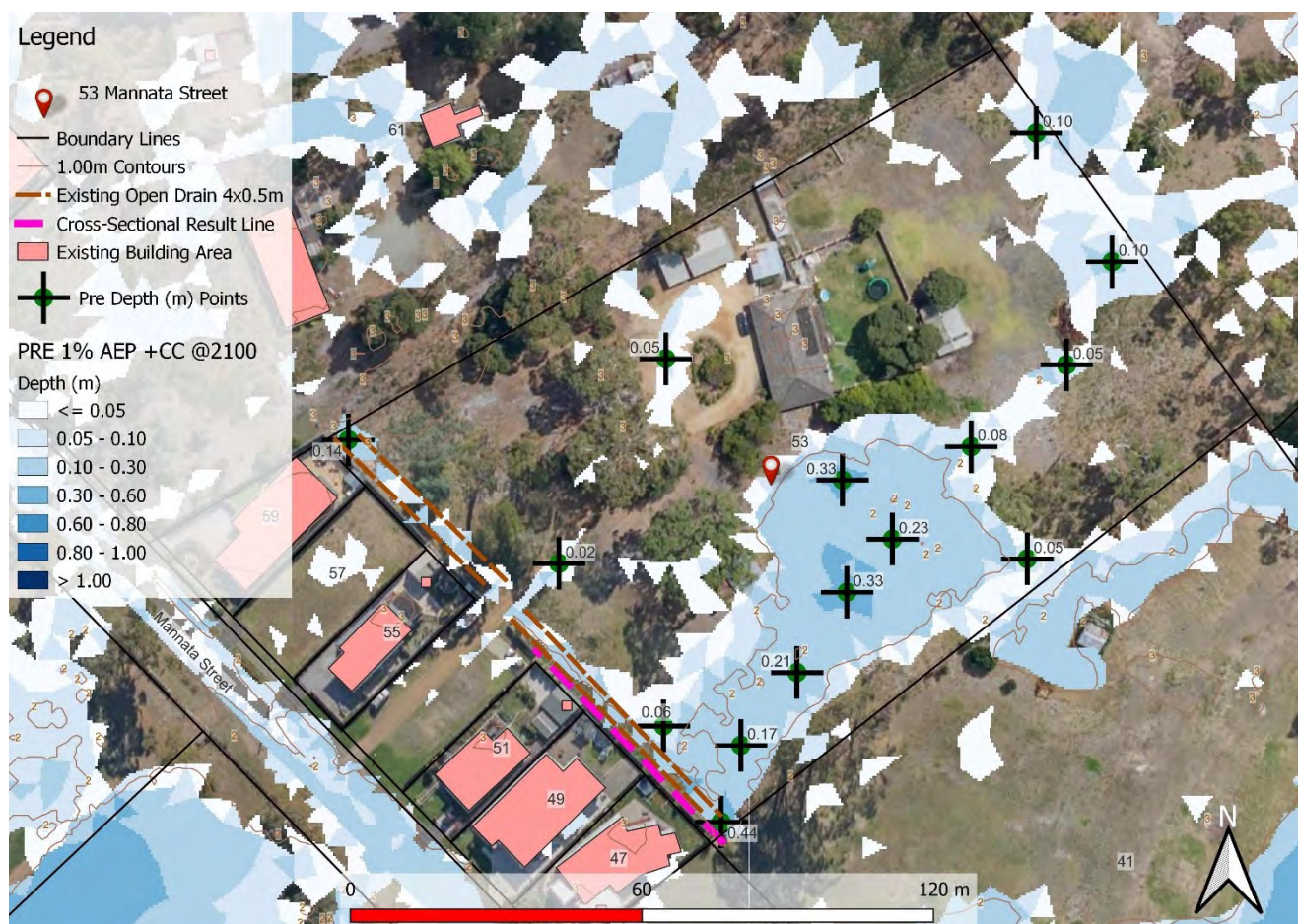


Figure 6. 1% AEP OFP Pre-Development

Post development flow paths can be seen in Figure 7. The extent of the 1% AEP storm dramatically reduces flooding within the lot from the pre-development flow paths in and along boundaries with the proposed detention pond modelled. There is some very minor pooling occurring on the proposed road, with majority of flooding dispersing into the open drain surrounding the lot. There is hence no detrimental impact on the overland flood path from pre- to post-development scenarios.



Figure 7. 1% AEP OFF Post-Development

5.3 Quantity Summary

The SWMP quantity report has been designed from the Tasmanian Planning Scheme and best practice design and guidelines. The following is a summary of the requirements for stormwater management for the development at 53 Mannata Street, Lauderdale.

1. The proposed development will be required to detain runoff from impervious areas to pre-development discharge quantities, as per Clarence City Council requirements.
2. The 1% AEP runoff overland flow paths can be directed from the development site via a detention pond.

6. Water Quality

Water quality modelling for the site has been undertaken with the urban stormwater improvement conceptualisation software MUSIC. The modelling conducted in MUSIC has been done in accordance with MUSIC Modelling Guidelines and the Tasmanian State Stormwater Strategy. This document provides a guide to water quality modelling methodology and outlines the assumptions that should be made when selecting input parameters.

Recommendations for the improvement of the water quality on site would include the diversion of stormwater flows from the subdivision to a primary treatment system (treatment train). This would reduce the pollutants in the receiving waters further and be a safe design option if future usage of this sub catchment provides higher pollutant storm water runoff.

6.1 Stormwater Quality Treatment (construction phase)

During construction, many pollutants are generated from various sources. These pollutants can easily be captured in stormwater runoff and introduced into the downstream receiving environment polluting the waterways. Listed below are some of the main construction phase pollutants:

- Litter from construction – material packaging, paper, plastic, food packaging, off cuts etc.
- Sediment erosion and transports from excavated material and fresh surfaces.
- Hydrocarbons – equipment and machinery
- Toxic material – cement, solvents, paints, cleaning agents etc.
- pH altering substances – cement, cleaning agents etc

Construction phase pollutants should be planned and mitigated for by a designed site-specific SWMP as part of the drawing set. This should detail controls including but not limited to:

- Diversion of upslope water (where applicable)
- Stabilised exit/ entry points
- Minimise site disturbance where possible
- Implement sediment control along downslope boundaries
- Appropriate location and protection for stockpiles
- Capture on-site runoff that may contain pollutants
- Maintain control measures
- Stabilise site after disturbance (revegetate etc)

6.2 Stormwater Quality Modelling

Stormwater pollutant modelling for the 53 Mannata Street development was undertaken using Model for Urban Stormwater Improvement Conceptualisation (MUSIC) software, version 6.3.0, under the guidelines of the State Stormwater Strategy.

This model splits the catchment into the following typical areas:

- Commercial Catchment
- Road Catchment

The following fraction impervious and land areas having been adopted in the modelling as per the concept design measurements. See Table 6 below for fraction imperviousness (fi).

Table 6. Adopted Fraction Impervious

Catchment Area (ha)	Roof		Asphalt		Gravel		Garden	
	Area (ha)	fi	Area (ha)	fi	Area (ha)	fi	Area (ha)	fi
1.62	0	1	0.26	0.9	0	0.5	1.36	0.3

6.2.1 Council Planning Quality Removal Standards

Clarence City Council has adopted the pollutant removal targets and best practice from the State Stormwater Strategy 2010. See Table 7 for target removal rates.

Table 7. State Stormwater Strategy Pollutant Removal Targets

Parameter (kg/ year)	Result Pollutant Retention on Developed Site
Total Suspended Solids (TSS)	80%
Total Phosphorous (TP)	45%
Total Nitrogen (TN)	45%
Gross Pollutants	90%

6.3 Treatment Train

To achieve stormwater pollutant removal targets outlined above and considering site constraints, this model utilised a SPEL Hydrosystem 400(or similar). The treatment train consists of roads draining through stormwater infrastructure to a single Hydrosystem (or similar) within the road reserve.

Properties of each treatment product can be seen in Table 8. Should an alternative similar product be selected it needs to have equal or greater removal properties.

Table 8. SPEL Hydrosystem Properties

Properties	SPEL Hydrosystem 1500
Are the proposed pollutant reduction efficiencies independently verified using a method suited to local conditions?	Y
Does the data provided include performance results under dry weather flows	Y
Is the assumed high-flow bypass rate consistent with manufacturer specifications?	Y
High Flow by-pass (m ³ /s)	0.008
Low Flow (m ³ /s)	0.003
Suspended Solids (TSS) Input (mg/L)	1000.00
Suspended Solids (TSS) Output (mg/L)	150.00
Phosphorous (TP) Input (mg/L)	100.00
Phosphorous (TP) Output (mg/L)	34.00
Nitrogen (TN) Input (mg/L)	100.00
Nitrogen (TN) Output (mg/L)	57.00
Gross Pollutants (GP) Input (mg/L)	15.0
Gross Pollutants (TP) Output (mg/L)	0.00



Figure 8. MUSIC Treatment Train Effectiveness Result

6.4 Quality Results

The MUSIC pollutant load reductions are detailed in Table 9 below. As can be seen when comparing the MUSIC results to the required state stormwater strategy target load reductions, the specified treatment train outlined above and as seen in Figure 8 show that all targets either meet or exceed state reduction targets.

Table 9. Pollutant Removal Achieved vs Targets

Parameter (kg/year)	Target Load Reduction (%)	MUSIC Modelled Load Reduction (%)	State Stormwater Targets Achieved (Y/N)
Total Suspended Solids (TSS)	80.0	93.9	Y
Total Phosphorous (TP)	45.0	85.9	Y
Total Nitrogen (TN)	45.0	71.2	Y
Total Pollutants (GP)	90.0	100	Y

Based on the water quality assessment using the MUSIC software, it is found that the pollutant reduction improvement can be achieved through use of the detention pond, SPEL Stormsacks and SPEL Hydrosystem.

Table 10. Required SQUIDS

Stormwater Quality Improvement Device	
Stormwater Detention Pond	1 x 18 m ³
SPEL Stormsacks or Similar	4 units
SPEL Hydrosystem	1 unit HS400.3

6.5 SQUID Maintenance

To ensure ongoing operation of all treatment systems, the Council would be required to perform regular maintenance on all treatment mechanisms to ensure they remain in good working order. This would include, but not be limited to, the information described in Table 11.

Table 11. Concept Maintenance Plan

Task	Action	Frequency
General Inspection	Clear all sediment and debris, check for erosion and vegetation growth, ensure operational.	Approximately every 3 months
Specialised cleaning and inspection	Inspect all storage, inlets and outlets – clean and flush if required. Visually inspect main device for defects.	Yearly
Maintenance	Perform detailed inspection and maintenance of associated infrastructure by a qualified person.	Every 5 years.

The above maintenance plan is generic and based on removal rates and best practice advice. Specific maintenance plans should be created for each specific mechanism upon purchasing or confirmation of design.

6.6 Quality Summary

Flüssig Engineers recommends the following be undertaken to ensure the ongoing stormwater quality from the developed site:

1. Construction quality control should be implemented to prevent pollution during construction.
2. Maintenance plans need to be created and adhered to ensure the ongoing operation of the systems.
3. Flüssig Engineers notes that the recommended SQUIDS treatment, whilst suitable in this instance, does not limit the developer to this treatment method. However, any replacement method/product selected by the developer should meet removal properties of these products for the MUSIC model to be valid.

7. Conclusion

The post-development quantity and quality scenarios for the Stormwater Management Plan for 53 Mannata Street, Lauderdale have been investigated. Post-development quantity and quality have been assessed against the Clarence City Council Stormwater guidelines, Tasmanian Planning Scheme and the State Stormwater Strategy to ensure the post-development flows meet specified standards.

The following conclusions were derived in this report:

1. A comparison of the post-development peak flows for the 5% AEP storm event were undertaken against the pre-development flows and found to increase site discharge with development changes.
2. New detention is required for the proposed access road into the subdivision.
3. The 1% OFP was assessed through the site and show that changes in flow can be directed away from neighbouring properties and critical infrastructure on site via open drains surrounding the lot.
4. SQUIDS designed and sized using MUSIC, 4 units of SPEL Stormsacks or similar and a 18m³ detention pond can achieve required pollutant removal through passive treatment.

Under the Stormwater Management Plan, the development site will meet current specified standards for both quantity and quality control.

8. Limitations

Flüssig Engineers were engaged by **In the Pipeline Pty Ltd** to assess the proposed subdivision at 53 Mannata Street, Lauderdale for the purpose of a site-specific stormwater management plan. This report is deemed suitable for purpose at the time of undertaking the study. If conditions of the development change, the plan will need to be reviewed against all changes.

This report is to be used in full and may not be used in part to support any other objective other than what has been outlined within, unless specific written approval to do otherwise is granted by Flüssig Engineers. Flüssig Engineers accepts no responsibility for the accuracy of third-party documents supplied for the purpose of this stormwater management plan.

APPENDIX A: ONSITE DETENTION CALCULATIONS

STORMWATER DETENTION V5.04

Flüssig Engineers

Location: Lauderdale, TAS
Site: 1667m² with tc = 20 and tcs = 15 mins.
PSD: AEP of 5%, Above ground PSD = 6.29L/s
Storage: AEP of 5%, Above ground volume = 16.71m³

Design Criteria (Custom AEP IFD data used)

Location = Lauderdale, TAS
Method = E (A)RI 2001,A(E)P 2019

PSD annual exceedance probability (APE) = 5 %
Storage annual exceedance probability (APE) = 5 %

Storage method = A (A)bove,(P)ipe,(U)nderground,(C)ustom

Site Geometry

Site area (As) = 1667 m² = 0.1667 Ha
Pre-development coefficient (Cp) = 0.30
Post development coefficient (Cw) = 0.90
Total catchment (tc) = 20 minutes
Upstream catchment to site (tcs) = 15 minutes

Coefficient Calculations

Pre-development				Post development			
Zone	Area (m ²)	C	Area * C	Zone	Area (m ²)	C	Area * C
Concrete	0	0.90	0	Concrete	1667	0.90	1500
Roof	0	1.00	0	Roof	0	1.00	0
Gravel	0	0.50	0	Gravel	0	0.50	0
Garden	1667	0.30	500	Garden	0	0.30	0
Total	1667	m²	500	Total	1667	m²	1500
Cp = $\Sigma \text{Area} * C / \text{Total} = 0.300$				Cw = $\Sigma \text{Area} * C / \text{Total} = 0.900$			

Permissible Site Discharge (PSD) (AEP of 5%)

PSD Intensity (I) = 43.6 mm/hr For catchment tc = 20 mins.
Pre-development (Qp = Cp*I*As/0.36) = 6.06 L/s
Peak post development (Qa = 2*Cw*I*As/0.36) = 36.33 L/s = (0.834 x I) Eq. 2.24
Storage method = A (A)bove,(P)ipe,(U)nderground,(C)ustom
Permissible site discharge (Qu = PSD) = 6.294 L/s

Above ground - Eq 3.8

$$Q_p = \text{PSD}^2 - 2 * Q_a / t_c * (0.667 * t_c * Q_p / Q_a + 0.75 * t_c + 0.25 * t_{cs}) * \text{PSD} + 2 * Q_a * Q_p$$

Taking x as = PSD and solving

$$a = 1.0 \quad b = -76.2 \quad c = 440.0$$

$$\text{PSD} = \frac{-b \pm \sqrt{b^2 - 4ac}}{2a}$$

$$\text{PSD} = 6.294 \text{ L/s}$$

Below ground pipe - Eq 3.3

$$Q_p = \text{PSD} * [1.6 * t_{cs} / \{t_c * (1 - 2 * \text{PSD} / (3 * Q_a))\} - 0.6 * t_{cs}^{2.67} / \{t_c * (1 - 2 * \text{PSD} / (3 * Q_a))\}^{2.67}]$$

$$= 6.06$$

$$\text{PSD} = 6.242 \text{ L/s}$$

Below ground rectangular tank - Eq 3.4

$$t = t_{cs} / (t_c * (1 - 2 * \text{PSD} / (3 * Q_a))) = 0.844$$

$$Q_p = \text{PSD} * [0.005 - 0.455 * t + 5.228 * t^2 - 1.045 * t^3 - 7.199 * t^4 + 4.519 * t^5]$$

$$= 6.06$$

$$\text{PSD} = 6.060 \text{ L/s}$$

STORMWATER DETENTION V5.04

Flüssig Engineers

Design Storage Capacity (AEP of 5%)

$$\begin{aligned} \text{Above ground (Vs)} &= [0.5 \cdot Q_a \cdot t_d - [(0.875 \cdot \text{PSD} \cdot t_d)(1 - 0.917 \cdot \text{PSD}/Q_a) + (0.427 \cdot t_d \cdot \text{PSD}^2/Q_a)]] \cdot 60/10^3 \text{ m}^3 & \text{Eq 4.23} \\ \text{Below ground pipe (Vs)} &= [(0.5 \cdot Q_a - 0.637 \cdot \text{PSD} + 0.089 \cdot \text{PSD}^2/Q_a) \cdot t_d] \cdot 60/10^3 \text{ m}^3 & \text{Eq 4.8} \\ \text{Below ground rect. tank (Vs)} &= [(0.5 \cdot Q_a - 0.572 \cdot \text{PSD} + 0.048 \cdot \text{PSD}^2/Q_a) \cdot t_d] \cdot 60/10^3 \text{ m}^3 & \text{Eq 4.13} \end{aligned}$$

td (mins)	I (mm/hr)	Qa (L/s)	Above Vs (m³)	Pipe Vs (m³)	B/G Vs (m³)
5	82.5	68.8	8.73		
12	57.6	48.0	13.54		
16	49.5	41.2	14.86		
20	43.6	36.3	15.68		
24	39.1	32.6	16.20		
27	36.4	30.3	16.45		
31	33.4	27.8	16.65		
35	31.0	25.8	16.74		
38	29.4	24.5	16.76		
42	27.6	23.0	16.72		

Table 1 - Storage as function of time for AEP of 5%

Type	td (mins)	I (mm/hr)	Qa (L/s)	Vs (m³)
Above Pipe B/ground	33.2	32.0	26.7	16.71

Table 2 - Storage requirements for AEP of 5%

Frequency of operation of Above Ground storage

$$\begin{aligned} Q_{p2} &= 0.75 \text{ CI 2.4.5.1} \\ Q_{p2} = Q_{p2} \cdot Q_{p1} \text{ (where } Q_{p1} = \text{PSD)} &= 4.72 \text{ L/s at which time above ground storage occurs} \\ I = 360 \cdot Q_{p2} / (2 \cdot C_w \cdot A_s \cdot 10^3) &= 5.7 \text{ mm/h} & \text{Eq 4.24} \end{aligned}$$

Period of Storage

Time to Fill:

$$\begin{aligned} \text{Above ground (tf)} &= t_d \cdot (1 - 0.92 \cdot \text{PSD}/Q_a) & \text{Eq 4.27} \\ \text{Below ground pipe (tf)} &= t_d \cdot (1 - 2 \cdot \text{PSD}/(3 \cdot Q_a)) & \text{Eq 3.2} \\ \text{Below ground rect. tank (tf)} &= t_d \cdot (1 - 2 \cdot \text{PSD}/(3 \cdot Q_a)) & \text{Eq 3.2} \end{aligned}$$

Time to empty:

$$\begin{aligned} \text{Above ground (te)} &= (V_s + 0.33 \cdot \text{PSD}^2 \cdot t_d / Q_a \cdot 60/10^3) \cdot (1.14 / \text{PSD}) \cdot (10^3/60) & \text{Eq 4.28} \\ \text{Below ground pipe (te)} &= 1.464 / \text{PSD} \cdot (V_s + 0.333 \cdot \text{PSD}^2 \cdot t_d / Q_a \cdot 60/10^3) \cdot (10^3/60) & \text{Eq 4.32} \\ \text{Below ground rect. tank (te)} &= 2.653 / \text{PSD} \cdot (V_s + 0.333 \cdot \text{PSD}^2 \cdot t_d / Q_a \cdot 60/10^3) \cdot (10^3/60) & \text{Eq 4.36} \end{aligned}$$

$$\text{Storage period (Ps = tf + te)} \quad \text{Eq 4.26}$$

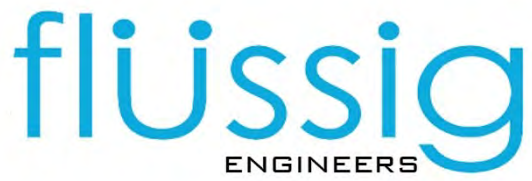
Type	td (mins)	Qa (L/s)	Vs (L/s)	tf (mins)	te (mins)	Ps (mins)
Above Pipe B/ground	33.2	26.7	16.7	26.0	53.4	79.4

Table 3 - Period of Storage requirements for AEP of 5%

Orifice

$$\begin{aligned} \text{Permissible site discharge (Qu=PSD)} &= 6.29 \text{ L/s (Above ground storage)} \\ \text{Orifice coefficient (CD)} &= 1 \text{ For sharp circular orifice} \\ \text{Gravitational acceration (g)} &= 9.81 \text{ m/s}^2 \\ \text{Maximum storage depth above orifice (H)} &= 200 \text{ mm} \\ \text{Orifice flow (Q)} &= CD \cdot A_o \cdot \sqrt{2 \cdot g \cdot H} \\ \text{Therefore:} \\ \text{Orifice area (Ao)} &= 3177 \text{ mm}^2 \\ \text{Orifice diameter (D = } \sqrt{4 \cdot A_o / \pi}) &= 63.6 \text{ mm} \end{aligned}$$

Contact Project Manager: Max Moller



P: 03 6288 7704
M: 0431 080 279
E: max@flussig.com.au
W: www.flussig.com.au
A: Level 4, 116 Bathurst Street
Hobart TAS 7000

Property report for 53 MANNATA ST LAUDERDALE TAS 7021



Property Identification Number

3310725

Locality

Lauderdale

Planning Zones

General Residential, Rural Living

Total Area

16240 sqm

Certificate of Title Reference (Volume/Folio)

167480/7

Municipality

Clarence

Planning Codes Overlay

High coastal inundation hazard band, Airport obstacle limitation area, Flood prone areas, Medium coastal inundation hazard band, Low coastal inundation hazard band

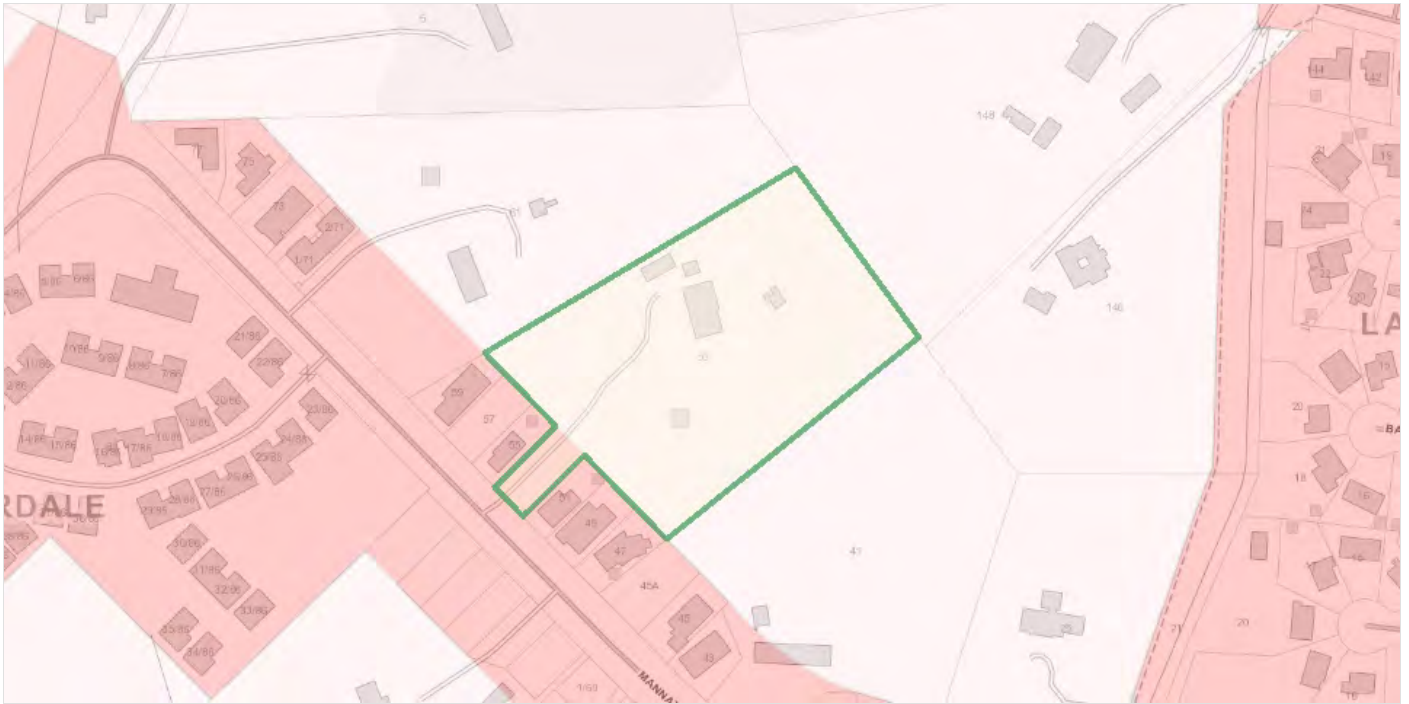
Planning Scheme

Tasmanian Planning Scheme

This property is in the **General Residential, Rural Living** planning zones under the Tasmanian Planning Scheme.

The Tasmanian Planning Scheme consists of state wide provisions to ensure consistency across Tasmania, and local provisions which spatially apply those through zoning maps along with specific provisions for unique places in each municipality to address local issues.

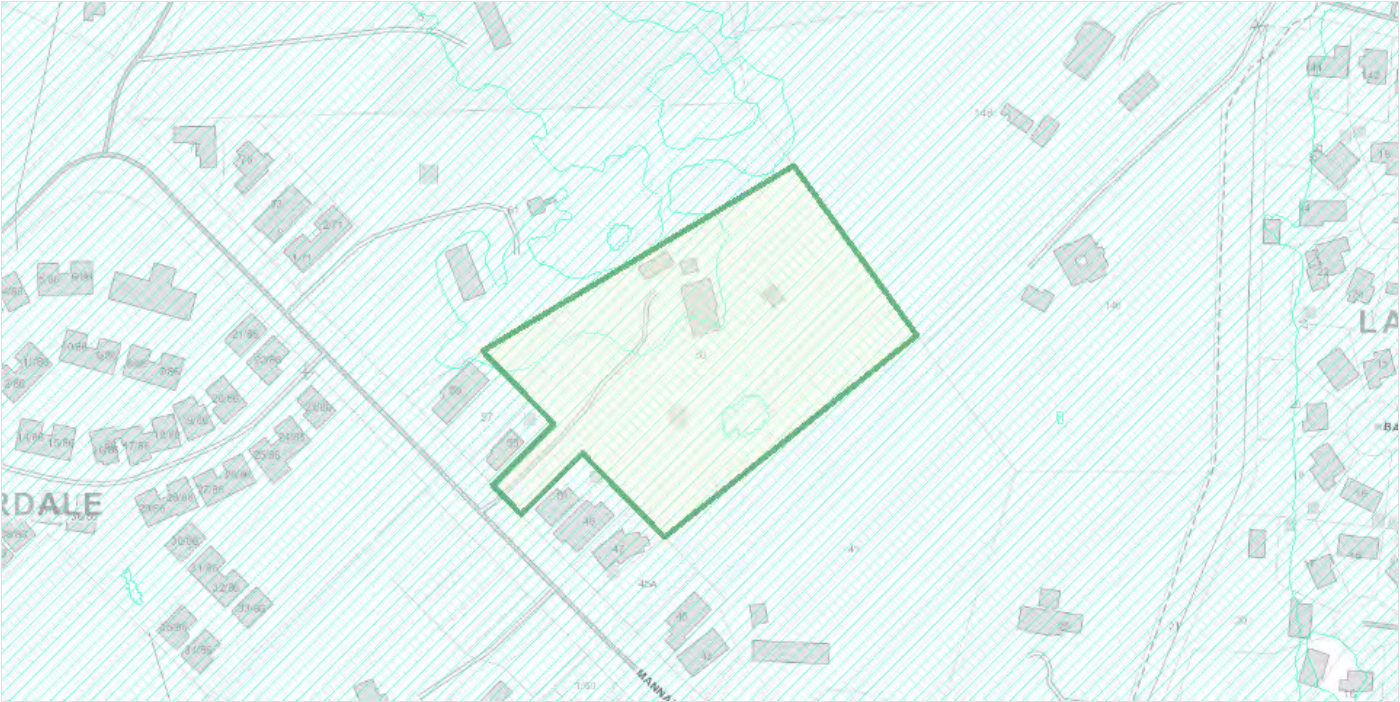
Planning Zone



Tasmanian Planning Zone

Zone Number	8
Zone	General Residential
Zone Number	11
Zone	Rural Living

Coastal Inundation Hazard

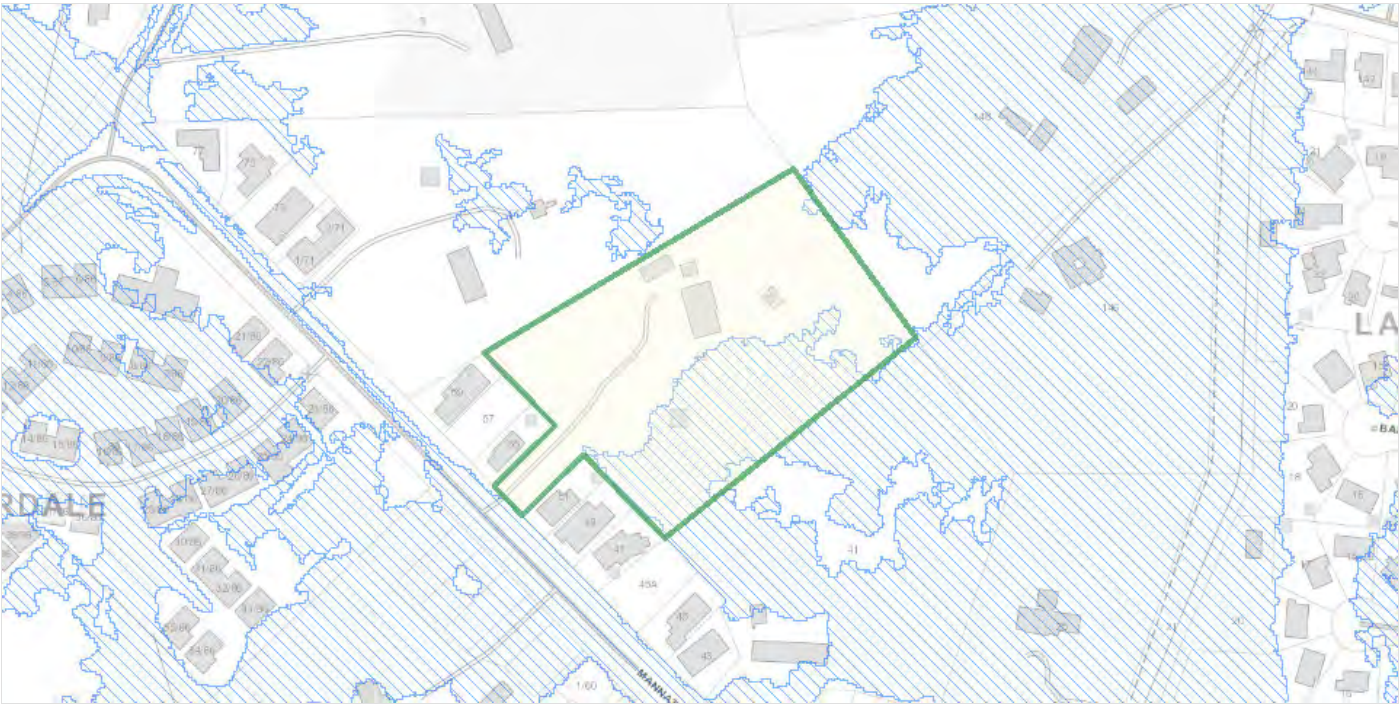


Coastal inundation hazard: All

The Coastal Inundation Hazard Code is applied by reference to the coastal inundation hazard area overlay, which includes land within the High coastal inundation hazard band (Mean high tide plus sea level rise in 2050, rounded up to the nearest 0.1m). The presence of a Hazard Code on the property may affect the planning and building approvals required for development.

Overlay Name	Low coastal inundation hazard band
Description	Data source WRL
Overlay Name	Medium coastal inundation hazard band
Description	Alterations of electronic planning map made under s.800 of LUPAA
Overlay Name	High coastal inundation hazard band
Description	Data source WRL

Flood-Prone Area

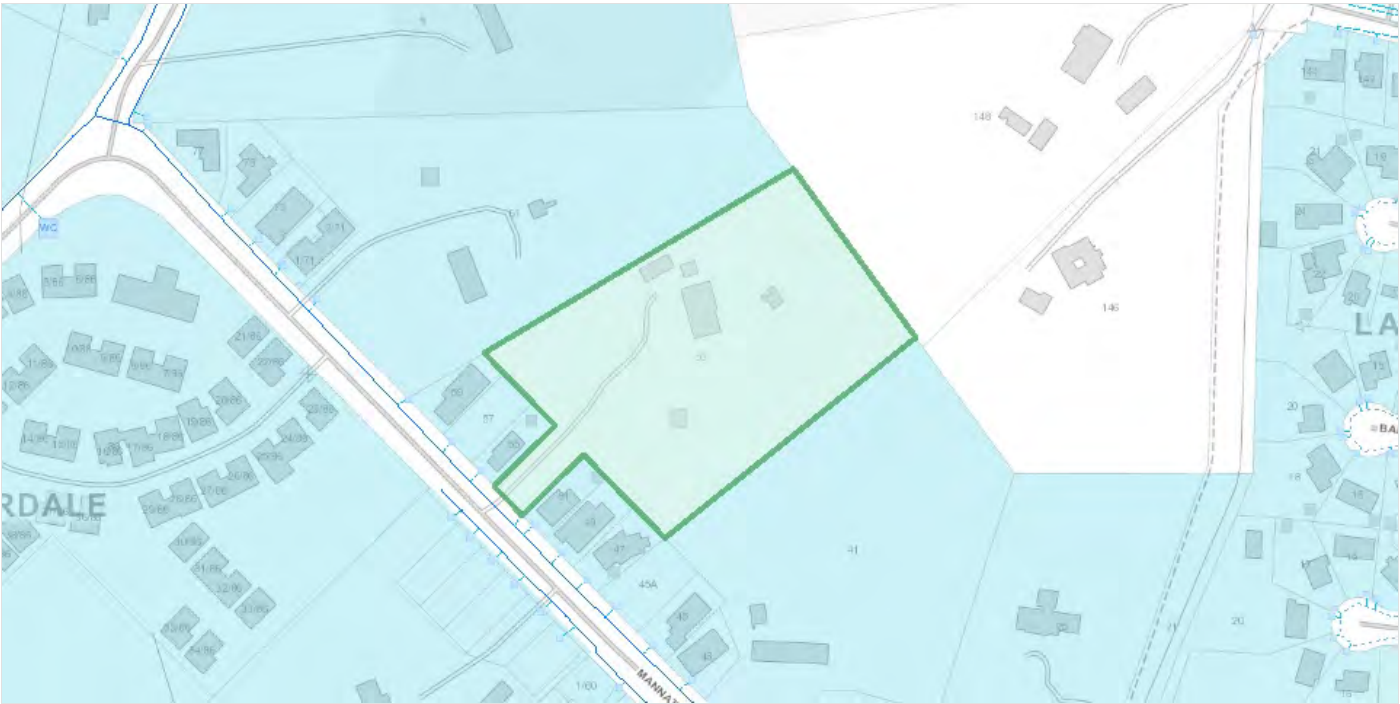


Flood-prone areas

The flood prone hazard area overlay is applied to areas known to be prone to flooding, particularly areas known to be within the 1 per cent annual exceedance probability (AEP) level.

Description	Amendment reference: PDPSAMEND 2021 022806
Overlay Name	Flood prone areas
LPS Reference	C12.0

TasWater - Water Service

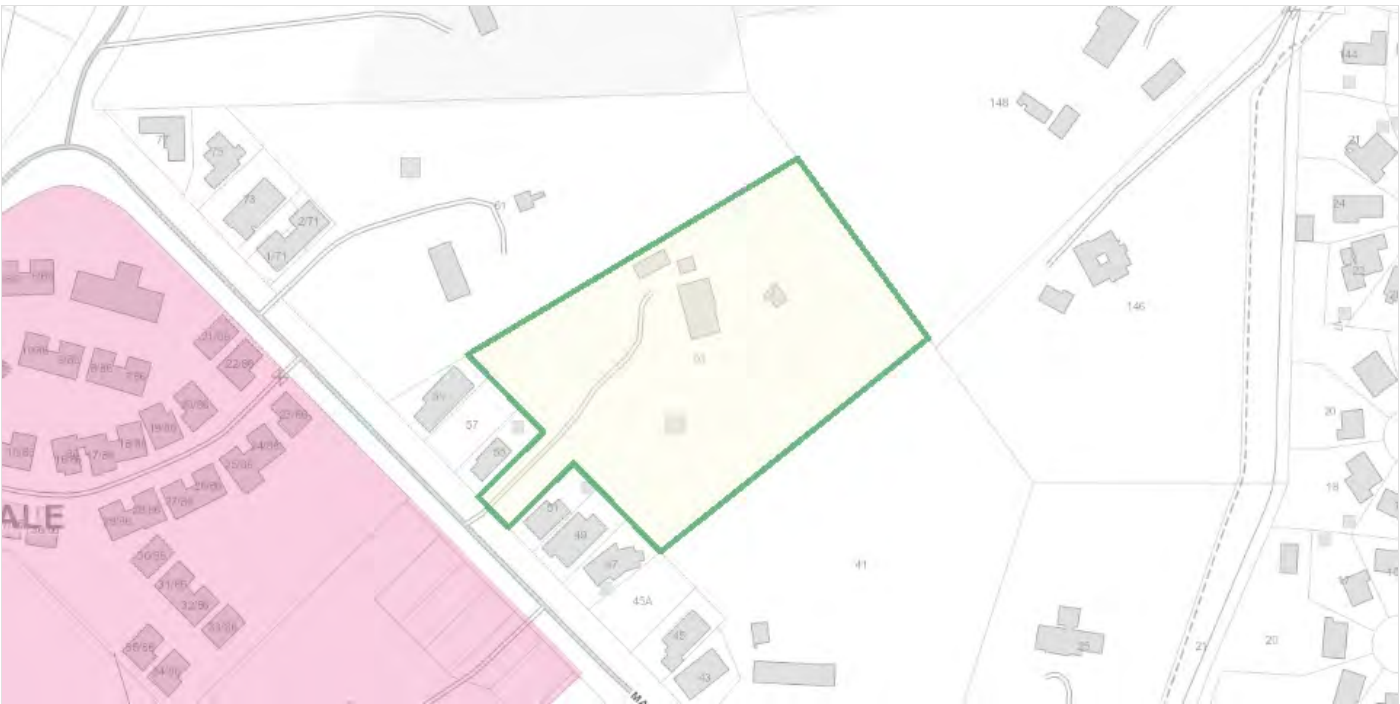


TasWater - Water Serviced Land

Serviced Land is the land which TasWater will permit to be connected to its water and sewerage infrastructure. The blue shading on the map indicates water serviced properties. The property is connected to, or is able to connect to the TasWater water supply network. Development assessments will be required to be undertaken prior to undertaking any work on TasWater Infrastructure. See <https://www.taswater.com.au/Customers/Serviced Land> for further information.

Service Type Full Service

TasWater - Sewer Service



TasWater - Sewer Serviced Land

Serviced Land is the land which TasWater will permit to be connected to its water and sewerage infrastructure. The red shading on the map indicates sewerage serviced properties. The property is connected to, or is able to connect to the TasWater sewerage reticulation network. Development assessments will be required to be undertaken prior to undertaking any work on TasWater Infrastructure. See <https://www.taswater.com.au/Customers/Serviced Land> for further information.

Service Type Unserviced

TasWater infrastructure

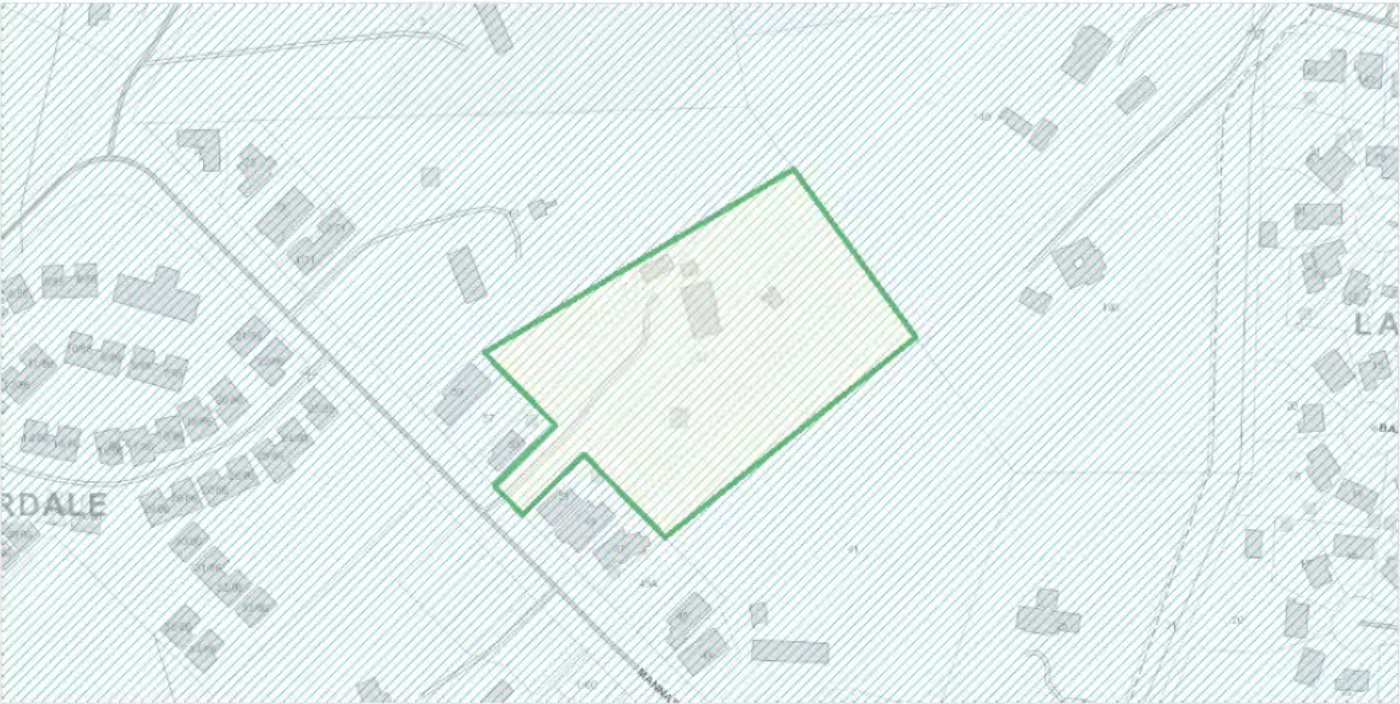


TasWater - Sewer Lateral Line

The lateral line indicates the property service pipe that begins at the sewer main and ends at the customer connection point. This is displayed on the map as a thin red line. Work cannot be undertaken within 2 metres of any infrastructure without seeking approval from TasWater.

DIAMETER	40
MATERIAL	PVC

Safeguarding of airports code



Airport obstacle limitation area

The airport obstacle limitation area overlay is based on the Obstacle Limitation Surfaces (OLS) and Procedures for Air Navigation Services Aircraft Operations (PANS OPS) contained in the airport master plan or those otherwise adopted by the relevant airport owner or operator for the relevant airport in accordance with any accepted guidelines. It identifies the specified height limit on the land within the overlay by reference to AHD.

Description	Alterations of electronic planning map made under s.800 of LUPAA
Overlay Name	Airport obstacle limitation area
LPS Reference	CLA C16.0

Council Details

The local council where your property is located can provide advice on a proposed project.

Consult

Clarence City Council

Mailing address

38 Bligh Street

Rosny Park Tasmania 7018

Work:

(03) 6217 9500

Disclaimer

This enquiry tool is a guide only and is not a substitute for professional advice.

This enquiry tool only provides information for common developments undertaken individually, for example, building a deck.

The Tasmanian Planning Commission, a court, council or other relevant authority may have an interpretation of the law that is different from the information provided as part of this enquiry tool.

You should always confirm that you are permitted to commence a development by contacting a relevant authority who may be:

- the local council; or
- an independent Licensed Professional



Southern Tasmania Regional Land Use Strategy - Urban Growth Boundary

LAUDERDALE

Adjusting the urban growth boundary (UGB) to cover Central Lauderdale is crucial for various strategic, environmental, and social reasons.

Dear Minister Ellis,

I am writing to advocate for the expansion of the urban growth boundary (UGB) in Lauderdale as part of the Southern Tasmania Regional Land Use Strategy (STRLUS) and your review of the UGB. This proposal aims to address the critical needs of our growing community and ensure sustainable development in the region.

1. Population Growth: Lauderdale's population is steadily increasing, with projections indicating significant growth in the coming years. Expanding the UGB is essential to accommodate this influx of residents. By doing so, we can prevent urban sprawl, maintain the integrity of our community, and support the town's sustainable growth trajectory.

2. Economic Development: Expanding the UGB and addressing current zoning anomalies will be a game-changer for Lauderdale and the broader Clarence area. Creating a commercial hub along South Arm Road will foster a vibrant and dynamic community, stimulate economic activity, and enhance local amenities. This development will attract new businesses, create job opportunities, and contribute to the overall prosperity of the region.

3. Infrastructure and Services: With an expanded UGB, we can better plan and allocate resources for essential infrastructure and services. This includes improved transportation networks, upgraded utilities, and enhanced public facilities such as schools, parks, and healthcare services. A well-planned expansion will ensure that Lauderdale's infrastructure can meet the demands of a growing population and provide a high quality of life for residents.

4. Environmental Stewardship: Expanding the UGB in a controlled and strategic manner allows us to implement sustainable development practices that protect our natural environment. By concentrating growth within defined boundaries, we can preserve green spaces, protect biodiversity, and minimize the environmental impact of urban expansion. This approach aligns with the principles of the STRLUS and supports our commitment to environmental stewardship.

5. Social Cohesion: A well-planned UGB expansion will promote social cohesion by ensuring that new development is integrated with existing neighbourhoods. This integration fosters a sense of community, enhances social interactions, and creates a more inclusive and connected Lauderdale. By prioritizing mixed-use development and affordable housing options, we can accommodate a diverse population and address housing affordability challenges.

I urge you to consider this proposal to expand the urban growth boundary in Lauderdale. This strategic decision will enable us to address the pressing needs of our growing community, support sustainable development, and enhance the overall well-being of our residents. Thank you for your attention to this important matter.

Sincerely,

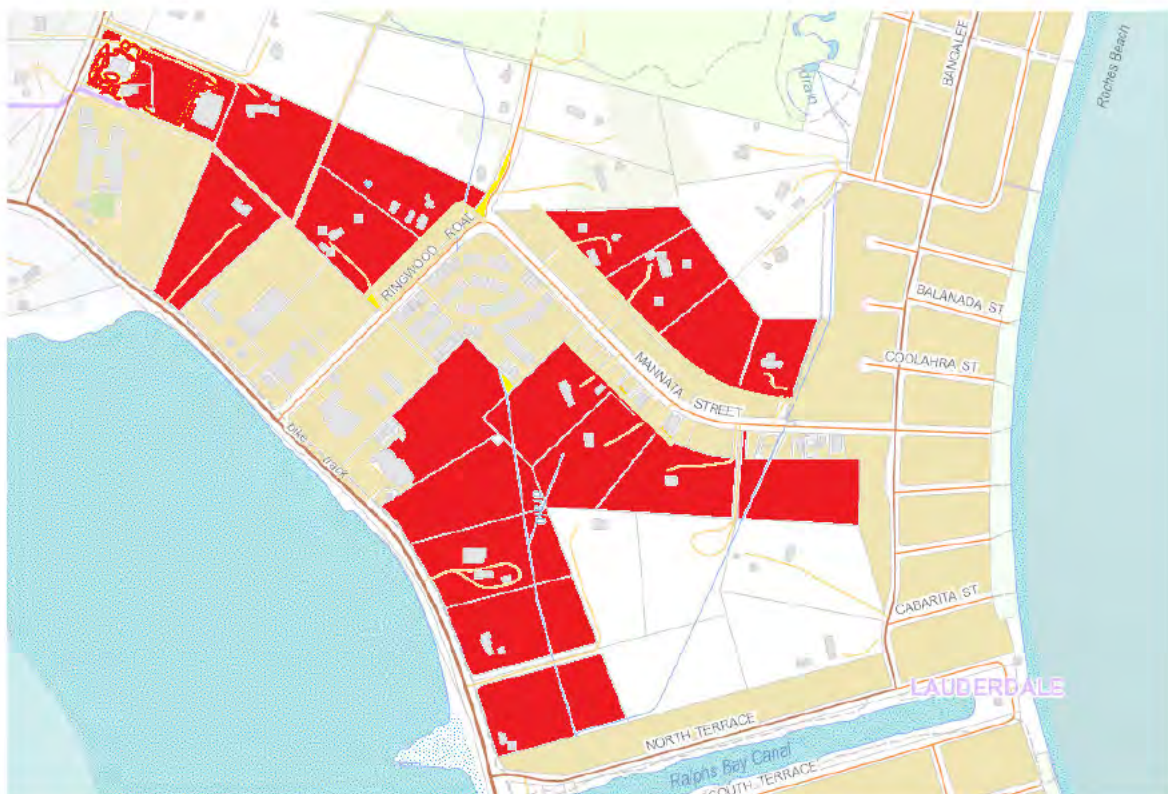
Michael Figg

For

The Advance Lauderdale Association (ALA)



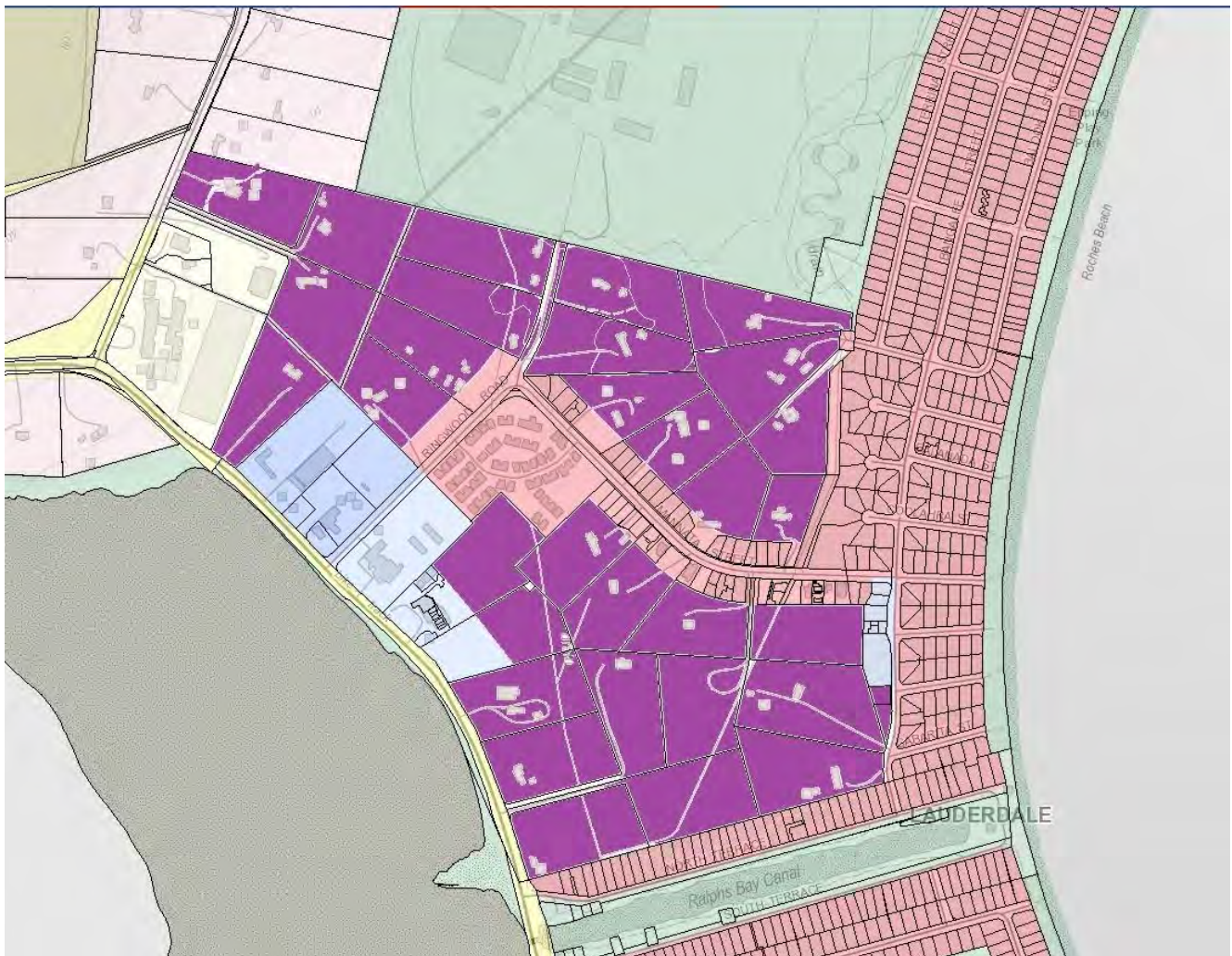
Areas for inclusion in the UGB in Lauderdale. STRLUS Urban Growth Boundary Update:



RED shading shows the logical inclusions of the UGB along South Arm Road Lauderdale promised by Clarence city Council over many years as well as the identified corrections to the UGB.

These proposed updates above to the UGB in Lauderdale are part of a broader effort to provide more land for residential development.

Central Lauderdale Previous LOGICAL INCLUSION Urban Growth Boundary area shown in purple.



NOTE:
The diagram shows the Mannata street extension and cycle path to Acton Rd and the Lauderdale School, a safer rout for children and an alternative roadway reducing South arm road traffic.

The **RED** line shows CENTRAL LAUDERDALE Land to be included in the UGB.

Support for the inclusion into the UGB and rezoning of Central Lauderdale



PARLIAMENT OF AUSTRALIA - THE SENATE

Senator the Hon

Eric Abetz

Leader of the Government in the Senate

Minister for Employment

Minister Assisting the Prime Minister for the Public Service

Liberal Senator for Tasmania

23rd December 2013

Alderman Doug Chipman
Mayor
Clarence City Council
PO Box 96
ROSNY PARK TAS 7325

Dear Mayor,

Re: Zoning in Lauderdale

As you would be aware, the Commonwealth Government is very anxious to see Tasmania help itself in developing its full potential.

Recently, I met with a delegation of the Advance Lauderdale Association which gave expression to the frustration of 27 separate land owners as to Council's delay in re-zoning an area that had been previously designated "future urban". I believe that the parcel of land which is in the central Lauderdale area is currently zoned rural/residential. I understand that a substantial amount of infrastructure has already been put in place in anticipation for its future urban designation. Further, landholders had been advised that they would need to lift the level of their land, and some have done so, at great expense, to fulfil the requirements of Council.

We understand that Council is now frustrating the re-zoning of the land, which begs the question as to why the infrastructure was put in in the first place, why the area was designated as future urban, and why landholders were encouraged to lift the level of their land at considerable expense in circumstances where the Council is not moving ahead with the re-zoning.

I trust that Council understands that it is examples such as this that turn people off investing in Tasmania and is part of the reason for Tasmania's exceptionally poor economic performance.

.../2

...advancing Tasmania's interests.

HOBART: 136 Davey Street GPO BOX 1675 HOBART TAS 7001, Ph 03 6224 3707 Fax 03 6224 3709 Toll free 1300 132 493
CANBERRA: Parliament House CANBERRA ACT 2600 Ph 02 6277 7320 Fax 02 6273 4115 Email senatorabetz@aph.gov.au Web <http://abetz.com.au>

2.

I trust that there is some explanation for Council's attitude in relation to the Lauderdale re-zoning and I would be pleased to be provided with an explanation, but more importantly, with a way forward so that we can see the development of the land. Awaiting your advice.

Yours sincerely

Eric Abetz
Leader of the Government in the Senate
Minister for Employment
Minister Assisting the Prime Minister for the Public Service
Liberal Senator for Tasmania

Treasurer

Minister for Planning and Local Government

Level 9 15 Murray Street HOBART TAS 7000 Australia

GPO Box 123 HOBART TAS 7001 Australia

Ph: +61 3 6165 7670

Email: treasureroffice@dpac.tas.gov.au



MAYORAL

20-10-17
RECEIVED
- 8 JUL 2015
BY: RECORDS

06 JUL 2015

Alderman Doug Chipman
Mayor
Clarence City Council
PO Box 96
ROSNY PARK TAS 7018

Dear Mayor

Clarence Interim Planning Scheme 2015 and Lauderdale Structure Plan Update

Further to my previous correspondence in regard to the Clarence Interim Planning Scheme 2015 (Interim Scheme), I note and acknowledge that Council is satisfied that the Interim Scheme complies with the Directions Notice, and I further congratulate Council on achieving this milestone in readiness for the transition to the Tasmanian Planning Scheme.

Declaration of the Interim Scheme also clears the way to update the Lauderdale Structure Plan (LSP) to address potential zoning amendments as foreshadowed by Council in its original draft of the Interim Scheme.

As previously advised, I am committed to assist Council with this project and ensure the LSP integrates future land use and development with the efficient provision of infrastructure and also addresses potential natural risks and hazards at Lauderdale.

I understand that the planning and infrastructure issues are well known and past investigations provide a useful information base which can be supplemented by further targeted studies. I also understand that Council has allocated funds in its 2015/16 budget to undertake this work, particularly in relation to stormwater drainage.

There is considerable community interest in the future of Lauderdale and high expectations from some property owners that their land should be rezoned immediately to facilitate new development. I also appreciate that the previous Government's drawn out and complex interim planning scheme reform has generated these expectations and created considerable confusion in the community. Consequently, it will be important for property owners and the community to be fully and fairly consulted in the LSP updating process.

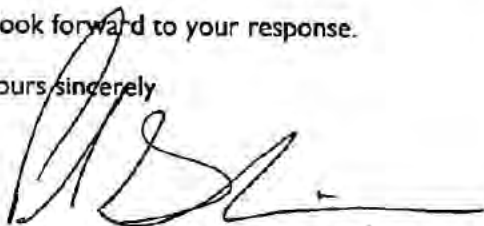
The Government's commitment is to ensure the relevant State agencies and authorities provide input at key stages of the project. The Government will also consider the outcomes of the project and how it can assist in the implementation phase. This includes consideration of any potential revision of the Southern Tasmania Regional Land Use Strategy, particularly in relation to the urban growth boundary.

M15/10567
Min/15/330

Implementing this project is a high priority and I request that a joint Council and Government steering committee be established to prepare and implement a project plan as a matter of urgency. I would also suggest that Council's General Manager chair the steering committee and that Council advise me on which particular State agencies it would like to be represented on the committee.

I look forward to your response.

Yours sincerely

A handwritten signature in black ink, appearing to be 'P. Gutwein', with a long horizontal stroke extending to the right.

Hon Peter Gutwein MP
Minister for Planning and Local Government

Hon Bryan Green MP

DEPUTY PREMIER

Level 10, Executive Building
15 Murray Street, Hobart, TAS 7000 Australia
Ph (03) 6233 6454 Fax (03) 6233 2272
Email bryan.green@dpac.tas.gov.au



Doc/13/6907

24 MAY 2013

Mr Michael Figg
506 South Arm Road
LAUDERDALE TAS 7021

Dear Mr Figg

The Premier, the Hon Lara Giddings MP, has asked that I convey her thanks for the opportunity to meet with you on 26 April 2013 to discuss your concerns in relation to planning processes associated with changing the zoning of land in the Lauderdale area.

I also understand your interest and that of other land owners in the Lauderdale area to have land currently zoned Rural Residential re-zoned to Residential.

As you appreciate, this is a matter for the Clarence Council in the first instance, as Council is responsible for initiating or accepting applications for amendments to its planning scheme. The Commission is also involved as it is responsible for conducting an independent assessment and public hearings into any planning scheme amendment.

Council is also responsible in the first instance for the implementation of the new zones in the Planning Scheme Template for Tasmania in its draft interim planning scheme. This forms part of the Government's planning reform program and could provide the opportunity for Council to initiate zoning changes in its draft interim scheme provided they are consistent with and further the outcomes of the *Southern Tasmanian Regional Land Use Strategy 2010-2035* (STRLUS).

The Commission may also be involved in the interim scheme process given I am likely to seek independent advice on the extent to which Clarence's draft interim scheme complies with the requirements of the *Land Use Planning and Approvals Act 1993*, including the Template and STRLUS.

It appears there would be considerable benefit if the parties met and clarified both these processes.

I have therefore asked my office to convene appropriate meetings with you, Council representatives and the Executive Commissioner to clarify the opportunities that exist within the planning system for you and/or Council to address the zoning issue.

In taking this initiative, I emphasise that, as Minister, I am not in a position to make any judgement on the planning merit or otherwise of your rezoning proposal. The Executive Commissioner will also be in the same position.

I look forward to receiving further advice on the outcome of the discussions and conveying this information to the Premier.

Thank you for bringing this matter to the Premier's attention.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Bryan Green', with a stylized flourish extending to the right.

Bryan Green MP
Minister for Planning



Clarence City Council

38 Bligh Street Rosny Park
Tasmania Australia
Address correspondence to:
General Manager
PO Box 96 Rosny Park 7018
Telephone (03) 6245 8600
Facsimile (03) 6245 8700
Dix 70402
Email clarence@ccc.tas.gov.au
Website www.ccc.tas.gov.au

Enquiries: Dan Ford - (03) 6245 8622

Your ref:

In reply please quote: 20-10-17

5 April 2013

Mr Tony Dourias Jnr
Dourias Group Holdings
PO Box 3193
WEST HOBART TAS 7000

Dear Mr Dourias

DRAFT PLANNING SCHEME - REVIEW OF PUBLIC REQUESTS

I refer to your submission received by Council in response to an invitation to assist Council in the early stages in the preparation of a new Planning Scheme and thank you for your interest in the project.

You will recall that on 10 March 2012 Council invited submissions from individuals or groups on matters that they would like to see addressed in the new Scheme. Your submission was one of 51 received. Whilst I appreciate that this was some time ago a summary of each of the submissions was presented to Council at its workshop on 29 January 2013 along with an overview of the relevant statutory and Southern Tasmanian Regional Land Use Strategy (STRLUS) provisions as they related to each submission. The workshop provided opportunity to work through the matters raised and informed a report considered by Council at its meeting on 18 March 2013.

I am pleased to advise that Council supported the matters raised in your submission and the suggested residential zoning of Lauderdale will be reflected moving into the next phase of the development of the draft Scheme. For your information a copy of the Council agenda report, associated attachment and minutes can be down loaded from Council's website www.ccc.tas.gov.au.

It is anticipated that there will be other opportunities for your input through both informal and statutory exhibition periods. Given your interest in the development of the draft Scheme your details have been included on a mailing list and you will be notified as further opportunities arise.

If you have any further queries relating to the development of the new scheme please contact me on telephone (03) 6245 8622 and I will be happy to assist.

Yours sincerely

A large, faint, handwritten signature in blue ink, appearing to read 'Dan Ford', is written over a rectangular box.

Dan Ford
STRATEGIC PLANNER

TPC MEMORANDUM OF UNDERSTANDING

TASMANIAN PLANNING COMMISSION



Drawn up By Commissioner Greg Alomes on the 17th of June in the year of our lord 2015

Between:

THE ADVANCE LAUDERDALE ASSOCIATION,

THE CLARENCE CITY COUNCIL

and

THE STATE OF TASMANIA

(Tasmania)

Background

Context

- A. All parties are committed to the rezoning of Central Lauderdale to General Residential as was the intention of Clarence City Council via their Draft Interim Planning Scheme 2014.
- B. All parties are of the view that no loss of natural justice to the land owners in Central Lauderdale shall occur through these planning changes.
- C. If the Rezoning of Central Lauderdale to General Residential is not successful, Clarence City Council Shall amend their Planning Scheme Ordinance to allow Community Living as a Discretionary use in the New Rural Living Zone. This will reinstate our current Discretionary use under our Rural Residential zone. This will eliminate our loss of Natural Justice.
- D. Both the Tasmanian Government and its instrumentalities shall work together for the successful outcomes indicated within this document.
- E. A timeline shall be agreed to by all parties and kept to as much as is practical and shall start no sooner than the 22 of June 2015 and be completed no later than October 2015.

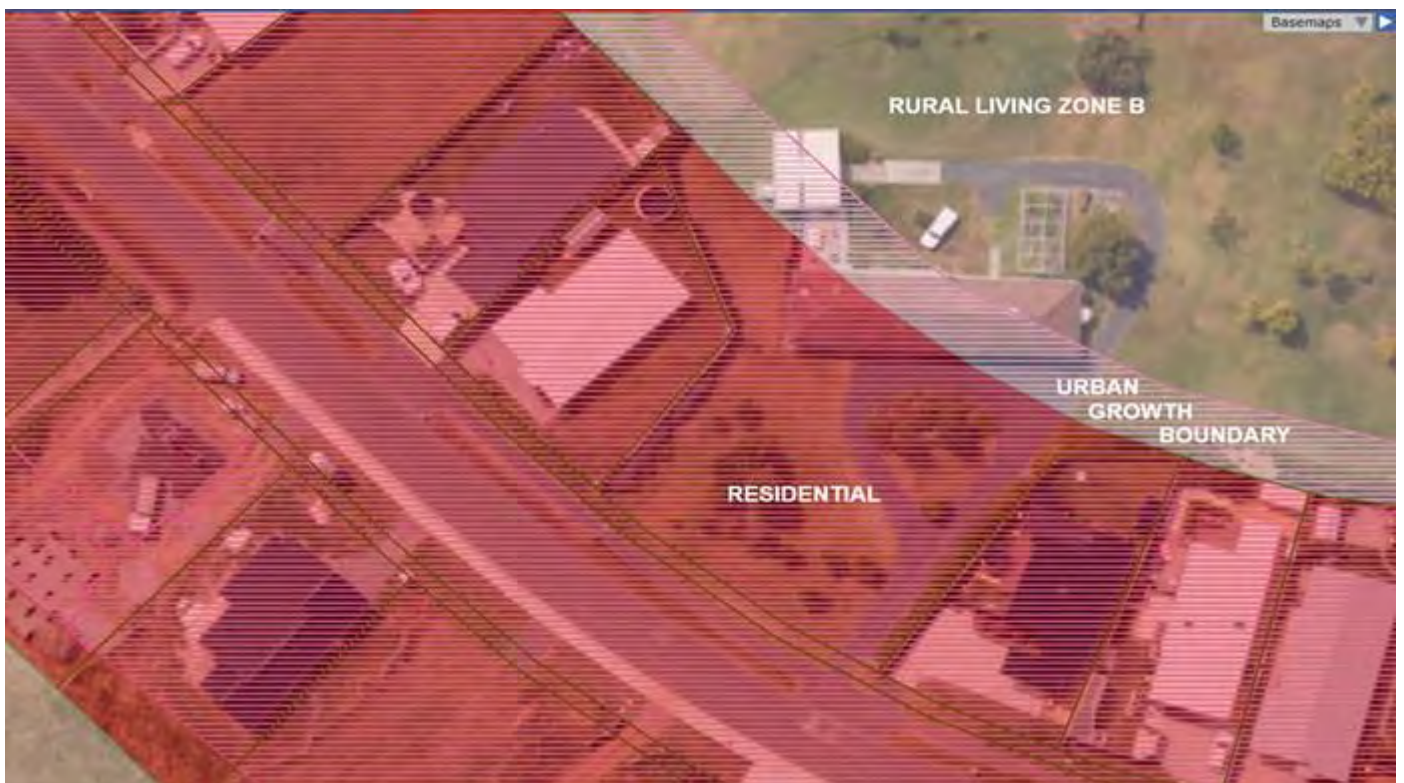
Purpose

- F. The purpose of the Memorandum of Understanding (MOU) is to set out the agreed arrangements that will be pursued by the State of Tasmania and the Advance Lauderdale Association along with the Clarence City Council to deliver an agreed Central Lauderdale outcome of a planning change to benefit all parties.
- G. This MOU is not a legal agreement. However, both Parties commit to using their best endeavours to achieve its purpose.

**Clarence Council errors in mapping the
Lauderdale Urban Growth Boundary on Mannata Street.**



Existing mapping of Mannata st Lauderdale on “TheList” 2025 showing the misalignment of the UGB



Residential/ Rural Living Zone & UGB placed through residents Home.
You cannot have two Zones through a House, Council fails to correct; Zone should be corrected.

Map showing the correct location of the Central Lauderdale UGB

In the Southern Tasmania Regional Land Use Strategy, the Urban Growth Boundary (UGB) is generally aligned with established cadastral boundaries as below and should as a minimum be corrected as shown:



Yellow shading shows the correct placement of the current Lauderdale UGB to the Cadastral Boundaries.

Examples of Obstruction and false statements by Clarence City Council Planners (Ross Love) 2012 Letter and the reality at that time:

- Over many years the zoning of the land has not provided any expectation that would be zoned for residential development.
 - a) Members of the public in Lauderdale have received approvals for land fill and plans from Council that subdividing would be allowed in the future.
 - b) 2010 during the LSP Council and Alderman agreed to begin work on Rezoning this Land to Residential when there is a first window of opportunity, that has not happened.
 - c) Council also approved an amendment at the TPC for filling the Land for Development.
 - d) Attempts to obtain stormwater system improvement report blocked by head engineer Ross Graham.
 - e) Clarence City Council advised external consultants not to deal with ALA.
 - f) Council's conclusion is incorrect! See its own documentation below:

1983

Eastern Shore planning scheme

“RESERVED URBAN” & “URBAN”

Eastern Shore Planning Scheme

1986

“Reserved URBAN”

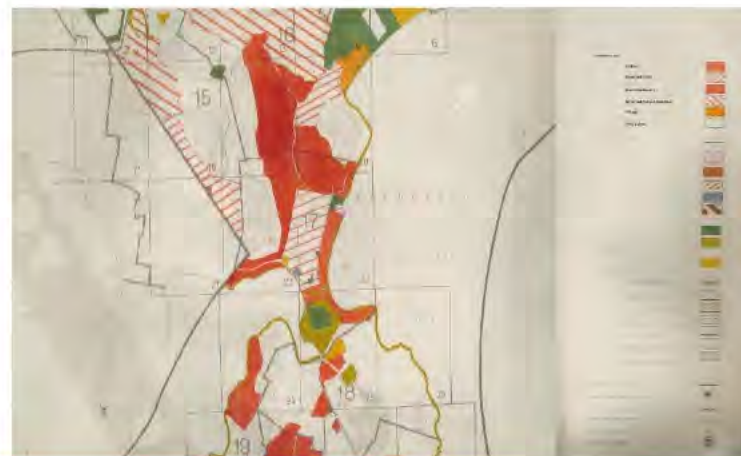
The Lauderdale area will be reserved from any expansion in residential development, pending further investigation of sewerage, drainage and any possible rises in sea level.

(See Southern Water report below)

Infill development on the existing vacant sites will be permitted and the consolidation of rural residential development within existing areas is to be encouraged.

1999

Tominex proposal for a Residential Marina in Ralphs Bay



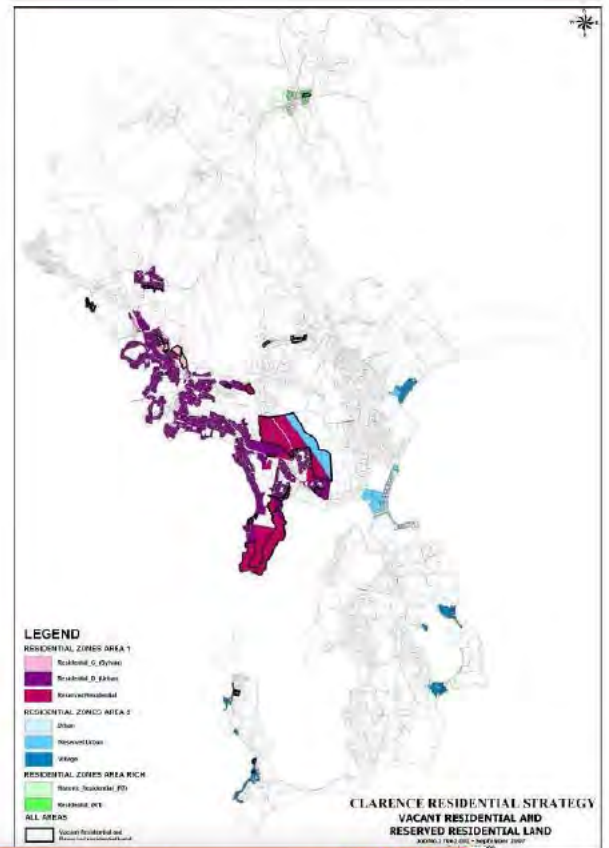
2004

Walker Corporation's proposal for a Residential Marina in Ralphs Bay



2007

Clarence Residential Strategy **RESIDENTIAL Zoned area 2 "Reserved URBAN"**



2011

Lauderdale Structure Plan Clarence City Council 2011
"expansion of the Urban Growth Boundary"



WATER AND SEWERAGE SERVICING ADVICE

Southern Water Reference No.	SWSI 2013/00068-CCC	Southern Water response date	31 May 2013
Responsible Officer	Peter Ralph	Contact Number	6237 8247

RESPONSE ISSUED TO

Applicant name	Michael Figg, Advance Lauderdale Association
Address	--
Contact details	thefiggs@bigpond.com

DEVELOPMENT

Address	MANNATA ST / RINDWOOD ROAD AREA, LAUDERDALE	Property ID (PID)	Various
Nature of development	Availability of Sewerage Infrastructure for Development in the Mannata Sreet / Ringwood Road Area, Lauderdale		
Application date	24/04/2013		

SCHEDULE OF DRAWINGS / DOCUMENTS

CONSULTANT	DRAWING/DOCUMENT No.	REVISION No.	DATE OF ISSUE
Advance Lauderdale Association (Michael Figg)	Doc 1		10 April 2013
Southern Water	Document D1		31 May 2013

ADVICE

Southern Water confirms that you have made a pre-lodgment enquiry for the above proposal. Southern Water's servicing advice in this response to the above proposal is based on the water and sewerage components of the proposal only. The other aspects of the proposal will be assessed by, the relevant Planning Authority, or the Development Assessment Panel established under section 60M of the Land Use Planning and Approvals Act ("the Act") where the proposal is declared as a project of regional significance under 60G of the Act. Despite anything else in this servicing advice Southern Water reserves its rights regarding this proposal, when it is submitted for assessment as required by law under the Act.

The proposal plan Doc 1 (attached) shows the area that is being proposed for development.

Southern Water has recently approved implementation of a Pressure Sewer Area within this area. It has been denoted as Lauderdale Pressure Sewer Stage 3A. This area is the recently zoned residential area along Mannata Street/Ringwood Road. Southern Water Document D1 shows this approximate area. The Stage 3A area will be development driven in comparison to the Lauderdale Stage 2 area where Southern Water is the lead agent in developing this pressure sewer area.

In Stage 3A the developers will be responsible for preliminary design, design and construction undertaken by the developer(s) at developer(s) cost to Southern Water approval. Pipe work for the pressure sewer will be constructed by the developer while the individual pumps on each lot will be supplied and installed by Southern Water (contractor) during house construction. Sewerage (and water) headworks will be paid by the developer while the pump supply and installation will be requested and paid by the property owner/builder.

Should the balance of the area shown on the Advance Lauderdale Association Plan Doc 1 be rezoned to a land use that allows intensification requiring sewerage facilities, Southern Water will be able to service this land. This area would also be development driven.

If you need clarification in relation to this request, please contact Southern Water quoting the Southern Water Reference Number. Phone: 13 MYWATER (13 6992), Email: development@southernwatertas.com.au

Executive Manager
Customer Services



Council officers negative Statements



- Over many years the zoning of the land has not provided any expectation that would be zoned for residential development.
-
- **Negative Bias:** Statements reflecting opposition to development.
 - *We are not going to make you a millionaire*
 - *Nothing is ever going to happen in Lauderdale*
 - *If you purchase another property on North Terrace to facilitate the outflow of the stormwater, **(which was done)** we will look favourably on your development application abutting the UGB. **They didn't.***
 - **Flooding Issues:** Council's reluctance to address flooding impacts on development.
 - *Stormwater system not compliant to the Drains Act and Council refuses to make good*
 - **Inconsistency:** TPC planning review ignoring South Arm Road as a barrier to erosion and inundation on Dan Fords (Clarence Council Planner) advice and the overlays were put on the land.
 - *Council have also advised that the capacity for stormwater drainage is limited due to its low-lying nature. **YET** Council considered that the stormwater infrastructure in this area is appropriate for the existing settlement,*
 - Council refuses to have its stormwater system compliant with the Drains Act.

To the Honourable Minister for Planning Mr Felix Ellis MP,

Conclusion:

1. **Historical Inclusion:** Central Lauderdale should be re-included in the Urban Growth Boundary (UGB), as its exclusion since 2011 is an anomaly, given its longstanding history as part of the boundary.
2. **Council's Obstruction:** The Clarence City Council has been actively obstructive to the UGB, with officials making statements that do not align with residents' interests.
3. **Non-Compliant Infrastructure:** The Council's stormwater infrastructure fails to comply with the Drains Act. Their refusal to rectify this has led to inadequate drainage systems.
4. **Obstructive Overlays:**
 - o **Erosion Overlay:** The overlay from Ralphs Bay is invalid due to the highway acting as a barrier to erosion.
 - o **Waterway Overlay:** This is applied to a man-made stormwater drain, where no natural watercourse exists.
5. **Biased Attitudes:** Council officers, including the GM and Head of Planning, have shown bias against development in Lauderdale through statements discouraging residents from pursuing improvements.
6. **Logical Inclusion:** There is no logical reason to exclude Central Lauderdale from the UGB, as most of the area is filled or being filled to building specifications.
7. **Government Support:** Councillors and Ministers from Tasmanian and Federal governments support the inclusion of Central Lauderdale in the UGB, and historical Council plans have designated the area for future urban development.

Recommendation to the Minister for Planning:

1. **Insufficient Zoned Supply:** We believe there needs to be at least 15 years' supply of zoned land. Identifying, zoning, and developing Lauderdale sites for both residential and employment purposes will ensure that people can work close to home.
2. **Urban Growth Boundary Amendment:** Amending the Lauderdale Urban Growth Boundary to expand by more than 35 hectares will support the growth of our town, which already has a population exceeding 2,500 within its current boundary.
3. **Expansion Benefits:** Including Central Lauderdale within the Urban Growth Boundary, considering the current infrastructure and fully serviced land, would facilitate the construction of up to 800 new homes, fostering significant community development.
4. **Community Representation:** Residents may feel ignored or misrepresented if the UGB does not reflect the community's needs and aspirations. Expanding the boundary will ensure that the planning process is inclusive and responsive to community feedback.
5. **Incompatibility of Current Land Use:** Central Lauderdale is zoned Rural Residential B. Rural zones are intended for agriculture, low-density housing, and open spaces, while residential zones are meant for higher-density living. Expanding the UGB will prevent conflicts in land use and ensure orderly development.

By advocating for the UGB adjustment, we are pushing for progress that could bring significant benefits to the community. Expanding the boundary to include Central Lauderdale and align with logical inclusions makes sense, both strategically and practically. This would not only address the housing needs but also ensure the sustainable and balanced growth of the area. This will enhance residents' quality of life, improve infrastructure efficiency, and ensure that the town's development aligns with the community's needs and aspirations.

Sincerely, Michael Figg

Luca Vanzino

Tasmanai

14/03/2025

Submission to the STRLUS – Urban Growth Boundary – Proposed Changes

INTRODUCTION

My submission relates to the February 2025 Consultation paper and specifically changes proposed to the mapped boundary in Kingborough – particularly the Margate area.

I run a small 15Ha cattle farm at Woodbridge where I reside and own a property in South Hobart where I have previously resided. I speak as both a city and rural person.

My comments although they illustrate issues with the proposed changes in Kingborough are relevant to the other areas proposed for residential development.

There exists a guiding document for the Southern Tasmanian Regional Land Use Strategy and that is 'The 30 Year Greater Hobart Plan.'

https://www.shapingtasmania.com.au/images/projects/2/1727065603_Greater%20Hobart%20Plan%20-%20Strategy%20for%20Growth%20and%20Change.pdf

DISCUSSION

Set out below are excerpts from this report and my comments follow in **red** type.

On page 2 of this report it states:

This Plan is the first time that transport, housing and precinct planning have been brought together in a spatially integrated manner. This will allow us to plan for business and employment growth, recreation and environmental management, protect farmland and plan for climate change.

The "Vision" in this document notes the following theme

- *Have greater interconnection, but distinct communities – continue to 'feel like Hobart'*

The proposal will extend the southern urban area of Margate and continue the strip development of The Channel townships contrary to the above stated aim.

- *Be well planned – 'right place, right time'; collaborative approach to planning; and coordinated provision of infrastructure and services*

The existing urban development of Margate that has taken place in the last decade was a case of 'cart before the horse' with a over extended Margate Primary school being *prima facie* evidence. This urban development at Margate also preceded the \$68 million dollar Kingston bypass project. These 'visions' are motherhood statements, and the reality is that there has been poor implementation because the developers are "the tail wagging the dog".

- *Have greater connection – easy to get around; greater transport choice; increase co-location of jobs and housing; and smart technology to enhance useability*

There are virtually no jobs in the local surrounds with any existing Margate residents forced to use cars for their daily commute to Hobart. The well canvassed Metro Tas bus issues have not been addressed in the current greater Hobart urban footprint.

- *Plan for growth and change – greater housing choice; increase residential density in inner areas.*

If an increase in density in the inner areas is the aim, why continue the urban spawl? Einsteins maxim of "doing the same thing over and over and expecting different results" as a definition of insanity is apt. It is readily apparent that the outer reaches of the large mainland cities are planning failures – so why repeat these mistakes?

On page 3 of this report it states:

Housing also needs to be well-located so that people can have good access to local jobs, services and transport connections.

Margate, clearly, does not meet the above criteria. Minimal local employment, a near 100% reliance on private car for transportation and a near non-existent bus service is the reality.

Greater Hobart's history of outward growth and development outside of the city, mixed with a growing and ageing population, is contributing to some growing pains, such as congestion on our roads. More people are living further away from where they work, shop and play. This outward spread increases the pressure for major road infrastructure improvements, which can add to cost-of-living pressures. A focus on providing our community with more housing options can help reduce these pressures.

Prioritising and facilitating targeted infill development in preference to greenfield expansion will see the emergence of more inner-city housing through medium density development.

Broad acre housing development in peri-urban areas such as Margate is lazy planning.

It is a 'cookie cutter' approach.

Innovative planning would see zone changes to the precinct on the perimeter of Hobart's CBD whereby the car yards and light industry factories of the 19th and early 20th century in the Argyle / Campbell / Melville / Warwick streets quadrangle would be changed to Residential.

These 10 hectares could then be transformed into mixed usage residential. The existing owners would be well compensated with the zoning change and the car yards etc etc could then

relocate to areas within greater Hobart that are more suited to their purpose than to be on the fringe of a city CBD. The subsequent medium density residential development would allow those working in the CBD to walk rather than drive. Incorporated into the design of this precinct would be underground parking at the northern end of the precinct which would allow easy access to the 'Restaurant Strip' in North Hobart. Elizabeth Street in the commercial part of North Hobart could then become a pedestrian mall – with an allowance made at certain times of the day for deliveries. This is not rocket science. There is a massive underground car park under the Piazza Castello in Turin – and this is a World Heritage site !

Further supporting evidence is found in Paris. Paris is not just grand 17th century boulevards – it has a modern district called 'La Defense' which is easily accessible from the city centre.

In short, housing people in wasteland ghettos on the peri-urban areas of Hobart, where they have no work, amenities, transport or infrastructure is something that can be avoided with imagination. As a planner, ask yourself:

“Would I want to live in these locations?”

On page 4 of this report it states:

*Our analysis also confirms that the future planned growth of our city **can be primarily accommodated within the current Urban Growth Boundary currently described in the STRLUS**, (my emphasis) and is best placed within densification areas along main transit corridors to better utilise our current infrastructure*

The report clearly and emphatically states that there is no current need to adjust the UGB. This move to do so should be called out for what it is – political expediency on the part of the current Minister and Government. Where is the justification when a report – barely three years old – states that there is no need whatsoever.

On page 6 of this report it states:

This analysis indicates that the total available land supply within the current Greater Hobart Urban Growth Boundary could potentially cater for over 34 000 additional dwellings, which is more than our anticipated demand of 30 000 dwellings by 2050.

As noted previously there is already enough land under the current STRLUS. This is politics to assuage developers / builders/ tradies and a political base. There is absolutely no rationale to change the UGB and the report clearly states that this is the case.

On page 9 of this report it states:

The actions to be identified within the Implementation Plan will include:

- *precinct structure planning of growth and densification areas to balance growth and amenity*

I'd suggest the rezoning of the peri-CBD precinct – which I noted earlier in my submission - would offer a far better option for densification and reduce the urban sprawl footprint.

- *maintaining an Urban Growth Boundary that prioritises urban consolidation over urban sprawl, while developing an agreed approach to growth that may include changes to the Boundary based on evidence of need and technical planning analysis, as well as addressing any identified anomalies.*

There is no 'need'. The report clearly states that housing developments can be met from the existing UGB.

I concur that boundaries should be adjusted where anomalies are apparent.

I have a property in South Hobart and have built an auxiliary dwelling in the rear of this premises. This is where development should be encouraged through the planning schemes. It is well known that broad acre developments – despite headworks charges being paid by developers – never recoup the costs to governments. Urban consolidation is far cheaper.

- *urban renewal through a focus on medium density residential development and higher density dwellings where appropriate within the existing urban footprint*

So, how does expanding out the footprint into peri-urban areas and onto agricultural land encourage this motherhood statement?

- *a coordinated transport plan that encourages increased public transport use and active transport*

Once again another 'Motherhood' statement with no actual basis in the reality of the current – and longstanding – situation with Metro Tas. The bus services to The Channel are very poor.

Once again, some innovative thinking is called for rather than following Einstein's maxim.

There is no public transport system anywhere in the world that makes a substantial profit. The vast majority operate at a loss. In 2022 Metro Tas, across its entire statewide operations, made a profit of a mere \$1million dollars...an accounting error in the scheme of things. I would posit that if you made public transport free then patronage would improve. There are many aspects to our economic system that are cross subsidized for the greater good – so why, here in Tasmania can't we make an exception for public transport?

As an adjunct to this argument, most of the large existing fleet of Metro Tas buses have a capital purchase cost of half a million dollars with the attendant high maintenance costs. An innovative approach would be to replace these buses and run a fleet of smaller, less expensive, more easily manoeuvrable 20 seat mini-buses. Such a fleet would work well from the existing peri-urban areas.

I appreciate that what I am saying is off topic, but I have included it to highlight the lack of imagination that exists when it comes to planning – be it land use or transport planning.

- *provision of public infrastructure to facilitate desired future residential and/or commercial development, where appropriate*

Have you ever been out to a broad acre residential development and see it successfully implemented anywhere in Australia?

The answer is emphatically no. The 'brick venereal disease' has, and continues to be, a blight on our cities. Vast tracts of houses are built, and the infrastructure and schools follow many years later.

- *continued delivery of affordable and social housing close to local jobs and services*

So where are the local jobs and services in Margate?

- *consideration of incentives to encourage development in identified growth and targeted infill areas*

The much vaunted – and now ridiculed State Planning Scheme – should have addressed this.

Instead, the focus was to reduce the allowable lot size in the General Residential Zone so that density changes were achieved by more houses on more lots rather than using the existing lot size and easing the construction of ancillary buildings to achieve more houses on existing lots.

On page 10 of this report it states:

The successful implementation of this Greater Hobart Plan will result in:

- *improved liveability and accessibility for our people*

Not if you live in a peri-urban area like Margate without employment close by and its attendant transport issues as work is located in Hobart and beyond into the northern and eastern suburbs.

- *more social and affordable housing closer to city centres and along transit corridors*

The extolled virtues of the Huntingfield development will not materialise as public housing comprises a mere 15% of the development. Any proposed social and affordable housing at Margate will perpetuate the model that exists in Clarendon Vale, Rokeby, Bridgewater and Risdon Vale – that is the *ghettoisation* of the area as there is no employment or transport.

- *more people able to live closer to where they work, shop and access services*

This doesn't currently exist at Margate and is unlikely to do so with an additional 588 houses.

- *increased uptake of public transport and more active transport opportunities*

Active transport means walking, bikes and scooters. Who is going to use these modes of transport from Margate to the Hobart CBD and beyond?

- *reducing travel distances/times and fuel costs*

It is a basic maths that the trajectory for these costs increases the further from employment and services. Therefore this aim cannot be met by housing in the peri-urban areas.

CONCLUSION

“They paved paradise and put up a parking lot” – Joni Mitchell

Planning is not about what you want – as much as it is about what you don’t want.

Why does Tasmania want to emulate, and likely exceed the excrescence of poor planning that clearly exists in the large mainland cities?

The Minister has called for a review of the UGB, so what happens in 10 years – another review and another slice from the salami? This becomes a death of a thousand cuts.

At some point there has to be a line marked on a map and say “No further”. When do you stop? When the UGB is at Kettering? At Bagdad? At Forcett?

As a city we cannot incrementally keep expanding the UGB wherever there is political pressure to do so. Planners cannot be lazy but need to be imaginative and have a paradigm change in their collective thinking, otherwise the outer reaches of Hobart will be sterile, soulless deserts with communities of social disfunction. “

As Olgas Truchanas said:

“...Tasmania can be a shining beacon in a dull, uniform and largely artificial world.”

Luca Vanzino

From: Peter Marshall
Sent: Friday, 14 March 2025 1:22 PM
To: State Planning Office Your Say
Subject: Clarence Subdivision Area 7

AREA 7

Dear Sir/Madam,

I write to 'have my say' regarding the proposed Richardsons Road Subdivision.

I have been residing at Bayview Road Lauderdale for 29 years and chose to do so because of the peaceful beachside living available here

I do not have a problem with more people moving to the area however my major concern regarding the future development is that the only entrance and exit to the area is via Bayview Road until at least towards the conclusion of the development.

a. This means all construction traffic will be via this recreational area used by many children and adults and will cause a safety issue, a noise and parking issue and cause the road surface to degrade even faster than it has already done so. The recently constructed Bayside Drive subdivision caused considerable disruption, dust and noise issues and road surface damage and that will be minor inconvenience compared to the huge proposed subdivision which will take several years to complete.

b. It is extremely difficult to exit Bayview Road onto South Arm Highway at peak times and this will increase exponentially if this issue is not resolved

before construction commences and, at least, another access road is constructed at the beginning of the development. This will then provide two (or three) roads to service the area and should provide other links to the property and ease the congestion at the T junctions.

c. Local estimates are that when completed the subdivision will provide approximately at least 200 cars in excess of the existing population travelling along Bayview Road daily, which is horrifying to contemplate.

d. Over many years local residents have requested traffic calming controls be installed along the beachfront to subdue the excessive speed at which some motorists consider it their right to travel down this recreational area, however with no success, this practice continues today and will only increase with extra cars on the road.

e. The subdivision is being advertised and sold as 'Richardsons Road' yet the only early access is via Bayview Road. By rights access should be via Richardsons Road with preferably another road between there and Bayview Road. Three entrances to the subdivision would provide easier and safer traffic access to South Arm Road.

I offer my submission for your consideration.

Sincerely,

Peter Marshall

From: Louise Walsh
Sent: Friday, 14 March 2025 12:49 PM
To: State Planning Office Your Say
Subject: Clarence Subdivision

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AREA 7

Dear Sir/Madam,

I write to 'have my say' regarding the proposed Richardsons Road Subdivision.

I have been residing at Bayview Road Lauderdale for 24 years and chose to do so because of the peaceful beachside living available here.

I do not have a problem with more people moving to the area however my major concern regarding the future development is that the only entrance and exit to the area is via Bayview Road until at least towards the conclusion of the development.

a. This means all construction traffic will be via this recreational area used by many children and adults and will cause a safety issue, a noise and parking issue and cause the road surface to degrade even faster that it has already done so. The recently constructed Bayside Drive subdivision caused considerable disruption, dust and noise issues and road surface damage and that will be minor inconvenience compared to the huge proposed subdivision which will take several years to complete.

b. It is extremely difficult to exit Bayview Road onto South Arm Highway at peak times and this will increase exponentially if this issue is not resolved before construction commences and, at least, another access road is constructed at the beginning of the development. This will then provide two (or three) roads to service the area and should provide other links to the property and ease the congestion at the T junctions.

c. Local estimates are that when completed the subdivision will provide approximately at least 200 cars in excess of the existing population travelling along Bayview Road daily, which is horrifying to contemplate.

d. Over many years local residents have requested traffic calming controls be installed along the beachfront to subdue the excessive speed at which some motorists consider it their right to travel down this recreational area, however with no success, this practice continues today and will only increase with extra cars on the road.

e. The subdivision is being advertised and sold as 'Richardsons Road' yet the only early access is via Bayview Road. By rights access should be via Richardsons Road with preferably another road between there and Bayview Road. Three entrances to the subdivision would provide easier and safer traffic access to South Arm Road.

I offer my submission for your consideration.

Sincerely,

Louise Walsh

Analysis lacking in government's land use plan

Is the urban growth boundary extension, a serious housing measure or political tactic? Asks **Peter McGlone**

The Minister for Planning and Housing Felix Ellis has released for public comment a document titled 'Southern Tasmanian Regional Land Use Strategy Urban Growth Boundary Update: Consultation Paper'. Submissions are due on March 14, 2025.

The government's proposed urban growth boundary 'update' is in fact an extension. It is proposed to expand the boundary by a total of 615.8ha including 15 parcels of land across the greater Hobart region to facilitate residential development.

Is this a timely response to the need for more land for residential development? Or is it a political tactic designed to make the Minister look like he is doing something to increase the supply of land for housing?

I believe it is primarily a political tactic. The reason is that the minister has pre-empted the review of the Southern Tasmanian Regional Land Use Strategy (STRLUS), which is currently occurring. The first stage of consultation was during September to December 2024, a draft strategy will be released in the coming months and a final strategy is due in the second half of the year.

One of the key outcomes of the strategy review is to provide the evidence-base for supplying land for housing and whether the urban growth boundary needs to be expanded and, if so, where and by how much.

Given the submissions could not have been assessed before Mr Ellis decided on February 2 to go down this path, what was the evidence that he

used to identify areas for expanding the urban growth boundary? It seems like the Minister is snubbing his nose at the strategic planning process and is saying 'I know better'.

When you visit some of the areas, as I have done, it becomes clear the government has done a very unprofessional job that may fail to deliver much new residential land and will cause conflict in the community.

The government proposes one parcel of land at Risdon Vale that will result in the loss of part of the Two Rivulets Park and it will be replaced by residential housing.

One parcel at Pass Rd, near Clarendon Vale, includes a large vineyard. Will it be bulldozed to make way for housing?

One parcel at Lauderdale includes one of the most important areas of native forest left in this part of Clarence and identified in the planning scheme as highly important native vegetation. Part of this area is only a few metres above sea level and the land is adjacent to the now disused Lauderdale landfill. This land

will be very hard to sell.

One parcel at Sorell seems ideal for housing as it is cleared land and adjacent to serviced areas. But, if this very large area were developed (the government claims it has potential for 3000 new dwellings) this would exacerbate the severe traffic congestion between Sorell and Hobart. The high cost of transport would also diminish the affordability of this area for housing. This is a perfect example of why the Minister should have waited for the outcome of the

“
Is this a timely response to the need for more land for residential development? Or is it a political tactic designed to make the Minister look like he is doing something to increase the supply of land for housing?



Minister for Housing, Felix Ellis discussing the new planning legislation to be tabled in parliament. Picture: Linda Higginson

STRLUS review.

Most of the land identified for housing is a long way from Hobart, in Brighton, Sorell and Clarence. None is identified in Hobart and Glenorchy and one small parcel in the far south of Kingborough. Is this urban sprawl what Hobart needs?

It will be interesting to see what the draft STRLUS recommends about increasing land for housing: increased medium density infill, expanding the urban growth boundary or a mix of both.

When critics pointed out the need for medium-density housing to be

considered Minister Ellis was quick to say he supported that as well as expanding the urban growth boundary. The only problem is that the Minister is doing nothing to address medium density. More than five years ago, in November 2019, the then minister for planning Roger Jaensch started a process to amend the Statewide Planning Scheme to provide what he called gentle infill medium-density housing for Hobart. Gentle infill referred to avoiding problems such as over-shadowing existing housing.

That was the year 2019 and still no

action to make more land available for medium density.

It begs the question, why Minister Ellis focused on expanding the urban growth boundary and opted to recommend certain areas for residential development ahead of other areas? Given that the Minister pre-empted the review of the STRLUS and did not provide any additional analysis to support his chosen areas.

Peter McGlone is the chief executive of the Tasmanian Conservation Trust

If another large land parcel at Sorell is developed for housing as planned, Tasmanian Conservation Trust chief executive Peter McGlone, pictured below, is concerned this will only exacerbate the severe traffic congestion between Sorell and Hobart. Pictures: Eddie Safarik and Chris Kidd



Dear the State Planning Office,

I am a member of the general public, a young planning professional and planning student at the University of Tasmania. I am disappointed that the State Planning Office and the Planning Minister have decided to use the planning tool of the Urban Growth Boundary in an attempt to create political goodwill while condemning the most vulnerable Tasmanians to the perils of further urban sprawl.

The locations chosen to extend the urban growth boundary in Kingborough, Brighton, Clarence, and Sorell are all locations that have no option for travel other than that of the private car. They are locations that exacerbate existing issues in Southern Tasmania of traffic congestion, car dependency, poor health outcomes, and poor access to essential services.

The naive conclusion is that more land for housing, and more housing for people no matter what is a good thing. Unfortunately this is not the case as there are many things that have to come along with this housing that contribute to people being able to live healthy fulfilling lives. Increasing housing on the urban fringe will result in more vehicle trips and longer vehicle trips, resulting in increasing strain and wear on our road infrastructure and increasing carbon emissions.

We are the most car dependent capital city in Australia. This is a result of continuing car centric planning and a degradation of public transport service in Hobart. This car dependency has resulted in less healthy people, increased costs of car infrastructure, and cost of other vital infrastructure to these outlying urban areas.

When looking at the VAMPIRE index that highlights vulnerability of communities to mortgage, petroleum, inflation risks and expenditure, we can see that the proposed areas of urban expansion are some of the most vulnerable in Hobart to future fluctuations such as the price of fuel (Figure 1).

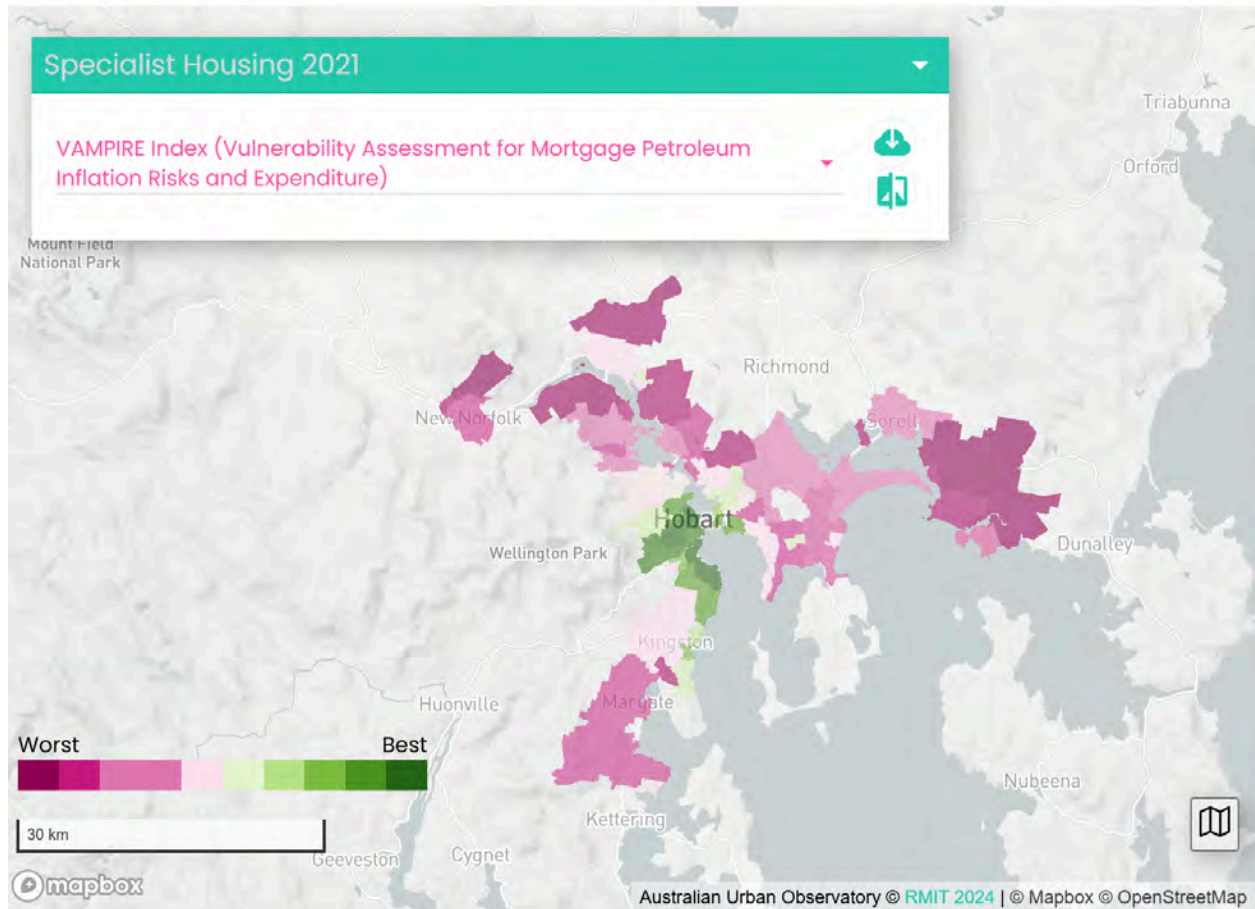


Figure 1 - VAMPIRE Index for Hobart Suburbs

So what should be done instead, firstly planning tools such as the urban growth boundary need to be updated inline with their corresponding strategic planning strategies that being that of the updated Southern Tasmanian Regional Land Use Strategy (STRLUS). The updated STRLUS will likely stress the need to consolidate Hobart's existing urban area and this jumping of the gun can only be seen as poor short sighted planning that disregards expert opinion.

There needs to be a focus on inner city areas that can be upzoned to higher density housing. With a push for 4-6 storeys as the minimum around existing and proposed public transit corridors. Make it easier and faster to build housing in inner city areas where there is already infrastructure, services and where people want to live. Making it easier for these inner city areas to be rezoned to allow for this type of housing will benefit all Tasmanians.

The state planning office and the planning minister have the powers to implement substantial change to the direction in which Hobart takes as a city. It is time that some inspiration and longer term thinking was used to reimagine how Hobart should be developed.

To conclude this is a short sighted and uninspired continuation of the status quo of car dependent, “people last” planning decision making in Hobart that will make for a poorer government and poorer, more vulnerable, less healthier and less happier Tasmanians.



Helen Burnet MP
Greens Member for Clark

14 March 2025

State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

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

Thank you for the opportunity to comment on the February 2025 Urban Growth Boundary consultation paper.

The Tasmanian Greens are opposed to the proposed changes to Urban Growth Boundaries outlined in the paper.

The proposal is ill-timed, and does not take a strategic approach to planning in Tasmania, particularly in this instance in southern Tasmania.

The government's reluctance over many years to undertake the important Regional Land Use Strategy reviews is underscored by this approach. Urban Growth Boundaries must be considered in the context of strategic planning outcomes.

Further urban sprawl will simply exacerbate existing problems in Hobart, increasing traffic congestion and reliance on private vehicle ownership, making it harder to access essential services and requiring expensive additional road and other infrastructure, which would come at a long term public cost.

Infrastructure upgrades in each of the major city centres would be a cheaper alternative and reduce urban sprawl. Each of these cities have done the work to increase housing options and satisfy that demand for multi-residential living.

The Greens also hold concerns over how the parcels of land were identified. For example, Area 6, Mannata Street, Lauderdale was identified "through dialogue with a developer". Asking developers which parcels of land they would like to have developed is the antithesis of strategic or community-informed approach to land use planning.

We believe that the claimed additional 10,000 new homes could be built within the existing boundaries by building good-quality, medium-density housing in the places people want to live – near schools, services, and existing amenities. Prime urban development locations across Tasmania are currently being “land-banked” by developers to drive up land prices for profit. Ending land banking will greatly increase the amount of residential land available for construction in urban areas.

The government would be well served to find immediate solutions to the housing crisis. Ending whole-home short stay rentals and phasing out short-stay rentals in residential areas will also increase the number of houses available for rent or purchase with a much shorter timeframe than building on the urban fringe.

The recent State of the Environment makes clear that expanding further on urban boundaries will damage ecosystems and impact native wildlife and waterways. Increasing land use intensification will clearly lead to poor environmental outcomes and require unnecessary vegetation clearing. Indeed, some of the areas recommended for expansion are in current landscape conservation zones. Creating pressure on the environment through land clearing is not a smart approach to addressing the state’s chronic housing shortage.

We believe that this proposal is a political solution and call instead for a strategic approach to planning and meaningful action on the housing crisis like reigning in whole-home short stay accommodation and taking action on land banking.

Yours sincerely,

Helen Burnet MP
Tasmanian Greens Spokesperson for Planning



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14 March 2025

State Planning Office
Department of State Growth
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Hobart TAS 7001

By email to: haveyoursay@stateplanning.tas.gov.au

Re: Southern Tasmania Regional Land Use Strategy – Urban Growth Boundary proposed update

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank the State Planning Office for the opportunity to provide feedback on the *Southern Tasmania Regional Land Use Strategy – Urban Growth Boundary proposed update*.

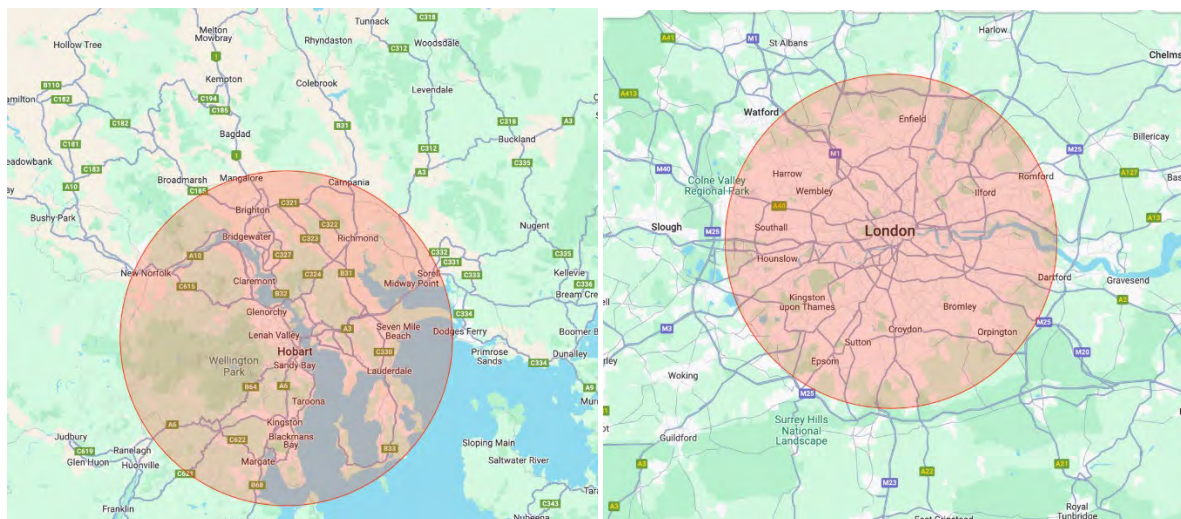
The Tasmanian Chapter is committed to helping create a positive future for our state that benefits all Tasmanians. The Institute advocates for the built environment, and works to shape policies, foster collaboration, and promote design excellence that benefits society as a whole. Strategic planning and coordination are critical components in this, and the Institute advocates for this in all decisions related to planning.

The Institute, in its response to the review of the *Southern Tasmania Regional Land Use Strategy* in 2024¹, has stated that it does not believe that the Urban Growth Boundary (UGB) should be increased. However, the Institute acknowledges the housing crisis and the need to for the Government to enable the provision of more homes, and it is critical that this is done in a way that retains what makes Hobart a unique and a desirable place to live. While the Government is looking at updates to the UGB, it must also implement mechanisms to enable development to take place within existing urban areas, as it is clear that the current regulatory and economic environment isn't enabling this to occur. Given the cost to government of urban sprawl, incentives must be provided to enable development within

¹ www.architecture.com.au/wp-content/uploads/20241218-AustInstArchsubmission_STRLUS-FINAL.pdf

existing urban areas, as this will be better for taxpayers in the long-term. Suggestions for this are outlined under ‘Encouraging Densification of Inner-City Areas’ below.

Making amendments to increase areas of the UGB will add to Hobart’s existing urban sprawl. It is worth noting that Greater Hobart is the second least dense capital city in Australia, and it is interesting to compare the area of Greater Hobart to that of Greater London, at the same scale, with the population of Greater Hobart sitting at 253,654², and London’s at 8,945,310³. A basic desktop image capture from Google Maps of both of these cities is shown below at the same scale, with the red circle indicating the same area.



If the UGB is to be extended, it must be done in a manner that is well-considered, with outcomes that are well-designed. The Institute expects that the following considerations are taken into account in order to have good outcomes:

- chosen sites to have been considered strategically with thorough site analysis
- sites need to be able to provide good solar orientation
- sites do not interfere with productive agricultural land
- sites don’t encroach or impact on sensitive natural environments
- sites should directly connect with existing urban infrastructure
- ensure that appropriate amenity is provided to the future occupants of the sites, including (there should be the consideration of the idea of The 30-Minute City⁴):
 - access to reliable public transport and a comprehensive and wholistic transport strategy
 - quality local amenities, including supermarkets and retail
 - quality services, including, but not limited to health facilities, public services, education facilities
 - quality public outdoor space, including playgrounds and recreation facilities

² <https://www.hobartcity.com.au/Council/About-Council/Research-and-statistics>

³ <https://data.london.gov.uk/dataset/londons-population>

⁴ “The 30-Minute City has more social cohesion, stronger social capital and a happier, healthier population,” <https://www.pwc.com.au/publications/pdf/30-minute-cities-may17.pdf>

- walkable neighbourhoods (both in the distance required to walk to get to services etc, and the provision of footpaths)

Innovative design solutions can incorporate aspects of all of the above with thoughtful urban design by appropriately qualified professionals.

It is imperative that the Tasmanian Government ensures that these future developments have good urban design embedded in them, that ultimately benefit Tasmanians with fulfilling and sustainable, liveable and cohesive communities, that improve the lives and health and wellbeing of those that live in them.

The Institute sees the below as some of the potential negative impacts of increasing the UGB:

- increased costs to taxpayers to provide infrastructure (refer to the 'Cost of Urban Sprawl' below for examples of increased costs)
- increased disadvantage to future occupants living on the outskirts of our city
- increased negative health impacts due to proximity to amenities⁵
- increased traffic congestion
- social isolation
- increased environmental impacts

Some of the areas proposed in the UGB update are expansive and should be master planned by architects and urban planners, to ensure that they have good shared open space and mixed-use development, and higher density needs to be encouraged to ensure that these developments are able to support future growth.

The Institute suggests there needs to be discussion about fiscal settings, such as Victoria's windfall tax, to offset the cost of trunk infrastructure development, including roads, and to establish a fund for social housing and social infrastructure. This could also be used to subsidise or reduce the cost burden of inner-urban development. The Institute also suggests that the Government consider controls on land banking when releases are done, so that poor, piecemeal development isn't the outcome.

The Institute questions whether the Government's Strategic Architectural and Urban Design Advisor was consulted in the process of identifying the additional areas for inclusion in the UGB, and if not, suggests that this would be a useful step to include, and for consultation to continue as this amendment progresses.

The Institute also questions how the increase to the UGB aligns with the density outlines and goals identified in both the existing *Southern Tasmania Regional Land Use Strategy* and the *30 Year Greater Hobart Plan*. Similarly, while the *STRLUS Urban Growth Boundary Update Consultation Paper* outlines the approximate maximum dwelling yields for each site, the Institute questions what mechanisms the Government will put in place to ensure that these dwelling yields are achieved.

⁵ Statistics from the ABS state the adults living within 1500m of a supermarket were less likely to be obese, [Neighbourhood impacts on health | Australian Bureau of Statistics](#)

The Cost of Urban Sprawl

While the immediate costs to developers to deliver standard housing on the outskirts of towns and cities is significantly less than denser, inner-city development, it is critical to examine the other costs associated with these developments, including the provision of networks of infrastructure for transport and services, and the real cost of urban sprawl to governments and taxpayers, as well as the future inhabitants of the site (due to car dependence).

“The greater the distance of these developments from the city centre, and the less dense the subdivisions the greater the relative cost of these services. The provision of roads is a case in point. In Tasmania for every dollar that is spent on arterial roads, approximately 40 cents per year is spent on maintenance. This means that the cost of a road doubles every two and a half years, and this cost continues in perpetuity. (National Transport Commission)”⁶

“Whilst developers may pay for the connections within the new subdivisions (with this cost passed on to the purchaser) the cost of the provision of the services to the site is generally borne by the local authority, or in fact the broader community, through rates and taxes. Other community borne housing related costs that are more difficult to quantify include: the provision of health services of various kinds; fire; policing; public transport; schools; sports facilities; parks and open space – to name a few. This leads to the third frequently overlooked issue, that of the social (in)equity that these centres produce due to their disconnection from a broad range of essential and non-essential services and facilities. This study contends that if all of these housing related costs, including the costs to the individual and to the broader community, are considered a dramatically different approach to housing and affordability will be implied based on a more holistic economic analysis.”⁷

Studies have looked at the costs related to development on the fringe of cities, and while there doesn't appear to be any Tasmanian-specific data, it is worth examining data from other jurisdictions.

Australian statistics in 2023 from the NSW Productivity Commission reported that “long-term urban sprawl will lead to higher taxes, increased debt and poorer quality of life.”⁸ The commission's report found that the “the cost of development is up to \$75,000 more per home to build in parts of western Sydney, compared to housing in the inner west or CBD. By comparing the costs of things such as wastewater connections, road congestion, public transport, schools and open spaces, the commission analysed the cost to the economy of additional homes across Sydney, finding a stark contrast in the associated costs of

⁶ Clarke + Norrie, 2009, see attached AASA Conference 2009 Sustainable Theory/Theorizing Sustainability paper.

⁷ Clarke + Norrie, 2009, see attached AASA Conference 2009 Sustainable Theory/Theorizing Sustainability paper.

⁸ [NSW Productivity Commission report finds Sydney housing sprawl costs economy \\$75,000 more per new home](#)

addressing the housing shortage. Comparing infrastructure across established areas in Sydney, it found the innermost suburbs such as Redfern, Ultimo and Surry Hills had the lowest additional cost at about \$39,500 per home, while areas in the north-west, such as Baulkham Hills, were the highest, at \$114,400.”⁹

“SGS Economics & Planning: Better Value from Greenfield Urban Infrastructure in Victoria, October 2017” is a report about ‘fragmented’ growth that “estimates that, depending on exactly what infrastructure assets are included, the (Victorian) State Government outlays about \$50,000 for every new home in Melbourne’s burgeoning greenfield growth areas to supply arterial roads, schools, public transport links, health care facilities and other regional level infrastructure, as well as part funding of local facilities like sport and recreation centres.”¹⁰

The Property Council, in collaboration the Australian Greens, CODA Architecture and Curtin University produced a report in 2016 for Design Perth that found, “the cost to government to provide infrastructure such as roads, water, communications, power, emergency services health and education to greenfield sites was \$150,389 per lot, compared to \$55,828 in infill sites.”¹¹ A similar Environment Design Guide report on ‘The Cost of Urban Sprawl, Infrastructure and Transportation’, lists the cost of initial capital cost for redevelopment versus fringe development to be \$50,502,726, vs \$136,041,065.¹²

An article in the Property Investor cites Sergio Famiano, Senior Development Manager, LandCorp, and author of *New Australian Dream: rethinking our homes and cities to solve the housing crisis*, who says that “studies have shown that 10,000 people housed in existing urban areas costs a third of what is required in new suburbs.”¹³

Encouraging Densification of Inner-City Areas

The Institute understands from feedback from members through their dealings with private developers that densification within the city is not always financially viable due to land costs, site specific conditions, planning requirements, approval complexities, and the additional construction costs that come with higher density multi-storey developments. The Government must consider ways to contribute to these developments, to ensure that densification is happening where there are existing services. An example of this could be by providing the land, and paying for good master planning, the architect and consultant team, which would generate more interest from private developers, and enable high-quality outcomes. Another example could be for the Government to partner with private developers to create vibrant and sustainable communities.

⁹ [NSW Productivity Commission report finds Sydney housing sprawl costs economy \\$75,000 more per new home](#)

¹⁰ [SGS-Economics-and-Planning-better-value-greenfield-infrastructure.pdf](#)

¹¹ [DESIGN_PERTH_FINAL_REPORT_5mb_0.pdf](#)

¹² [EDG62_GEN83_Paper.indd](#), p3.

¹³ [Scale of urban sprawl in Australia hurting more than just the environment - development news - API Magazine](#)

Institute members have suggested other various mechanisms to encourage private development within existing urban areas, which could include planning dispensations, tailored to the development type and appropriateness. Some of these mechanisms have been outlined in the Institute's response to the Central Hobart Precincts Plan in 2021¹⁴. The Institute would be willing to meet to discuss these ideas further.

Higher density development is of greater benefit to local councils as there is a higher rate density – i.e. more rate income per m², which enables provision of better services.

Thank you for the opportunity to provide input into the current consultation. The Institute looks forward to seeing this feedback inform the plan for Tasmania moving forward, while enabling all Tasmanians to achieve their potential and live healthy and fulfilled lives, contributing to our communities in a meaningful way.

Please don't hesitate to contact us if you would like to discuss any of the points raised further or if we can further contribute in any way.

Kind regards,

Daniel Lane

President, Tasmanian Chapter
Australian Institute of Architects

Jennifer Nichols

Executive Director, Tasmanian Chapter
Australian Institute of Architects

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with over 13,400 members across Australia and overseas. The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design. To learn more about the Institute, log on to www.architecture.com.au.

¹⁴ <https://www.architecture.com.au/wp-content/uploads/20211221-Central-Hobart-Precincts-Plan-Aus-Inst-Arch-Final-V2.pdf>, p3.

AASA CONFERENCE 2009 SUSTAINABLE THEORY/ THEORIZING SUSTAINABILITY

GEOFF CLARK + HELEN NORRIE

School of Architecture & Design
University of Tasmania
Locked Bag 1-323, Launceston, TAS, 7249

Geoff.Clark@utas.edu.au

Helen.Norrie@utas.edu.au

Clark, Geoff, and Helen Norrie. 2009. Affording Sustainable Housing. Paper read at 5th International Conference of the Association of Architecture Schools of Australasia 2009: Sustainable Theory/Theorizing Sustainability, at Wellington.

Abstract

Suburban sprawl is a common attribute of contemporary Australian cities. Despite continual criticism it forms the basis for the provision of housing in Australia, affordable or otherwise. The cause and effect of this housing or development type seems to be tied in a Gordian knot. It is often difficult if not impossible to argue for change when the alternative appears to 'cost' more. The relatively low purchase price of the outer suburban house and land package however, contains hidden costs attributable to typology. Such costs are incurred through:

The provision of networks of infrastructure for transport and services, and the costs associated with both their day-to-day use and their maintenance.

Environmental impacts that are only now being attributed a financial cost, as well as ecological impacts that are yet to achieve this status.

Inequity, as a root cause of many social problems that beset our collective social condition and both directly and indirectly result in significant financial impact.

These less immediate and less tangible *housing related costs* are shared by the individual 'home owner' and the broader community, and must be included in any assessment of the affordability of housing before we can accurately infer what inherent characteristics *economical* housing models must exhibit.

This research collates a comparative study of one outer residential subdivision in Northern Tasmania with a hypothetical inner development in the same city is employed to test the 'cost' hypothesis. A comparison of both financial and non-financial costs associated with each development is presented. Quantitative findings clearly point to the need for the expeditious review of our dominant housing model to consider both '*house price*' and '*housing related costs*'. Qualitative comparisons are also drawn that lend weight to the result.

The study supports a broader university research agenda that engages both the government and the commercial development sectors in a critical analysis of these and other urban design issues.

Key words: housing affordability; sustainability

AFFORDING SUSTAINABLE HOUSING

1 Housing in Australia

Our environment is coming under increasing pressure from development, resulting in the continual consumption of natural resources. The expansion of broad acre residential subdivisions, a resource hungry means of housing, is a major contributor to habitat depletion. The ever-expanding footprint of Australian cities produces undeclared impacts environmentally, socially and economically that we accept unquestioningly as we continue on with our habitual mode of urban growth.

Subdivision of rural land on the periphery of cities to create 'house and land' packages has offered a consistently strong profit margin to developers. cursory inspection suggests that it represents the cheapest approach to the provision of new housing. However this model disguises a number of *housing related costs*, and factoring these into the *house price* equation lends validity to consideration of other models of housing. Relevant *housing related costs* include: the provision of infrastructure for transport, reticulated and other services; costs to the individual for personal transport to access essential services; and the social cost incurred through lack of provision of a range of community services in these areas.

1.1 Housing related costs - transport

Since the middle of the last century the growth of Australian cities has been influenced and indeed underpinned by the private automobile, with very few new subdivisions connected to urban centres by any mode of public transport. The 'cost' of outer-ring housing does not factor in the two-fold costs of car ownership - a cost incurred directly by the individual home owner - and the provision and maintenance of expansive road infrastructure - a community borne cost - that these developments necessitate.

Outer ring housing also produces an additional risk associated with car dependency, as outlined in Dodson and Sipe's VAMPIRE study, Vulnerability Assessment for Mortgage, Petrol and Inflation Risks and Expenditure. This study documents the relative financial risk based on car dependence, income level and housing costs. It finds inward encroachment of vulnerability between 2001 and 2006 with outer areas becoming even more affected. (Dodson + Sipe) Outer ring housing developments not serviced by public transport tend to necessitate car ownership, and as a consequence this should be regarded as an essential *housing related cost*. The VAMPIRE Study reflects Australian Bureau of Statistics census data that, in 2006, shows a clear inverse relationship between housing costs and transport costs with distance from city centres, and identifies a steadily increasing separation. This data demonstrates that although *house price* decreases in the outer ring, transport costs increase. ("Housing"). This analysis is backed by data from the NRMA, which suggests that the cheapest car to own and run in Australia costs an average of \$121 per week, which will rise as petrol prices increase. This of course implies a *break-even* point, where the *housing related costs* of transport outweigh higher *house prices* ("Vehicle Operating"). These figures imply that as housing creeps outward the break even point is in fact creeping inward suggesting a compounding risk.

1.2 Housing related costs – infrastructure + services

Housing related costs are borne not only by the purchaser, they are often channelled directly back to ratepayers. As each new outer-ring development is approved, the local government authority accepts responsibility to provide and maintain the requisite infrastructure and services including: roads and transport; footpaths; street lighting; reticulated services such as power, water (supply and waste); storm water; and garbage and recycling services and infrastructure. The greater the distance of these developments from the city centre, and the less dense the subdivisions the greater the relative cost of these services. The provision of roads is a case in point. In Tasmania for every dollar that is spent on arterial roads, approximately 40 cents per year is spent on maintenance. This means that the cost of a road doubles every two and a half years, and this cost continues in perpetuity. (National Transport Commission)

Whilst developers may pay for the connections within the new subdivisions (with this cost passed on to the purchaser) the cost of the provision of the services to the site is generally borne by the local authority, or in fact the broader community, through rates and taxes. Other community borne *housing related costs* that are more difficult to quantify include: the provision of health services of various kinds; fire; policing; public transport; schools; sports facilities; parks and open space - to name a few. This leads to the third frequently overlooked issue, that of the social (in)equity that these centres produce due to their disconnection from a broad range of essential and non-essential services and facilities. This study contends that if all of these *housing related costs*, including the costs to the individual **and** to the broader community, are considered a dramatically different approach to housing and affordability will be implied based on a more holistic economic analysis.

2 Housing alternatives

Houses in Australia are not only 'homes', they also constitute a major component of the private investment portfolio. Both the initial purchase price, and the potential for real estate to appreciate in value over time are

central to the propagation of the current housing model of 'outer-ring' suburban subdivision. Many of these outer areas display quite spectacular *short-term growth* figures in terms of investment return, whilst more central areas tick over at a relatively consistent rate. For example outer areas of some cities have recently seen growth rates of up to 30% whilst inner areas return a more consistent 10%. One of the factors that can have a dramatic effect over outer area house prices is the approval of even more residential development further out. 'Getting in early' is justifiably seen as a safe investment strategy. Interested parties will continue to lobby for the continuation of broad acre development as this represents a favourable short-term investment for both developers and initial purchasers. The community's representative in this debate is the local government authority which in reality may well stand to lose from such approvals, with the expense of the loss passed on to the broader community through the housing related costs.

This paper proposes the possibility of considering a *longer-term view*, in which local authorities consider both the initial and the recurring costs of these developments to the municipality as a whole. It proposes that investment in housing be considered from an economically as well as an ecologically sustainable point of view, and calls for a consideration of *housing related costs* – both quantitative and qualitative – in the overall equation of *affordability*. It tests this question in Launceston, a regional community in northern Tasmania. This project was prompted by current collaborative work between the University of Tasmania and the Launceston City Council, who are currently completing a *Residential Strategy*, to set the blueprint for future residential development. (Launceston City Council 2009)

3 Case study Launceston, Tasmania

Launceston is a small regional Tasmanian city with a population of nearly 80 000, and an intact Victorian urban core that creates a picturesque settlement of identifiable character. The city would not appear, to the casual observer, to suffer too acutely from issues of urban sprawl, however, beyond the scenic Victorian city centre the pattern of suburban development exhibits economic, social and environmental issues characteristic to most Australian cities. The scale of the city enables ready identification of current patterns, and provides a workable basis upon which to speculate propositions within a less complex framework. Launceston represents a relatively simple test case and one that may offer transferability to thousands of comparatively scaled Australian cities and towns. It is deemed appropriate as a subject of study for these reasons.

In Launceston major impacts on the city began to occur in the 1960s, with the release of surrounding land for suburban subdivision. These suburbs exhibit all the symptoms expected of this housing model. They are disconnected from the city centre, poorly serviced by public transport and have few local facilities of any kind. Although houses in these suburbs are relatively inexpensive to purchase, they are encumbered with many of the *housing related costs* outlined above.

The pattern of growth has divided the city into discrete and relatively mono-cultural zones with outer ring housing and inner ring commercial activity. This dormitory suburb pattern has the effect of evacuating the city by night, and leaving the suburbs deserted or isolated during the day. Movement between these locations is presumed almost entirely to be by private automobile, as the relatively small scale of the city and low density conspire to preclude public transport viability. Instead, major arterial roads feed into the city centre providing the requisite private automobile access. The result is a significant negative effect on the city itself, its urban environment and character and the fine urban grain of the historic settlement.

Suburban sprawl results in a low *rate density*, requiring that the infrastructure dollar be spread very thin. The problem compounds as the quality of the urban space, already suffering under the burden of excessive road infrastructure, is further depleted through insufficient funding. It is an example of how our urban growth patterns have produced a trap from which we cannot easily escape, where major change and significant public expenditure are required to redeem our cities. (Launceston City Council 2007)

It is not only our urban environments that suffer under these growth patterns. Whilst Tasmanian urban centres remain relatively small they have a large per-capita footprint. The state is facing an imminent under supply of viable agricultural land, due in part to the declaration of forest protection boundaries and a lack of land suited to farming. Continuing to subdivide existing farmland for outer ring housing developments will exacerbate this problem and render the island state reliant on the importation of basic foodstuffs. Further, the combination of the historic urban fabric and the picturesque valley setting are seen as major contributors to the 'regional competitiveness' of the city as a tourist destination. Tasmania as a whole derives up to two billion dollars per annum from tourism, approximately 15% of GSP. Developing strategies for the growth of urban centres that underpin desirable qualities of cities and create people friendly places offer support to this major source of income to the city as a whole. (Gehl 41)

4 Case study comparison

In 2008 the Launceston City Council was finalising its draft *Residential Strategy*, which highlighted the following recommendation:

"Promoting more compact urban form and higher density housing in appropriate locations may have a number of social, economic and environmental benefits for the city including reduced costs of infrastructure, increased environmental sustainability, reduced demand for transport, and the creation of more vibrant city areas. It also sustains and increases viability of existing business and facilities." ("Residential Strategy" 2009)

At the same time the local councillors approved a development application for 400 new dwellings in Rocherlea, an existing outer-ring suburb 8 km from the city centre. The proposed expansion of this outer-ring suburb commits the local authority to significant infrastructure costs outlined above, and directly conflicts with values of 'local character' and 'liveability' as articulated in the Launceston City Council public consultation process, and compiled in the *Issues Paper*. (Launceston City Council 2007)

This paper was provoked by these two contradictory actions, which highlight the difficulties faced in achieving regionally and contemporarily appropriate urban development patterns. An alternative to this outer ring development is explored by considering how the provision of an equivalent number of dwellings could be accommodated on brown-field sites in Launceston's inner city, providing a comparative analysis that considers both short and long term cost differentials to developer, homeowner and council. This paper argues for a consideration of the whole range of *housing related costs* to be factored into the equation of housing affordability, acknowledging the ongoing 'cost' of infrastructure from an economic, environmental and socially sustainable perspective within the context of this regional centre.

4.1 Case study Site 1 Outer ring Rocherlea – new suburban subdivision

Rocherlea is at the extreme edge of the city limits, and is currently serviced by one local shop, a pub, a primary and secondary school, with health care and other services virtually nonexistent. The *Housing Tasmania Options Paper 2008* identified that 25% to 65% of Rocherlea residents are within a low socio-economic bracket and the area offers no local employment opportunities. Residents must travel a minimum of 5 km to access basic facilities in neighbouring areas. Although this distance seems relatively small by metropolitan standards, in a small city with little public transport infrastructure the distances render residents car dependent. Rocherlea represents a site of vulnerability as defined by Dodson + Sipe's VAMPIRE study.

4.2 Case study Site 2 Inner ring City centre – reuse existing brownfield sites

Launceston's central business area displays a typical pattern of rings of development. The intact and viable central commercial core has a high concentration of retail and business activity in predominantly two and three storey buildings and is focussed around 3 large parks. This central core occupies approximately one square kilometre. Beyond this core a ring of light-industry contains dilapidated and underutilized and brown-field sites, on a mix of large and smaller allotments. Existing built infrastructure is typically of the *industrial shed* type accommodating a range of automotive and light industry, stores and the like. Residential suburbs that date from the turn of the century ring this industrial zone and lie within one to two kilometres of the central core. They are well serviced by schools, shops and a diverse range of both essential and non-essential services. Beyond this a series of more remote newer suburbs remain both poorly serviced and disconnected from the urban core.

Although there are a few residential properties in the historic industrial ring, the existing brownfield sites lie within 1 km of the geographical centre of the CBD and therefore benefit from ready access to a large array of goods and services, making them ideal locations for a range of residential and mixed uses. Launceston City Council's *Draft Residential Strategy 2009 – 2029* cites a range of benefits attributable to inner-city and higher density development, including reduced infrastructure costs, environmental benefits, reduced car dependency and transport costs, more economic provision of community services, greater safety and sustained service provision through concentrated demand. The provision of housing in the inner core and historical industrial ring has the potential to achieve many or all of these advantages and in turn to promote a more positive urban environment. (Launceston City Council 2009)

5 Case study – pros and cons of outer or inner development

The low density achieved through existing housing patterns in outer ring suburbs results not only in a low rating density but also a low population density. This further exacerbates service provision funding by, for example, not providing the densities required for the economic provision of various services. Rules of thumb suggest residential densities of approximately 40 dwellings per hectare are required for economic provision of public transport for example. Suburban densities in Launceston, like many Australian suburbs, range between 8 and 12 dwellings per hectare. Creating higher density residential environments by, for example, accommodating more residents in the inner city areas would substantially increase the number of individuals able to access existing public facilities and infrastructure as well as increase the rating density that pays for these services. The additional utilisation renders any publicly funded service better value for money.

The primary short term benefit of utilising existing inner city brownfield sites is gained through the utilisation of existing connections to reticulated services such as: power; communications; water (supply and waste); storm water; as well as garbage and recycling services. Roads, footpaths and street lighting also exist on

these sites, and any additional provision would simply improve the general amenity of the city centre, and would do so for a large number of people. Infrastructure is provided in the Rocherlea subdivision at an up-front cost of approximately \$40,000 per house plus maintenance costs over time. Estimates of provision of equivalent services for the cost equivalent inner city site are estimated at approximately \$5,000, representing an immediate \$35,000 saving. Although additional houses would increase the load on the existing facilities, it is understood that the improved utilisation would far outweigh additional upgrade and maintenance costs and the increased rating density would represent net cost benefit.

On the face of it, based on the discussion outlined as an introduction to this paper, it would seem reasonable to expect that significant cost advantage, attributable largely to *housing related costs*, may be found in the denser inner housing arrangement given the diversity of cited benefits. However, the impediments to a denser, inner housing alternative are three-fold: cost of inner city land; cost differential of housing types; and the profit differential between more rapidly appreciating short term investment of outer-ring developments compared with slower relative appreciation of inner-ring investments. The cost of the land in the traditional 'house and land' packages in Australia usually comprises of three equal components: original land purchase price; infrastructure costs; and developer's profit.

This study considers the capacity of the central core and the historic industrial ring of Launceston to accommodate the 400 new residences proposed for Rocherlea on 'cost equivalent' residential sites in these inner areas. 'Finished land' – that which has been subdivided and is ready for construction of houses - at Rocherlea is expected to sell at approximately \$120,000 per 600m² block. Three scenarios are proposed to explore the cost-benefit analysis of various options for utilising existing inner-ring brownfield sites for new housing. These equations factor land costs only in order to understand potential development models.

5.1 Scenario A cost comparison of 'size equivalent' - 600m² city block

The first scenario explores the cost of locating equivalent 600m² housing lots on inner city blocks, allowing for a provision of a similar housing type as that traditionally proposed in residential developments, a single house with associate land that will allow private garden. The following costs might result:

Land purchase price to developer	\$120,000	(\$2,000,000/Ha / 16)
Infrastructure costs -	\$15,000	(20m frontage)
Profit -	\$65,000	((Land + Infra.) / 2)
'Finished land cost' to purchaser approx.	\$200,000	

Scenario A suggests that the same house and land provided in the inner area as opposed to Rocherlea would cost approximately \$80,000 more up front. It is important to remember though that ongoing costs to the broader community would be significantly reduced, as would costs to the individual purchaser. Further, in the event that the location of the housing allowed an occupant to reduce their car dependency by one vehicle the annual savings to the individual for this alone would be of the order of \$6,000 - \$12,000 per annum.

5.2 Scenario B 'finished land cost' equivalent (\$120,000) - 375m² city block

The second scenario explores the size of land that can be purchased for the equivalent cost (\$120,000) of the proposed Rocherlea lots. It reveals that it could be possible to provide a 375m² block in the inner city for a similar cost, which is 60% of the size of the outer ring lots.

Land purchase price to developer	\$72,000	(\$2,000,000/Ha / 26 - i.e. 3/5 scenario A)
Infrastructure	\$9,000	(12m frontage- i.e. 3/5 scenario A)
Profit	\$40,000	((Land + Infra.) / 2)
'Finished land cost' to purchaser approx.	\$120,000	

Scenario B suggests this might be represented by blocks of land of say 12m x 31m in dimension (372mm²), which offers an opportunity for a range of housing types. This proposition would still allow for significant useable outdoor space, whilst supporting the higher density arguments for the city.

5.3 Scenario C higher density - increase affordability/sustainability - 200m² city block

In order to consider the possibility of greater density, and a greater degree of both affordability and sustainability, a third scenario is proposed that would allow for a block of land of say 6m x 33m in dimension accommodating a generous residence, many precedents for which exist within Launceston dating from the turn of the century. Re-running the scenario we find the following:

Land purchase price to developer -	\$40,000	(\$2,000,000/Ha / 50)
Infrastructure costs -	\$5,000	(6m frontage)
Profit -	\$23,000	((Land + Infrastructure) / 2)
'Finished land cost' to purchaser approx.	\$68,000	

The above scenarios would of course best be deployed in a diverse mix offering potential purchasers 'standard' housing, inexpensive terrace housing and cost equivalent but more compact housing typologies. Regardless of the mix the costs to the broader community would be significantly reduced rendering such an approach to housing 'economical' in the broader sense. The diversity of product would offer individual purchasers packages to suit their means and needs and to the general benefit of the urban environment.

6 Conclusion

These three equations, albeit simplistic, provide significant evidence for the cost benefits of inner area housing in Launceston. Beyond this quantitative analysis that compares 'known costs', housing costs, there are also a set of both *housing related costs* and qualitative issues that can be considered to support the hypothesis. In addition, there is a large and diverse set of inter-related advantages of the inner model such as: increased amenity of open spaces in the city by virtue of reduced automobile incursion; reduced unemployment due to job proximity for those at risk of unemployment; and maintenance of scenic beauty through the retention of ecosystems resulting in improved tourism potential, to name a few. These outcomes directly support the aspirations of both the Launceston City Council's *Issues Paper* and the draft *Residential Strategy*. (Launceston City Council 2007 + 2009)

Higher density housing produces a proportionately higher *rate density*, and the rates that are generated produce equity that can then be used directly to support, extend or upgrade existing services,— a net cost saving. Locating residences in the inner city maximises the possibility of commuting to work and school by public transport or other means more economic and equitable than the private automobile. It allows greater utilisation of existing services, infrastructure and public amenities. These denser housing models would lead to an increased use of public spaces, which not only increases its value, but also promotes associations between individuals who might otherwise struggle to connect with their community.

From an environmental point of view these alternative models allow for the retention of existing natural ecosystems providing direct environmental benefit in the form of habitat provision, watercourse retention, biodiversity and the like as well as offering scenic protection and access to these natural landscapes by local residents. By maintaining the opportunity to utilise arable land in the future we insure ourselves against reliance on external provision of foodstuffs – we future-proof the city – an important consideration in the light of escalating transport costs.

This study presumes that the value of these inner city sites would stay the same once they are rezoned, and this is of course contestable. Despite a re-zoning from Light Industry to Residential representing a downgrade, it is reasonable to assume that the value of the land would in fact increase. In some instances these housing typologies may attract higher building costs, however this preliminary investigation suggests, by using readily available figures and some qualitative analysis, that a more detailed financial investigation of these issues would be valuable. A further study will consider projections of land value differentials and other models of development – higher density and mixed use – that might be considered, comparing similar issues of cost and potential profit to developer, homeowner, council and, by association, rate payers. This study is part of a broader *Outer to Inner Affordability (OTIA)* study, and continued detailed investigation of these issues will be adopted in future projects, which will likely lend support to the aspirations of the *Residential Strategy*, and assist in determining the planning changes that might need to be enacted to allow this to occur.

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14 March 2025

State Planning Office
haveyoursay@stateplanning.tas.gov.au

To whom it may concern,

Re: STRLUS UGB Draft Submission

Thank you for the opportunity to provide a submission on the Southern Tasmanian Regional Land Use Strategy (STRLUS) Urban Growth Boundary Update 2025.

Whilst the CCA have no interest in the Southern Tasmanian geographical area we are also in the process of preparing a Regional Land Use Strategy. The Southern Region have gone further down the path than the other two regions and as such has established something of a precedent for our RLUS by establishing expectations. For this reason, our submission does not comment on the specific merit of the specific Urban Growth Boundary (UGB) amendments proposed in the Southern Region but instead focuses on the process by which these proposed amendments were put forward and the implications this process will have in our region.

We commend the aspiration outlined in the SPO's documentation that "The UGB facilitates a more orderly and sustainable use and development of land by helping to contain development to areas already zoned for urban purposes or identified as being suitable for growth from an economic, environmental and liveability perspective. It takes into consideration:

- infrastructure capacity (road, water, sewer, electricity, telecommunications),
- access to services such as health, education and public transport,
- natural values, environmental, landscape and heritage values, and natural hazards".

Importantly, the SPO's background note states that "the UGB provides certainty for government, infrastructure and service providers, industry, landowners and the general community, by identifying where urban growth should occur".

We fully agree with the observation in the documentation that the UGB has to change over time as circumstances and community needs change. We commend the convention and practices defined in the Act that require these changes are delivered through a process of consultation and based on firm evidence. These are essential if we are to ensure our urban areas are compact, sustainable, can be efficiently serviced and support a high standard of liveability.

We note that the helpful and clear documentation of the proposed changes to the UGB (www.stateplanning.tas.gov.au) tells us that some proposed changes were "Identified through dialogue with a developer" rather than through Councils or through the STRLUS comprehensive review process, or all developers.

This raises concerns for us about the transparency of this process and the fairness of a short cut to inclusion available to some but not others. We further note the precedent it sets for the other two regions where the RLUS are less advanced.

The UGB in the draft RLUS is demonstrably tied to an agreed strategic understanding of need. To just add more land within the boundary without a comprehensive review process risks a too loose UGB. This will bring problems with sprawl, expensive servicing, social isolation, depletion of natural resources and loss of food security.

For this reason we request that the developer suggested inclusions are not incorporated into the UGB until they too have been demonstrated to have gone through the same process as other inclusions.

Regards

Sheree Vertigan AM

Chief Executive Officer
Cradle Coast Authority

From: Damian Shady
Sent: Friday, 14 March 2025 4:39 PM
To: State Planning Office Your Say
Subject: Support Submission - Southern Regional Land Use Strategy - Urban Growth Boundary

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State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

haveyoursay@stateplanning.tas.gov.au

Subject: Submission in Support of the Southern Regional Land Use Strategy – Urban Growth Boundary

To the Planning Officer,

I have been following the housing shortage situation , particularly in Tasmania where I reside , and have been reviewing the Southern Regional Land Use Strategy and especially the proposed Urban Growth Boundary (UGB). I believe this initiative is a must for ensuring sustainable development while addressing the key challenge of housing availability, affordability, and to assist with economic growth in the region.

It is absolutely necessary to provide more land for development which will not only make housing more available for more people but promote investment in infrastructure by local businesses and in turn create new job opportunities.

Local suppliers will also benefit with the much needed increase in the civil construction and building industries.

With the increasing demand for houses the affordability and availability is decreasing and prohibiting some deserving families from being able to buy or rent a home.

The Urban Growth Boundary changes proposed will go a long way to easing the current issues with the roll on effect of future development and opening up more options for those people looking to move into their own property.

I strongly support the adoption and implementation of the Urban Growth Boundary as part of the Southern Regional Land Use Strategy.

Thank you for giving me the opportunity to contribute to this very important initiative and may the decision be positive for the proposed changes which will benefit so many people in our communities.

Yours Sincerely ,

Damian Shady

From: Thomas Moore
Sent: Friday, 14 March 2025 4:21 PM
To: State Planning Office Your Say
Subject: "Have your say" submission - Clarence - STRLUS Urban Growth Boundary (UGB)

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"Have your say" submission - Clarence - STRLUS Urban Growth Boundary (UGB)

14 March 2025

To whom it may concern,

I'm making this submission as a resident and a Clarence City Council (CCC) rate payer on in Lauderdale, Tasmania. I'm also making this submission as father to a three year old daughter for whom it's likely the future of her home will matter to her health, happiness, and lifestyle in the year 2075, 50 years from now.

My submission speaks directly to the proposed changes to Clarence "Area 7" which was "Identified through dialogue with a developer" (1).

Some of the land identified in "Area 7" is under the identified "coastal inundation hazard bands" (2). All these areas must be excised from the proposed update to the UGB. Where this is ignored, governments and responsible entities would need to show that any land raised to reduce flood risk for building new dwellings and infrastructure would not, in any way, increase flooding risk to existing properties under any scenario. Residents will be seeking advice from authorities on this matter.

Further parts of the proposed area contain *Eucalyptus amygdalina* (IUCN Near Threatened) coastal woodland and little of this original forest remains in Clarence. While the amenity value for the community and suburban ecosystem is obvious, conservation values for this woodland must be assessed for removal from the proposed UGB update.

It is true that some of this land might be ideal for residential development if the road network wasn't currently failing to meet capacity for current needs and safely.

I point to gaps in the developers Traffic Impact Statement (3) from July 2020 where data was sourced and interpreted from periods of COVID restriction. This significantly raises uncertainty about how fit-for-purpose the statement is for the reality in 2025. The report downplays the record of serious traffic accidents on Bayview Rd, however, it uses an inadequate period of study. As someone who has lived on the blind "right hand bend" directly referenced in the consultants report for 25 years I have personal experience with traffic accidents that damaged infrastructure and would have killed residents on their properties if not for good luck.

I will be contacting my council representatives to understand the CCC view of this UGB expansion. Please keep me updated on the progress of this proposal, which I understand is the first step before a re-zoning process. A re-zoning process that would presumably financially benefit the developer at the risk of the existing local residents.

Thank you for your time and consideration of my submission,

Dr Thomas Moore (MSME, Phd)

Thomas Moore

(1) STRLUS Urban Growth Boundary Update: Consultation Paper - Figure 2. Areas for inclusion in the UGB at Clarence, page 11 and Table 11. Clarence – Area 7. Page 18.

(2) The List Map - <https://maps.thelist.tas.gov.au/listmap/app/list/map>

(3) TRAFFIC IMPACT STATEMENT PROPOSED RESIDENTIAL SUBDIVISION DEVELOPMENT 52 RICHARDSONS ROAD SANDFORD - July 2020 - via <https://richardsonroad.com.au/maps-and-other-info/>

HOBART INTERNATIONAL BUSINESS PARK PTY LTD

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11th March 2025

State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

Emailed to: haveyoursay@stateplanning.tas.gov.au

To the State Planning Office,

Submission – UGB Boundary

Hobart International Business Park – Cranston Parade, Cambridge

The Hobart International Business Park (HIBP) hereby provide this submission on the current consultation on the Southern Tasmania Regional Land Use Strategy - Urban Growth Boundary proposed update project.

This submission is further to our submissions on the *Southern Tasmanian Regional Land Use Strategy* “State of Play” Report in December 2024 and the *Statewide Industrial Land Study* in mid-2024.

The Hobart International Business Park (HIBP) are the owners of the 158ha land holding adjoining the Hobart International Airport at 51 Cranston Parade, Cambridge. The land is shown below in Figure 1. The land is also known as the Hobart International Business Park (HIBP).

We request that the State Planning Office consider this submission and extend the UGB over the HIBP land.

We also request that the State Planning Officer consider an extension of the UGB over the two (2) neighbouring properties to the HIBP. The properties are:

- 1047 Acton Road, Cambridge (CT107856/2) owned by Robert Thornbury; and
- 93 Cranston Parade, Cambridge (CT 156582/1) owned by Wyka Pty Ltd

We have discussed our intentions for the HIBP with the owners of these two (2) properties and have agreed to work cooperatively in seeking an extension of the UGB over these additional properties. The two (2) owners will also provide their own separate submission to the State Planning Office.

It remains our position that the HIBP land and project is one of regional significance. The land ought to be recognised and supported in drafting the next version of the STRLUS and updates to the UGB. The land provides a long-term supply of flat light industrial and commercial land in close proximity to Hobart that can be serviced through existing transport and infrastructure networks.

We are available to discuss any aspect of this project and would be pleased to provide further details.

Current Land Use and Zoning

The land is currently used for light industrial, agricultural and commercial purposes across three (3) different zones. This includes:

- Onsite recycling and processing facility of aggregates (gravels) for civil construction
- Processing of fill for the major subdivision
- Road works and drainage works
- Depot for two (2) major waste collection services
- Paintball facility
- Motocross park
- Vehicle parking and storage for car rental businesses
- Office building for administration
- Grazing on the vacant pasture

Approximately 74ha of this land is in the Light Industrial Zone and in various stages of development. HIBP have lodged a Development Application for a 154-lot subdivision over this part of the land. The subdivision, will be developed in stages, and will provide individual lots for a range of light industrial and business uses over a broad range of lot sizes. The works include roads, servicing, public open space and major drainage works.

Approximately 22ha is currently in the Rural Living Zone which, under the *Tasmanian Planning Scheme – Clarence* (the Planning Scheme) could be developed for subdivision at 1 lot per 2ha.

The remaining 62 +/- ha is currently in the Rural Zone under the Planning Scheme. HIBP have plans to rezone this land for future light industrial and commercial use. A portion of this land to be used for environmental management and stormwater detention and retention. 7ha +/- currently within the UGB cannot be developed due to the natural values and grasslands in the middle of the site. Which necessitates an extension of the UGB to more usable land.



Figure 1: Hobart International Business Park - 158 hectares of flat land at Cambridge (Source: theLIST Mapping Services)

As shown in Figure 3, the Light Industrial Zoned part of the land is currently within the UGB.

The adjoining land at 1047 Acton Road (18.97ha) and 93 Cranston Parade (15.35ha) is shown below in Figure 2.



Figure 2: Adjoining land at 1047 Acton Road and 93 Cranston Parade (Source: theLIST Mapping Services)

The two (2) adjoining properties are a total 34.32ha in area. This includes the narrow access strip to Acton Road.

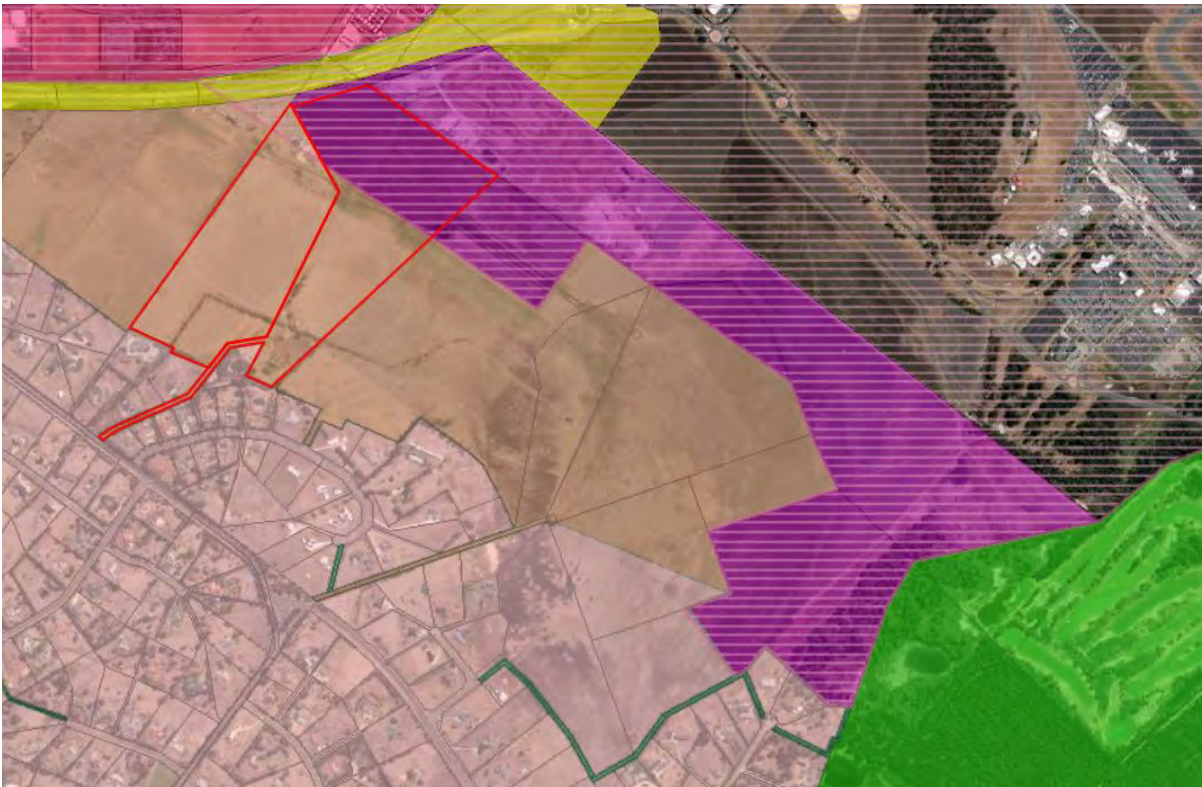


Figure 3: UGB over part of the land (Source: theLIST Mapping Services)

Part of 1047 Acton Road and 93 Cranston Parade are already within the UGB. This is shown in Figure 3.

Light Industrial Subdivision (154 Lots)

The 154-lot subdivision is currently being assessed by the Clarence City Council. This subdivision is shown in Appendix A to this document.

This is one of the largest commercial and light industrial subdivisions in Tasmania. The project has been in the planning and design phase for the past 2-3 years. This has included, traffic impact assessments, servicing and engineering, natural values assessment, planning and connectivity to the surrounding area. This project is in principle supported by the local Council as the land has been strategically zoned as a Specific Area Plan under the *Tasmanian Planning Scheme – Clarence* to facilitate a light industrial/commercial business area adjacent to the Hobart International Airport and Tasman Highway. The subdivision application is a major step forward in achieving this strategic vision for the area.

Phase	Late 2024	Mid 2025	Late 2025	Early 2026	Mid 2026	Late 2026
Planning						
Detailed Design Approvals						
Stage 1 of Construction						
Issue of Titles for Stage 1						

Table 1: Subdivision Timeframes (Indicative Only and Subject to funding and Council approvals)

Whole of Site Master Plan and Rezoning

The HIBP are also preparing a whole of site master plan for the land. We have a vision that 56ha +/- of land is best suited for further light industrial, business and complimentary large commercial uses. The remaining land would be used for environmental management and drainage. This is shown in Figure 4 as the “Rural Balanced Land” and “Rural Living Balance Land”.

The creation of a whole of site master plan is the precursor to an application to the Clarence City Council for a planning scheme amendment. The master planning is a 12 + month planning, design and consultation process.

The planning scheme amendment application, if approved, would formally allow for the master plan to be implemented through the Planning Scheme under a Specific Area Plan (SAP). It would include the rezoning of the land and provide a plan and set of standards that would guide the future use and development of this land specific to this site and per the master plan.

We may work with the adjoining owners at 93 Cranston Parade and 1047 Acton Road as part of the overall site master planning but are yet to prepare any formal agreements between parties.

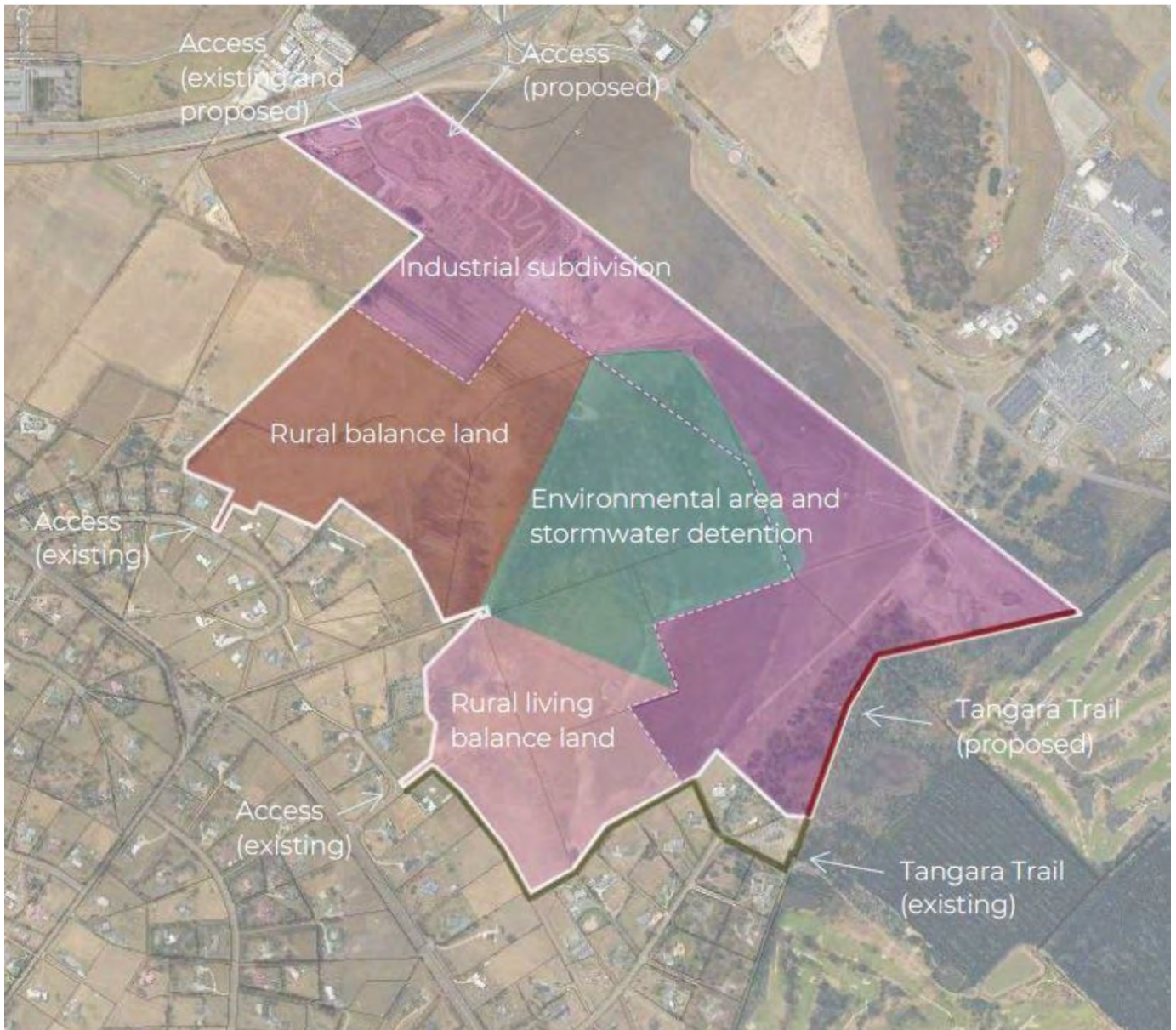


Figure 4: Cranston Parade/HIBP land (Source: ERA Planning and Environment)

A Specific Area Plan (SAP) through the Planning Scheme is the only way to formally secure the future vision and master plan for the land. This will ensure that development is undertaken:

- In accordance with the defined master plan (i.e. road layout, landscaping, services, staging, design details etc)
- Infrastructure provision; and
- Provide guidelines and standards that are specific to the Cambridge and Acton Park area (and community);
- The specific area plan process, through the Council and Tasmanian Planning Commission allows for public, government and other stakeholder to have formal input into the plan. In other words the application is a public process.

An amendment to the planning scheme would dedicate the land to the Hobart International Business Park in perpetuity. Even if the land is sold then future use and development of the land can only be undertaken in accordance with the SAP (until such time as the planning scheme is amended to do otherwise).

The creation of a whole of site master plan and SAP is a lengthy and detailed process. The process to date is provided in the table below:

Activity	Who	Purpose	Status
Site specific studies, reports and draft master plans	HIBP and key stakeholders such as the Clarence City Council, Department of State Growth, State Planning Office, TasWater and Hobart International Airport.	To understand and assess site constraints and opportunities and options	2023 – 2025 <ul style="list-style-type: none"> • Acid Sulfate and Dispersive Soil assessment completed • Natural Values Assessment completed • Flood hydrology and stormwater management options in progress • Site Master Plan in progress • Traffic impact and road layout in progress • Planning assessment in progress • Urban design framework in progress • Aboriginal Heritage assessment completed • Site serviceability in progress • CASA and impact study on airport in progress
Project Scoping and Development with key Stakeholders	Key Stakeholders Only	Understand strategic need for SAP, manage high interests/high power and to develop the first complete draft of the master plan	2023 – 2025 In progress

Engagement with <i>Industrial Land Supply and Demand Project</i>	HIBP, Clarence City Council, State Planning Office, Department of State Growth	To prepare a submission to the Clarence City Council, State Planning Office on merits of the HIBP land for future industrial and business use and seek that HIBP land is included in the project.	Mid – late 2024 In progress
First Complete Draft Master Plan for Consultation	General Public, Landowners, key stakeholders	Feedback on Master Plan, SAP standards through dedicated consultation	Late 2024 Yet to commence
Second Complete Draft Master Plan Consultation	General Public, Landowners, key stakeholders	Feedback on updated Master Plan and SAP standards	Early 2025 Yet to commence
Application for Planning Scheme Amendment for SAP and associated rezoning	Council, HIBP and Key Stakeholders	Statutory process	2025 Yet to commence
Council request for additional information and notification for public comment by Council	By Council and HIBP	HIBP to monitor process and update stakeholders, public and work with Council	Pending acceptance by Council and initiation of amendment which will be in 2025
Council decision on the public notification	By Council	Council to consider any representations received during the statutory notification period and provide any recommendations for alterations to the amendment to the Tasmanian Planning Commission.	2025

Tasmanian Planning Commission Hearings and Decision	Council, TasWater, Representatives, other stakeholders, Tasmanian Planning Commission	HIBP, other	Tasmanian Planning Commission to hold hearings into the amendment and to make a final decision. Further information may be required to address concerns or to clarify details.	2025
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Table 2 – Timeframe and Work Schedule for the Specific Area Plan (subject to Council Approvals, Tasmanian Planning Commission Approvals and Consultant availability)

The inclusion of this land in the UGB is a critical precursor to further planning for future development of this land and as a statutory precursor to any amendment to the Planning Scheme to facilitate the growth and development of this land.

HIBP Summary

1. The HIBP have lodged a Development Application with the Clarence City Council for a major 154 lot subdivision with access to the Tasman Highway over 74ha of the land. An indicative timeframe for this subdivision (planning, design and construction for Stage 1) is provided in Table 1 of this document.
2. The HIBP are also developing a master plan and Specific Area Plan for the entire 158ha area of land – of which:
 - a. 74ha is currently in the Light Industrial Zone and proposed for a major 154 lot subdivision under the current Development Application.
 - b. 22ha is currently in the Rural Living Zone; and
 - c. 34ha, currently in the Rural Zone. These areas could be dedicated to industrial, business and commercial use.
 - d. Approximately 30ha would be dedicated to environmental values and stormwater management.
3. A Specific Area Plan is intended to further develop the land for industrial, business and commercial use and lifestyle/retirement living development within the Rural Living Zone area.
4. The Master Plan is progressing well and indicative timeframe and process is provided in Table 2 of this submission.
5. The HIBP land is flat vacant land. There is no standing vegetation or structures to be demolished to accommodate future development. There is no need to displace other users to accommodate future use and development.
6. The site is 12 minutes from the Hobart CBD.
7. Part of the site is currently used for business and light industrial type uses.
8. The site can be accessed from the Tasman Highway (State owned highway) or from Local Roads such as Shelomith Drive or Rotary Place (Council Owned). The HIBP are also proposing a future access to Gruber Avenue.
9. The site has exposure to the Tasman Highway and people travelling to and from the Hobart International Airport.
10. The site supports an improved Brighton to Cambridge freight route.
11. The site has connectivity to existing settlements and is within close proximity to other facilities and community infrastructure such as parks, open space, schools, childcare and many sport and recreation amenities.
12. The land has compatibility with the Hobart International Airport and the future Airport Master Plan.
13. The land can be serviced for sewer, water and power.
14. Businesses can be brought together in a state-of-the-art precinct in Tasmania. This may open up residential corridors and areas in the Glenorchy, Moonah and Derwent Park areas in Hobart. A new/expanded SAP would attract business to the Clarence Local Government Area.

15. Based on our stakeholder engagement there still scope to provide land for indoor sport and recreation facilities such as indoor training facilities, ball sports, ice skating and ice sports. This would compliment the other business and light industrial uses and the linkages to nearby recreational facilities and open space networks.
16. The site has the potential to meet future industrial and business needs and ought to be considered through the current State Planning Office *Industrial Land Supply and Demand Tasmania Project*.
17. The adjoining landowners at 93 Cranston Parade and 1047 Acton Road have expressed interest in having their land also included in the UGB.

UGB Extension Options

We envision that the land will be identified as a future light industrial/commercial area in the next version of the STRLUS. This will facilitate the rezoning and staged development process. The area can provide a mixed-use of business, environmental management and residential living with connectivity to the Hobart International Airport, the Cambridge Business Park and nearby residential and open space areas.

We anticipate the land and overall project will be of high interest to the State Planning Office and the Tasmanian Government.

We present two (2) UGB extension options for the land.

Option 1 - Hobart International Business Park and 93 Cranston Parade and 1047 Acton Road (109ha)

Option 1 includes the balance of HIBP land and the land at 93 Cranston Parade and 1047 Acton Road in an updated UGB for Greater Hobart. The total area is 109ha. The proposed extension is shown below in Figure 5.



Figure 5: Option 1 - Proposed Urban Growth Boundary Extension (Source: theLIST Mapping Services)

Option 2 - Hobart International Business Park (85.5ha)

Option 2 is the balance of the HIBP land (only) owned by the HIBP is included in an updated UGB for Greater Hobart. The total area is 85.5ha. The proposed extension is shown below in Figure 6.



Figure 6: Option 2 - Proposed Urban Growth Boundary Extension (Source: theLIST Mapping Services)

Conclusion

This document has provided an overview of the HIBP subdivision and Specific Area Plan Project with indicative timeframes, milestones and details. All of which is subject to availability of consultants, Council approvals and the final decision by the Tasmanian Planning Commission. We strongly encourage the State Planning Office to further consider this land (and submission) and include either Option 1 or Option 2 in an updated UGB for the Greater Hobart Area. This would provide HIBP with the confidence to finance and resource and continue the planning and design process for the land. The extension of the UGB would also be a critical step towards securing land adjacent to the Hobart Airport and Tasman Highway as a future light industrial and commercial land supply for Southern Tasmania.

We thank you again for this opportunity and look forward to discussing this exciting venture with you. Please visit our website and Facebook page for further details and project updates.

If you would like to discuss any further details then please contact our consultant town planner David Cundall at david.cundall@formplanning.com.au or

Sincerely,

Hobart International Business Park Pty Ltd
(ACN 677 341 365)



DOURIAS GROUP HOLDINGS

Dourias Group Holdings
PO BOX 3193, WEST HOBART
TASMANIA, 7000

Email:

14th March 2025

State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

Emailed to: haveyoursay@stateplanning.tas.gov.au

To the State Planning Office,

Re: STRLUS UGB Update

Mannata Street Lauderdale Rezoning and Subdivision

I write to provide this submission in support of the proposed extension of the Urban Growth Boundary (UGB) over 34, 36, and 46 Mannata Street, Lauderdale (the land) for a proposed 44 lot residential subdivision per Figure 1 and Figure 2.

I have lodged my application with the Clarence City Council for the rezoning and subdivision and will develop the land for housing as soon as permits are granted.

The application has cost Dourias MGH approximately \$150,000.00 to prepare. The application was submitted after Council had recommended that Dourias MGH prepare the application and submit for assessment.

The UGB extension over this part of Lauderdale would remove ambiguity in the *Southern Tasmanian Regional Land Use Strategy* (STRLUS) and allow for the assessment process to continue. This follows commitments by the Tasmanian Government made in July 2015 (see attached letter from the Hon. Peter Gutwein to the Mayor Clarence City Council).

4.2.6 Area 6

Municipal Area	Clarence
Reference	Mannata Street, Lauderdale
Current Zoning	8.0 General Residential 11.0 Rural Living (Zone B) 14.0 Local Business
Current Use	Residential & Vacant Land
Approximate Total Land Area	3.7 ha
Approximate Maximum Dwelling Yield ²	44
Comments	Identified through dialogue with a developer

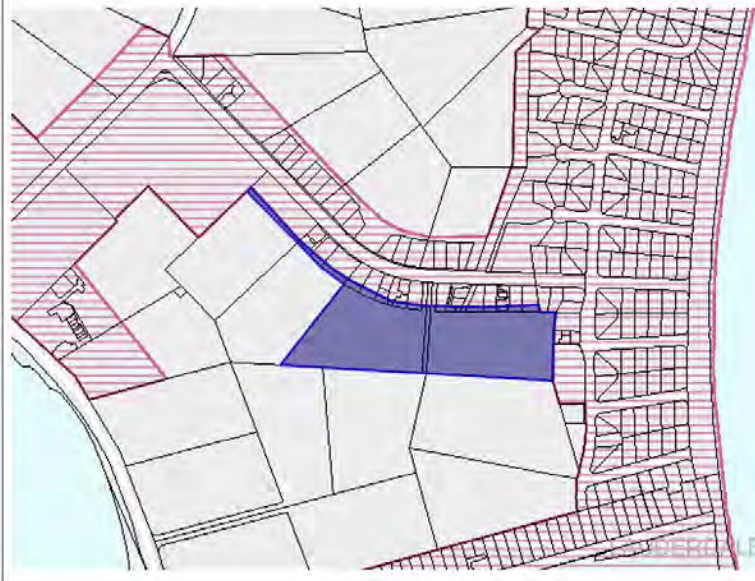


Figure 1: Proposed Extension of the UGB Boundary for Mannata Street (Source: State Planning Office)

PROJECT OVERVIEW

Location

34, 36, and 46 Mannata Street, Lauderdale.

Project Scope

A 44-lot subdivision, which will include constructing a new public road, services, footpaths, access to the local business area, access to public open space, and lots suitable for single or multiple dwellings.



Figure 2: Illustrated subdivision layout plan for Mannata Street Lauderdale (Source: GHD Pty Ltd)

Development of the Land

The land has been progressively filled to raise its elevation above the flood level. The Flood Prone Area Overlay was largely removed in mid-2022 following a planning scheme amendment by Clarence City Council. Filling work continues, and 34 Mannata Street is currently being engineered to accommodate future construction.

Considerable investment and engineering design and assessment was undertaken to construct the fill and provide a large sandstone stormwater drainage channel through the land. This is shown below in Figure 3.



Figure 3 – Existing Sandstone stormwater channel and gravel access during rainfall event (Source: David Cundall, taken December 2021)

The land adjoins the Local Business Zone and Bangalee Road Shops and Community Purpose Zone. Public transport and essential services are all within walking distance, making this land ideally suited for housing development. It is also within walking distance of the proposed Woolworths Supermarket on the South Arm Road (see Figure 9).

Significant construction works continue on the land, per current permits. This is shown below in the recent aerial photographs taken 21st May 2024. These are shown below in Figures 4 – 6.



Figure 4: Site Aerial Photo and subject land taken 21st May 2024 (Source: Richard Harmey Productions)



Figure 5: Site Aerial Photo and subject land taken 21st May 2024 (Source: Richard Harmey Productions)



Figure 6: Site Aerial Photo and subject land taken 21st May 2024 (Source: Richard Harmey Productions)

URBAN GROWTH BOUNDARY EXTENSION

Per the attached letter from then Minister for Planning and Local Government the Hon. Peter Gutwein, dated 6th July 2015, the Tasmanian Government identified this area as a high priority and that the Tasmanian Government would support an update to the Planning Scheme and to consider expansion of the Urban Growth Boundary (UGB) over this land.

The Minister has the head of power to extend the UGB over this part of Lauderdale and allow landowners to prepare applications for rezoning and development of this area. All of which must be informed by modern best practice for planning, design and engineering. This can be done so in full cooperation with the Clarence City Council as a major stakeholder, particularly, in stormwater management.

Should Council initiate the amendment then the Tasmanian Planning Commission must still consider the LPS Criteria and the public and stakeholders will participate in the planning process through the representations to the Council and through hearings before the Tasmanian Planning Commission.



Figure 7: Urban Growth Boundary shown in hatched overlay and subject titles in blue outline (Source: theLIST Mapping Services)

Residential Demand and Supply (Lauderdale)

The Southern Regional Tasmania Residential Demand and Supply Study: Demand and Supply Report 2024 (SRTRDSS) has been prepared as a key input into updating STRLUS. The STRDSS has indicated residential supply will be exhausted in Clarence (excluding the metro area) within 6 years and within 8 years in the Lauderdale suburb (See Figure 8).

The Greater Hobart Plan Area Residential Demand and Supply Study, 2024 was also prepared to consolidate the data from the SRTRDSS with data from “metropolitan” Hobart. When considering the entire Clarence LGA, demand will outstrip supply by 1,466 dwellings by 2046.

One of the key variables in the data of the two residential demand and supply reports is that there is varying level of confidence that available land will be brought to market. In this instance, I already have a Development Application lodged with the Clarence City Council for the 44 lot subdivision. I am ready to develop this land as soon as permits are granted.

Table ES-2 Forecast Planning Area population and land supply, SRT region

Planning Area	Demand				Supply exhausted (in years) ^a		
	Population 2021	Forecast Pop 2046	AAGR ^a	AADD ^a	Theoretical	Practical	Practical (vacant)
Bridgewater	4,386	4,823	0.38	15	5	8	7
Brighton	3,700	5,266	1.42	36	18	16	7
Gagebrook	2,829	3,058	0.31	10	11	21	21
Old Beach	3,156	3,662	0.60	10	23	23	23
Brighton Balance	5,192	8,569	2.02	59	2	2	2
Bothwell	388	409	0.21	1	23	23	23
Central Highlands Balance	2,192	2,272	0.14	8	23	23	23
Cambridge	427	735	2.20	5	8	2	1
Lauderdale	2,512	2,698	0.29	4	8	14	8
Richmond	935	1,135	0.78	4	23	23	20
South Arm-Opossum Bay	1,358	1,549	0.53	7	12	12	12
Clarence Balance	12,390	15,712	0.95	57	4	5	4

Figure 8: Lauderdale dwelling demand (Source: Remplan 2024, Southern Regional Tasmania Residential Demand and Supply Study: Demand And Supply Report)

RECENT AREA DEVELOPMENTS

Lauderdale continues to grow and develop, further supporting the case for expanding the UGB. Woolworths is planning a new supermarket on South Arm Road, with pedestrian access to Ringwood Road, just 700 meters from my proposed subdivision. This demonstrates the demand for more urban infrastructure in the area, which makes my development proposal even more relevant.

A new Woolworths is proposed for Lauderdale!

We want to know your thoughts about the proposed new Woolworths coming to Lauderdale.

We will be establishing a full-sized supermarket, as well as options for up to 10 complementary shops or facilities along South Arm Road, next to the Harmony Garden Centre.

We want to create a quality location shaped by the local community.

Ideas for the site include:

- A fresh and modern design
- Free parking area for easy access
- A new pedestrian link from Ringwood Road.

What else? We want to hear from you!

Welcoming your ideas

You're invited to share your ideas around what would make Woolworths and this location a shopping destination of choice for you.

Send us an email at Feedback@communicationlink.com.au or phone us on 02 6185 3301.

Consultation closes Sunday 15 September.

Take a short survey by following the QR code by Sunday 1 September to share your thoughts

Woolworths

Figure 9: Flyer for the proposed Woolworths Supermarket (Source: Woolworths)

Woolworths has advised us that they submitted their Development Application (DA) in December 2024, and have received a Request for Additional Information from the Council. They are currently finalising their response to the request. Construction of the shopping centre is to commence as soon as the DA is approved.

SUMMARY

Extending the Urban Growth Boundary over this part of Lauderdale is a logical, necessary step that will benefit the entire region by enabling well-planned urban infill development. It will help reduce unnecessary red tape and ensure a fair, merit-based assessment process by Clarence City Council. This extension would also provide confidence to both the Council and developers, fostering a more collaborative and transparent planning process.

I am happy to provide additional information or to discuss further. Please do not hesitate to contact me at _____ or by email at _____

Sincerely,

Tony Dourias

Director: Dourias MGH Pty Ltd

Attached: Letter from Hon. Peter Gutwein (6 July 2015) regarding Clarence Interim Planning Scheme 2015 and Lauderdale Structure Plan Update.

Treasurer

Minister for Planning and Local Government

Level 9 15 Murray Street HOBART TAS 7000 Australia

GPO Box 123 HOBART TAS 7001 Australia

Ph: +61 3 6165 7670

Email: treasureroffice@dpac.tas.gov.au



Tasmanian
Government

20-10-17
RECEIVED
- 8 JUL 2015

BY: RECORDS

06 JUL 2015

MAYORAL

Alderman Doug Chipman
Mayor
Clarence City Council
PO Box 96
ROSNY PARK TAS 7018

Dear Mayor

Clarence Interim Planning Scheme 2015 and Lauderdale Structure Plan Update

Further to my previous correspondence in regard to the Clarence Interim Planning Scheme 2015 (Interim Scheme), I note and acknowledge that Council is satisfied that the Interim Scheme complies with the Directions Notice, and I further congratulate Council on achieving this milestone in readiness for the transition to the Tasmanian Planning Scheme.

Declaration of the Interim Scheme also clears the way to update the Lauderdale Structure Plan (LSP) to address potential zoning amendments as foreshowed by Council in its original draft of the Interim Scheme.

As previously advised, I am committed to assist Council with this project and ensure the LSP integrates future land use and development with the efficient provision of infrastructure and also addresses potential natural risks and hazards at Lauderdale.

I understand that the planning and infrastructure issues are well known and past investigations provide a useful information base which can be supplemented by further targeted studies. I also understand that Council has allocated funds in its 2015/16 budget to undertake this work, particularly in relation to stormwater drainage.

There is considerable community interest in the future of Lauderdale and high expectations from some property owners that their land should be rezoned immediately to facilitate new development. I also appreciate that the previous Government's drawn out and complex interim planning scheme reform has generated these expectations and created considerable confusion in the community. Consequently, it will be important for property owners and the community to be fully and fairly consulted in the LSP updating process.

The Government's commitment is to ensure the relevant State agencies and authorities provide input at key stages of the project. The Government will also consider the outcomes of the project and how it can assist in the implementation phase. This includes consideration of any potential revision of the Southern Tasmania Regional Land Use Strategy, particularly in relation to the urban growth boundary.

M15/10567
Min/15/330

Implementing this project is a high priority and I request that a joint Council and Government steering committee be established to prepare and implement a project plan as a matter of urgency. I would also suggest that Council's General Manager chair the steering committee and that Council advise me on which particular State agencies it would like to be represented on the committee.

I look forward to your response.

Yours/sincerely

Hon Peter Gutwein MP
Minister for Planning and Local Government



DOURIAS GROUP HOLDINGS

Dourias Group Holdings

PO BOX 3193, WEST HOBART
TASMANIA, 7000

Email:

7th March 2025

State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

Emailed to: haveyoursay@stateplanning.tas.gov.au

Dear Minister Ellis,

STRLUS UGB SUBMISSION - 69 Brighton Road, Brighton

I write to provide this submission on the *Southern Tasmanian Regional Land Use Strategy (STRLUS) 2010-2035 Urban Growth Boundary (UGB) Update Consultation Paper*.

I am a Director of 69 Brighton Rd Pty Ltd that owns a 24.6ha parcel of land at 69 Brighton Road, Brighton (CT 179925/1). I have shown the land area below in Figure 1:

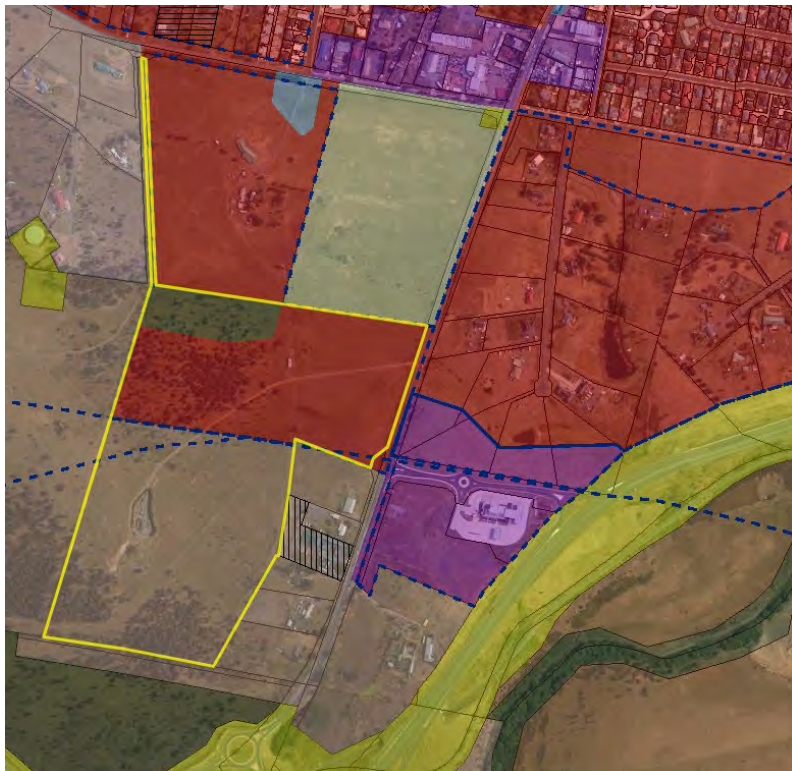


Figure 1 - 69 Brighton Road with zoning and quarry and industrial SAP overlay (Source: theLIST Mapping Services)

As shown in Figure 1 the land is currently within different zones. 10ha is within the General Residential Zone, 1.7ha is within the Environmental Management Zone and the remaining 12.9ha is within the Rural Zone. The land within the Environmental Management Zone and the Rural Zone cannot be subdivided for residential development or multiple dwellings. Also, the Boral Quarry Specific Area Plan and Brighton Industrial Hub Specific Area Plan applies to the Rural Zone part of the site which prohibits residential development completely.

Per Figure 2 below the land within the Environmental Management Zone and General Residential Zone is within the UGB. The remaining 12.9ha of Rural Zoned land (shaded in blue) is outside of the UGB.

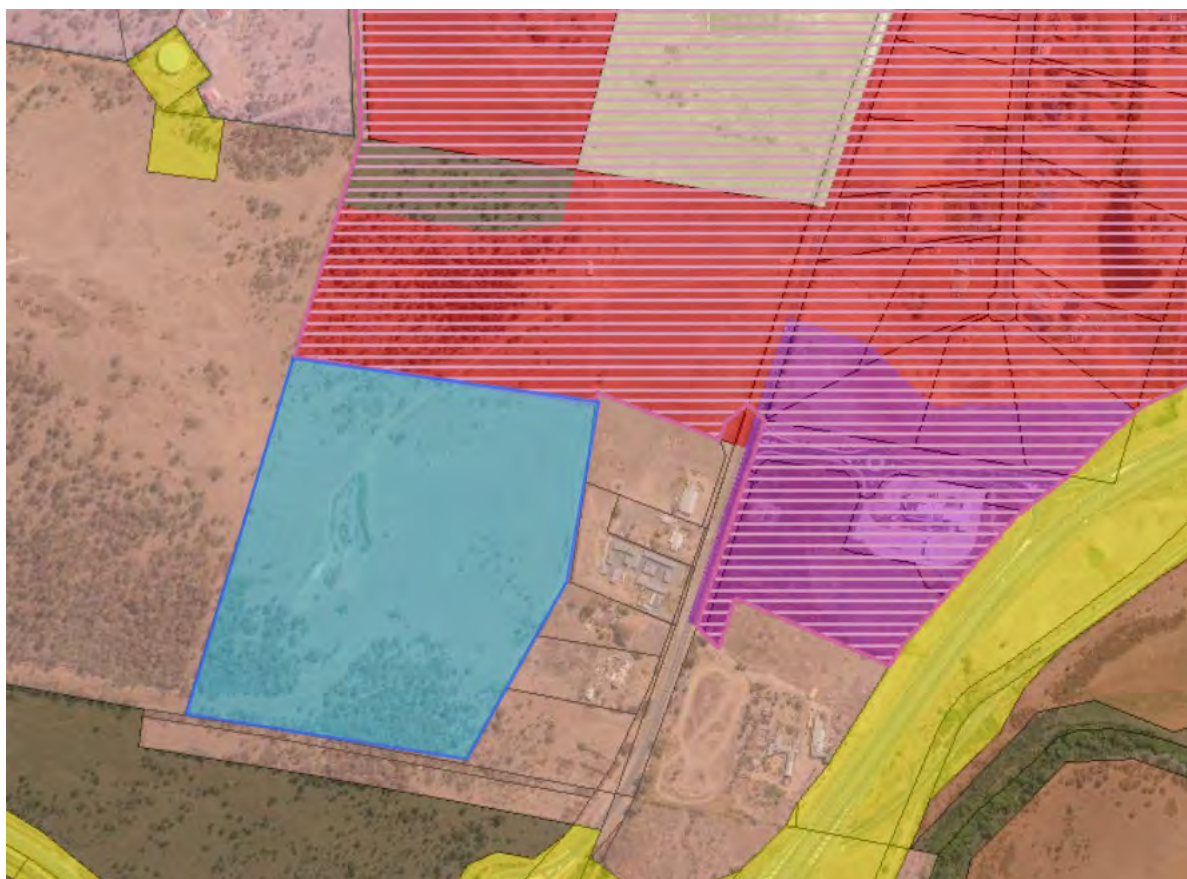


Figure 2: 12.9ha of land at 69 Brighton Road (highlighted in blue) (Source: theLIST Mapping Services)

We intend to rezone this 12.9ha area of land and seek that the UGB is extended over this area.

The land is over 1000m from the Bridgewater Quarry working area which correlates with the Standard Recommended Attenuation Distances (SRAD) provided under the Attenuation Code for an open quarry. However, most of this area remains within the Boral Quarry Specific Area Plan which predates the current Attenuation Code (and modern day best practice). If the 1000m is measured from the outer extent of the Mining Lease then this land is within the Attenuation area of the Bridgewater Quarry. Though, at this stage, we do not have any information to support Boral's plans to quarry to the north west of the land.

The inclusion of this area of land within a revised Urban Growth Boundary would be a precursor to an application to rezone and subdivide this land or develop for multiple dwellings. In which case we would further consider the Bridgewater Quarry and Brighton Industrial Estate into our planning and design process.

Background

69 Brighton Road, together with the adjoining land to the east and to the south was included in the proposed changes to the UGB in March 2023 as part of the Draft Amendments to the Southern Tasmania Regional Land Use Strategy (STRLUS) Urban Growth Boundary (UGB) for Greater Hobart. This suite of amendments included changes to the UGB and also a modification to the STRLUS Policy SRD 2.12. Council per the attached decision (Appendix A) of the Ordinary Meeting of Council in April 2023 supported the inclusion of the 69 Brighton Road within the UGB. Below is an extract from that report

Assessment

Council Officers support the mapping amendment to the UGB, and the policy wording change, as proposed in the documents prepared by the Department.

Whilst site 1 is on land currently constrained for future sensitive uses by virtue of the Bridgewater Quarry and Brighton Industrial Hub Specific Area Plans, the land is adjacent to the site of the new high school and the proposed master planned 'South Brighton' residential area. Including it in the UGB will allow parts of it to potentially be investigated for a zoning to provide for 'urban development'.

Figure 3: Extract from Brighton Council Agenda Report on the UGB (Brighton Council OCM, April 2023)

Site: Brighton Road, Brighton	
Municipality	Brighton
Area	62.0 ha
Current Zoning(s)	Industrial, Environmental Management, Rural, Utilities
Current Use	Industrial, Residential, Vacant, Roads
Reason for Inclusion within the UGB	Logical extension. Connects industrial estate with southern edge of existing urban area.



Figure 4: Proposed Amendment to the UGB (Source: State Planning Office, Brighton Council OCM April 2023)

It is my understanding that the proposed are of land included in the extended UGB shown in Figure 4 had included the highway interchange and a large parcel of land owned by the Department of State Growth. That land is within the Environmental Management Zone and, at the time, was considered unsuitable for urban expansion. Subsequently, the entire amendment did not proceed. In my opinion, an amended map should have been supplied to reduce the UGB expansion area to those areas north of the Environmental Management Zone (DSG Land) and highway interchange. This however did not occur at the time.

The current consultation on the UGB boundary is now the opportunity to again assess the extension of the UGB over 69 Brighton Road and other adjoining lands as previously supported by the Brighton Council.

Inclusion of 69 Brighton Road would give me the confidence to continue working with consultants, the Brighton Council and other stakeholders to design and plan for a future residential area. All of which is still subject to the ordinary assessment process under the *Land Use Planning and Approvals Act 1993*.

Merit of UGB Extension

The Southern Regional Tasmania Residential Demand and Supply Study: Demand and Supply Report 2024 (SRTDSS) demonstrates there are land supply shortages within Brighton LGA. Existing supply will be exhausted in 11 years (See Figure 5). This falls below the 15-year supply target set in the draft Tasmanian Planning Policies and the current STRLUS. The forecast also shows that supply will be exhausted in 7 years in the Brighton township alone. It is critical that more land is available for this growing population and township.

Table ES-1 Forecast LGA population and land supply, SRT region

LGA	Demand				Supply exhausted (in years) [#]		
	Population 2021	Forecast Pop 2046	AAGR*	AADD*	Theoretical	Practical	Practical (vacant)
Southern Regional Tas	116,732	141,931	0.78	636	23	23	19
Brighton	19,263	25,378	1.11	131	13	14	11
Central Highlands	2,580	2,681	0.15	8	23	23	23
Clarence (excl metro)	17,622	21,829	0.86	76	6	7	6
Derwent Valley	11,114	12,542	0.48	37	23	23	23
Glamorgan Spring Bay	5,118	6,079	0.69	69	23	23	23
Huon Valley	18,809	23,029	0.81	103	23	23	19
Kingborough (excl metro)	15,770	18,648	0.67	71	13	12	12
Sorell	16,975	20,959	0.85	99	23	23	17
Southern Midlands	6,838	7,838	0.55	27	23	23	22
Tasman	2,643	2,948	0.44	15	23	23	23

Table ES-2 Forecast Planning Area population and land supply, SRT region

Planning Area	Demand				Supply exhausted (in years) [#]		
	Population 2021	Forecast Pop 2046	AAGR*	AADD*	Theoretical	Practical	Practical (vacant)
Bridgewater	4,386	4,823	0.38	15	5	8	7
Brighton	3,700	5,266	1.42	36	18	16	7
Gagebrook	2,829	3,058	0.31	10	11	21	21
Old Beach	3,156	3,662	0.60	10	23	23	23
Brighton Balance	5,192	8,569	2.02	59	2	2	2

Figure 5: Brighton dwelling and population forecast (Source: Remplan 2024, Southern Regional Tasmania Residential Demand and Supply Study: Demand And Supply Report)

It is understood from reviewing the proposed UGB extension areas, under this consultation, that other areas in Brighton will be considered for residential development. However, these sites, together with the proposed site at 69 Brighton Road will all take varying times/stages for housing land and dwellings to be available.

The point being, beyond the UGB alterations under STRLUS, there is still a detailed planning and design process to rezone and plan for future residential development. This can take years to complete. Notwithstanding, the additional time taken to finance, tender and construct these areas afterwards. This should overall provide a steady stream of housing over the next 15 years and allow time for community services to catchup.

As noted. The land at 69 Brighton Road has some additional challenges under the Local Provisions Schedule of the Planning Scheme. The Bridgewater Quarry SAP and the Brighton Industrial Hub SAP will need to be modified to accommodate residential development on this land. However, based on the April 2023 decision of the Council to include 69 Brighton Road within the UGB, it is a sound indication that the Brighton Council would consider an amendment to the zoning and the SAP to allow housing on this land.

Such an amendment or application to develop the land will likely be subject to normal design solutions such as vegetation buffers, management of existing bushland or design standards for housing and engagement with other stakeholders.

Based on a density of 15 dwellings per 1ha, the land has the potential to provide an additional 195 +/- dwellings. This will provide an extended residential area with the following qualities:

- Within walking distance of the new Brighton High School. Families can safely walk or ride to school.
- Adjoining the South Brighton Development Precinct
- A proposed childcare centre
- Part of a fast growing township
- Access to public transport
- Walking distance to local shops and amenities
- Easy access to the Midland highway via the nearby interchange and commute to other destinations.
- Walking, cycling or a 5 minute drive to the Brighton Industrial Hub. Which offers a major source of employment.
- The land supplements other industry and employment opportunities in the area
- The land is also serviceable under the recently announced sewer upgrade
<https://www.taswater.com.au/news/taswater-news-and-media/news-articles/taswater-brighton-council-urban-growth-collaboration-supported-by-10-million-grant-from-australian-government> . This is a \$10 million dollar urban growth collaboration funded by the Federal Government.



Figure 6: TasWater Media Release for the South Brighton Sewer Project (Source: TasWater Website)

The proposal

Based on the above. We propose that the 12.9ha 69 Brighton Road site is included in an extended Urban Growth Boundary as shown below in Figure 7. This figure shows the adjoining General Residential Zone to the north and the newly built Brighton High School.

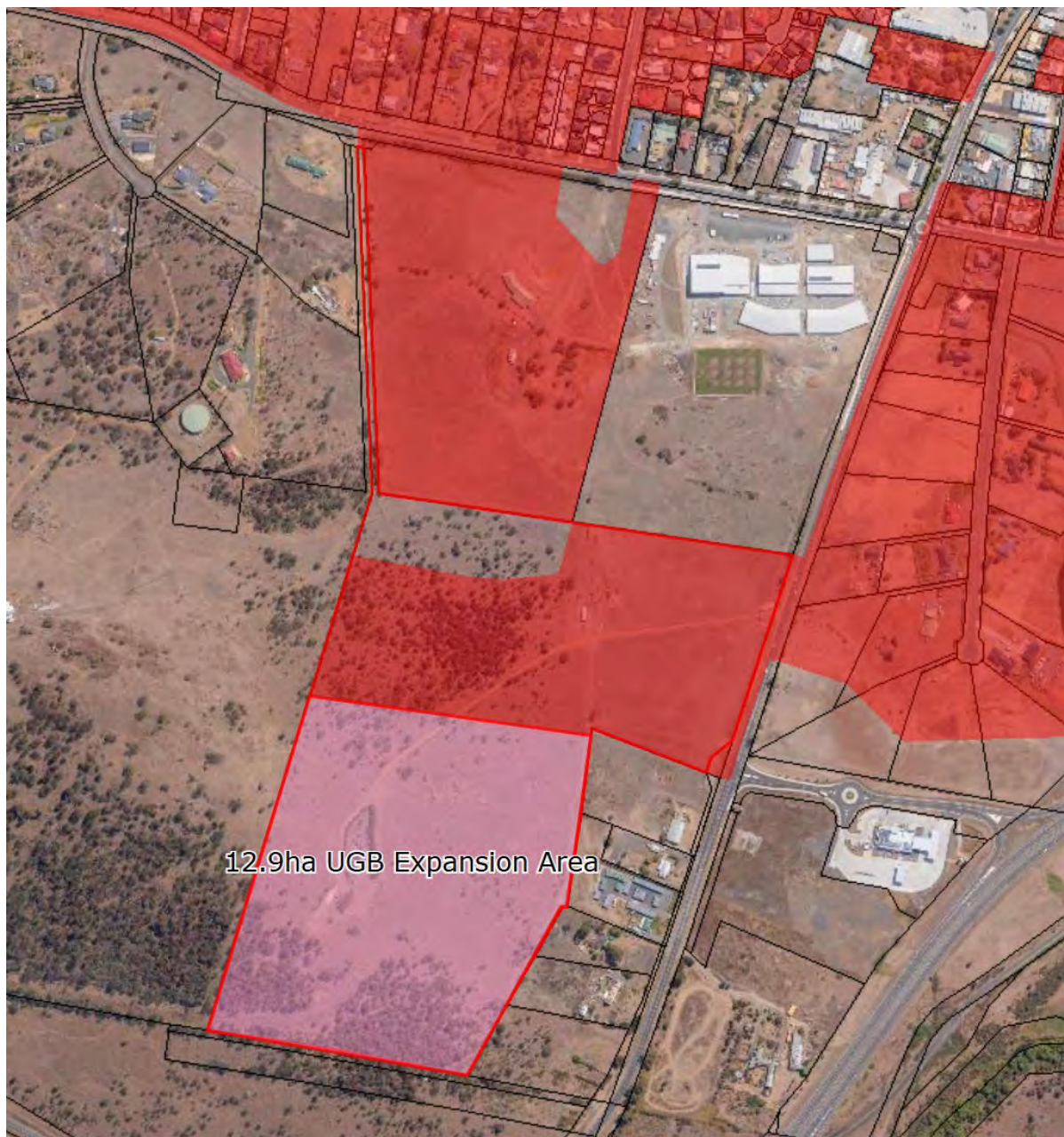


Figure 7: Proposed UGB Extension Area of 69 Brighton Road (Base Layer Source: theLIST Mapping Services)

Thank you for considering this written submission. I am available anytime to discuss this further. I will also consult with the Brighton Council to seek their position remains supportive of extending the UGB over this land.

With Regards

Tony Dourias.

Director

69 Brighton Rd Pty Ltd (ACN 644149879) ATF for the 69 Brighton Rd Unit Trust (ABN 56606795047)

14th March 2025

State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

Emailed to: haveyoursay@stateplanning.tas.gov.au

To the State Planning Office,

STRLUS UGB Update
4 and 6 Ringwood Road, Lauderdale

I write on behalf of my client Dourias MGH Pty Ltd, with regard to land at 4 and 6 Ringwood Road, Lauderdale (CT 23315/18 and CT 23315/17) to provide a submission on the Southern Tasmanian Regional Land Use Strategy (STRLUS) 2010-2035 Urban Growth Boundary (UGB) Update.

The two (2) titles are a total 4ha in area (each title is 2ha). The land is shown in Figure 2. The front part of the 4 Ringwood Road is within the General Residential Zone and already within the UGB with the balance of the land in the Rural Living Zone. The adjoining 6 Ringwood Road is entirely within the Rural Living Zone and outside of the UGB.

Dourias MGH Pty Ltd have commenced planning and design for a retirement living village/Land Lease Community Lifestyle Village over the total 4ha site. A concept layout for this proposal is provided in Figure 1.

Dourias MGH Pty Ltd have also engaged Urbis to prepare a supply and demand study to support this submission and to demonstrate the need for retirement type living in this area and the suitability of 4 and 6 Ringwood Road for such development. The report *Future Demand for Retirement Living in Clarence LGA by Urbis* (February 2025) is included as Appendix A to this submission.

My client has informed me that the land under a previous planning scheme had allowed for a retirement village. However, since the Interim Planning Scheme and now current Tasmanian Planning Scheme has come into effect such a use/development is prohibited. The extension of the UGB over the land is then a step toward again enabling/working towards a retirement living development on the land.

My clients request that the State Planning Office consider and discuss this submission and include the land in the updates to the UGB. It is then my client's intention to have the UGB extended over their land and to then prepare an application for the retirement living village under the General Residential Zone or potentially under the Community Purpose Zone.

Should my client be able to rezone and develop the land under the *Land Use Planning and Approvals Act 1993* then the land could provide up to 101 dwellings¹ and community living facilities in Lauderdale where demand for land and dwellings is high but supply is low.



Figure 1: Concept design for retirement living village at 4 and 6 Ringwood Road, Lauderdale (Source: trg & Dourias MGH Pty Ltd)

Land Description

The land fronts Ringwood Road in Lauderdale. Each lot contains a single dwelling and outbuildings. The land is best described as flat open pasture with some established trees along the fence boundaries and near the dwellings and a small cluster in the north east corner of 6 Ringwood Road. There is also a small drain that runs through the front of each property.

The land, per the enclosed Appendix B *Property Report* is subject to the Coastal Inundation Hazard Code, Safeguarding of Airports Code, Natural Assets Code (waterway and coastal protection area along a small drain and priority vegetation area around the vegetation in the north east corner of 6 Ringwood Road) and the Flood-Prone Hazard Areas Code. There are no mapped threatened vegetation communities or listed threatened flora or fauna on the land (Source: theLIST Mapping Services).

The land is adjacent to the Roches Beach retirement living facility (50-60 dwellings) and other rural residential lots. The Mannata Street residential area forms part of the land and immediate area.

Under the *Tasmanian Planning Scheme – Clarence*, the land, under the Rural Living Zone, cannot be developed for retirement living. The land would need to be rezoned to a residential zone in order for the use and development to be allowable.

¹ Based on the preliminary plan provided by trg and Dourias MGH Pty Ltd and contingent on further site analysis and statutory approvals

4 Ringwood Road is split zoned between the Rural Living zone and General Residential Zone. Dourias MGH Pty Ltd had a permit previously issued for four (4) lots within the General Residential Zone with land fill works. It is noted also that the split zoning is not aligned with any geographical, natural, cadastral boundaries or other identifiable feature on the ground. This type of split zoning is not consistent with the application of zone mapping per *Practice Note 7 – Draft LPS Mapping: Technical Advice, Tasmanian Planning Commission* (October 2020).



Figure 2: 4 and 6 Ringwood Road showing UGB, General Residential Zone and nearby retirement living development and local business area (Source: theLIST Mapping Services)

Residential Demand and Supply (Lauderdale)

The Southern Regional Tasmania Residential Demand and Supply Study: Demand and Supply Report 2024 (SRTRDSS) has been prepared as a key input into updating STRLUS. The STRDSS has indicated residential supply will be exhausted in Clarence (excluding the metro area) within 6 years and within 8 years in the Lauderdale suburb (See Figure 3).

The Greater Hobart Plan Area Residential Demand and Supply Study, 2024 was also prepared to consolidate the data from the SRTRDSS with data from “metropolitan” Hobart. When considering the entire Clarence LGA, demand will outstrip supply by 1,466 dwellings by 2046.

One of the key variables in the data of the two residential demand and supply reports is that there is varying level of confidence that available land will be brought to market.

The Urbis report (Appendix A) demonstrates that Tasmania has a rapidly aging population with an expected 14.3% of Tasmanians to be over 75 years old by 2040 (88,859 residents). Clarence also attracts retirees with 16% of over 55 year olds having moved to the area between 2016 and 2021.

Urbis project that 1,300 retirement living dwellings will be required in Clarence by 2045 (within the next 20 years). Currently there are only 53 dwellings currently in the planning and design phase of construction designated as retirement type living.

There is clearly an urgent need to cater for retirement living in the Clarence area. With Lauderdale being a particularly attractive place for retirement living due to its proximity to services and beach type lifestyle.

Dourias MGH Pty Ltd are motivated to prepare an application rezone and develop this land and are reliant on an extension to the UGB to help facilitate this application.

Table ES-2 Forecast Planning Area population and land supply, SRT region

Planning Area	Demand				Supply exhausted (in years) ^a		
	Population 2021	Forecast Pop 2046	AAGR*	AADD*	Theoretical	Practical	Practical (vacant)
Bridgewater	4,386	4,823	0.38	15	5	8	7
Brighton	3,700	5,266	1.42	36	18	16	7
Gagebrook	2,829	3,058	0.31	10	11	21	21
Old Beach	3,156	3,662	0.60	10	23	23	23
Brighton Balance	5,192	8,569	2.02	59	2	2	2
Bothwell	388	409	0.21	1	23	23	23
Central Highlands Balance	2,192	2,272	0.14	8	23	23	23
Cambridge	427	735	2.20	5	8	2	1
Lauderdale	2,512	2,698	0.29	4	8	14	8
Richmond	935	1,135	0.78	4	23	23	20
South Arm-Opossum Bay	1,358	1,549	0.53	7	12	12	12
Clarence Balance	12,390	15,712	0.95	57	4	5	4

Figure 3: Lauderdale dwelling demand (Source: Remplan 2024, Southern Regional Tasmania Residential Demand and Supply Study: Demand And Supply Report)

Merits of UGB Extension

The land, per the plans supplied by Dourias MGH Pty Ltd and trg, has the potential to accommodate 101 small dwellings and community services (i.e. shared facilities).

The land is suitable for residential development for the following reasons:

- The land is within 800m walking distance of shops, public open space, Lauderdale Primary School, Lauderdale church, beaches and integrated walking trails.



Figure 4: 800m Walking Distance 4 and 6 Ringwood Road, Lauderdale (Source: theLIST Mapping Services)

- 400m of bus stops (Metro bus routes)
- Fill or other design solutions may be required to address the Coastal Hazards together with professional reporting.
- Supports further community services in the area and contributes to a retirement living precinct together with the Roches Beach facility.
- Supports further economic and neighbourhood activity; and
- Compliments the recent approval for 13 dwellings and mixed use development at 2A Ringwood Road (Figure 5 below).



Figure 5: Approved 2A Ringwood Road Development (Source: Dourias MGH Pty Ltd)

- The land can be serviced for sewer and water (subject to planning and design approvals).
- Access is via an established road network with pedestrian access on Mannata Street and to surrounding areas.
- 100m from a proposed Woolworth supermarket (see Figure 6 below)



Figure 6: Flyer for the proposed Woolworths Supermarket (Source: Woolworths)

Lauderdale continues to grow and develop, further supporting the case for expanding the UGB. Woolworths is planning a new supermarket on South Arm Road, with pedestrian access to Ringwood Road, just 100 meters from the Ringwood Road properties. This demonstrates the demand for more urban development in the area.

Woolworths have advised Dourias MGH Pty Ltd that they submitted their Development Application (DA) in December 2024 and have received a Request for Additional Information from the Council. They are currently finalising their response to the request. Construction of the shopping centre is to commence as soon as the DA is approved.

Proposed UGB Expansion

Per Figure 7 below, it is proposed that the UGB be extended over the balance of 4 Ringwood Road and the entirety of 6 Ringwood Road, Lauderdale.



Figure 7: 4 and 6 Ringwood Road, Lauderdale UGB Expansion (Source: theLIST Mapping Services)

The proposed Ringwood Road UGB extension would complement the nearby proposed UGB extension over the nearby Acton Road and South Arm Road by the State Planning Office (Figure 8).

4.2.5 Area 5


Municipal Area	Clarence
Reference	Acton Road & South Arm Road, Acton Park & Lauderdale
Current Zoning	11.0 Rural Living (Zone B) 27.0 Community Purpose
Current Use	Education and Occasional Care & Residential
Approximate Total Land Area	4.1 ha (Out of which 2.1 ha are for community purpose)
Approximate Maximum Dwelling Yield	35
Comments	Identified through dialogue with council officers
	

Figure 8: Proposed State Planning Office UGB Extension over nearby land (Source: STRLUS Urban Growth Boundary Update Consultation Paper February 2025, State Planning Office)

Conclusion

This submission has provided a written overview and diagrams to describe the land at 4 and 6 Ringwood Road, Lauderdale as potentially suitable for inclusion in an updated Urban Growth Boundary for the area. The land is within an established residential area and is a small and logical extension to the UGB.

The report by Urbis together with the data provided by Remplan (Figure 3) demonstrates an urgent need for more dwellings for retirement living and land suitable for retirement living. The addition of retirement living areas to Lauderdale would further grow and support the community and other community services. It would also complement the existing Roches Beach facility.

Dourias MGH Pty Ltd have commenced the planning and design for a retirement living facility on the land. Which, based on the concept plan, may allow for up to 101 new dwellings.

It is my opinion that an extended UGB is suitable for this land and further design and site planning would be addressed through the usual assessment process.

If you have any enquiries about this submission or would like to discuss further then please contact me on 0458 892 183 or email david.cundall@formplanning.com.au

Sincerely,

David Cundall

Director

BA, GradDipEnvPlg, DipPM, MPIA

Encl.

Appendix A - Future Demand for Retirement Living in Clarence LGA by Urbis (February 2025)

Appendix B – Property Report for 4 and 6 Ringwood Road, Lauderdale (Source: PlanBuild)

Document Disclaimers

Form Planning and Projects Pty Ltd has prepared this report on the basis of information provided by the client and others who provided information to Form Planning and Projects Pty Ltd (including Government authorities), which Form Planning and Projects Pty Ltd has not independently verified or checked beyond the agreed scope of work. Form Planning and Projects Pty Ltd does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

Form Planning and Projects Pty Ltd take no responsibility or obligation to update this document to account for events or changes occurring subsequent to the date that the document was prepared.



**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Ltd
ABN 50 105 256 228

27 February 2025

The Honourable Felix Ellis
Minister for Housing, Planning and Consumer Affairs
Department of State Growth
Tasmanian Government

Dear Sir,

FUTURE DEMAND FOR RETIREMENT LIVING IN CLARENCE LGA

Urbis has been engaged by Dourias MGH Pty Ltd to prepare this submission with regard to its landholdings on 4 and 6 Ringwood Road, Lauderdale. Part of the land is General Residential Zone and as such developable for specific retirement living dwellings, while this is not permitted in the Rural Living Zoned component of the holdings. With an ageing population and increasing popularity of dedicated retirement communities for retirees, this location is ideal to meet the growing demand for retiree housing.

There is a growing demand for purpose-built retiree housing, either as a registered retirement village or Land Lease Communities (LLC) also commonly known as 'lifestyle communities', neither of which is permissible under the current land zonings. This housing type is a very efficient use of land yielding substantially more dwellings than single lot housing. In this case 101 LLC dwellings versus 48 single lot dwellings. A concept plan for the proposed subdivision layout is provided as a reference in the Appendix to this letter.

Summary

We have undertaken demographic and supply analysis to illustrate demand for retirement living and request this evidence be considered when reviewing the UGB to allow for the rezoning of the above site and surrounding areas of Lauderdale.

- **The Tasmania has a rapidly ageing population.** in 2024, 9.5% of the State's population were aged over 75 years. By 2040 that will increase to 14.3% to a total of 88,859 residents
- **Clarence LGA's older age cohorts are growing,** residents aged 75+ years account for 32% of the population aged over 55 years and are projected to increase to 42% of the over 55s population in 2045.
- **The Clarence LGA attracts retirees from outside the area.** Between the 2016 and 2021 Censuses of those residents aged over 55 years who moved addresses, 16% moved from outside the Clarence LGA, and some from interstate.

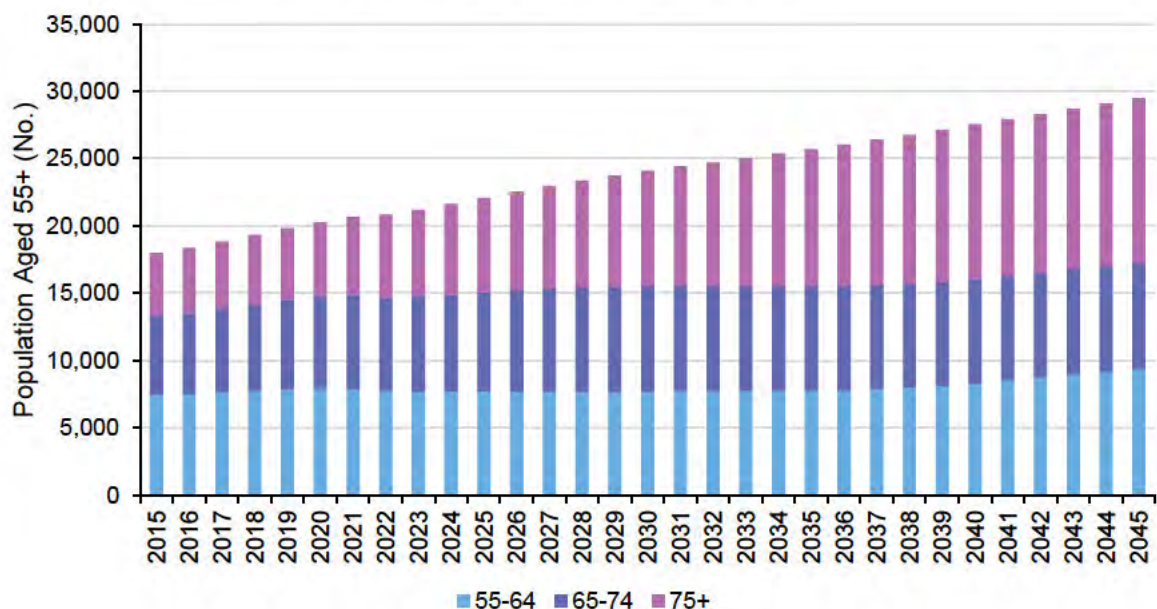
- **An additional 638 retirement living dwellings will be required in the Clarence LGA by 2045** assuming current propensity rates. The Clarence LGA has a lower provision of retirement villages compared to Greater Hobart. They will also help Tasmania meet its housing target obligations under the National Housing Accord.
- **4 and 6 Ringwood Road is an ideal location for retirees to live.** It is adjacent to a retirement living development, 100 metres to a business/ shopping area, walking distance to the proposed Woolworths and shops, Lauderdale Medical Centre, has access to a network of paths, close to open space, public transport and beaches.
- **Retirement villages and land lease communities are gaining in popularity** with retirees offering an affordable lifestyle with social and health benefits

Supporting evidence is provided below.

Population Growth

The population aged 55 years and over in the Clarence LGA has grown from approximately 18,000 in 2015 to an estimated 22,000 in 2025. The over 55 aged population is projected to increase to around 29,500 in 2045, representing an average growth rate of 1.5%. Notably, the proportion of those aged 75 years and over is expected to continue to grow from around 32% of the 55+ population in 2025 to 42% in 2045.

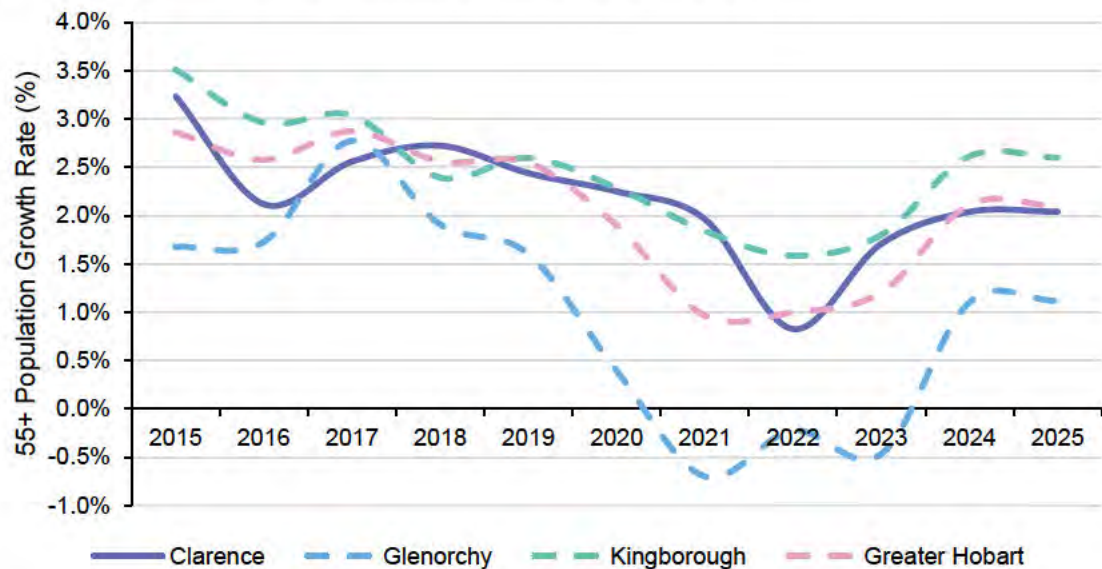
Clarence LGA Historic and Projected 55+ Population, 2015 to 2045



Source: Tasmanian Treasury; Prepared by Urbis

Clarence has also seen benchmark growth in the over 55 aged population compared to other Tasmanian regions. Over the decade from 2015 to 2025, the over 55+ population in Clarence has grown at an average 1.9% per annum, in line with the Greater Hobart and Kingborough averages of 2.0% and 2.1% respectively, and higher than the Glenorchy average growth of 0.8%.

Clarence LGA Historic 55+ Population Growth Rate, 2015 to 2025



Source: Tasmanian Treasury; Prepared by Urbis

Migration Trends in Clarence LGA

Clarence LGA is a popular region attracting retirement aged residents from across Tasmania and interstate likely attracted to the features of the region including water areas and its temperate climate. Lauderdale offers a relaxed coastal lifestyle whilst remaining close to the centre of Hobart and is likely to appeal to retirees from outside the region. Approximately 16% of those aged 55 years and over living in Clarence moved from outside the LGA between the 2016 and 2021 Censuses. Of those that moved, approximately 74% moved from LGAs within Tasmania, 19% moved from interstate, and 7% migrated from overseas.

Top 10 LGAs and States for 55+ Migration to Clarence LGA, 2016 to 2021

LGA or Region	Proportion of 55+ Migrants (%)
Hobart	20.8%
Glenorchy	13.9%
Kingborough	8.7%
New South Wales	7.9%
Sorell	7.4%
Overseas	6.6%
Queensland	6.2%
Brighton	4.1%
Huon Valley	3.4%
Victoria	3.1%
Other	17.8%

Source: ABS; Prepared by Urbis

Propensity Rates Compared with Other Regions

Propensity rates indicate the proportion of the population for the specified age group that were living in retirement villages at the time of the 2021 Census. We note there has been one expansion to an existing retirement village adding an additional 53 dwellings since then, so it is likely that this propensity rate has slightly increased. Propensity rates are driven by both supply and demand factors, though typically by supply in most locations. The analysis of propensity rates for the Clarence LGA shows a slightly lower provision of retiree specific accommodation compared with other Greater Hobart LGAs.

The growth in propensity rates between 2016 and 2021 reflects an increase in residents living in retirement villages due to the addition of new retirement dwellings and the growth of the ageing cohorts. Development of new retirement accommodation is required to replace aging and withdrawn stock and meet demand for a growing population.

Retirement Living Demand Propensity – Catchment and Benchmarks

AGE COHORT	CLARENCE LGA	GLENORCHY LGA	KINGBOROUGH LGA	GREATER HOBART GCCSA
65-74 Years	2.2%	2.1%	1.0%	2.2%
75-84 Years	5.6%	5.8%	2.3%	6.4%
85+ Years	7.0%	8.5%	0.4%	8.7%
Over 65 Years	4.0%	4.2%	1.3%	4.4%

Source: ABS; Prepared by Urbis

Over 65 Years Retirement Living Demand Propensity – 2016 to 2021

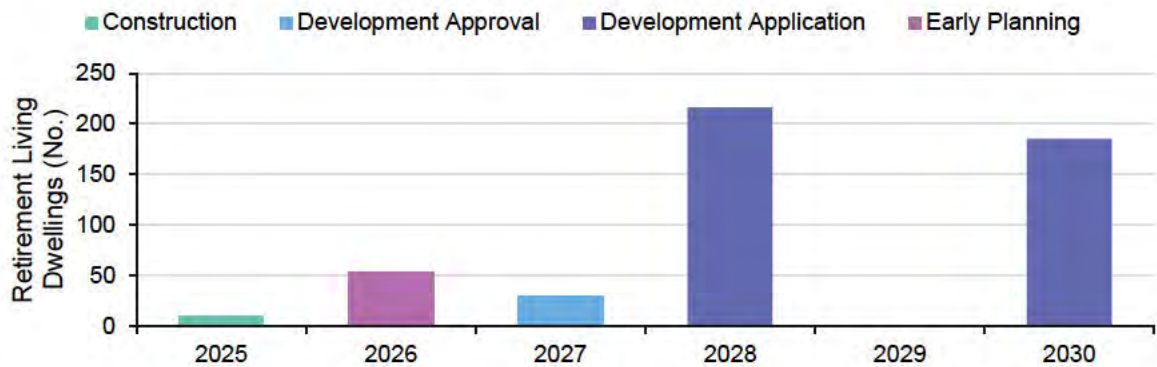
	CLARENCE LGA	GLENORCHY LGA	KINGBOROUGH LGA	GREATER HOBART GCCSA
2016	3.5%	4.2%	11.2%	3.5%
2021	4.0%	4.2%	1.3%	4.4%
Change	0.5%	0.0%	-9.8%	0.9%

Source: ABS; Prepared by Urbis

Proposed Supply

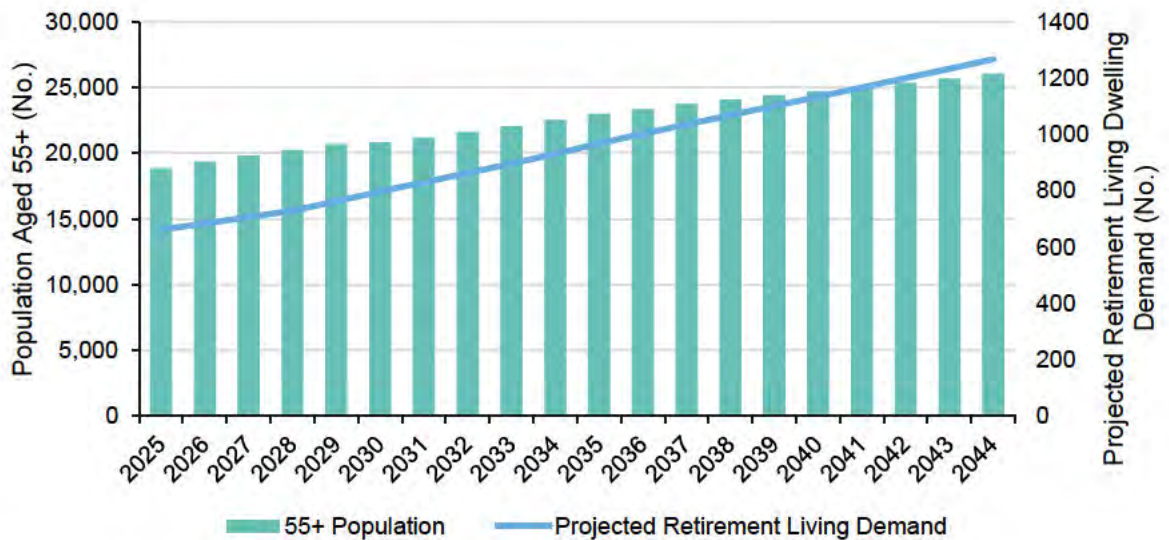
There are six retirement living projects across Tasmania in the development pipeline, totalling 494 dwellings over the next five years. Only 10 dwellings are currently under construction, with a further 30 with development approval, and 401 in the development application stage. Only two projects are proposed in the Greater Hobart area including 53 dwellings in Clarence LGA.

Proposed Tasmanian Retirement Living Supply by Stage



Source: Cordell Connect; Prepared by Urbis

Projected Clarence Retirement Living Demand, 2024 to 2044



Source: Tasmanian Treasury, ABS; Prepared by Urbis

Future Demand Implications

Based on the retirement living propensities identified above and projected growth in the retirement aged population, the Clarence LGA is estimated to currently demand 662 retirement dwellings. This demand is expected to grow to a total of around 1,300 retirement dwellings in 2045, representing an average 3.2% growth per annum.

No area is immune to the housing shortage in Tasmania, and it has never been more critical to develop age-friendly housing that can address this issue in meaningful ways. Retirement villages and land lease lifestyle communities remains an over-looked potential housing solution around Australia. They provide easy to manage housing, social and health benefits, and for many an ability to unlock equity from rising house prices and still afford a very good lifestyle. The National Cabinet set a target of 1.2 million new homes to be delivered over 5 years from mid-2024. Importantly, retirement housing can contribute to these targets and each time one dwelling is delivered frees up another for occupation. If the proposed development was to proceed on the site would add 101 dwellings to the established housing supply.

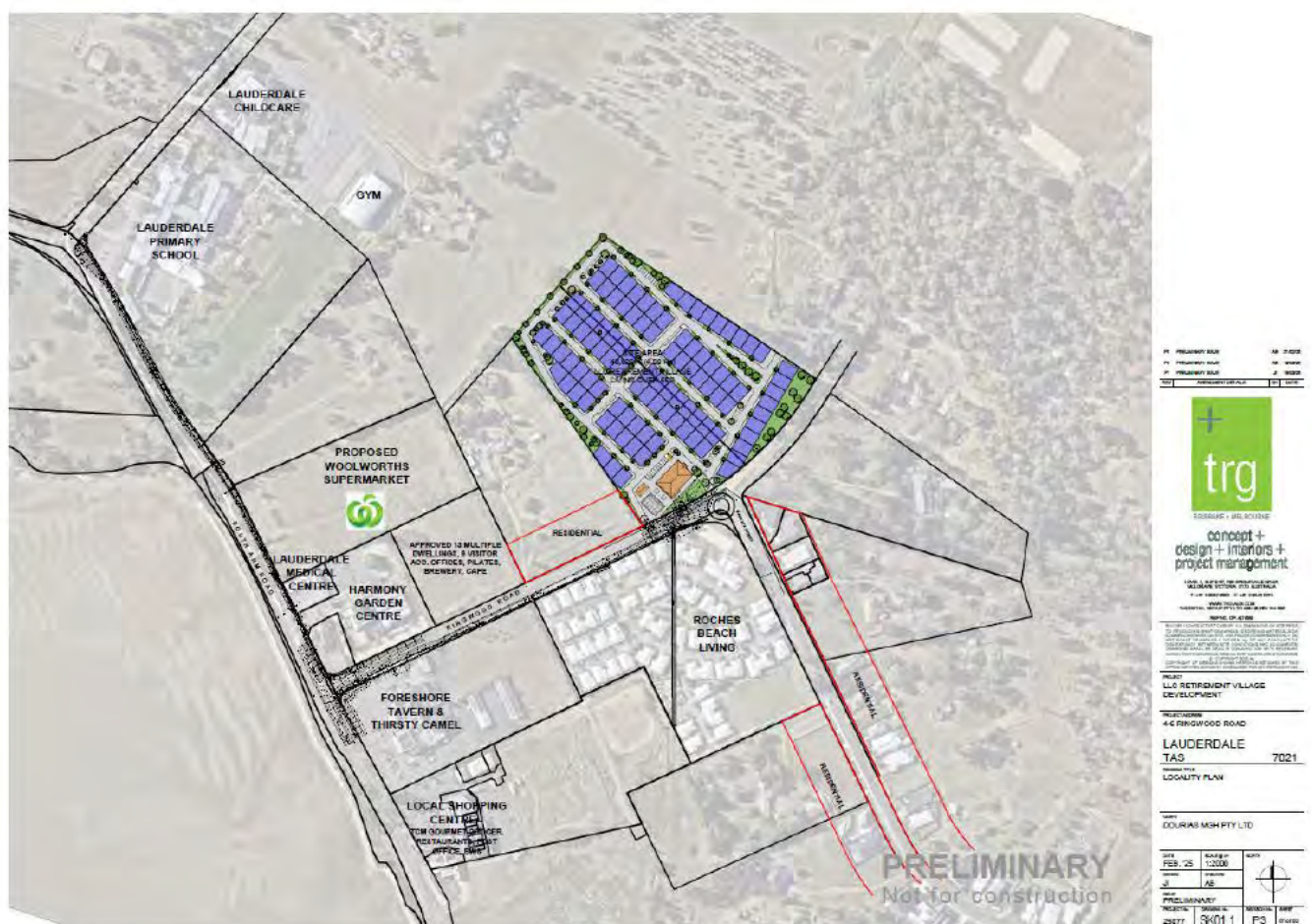
This is obviously a missed opportunity at a time when Australia's population continues to age and as the nation's housing supply and affordability crisis worsens. Dourias MGH Pty Ltd is committed to facilitating the development of housing for retirees in Hobart. With the demonstrated need and benefits of this type of housing for its residents and the broader community, we encourage the Tasmanian Government to ensure that the appropriate planning policy is in place to facilitate development.

Yours sincerely,

Kylie Newcombe
Associate Director
+61 2 8233 7612
knewcombe@urbis.com.au

Site Context

The below plan illustrates the location of the proposed development and immediate context including the proposed Woolworths development.



Subdivision Layout

The below plan illustrates the lots and street layout.





Property report for 6 RINGWOOD RD LAUDERDALE TAS 7021



Property Identification Number

5229330

Locality

Lauderdale

Planning Zones

Rural Living

Total Area

20390 sqm

Certificate of Title Reference (Volume/Folio)

23315/17

Municipality

Clarence

Planning Codes Overlay

Airport obstacle limitation area, Flood prone areas, Priority vegetation area, Medium coastal inundation hazard band, Waterway and coastal protection area

Planning Scheme

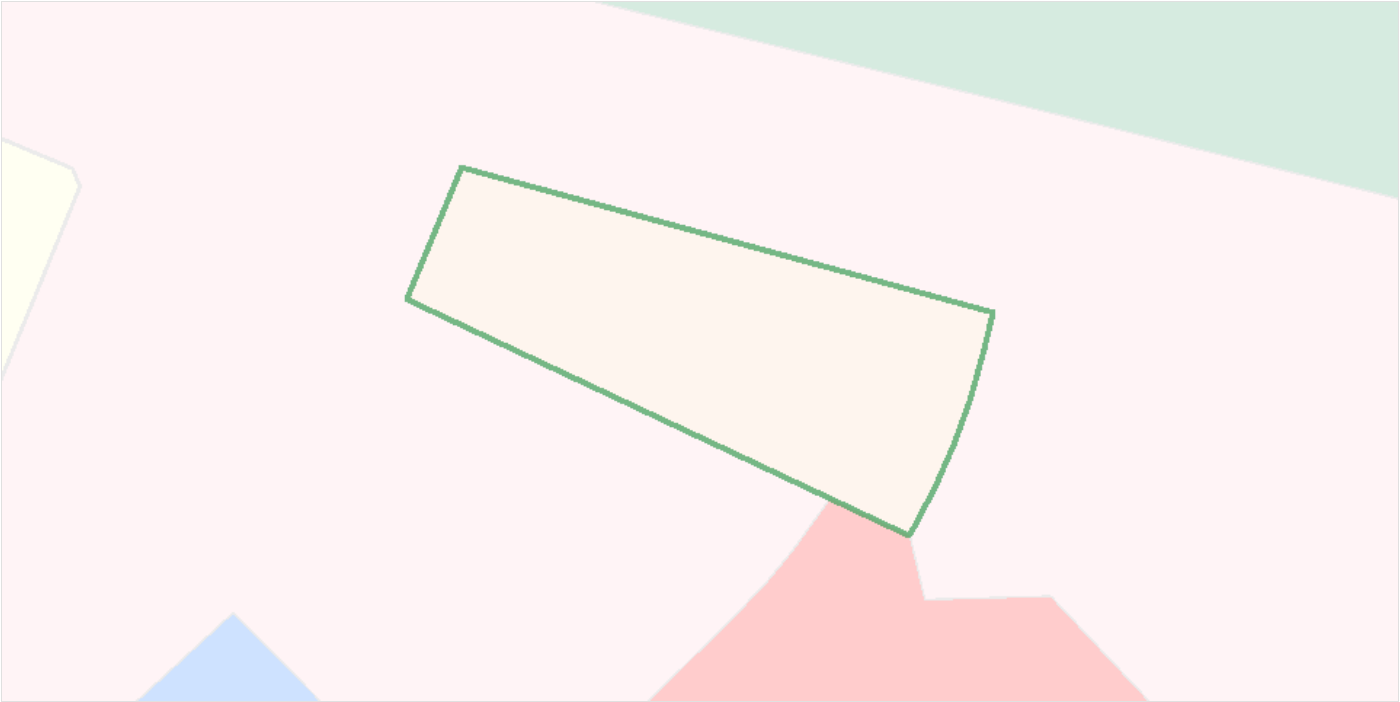
Tasmanian Planning Scheme

This property is in the **Rural Living** planning zone under the Tasmanian Planning Scheme.

The Tasmanian Planning Scheme consists of state wide provisions to ensure consistency across Tasmania, and local provisions which spatially apply those through zoning maps along with specific provisions for unique places in each municipality to address local issues.

Location Information

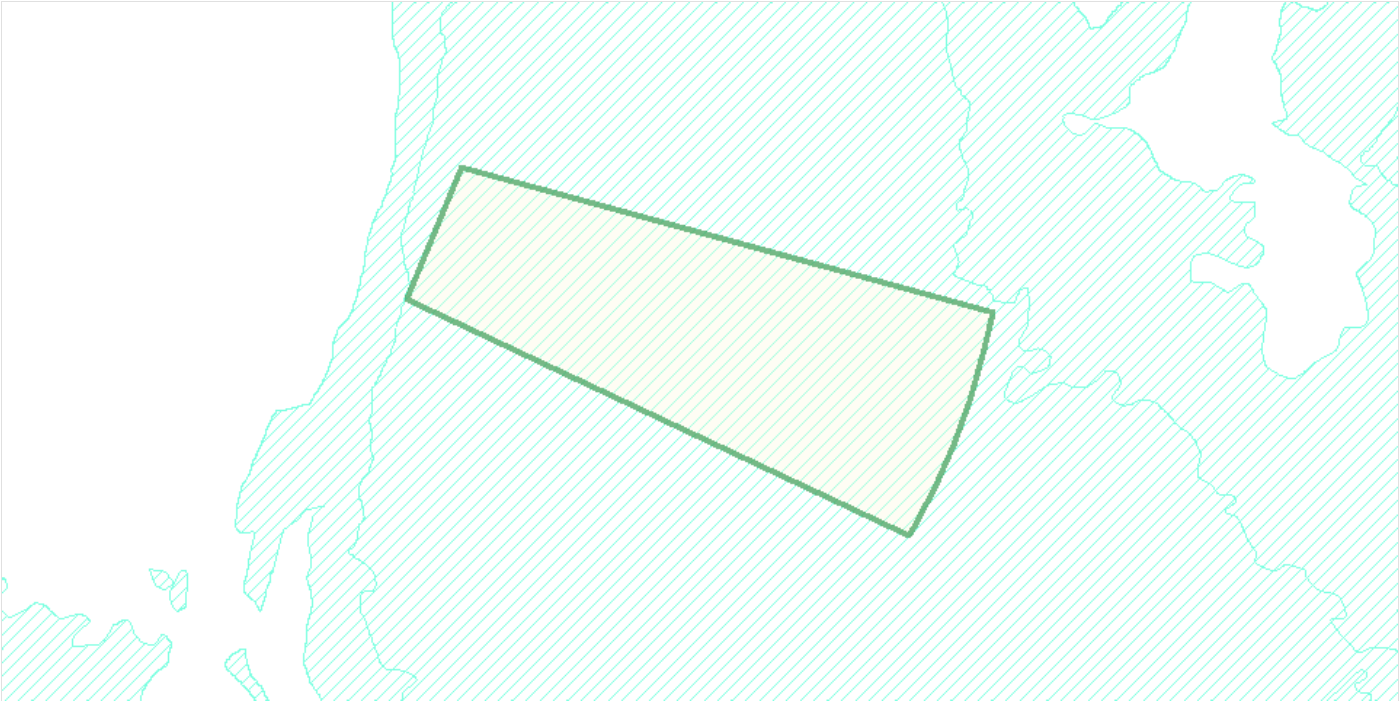
Planning Zone



Tasmanian Planning Zone

Zone Number	11
Zone	Rural Living

Coastal Inundation Hazard

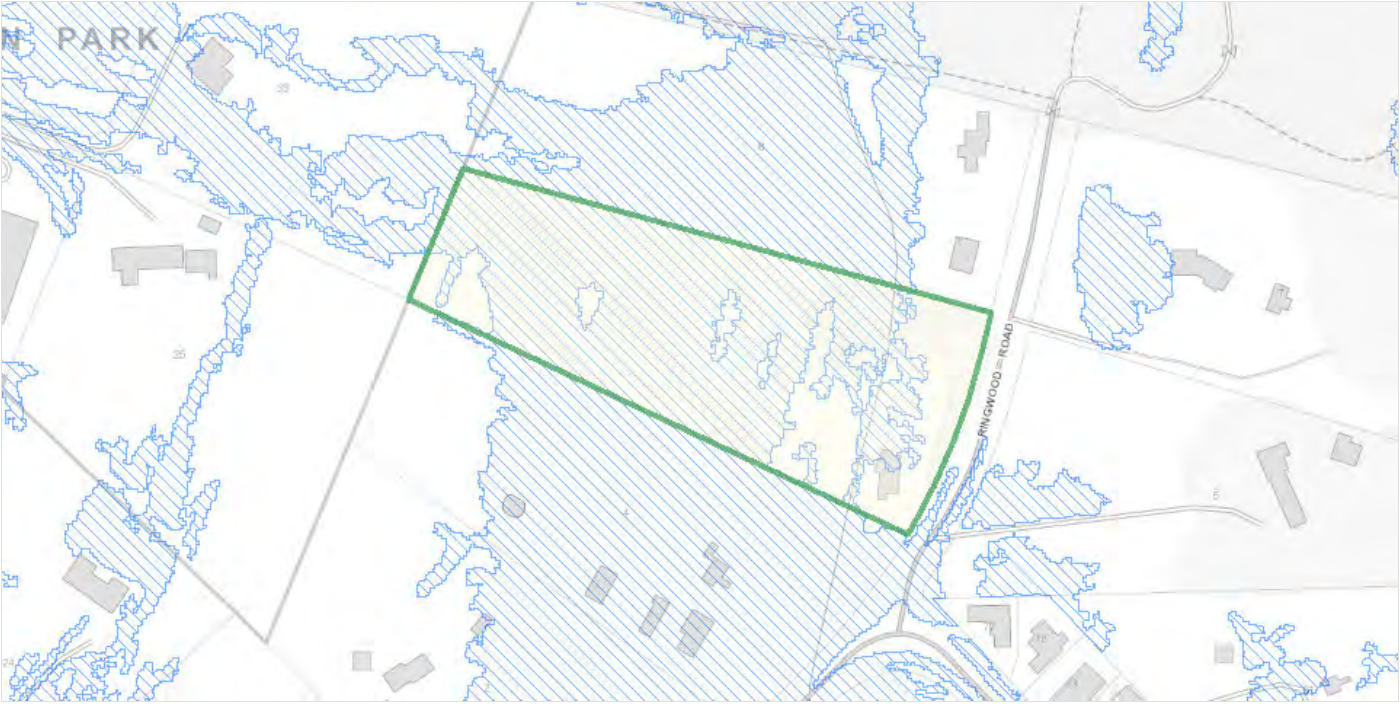


Coastal inundation hazard: All

The Coastal Inundation Hazard Code is applied by reference to the coastal inundation hazard area overlay, which includes land within the High coastal inundation hazard band (Mean high tide plus sea level rise in 2050, rounded up to the nearest 0.1m). The presence of a Hazard Code on the property may affect the planning and building approvals required for development.

Overlay Name	Medium coastal inundation hazard band
Description	Alterations of electronic planning map made under s.800 of LUPAA

Flood-Prone Area



Flood-prone areas

The flood prone hazard area overlay is applied to areas known to be prone to flooding, particularly areas known to be within the 1 per cent annual exceedance probability (AEP) level.

Description	Amendment reference: PDPSAMEND 2021 022806
Overlay Name	Flood prone areas
LPS Reference	C12.0

Waterway and Coastal Protection Area



Waterway and coastal protection area

The waterway and coastal protection area overlay includes land within a specified buffer distance from Class 1 to 4 watercourses and wetlands, including Ramsar wetlands. Class 1 watercourses include lakes and tidal waters.

Description	Alterations of electronic planning map made under s.800 of LUPAA
Overlay Name	Waterway and coastal protection area
LPS Reference	C 7.0

Priority Vegetation Area

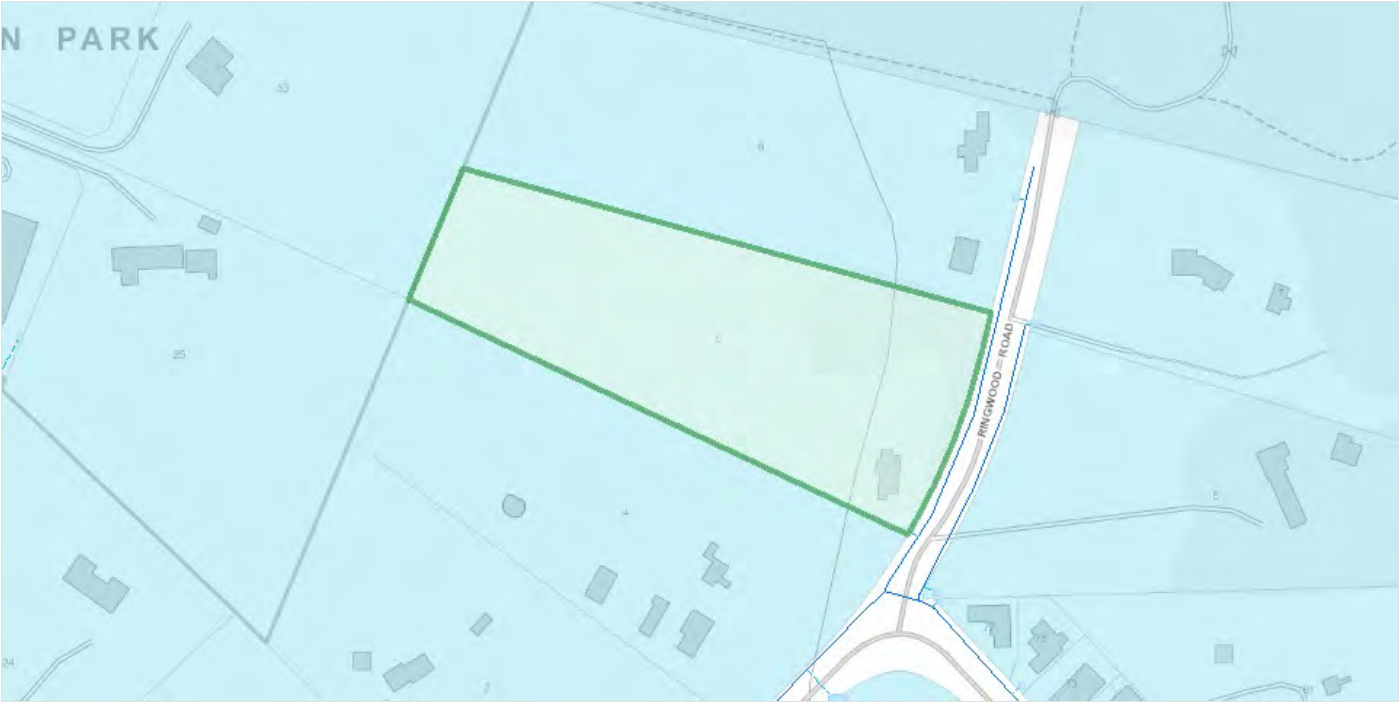


Priority vegetation area

The priority vegetation area overlay is intended for native vegetation that forms an integral part of a threatened native vegetation community as prescribed under Schedule 3A of the Nature Conservation Act 2002 or is a threatened flora/fauna species.

Description	Data source Entura
Overlay Name	Priority vegetation area
LPS Reference	CLA C7.0

TasWater - Water Service



TasWater - Customer Connection Point

The Water Customer Connection Point represents the location where the customer's water infrastructure connects to, or can connect to TasWater's reticulated water supply network. The property has a Customer Connection Point, which typically is the location of the stop tap and water meter at the end of a lateral pipe from the main. This is represented on the map by a square, often containing "WC".

Location ID	L57056
Water Connection Size	20mm

TasWater - Water Lateral Line

A lateral line indicates the property service pipe that begins at the water main and ends at the customer connection point. This is displayed on the map as a thin light blue line. Work cannot be undertaken within 2 metres of any infrastructure without seeking approval from TasWater.

MATERIAL	Unknown
DIAMETER	1

TasWater - Water Serviced Land

Serviced Land is the land which TasWater will permit to be connected to its water and sewerage infrastructure. The blue shading on the map indicates water serviced properties. The property is connected to, or is able to connect to the TasWater water supply network. Development assessments will be required to be undertaken prior to undertaking any work on TasWater Infrastructure. See https://www.taswater.com.au/Customers/Serviced_Land for further information.

Service Type	Full Service
--------------	--------------

TasWater infrastructure

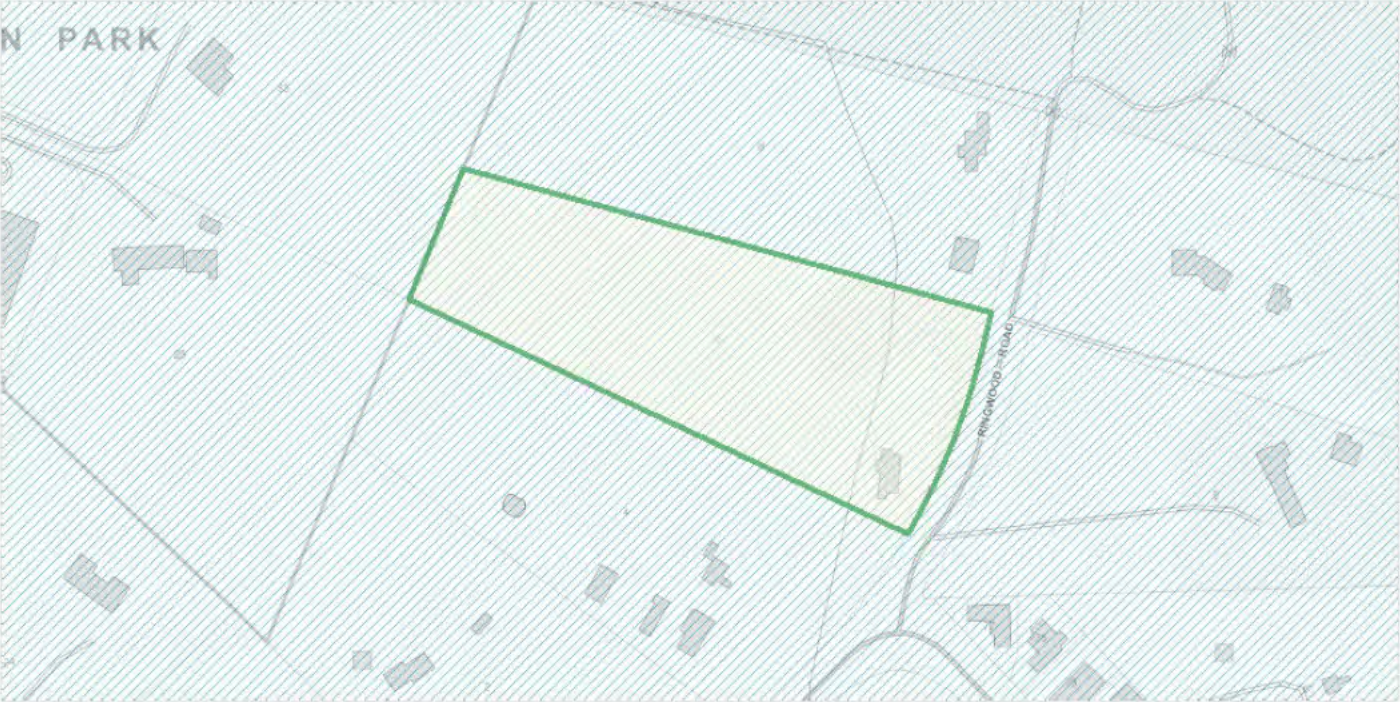


TasWater - Water Lateral Line

A lateral line indicates the property service pipe that begins at the water main and ends at the customer connection point. This is displayed on the map as a thin light blue line. Work cannot be undertaken within 2 metres of any infrastructure without seeking approval from TasWater.

MATERIAL	Unknown
DIAMETER	1

Safeguarding of airports code



Airport obstacle limitation area

The airport obstacle limitation area overlay is based on the Obstacle Limitation Surfaces (OLS) and Procedures for Air Navigation Services Aircraft Operations (PANS OPS) contained in the airport master plan or those otherwise adopted by the relevant airport owner or operator for the relevant airport in accordance with any accepted guidelines. It identifies the specified height limit on the land within the overlay by reference to AHD.

Description	Alterations of electronic planning map made under s.800 of LUPAA
Overlay Name	Airport obstacle limitation area
LPS Reference	CLA C16.0

Council Details

The local council where your property is located can provide advice on a proposed project.

Consult

Clarence City Council

Mailing address
38 Bligh Street
Rosny Park Tasmania 7018

Work: (03) 6217 9500

Disclaimer

This enquiry tool is a guide only and is not a substitute for professional advice.

This enquiry tool only provides information for common developments undertaken individually, for example, building a deck.

The Tasmanian Planning Commission, a court, council or other relevant authority may have an interpretation of the law that is different from the information provided as part of this enquiry tool.

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- the local council; or
- an independent Licensed Professional

Property report for 4 RINGWOOD RD LAUDERDALE TAS 7021



Property Identification Number

5229322

Locality

Lauderdale

Planning Zones

Rural Living, General Residential

Total Area

20440 sqm

Certificate of Title Reference (Volume/Folio)

23315/18

Municipality

Clarence

Planning Codes Overlay

Low coastal inundation hazard band, Airport obstacle limitation area, Flood prone areas, Medium coastal inundation hazard band, Waterway and coastal protection area

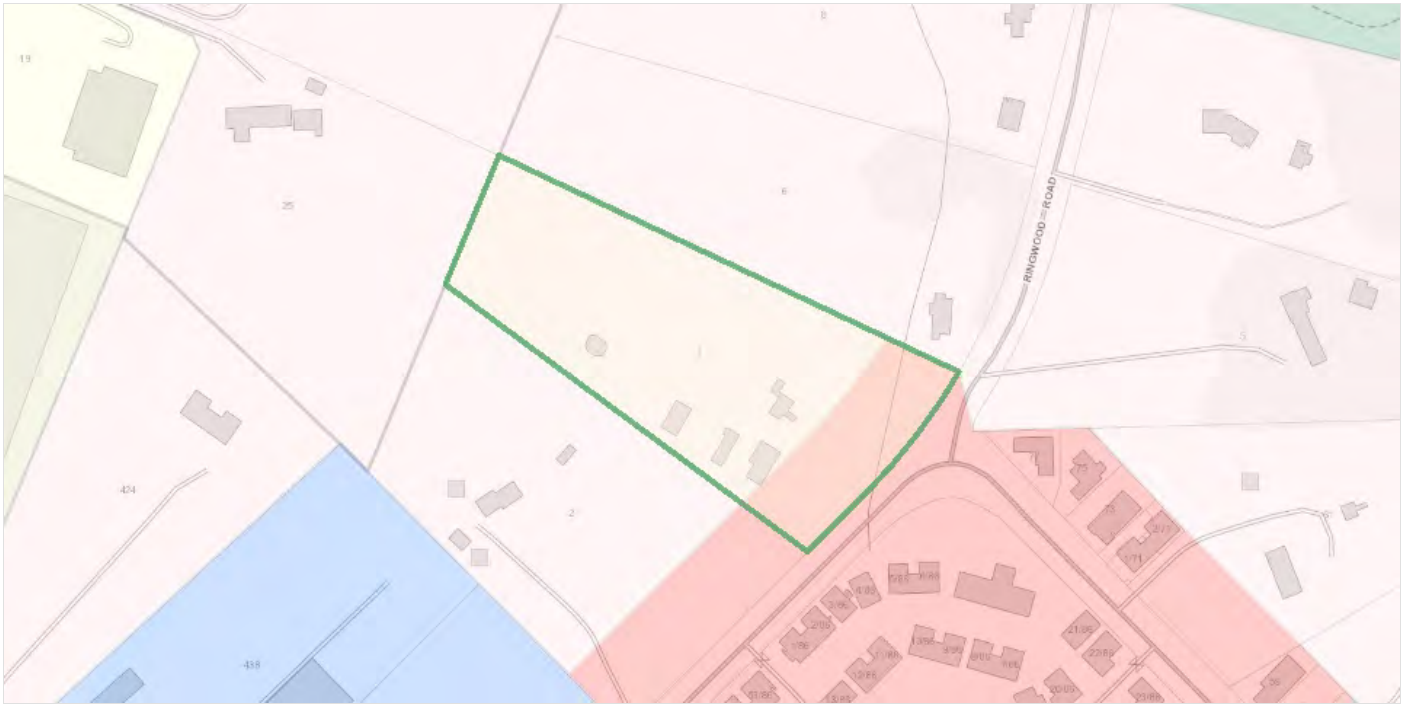
Planning Scheme

Tasmanian Planning Scheme

This property is in the **Rural Living, General Residential** planning zones under the Tasmanian Planning Scheme.

The Tasmanian Planning Scheme consists of state wide provisions to ensure consistency across Tasmania, and local provisions which spatially apply those through zoning maps along with specific provisions for unique places in each municipality to address local issues.

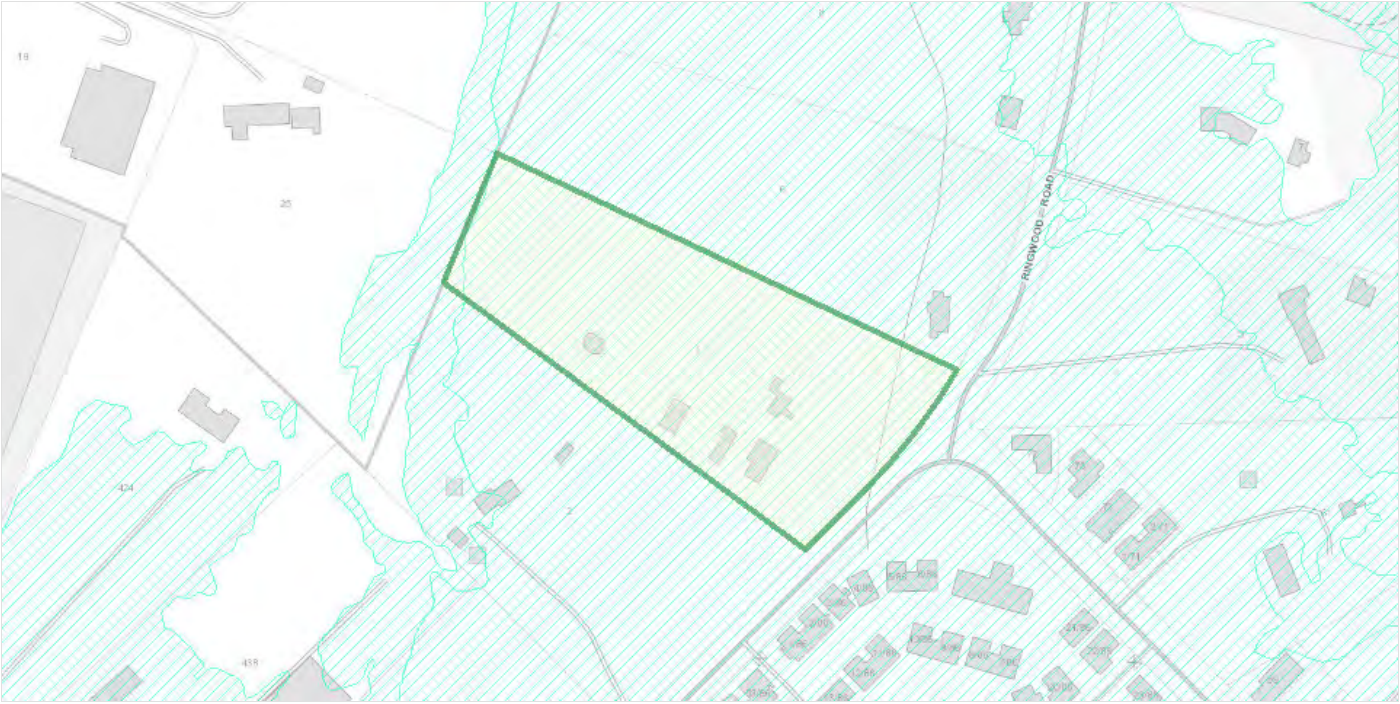
Planning Zone



Tasmanian Planning Zone

Zone Number	8
Zone	General Residential
Zone Number	11
Zone	Rural Living

Coastal Inundation Hazard

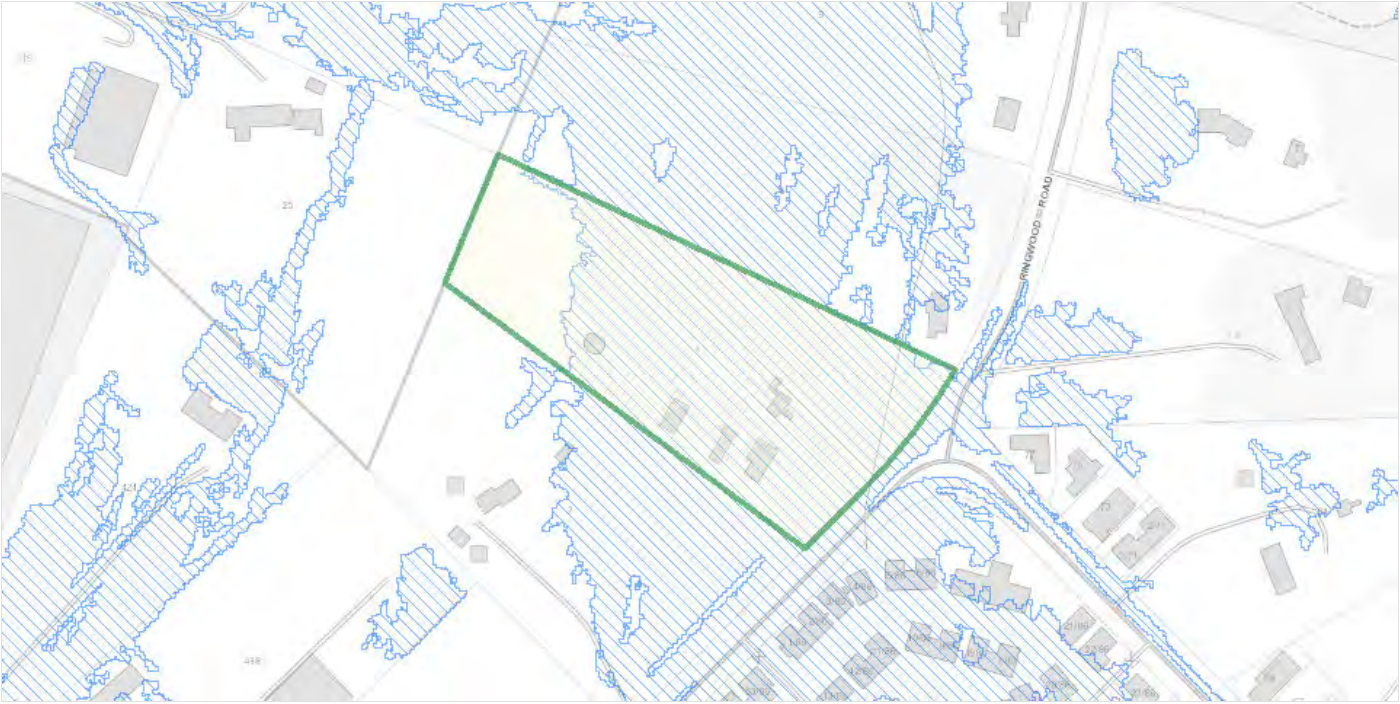


Coastal inundation hazard: All

The Coastal Inundation Hazard Code is applied by reference to the coastal inundation hazard area overlay, which includes land within the High coastal inundation hazard band (Mean high tide plus sea level rise in 2050, rounded up to the nearest 0.1m). The presence of a Hazard Code on the property may affect the planning and building approvals required for development.

Overlay Name	Low coastal inundation hazard band
Description	Data source WRL
Overlay Name	Medium coastal inundation hazard band
Description	Alterations of electronic planning map made under s.800 of LUPAA

Flood-Prone Area



Flood-prone areas

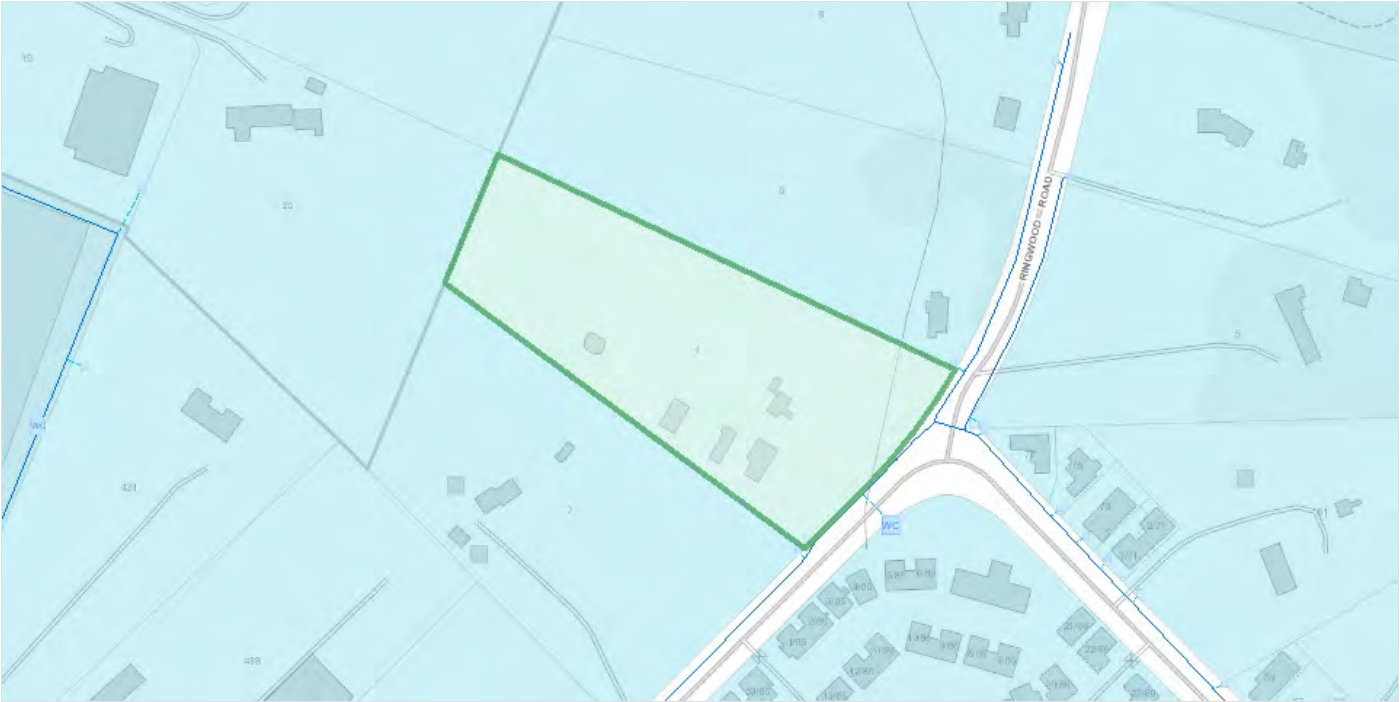
The flood prone hazard area overlay is applied to areas known to be prone to flooding, particularly areas known to be within the 1 per cent annual exceedance probability (AEP) level.

Description	Amendment reference: PDPSAMEND 2021 022806
Overlay Name	Flood prone areas
LPS Reference	C12.0

The waterway and coastal protection area overlay includes land within a specified buffer distance from Class 1 to 4 watercourses and wetlands, including Ramsar wetlands. Class 1 watercourses include lakes and tidal waters.

Description	Alterations of electronic planning map made under s.800 of LUPAA
Overlay Name	Waterway and coastal protection area
LPS Reference	C 7.0

TasWater - Water Service



TasWater - Water Lateral Line

A lateral line indicates the property service pipe that begins at the water main and ends at the customer connection point. This is displayed on the map as a thin light blue line. Work cannot be undertaken within 2 metres of any infrastructure without seeking approval from TasWater.

MATERIAL	Unknown
DIAMETER	1

TasWater - Customer Connection Point

The Water Customer Connection Point represents the location where the customer's water infrastructure connects to, or can connect to TasWater's reticulated water supply network. The property has a Customer Connection Point, which typically is the location of the stop tap and water meter at the end of a lateral pipe from the main. This is represented on the map by a square, often containing "WC".

Location ID	L132552
Water Connection Size	20mm

TasWater - Water Serviced Land

Serviced Land is the land which TasWater will permit to be connected to its water and sewerage infrastructure. The blue shading on the map indicates water serviced properties. The property is connected to, or is able to connect to the TasWater water supply network. Development assessments will be required to be undertaken prior to undertaking any work on TasWater Infrastructure. See https://www.taswater.com.au/Customers/Serviced_Land for further information.

Service Type	Full Service
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TasWater - Sewer Lateral Line

The lateral line indicates the property service pipe that begins at the sewer main and ends at the customer connection point. This is displayed on the map as a thin red line. Work cannot be undertaken within 2 metres of any infrastructure without seeking approval from TasWater.

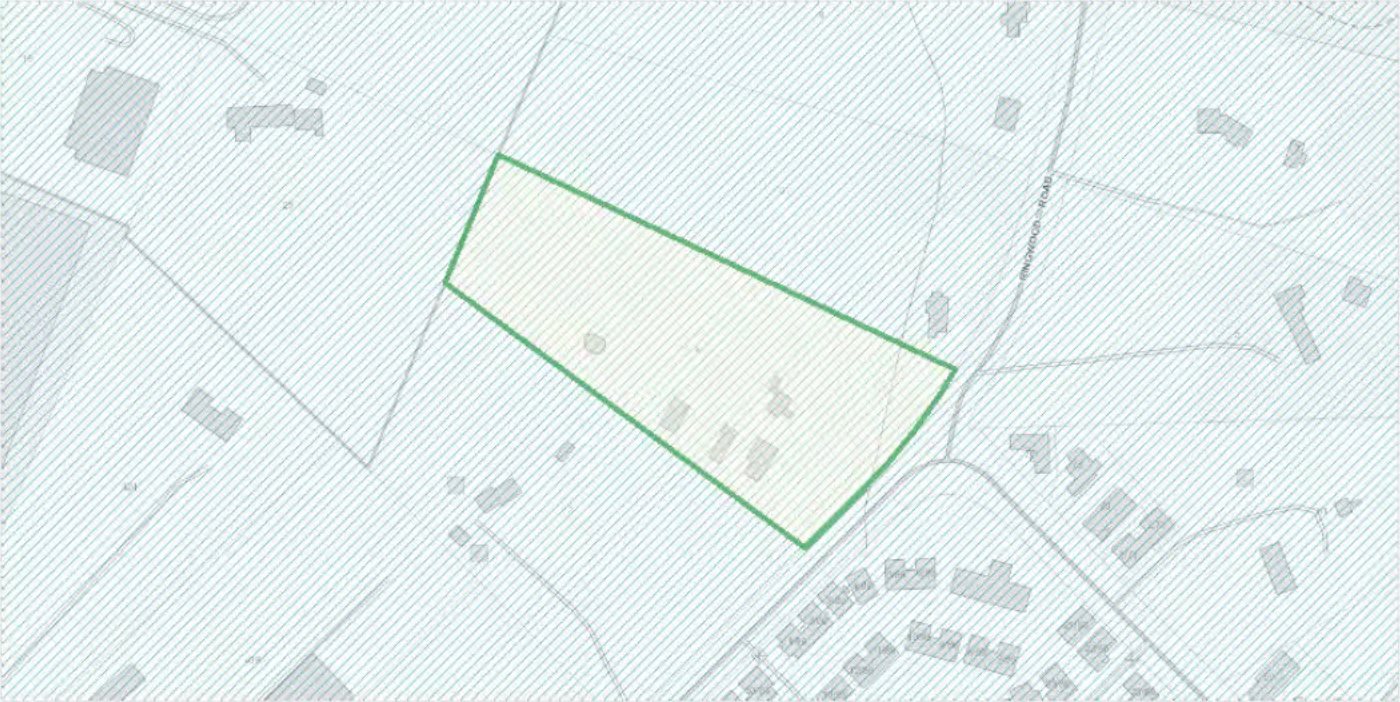
DIAMETER	40
MATERIAL	PE100

TasWater - Water Lateral Line

A lateral line indicates the property service pipe that begins at the water main and ends at the customer connection point. This is displayed on the map as a thin light blue line. Work cannot be undertaken within 2 metres of any infrastructure without seeking approval from TasWater.

MATERIAL	Unknown
DIAMETER	1

Safeguarding of airports code



Airport obstacle limitation area

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Mailing address
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- an independent Licensed Professional

13th March 2025

State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

Emailed to: haveyoursay@stateplanning.tas.gov.au

To the State Planning Office,

**STRLUS UGB Update
Cranston Parade Cambridge**

I write on behalf of my clients Robert Thornbury, owner of 1047 Acton Road, Cambridge and Paul Garrott owner of 93 Cranston Parade, Cambridge, to provide a submission on the Southern Tasmanian Regional Land Use Strategy (STRLUS) 2010-2035 Urban Growth Boundary (UGB) Update.

The two (2) properties adjoin each other and are a total 34.3ha in area. This includes the narrow access strip to Acton Road. The land is shown below in Figure 1. The northern part of each property is already within the UGB.

The owners have been in discussion with the owners of the adjoining industrial land owned by the Hobart Business International Business Park. Both parties have agreed to lodge submissions to the Tasmanian Government seeking an extension of the UGB over their land. Accordingly two (2) options for extending the UGB are provided in this submission.

My clients request that the State Planning Office consider and discuss this submission and include their land in the updates to the UGB alongside the neighbouring land known as the Hobart International Business Park (HIBP).

Land Description

93 Cranston Parade, Cambridge

93 Cranston Parade, (CT 156582/1) is a flat 15.35ha site, accessed from Cranston Parade, and entirely within the Rural Zone. The land adjoins the Rural Living Zone (Acton Park area) to the south, the Light Industrial (HIBP land) to the north, the Hobart Golf Park to the west and 1047 Acton Road to the East. Around 6100m² of land in the northern corner is currently within the UGB. The land has a small commercial warehouse and outbuildings.

The land has two (2) small waterways/drainage lines that run through the site and is otherwise open pasture with some standing vegetation (mostly hawthorn) along the southern creek. The land is subject to the Bushfire-prone Areas Code, Flood-prone Hazard Areas Code, Safe-Guarding of Airports Code, Road and Railway Assets Code (along the Tasman Highway) and Natural Assets Code (Waterway and Coastal Protection Area along the waterways).

1047 Acton Road, Cambridge

1047 Acton Road (CT 107856/2) is mostly flat with a slight rise towards the HIBP land to the north. The land is 18.97ha of mostly open pasture and a dwelling and workshop located close to the Rural Living Zone (Acton Park area) to the south. Approximately 9.6ha, in the northern part of the land, is within the Light Industrial Zone and under the CLA-S9.0 Cranston Parade Specific Area Plan. The remaining 9.3ha is within the Rural Zone.

The two (2) small creek/drainage lines that run through 93 Cranston Parade also run through this land. The land is subject to the Bushfire-prone Areas Code, Flood-prone Hazard Areas Code, Safe-Guarding of Airports Code, Road and Railway Assets Code (along the Tasman Highway) and Natural Assets Code (Waterway and Coastal Protection Area along the waterways).

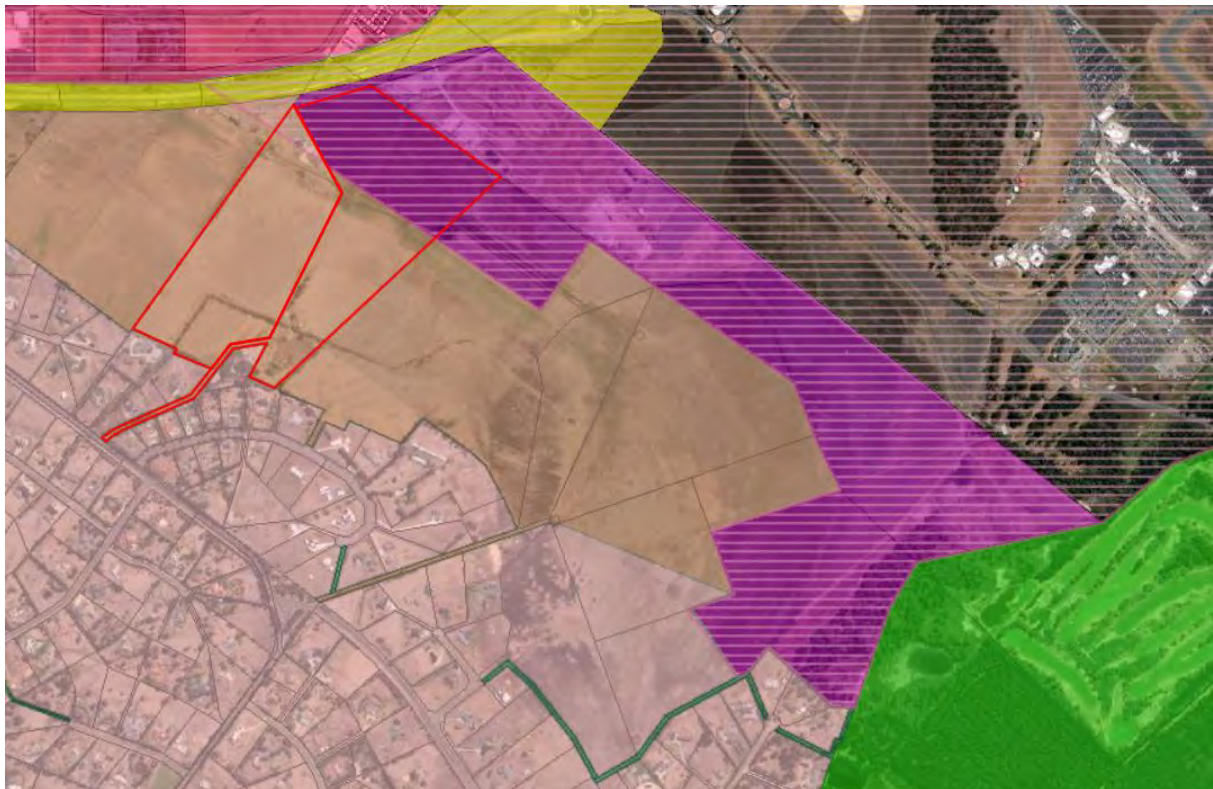


Figure 1: 1047 Acton Road and 93 Cranston Parade, Cambridge with UGB over part of the land (Source: theLIST Mapping Services)

Hobart International Business Park

The land adjoins the HIBP and is currently used for light industrial, agricultural and commercial purposes across three (3) different zones. This includes:

- Onsite recycling and processing facility of aggregates (gravels) for civil construction.
- Processing of clean-fill for major subdivision works.
- Road works and drainage works.

- Depot for two (2) major waste collection services .
- Paintball facility.
- Motocross park.
- Vehicle parking and storage for car rental businesses.
- Office building for administration.
- Grazing on the vacant pasture.

The Hobart International Business Park (as landowner), have also lodged a Development Application with the Clarence Council for a 154 lot subdivision over the Light Industrial Zoned part of the land. This subdivision includes a re-routing of Cranston Parade and will provide a new access through to 93 Cranston Parade and 1047 Acton Road. This will effectively join the two properties and allow for future rezoning or other use or development opportunities under the current zoning.

The HIBP owners are also preparing a whole of site master plan for their land. This may also have regard or potentially include 93 Cranston Parade and 1047 Acton Road (pending formal agreements). Regardless, of whether or not these two (2) properties are included in an overall master plan for the area, there is still merit in extending the UGB over these properties to allow opportunity for a future expansion of the light industrial and commercial land available in this area.

The owners of the HIBP have also lodged a submission with State Planning Office seeking to extend the UGB over the balance of their land. This is a large parcel of land. There is potential, as shown, in Figure 6 (Option 1) to include both the land at 93 Cranston Parade and 1047 Acton Road in a single update to the UGB. The Options are provided in this submission.

Merits of UGB Extension

Site Suitability

Further to the above relationship with the adjoining HIBP, the two (2) properties have the following qualities that make it suitable for inclusion in the UGB:

- 95% of the total 34.3 ha is flat vacant land.
- There is only some standing vegetation along the southern waterway and along fence lines. The vegetation along the waterway would likely be retained in any future development.
- The land is not mapped as having any threatened vegetation communities or threatened flora or fauna (Source: theLIST Mapping Services).
- Both properties can be serviced for water.
- Pending the HIBP subdivision the land can also be serviced for sewer (subject to design and construction).
- The large vacant area and internal waterways/drainage lines provide suitable scope for flood and stormwater management such as further drainage works, fill and stormwater detention areas.
- The land is accessible from Cranston Parade or via a new internal road through the adjoining HIBP subdivision. This would be the more suitable access to the land if the land is rezoned and developed for commercial purposes.
- The site is 12 minutes from the Hobart CBD.
- The site has exposure and connectivity to the Tasman Highway and freight or people travelling to and from the Hobart International Airport.
- The site has connectivity to existing settlements and is within close proximity to other facilities and community infrastructure such as parks, open space, schools, childcare and many sport and recreation amenities.
- The site has the potential to meet future industrial and business needs and ought to be considered through the current State Planning Office Industrial Land Supply and Demand Tasmania Project.
- The site supports an improved Brighton to Cambridge freight route.

- The site can be developed as part light industrial and part commercial or recreational type use (such as indoor or outdoor sporting areas) with minimal impact on the amenity of nearby residential uses.

Southern Tasmanian Regional Land Use Strategy (STRLUS)

Cambridge has been identified as one of three Regionally Significant Industrial Precincts (RSIP) through the ongoing review STRLUS. It is expected that the findings of the statewide industrial land supply and demand study will find there is a demand for further industrial/commercial land in Tasmania. The proposed site provides a opportunity to provide a logical extension to an existing RSIP s and consolidate well-located land suitable to meet the industrial and commercial needs of Southern Tasmania.

Land use and development, such as light industrial uses, large storage areas, commercial vehicle parking (and road infrastructure), warehousing and bulky buildings typically found in large business estates requires large areas of relatively flat land, that can be serviced, close to transport corridors with minimal potential for conflict with other land uses. These requirements are captured in the regional policies 17.5 of the STRLUS.

The land at 93 Cranston Parade and 1047 Acton Road is consistent with the policy statements IA 1 to IA 3 shown below in Figure 3.

17.5 REGIONAL POLICIES

IA 1	Identify, protect and manage the supply of well-sited industrial land that will meet regional need across the 5, 15 and 30 year horizons.
IA 1.1	Ensure industrial land is relatively flat and enables easy access to major transport routes, other physical infrastructure such as water, wastewater, electricity and telecommunications
IA 1.2	Locate new industrial areas away from sensitive land uses such as residentially zoned land.
IA 1.3	Provide for a 30-year supply of industrial land, protecting such land from use and development that would preclude its future conversion to industrial land use - in accordance with the recommendations within the Southern Tasmania Industrial Land Strategy 2013.
IA 1.4	Provide a 15-year supply of industrial land, zoned for industrial purposes within the new planning schemes - in accordance with the recommendations within the Southern Tasmania Industrial Land Strategy 2013.
IA 1.5	Aim to ensure a minimum 5-year supply of subdivided and fully serviced industrial land.
IA 1.6	Take into account the impact on regional industrial land supply, using best available data, prior to rezoning existing industrial land to non-industrial purposes.
IA 2	Protect and manage existing strategically located export orientated industries.
IA 2.1	Identify significant industrial sites through zoning and ensure that other industrial uses not related to its existing function do not diminish its strategic importance.
IA 3	Ensure industrial development occurs in a manner that minimises regional environmental impacts and protects environmental values.
IA 3.1	Take into account environmental values and the potential environmental impacts of future industrial use and the ability to manage these in the identification of future industrial land.

Figure 3: Industrial Activity Policies (Source: STRLUS)

The following comments are made with regard to the policy statements:

- The land is flat and would enable access to major transport routes. The land is already partly serviced and can be serviced through the adjoining HIBP for sewer and other services.
- The Acton Park residential area is in the Rural Living Zone with housing on large lots. There is significant potential to attenuate or separate between residential and light industrial land uses through greater setbacks, site master planning, vegetation screening and earth mounding between the two (2) areas.
- Site master planning would take into consideration the surrounding land uses and distances from the nearby residential areas.
- As shown in Figure 4 a large part of the land is within the Hobart Airport Noise Exposure Area (N Contour). This provides a useful guide for more light industrial uses with potential to create noise being located within the noise exposure area and use/development more suitable for residential type areas such as storage, warehousing etc being located between the noise contour and adjoining residential properties.



Figure 4: Hobart Airport Noise Exposure Area (N Contour) (Source: theLIST Mapping Services)

- The extension of the UGB and the landowner's willingness to dedicate their land to light industrial and commercial use would contribute to the assumed demand for more light industrial/commercial land.
- There are minimal environmental values on the land and other use or development would not be displaced to allow for future development of this land.

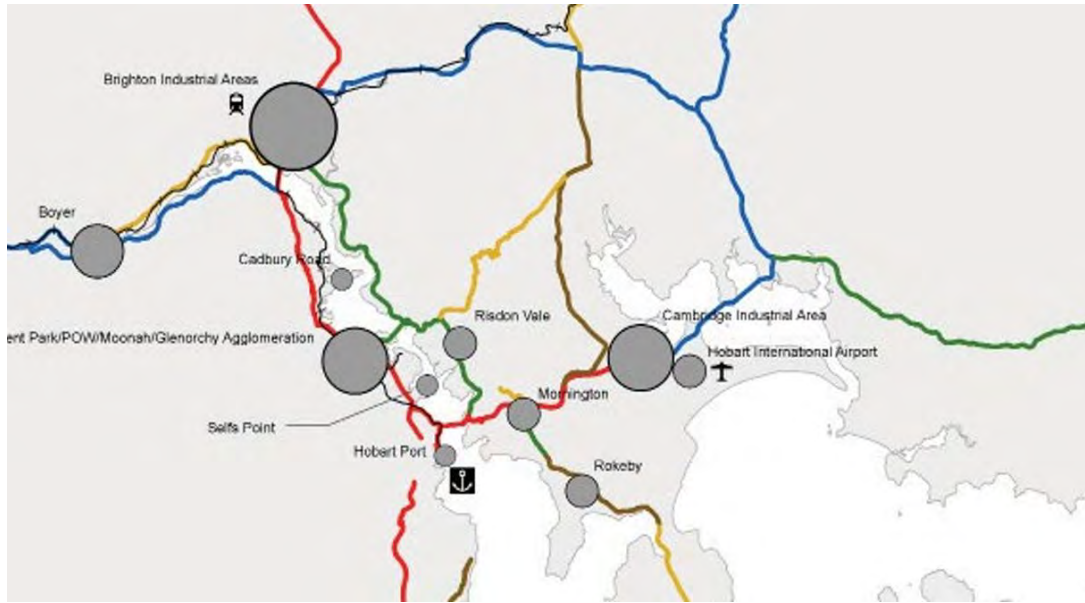


Figure 5: Extract from Map 7: Industrial Activity in Southern Tasmania (Source: STRLUS page 73)

It is noted also that the land is within the 200-500ha catchment area for the Cambridge Industrial Area on Map 7: Industrial Activity in Southern Tasmania. This is shown below in Figure 5.

Proposed UGB Expansion

It is proposed that the UGB be extended over the entirety of 93 Cranston Parade and 1047 Acton Park Road or alternatively the land is included together with the adjoining HIBP land to create one large UGB extension.

The two (2) options are presented below:

Option 1 - Hobart International Business Park and 93 Cranston Parade and 1047 Acton Road (109ha)

Option 1 includes the balance of HIBP land and the land at 93 Cranston Parade and 1047 Acton Road in an updated UGB for Greater Hobart. The total area is 109ha. The proposed extension is shown below in Figure 6.



Figure 6: Option 1 - Proposed Urban Growth Boundary Extension (Source: theLIST Mapping Services)

Option 2 - 93 Cranston Parade and 1047 Acton Road only (34.3ha)

Option 2 is the two (2) properties only. As described in this submission, part of each property is already within the UGB. The narrow access from Acton Road to the body of the lot(s) could be excluded from the UGB extension. However, from a technical drafting perspective and statutory planning perspective it would be simpler to just include the access strip so there are no conflicting standards between zones or future Specific Area Plans that may or may not rely upon this access.



Option 2: 93 Cranston Parade and 1047 Acton Road only (Source: theLIST Mapping Services)

Conclusion

This submission has provided a written overview and diagrams to describe the land at 93 Cranston Parade and 1047 Acton Road, Cambridge as potentially suitable for inclusion in an updated Urban Growth Boundary for the area. The land has connectivity and a potential relationship with the adjoining Hobart International Business Park. Accordingly, two (2) options for an expanded UGB are presented in the submission for consideration by the State Planning Office.

It is my opinion that an extended UGB is suitable for this land and further design and site planning would be addressed through the usual planning scheme amendment and development approval process. This may include specific site master planning or a specific area plan to ensure future commercial or light industrial development will not, or is unlikely to, conflict with the nearby Acton Park residential areas. The site can be planned and designed to accommodate the natural values and natural hazards of the site (e.g. waterways and flood areas).

If you have any enquiries about this submission or would like to discuss further then please contact me on 0458 892 183 or email david.cundall@formplanning.com.au

Sincerely,

David Cundall
Director
 BA, GradDipEnvPlg, DipPM, MPIA

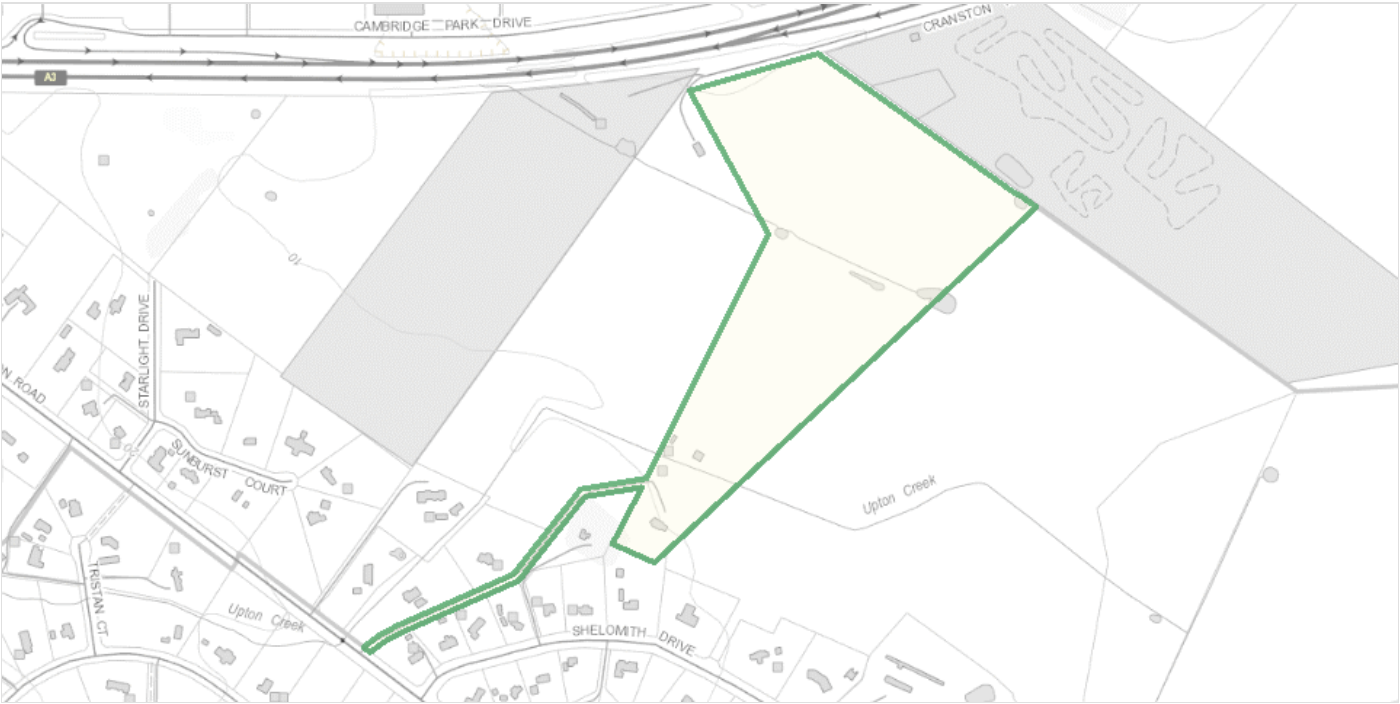
Encl. Appendix A – Property Report for 93 Cranston Parade and 1047 Acton Road, Cambridge

Document Disclaimers

Form Planning and Projects Pty Ltd has prepared this report on the basis of information provided by the client and others who provided information to Form Planning and Projects Pty Ltd (including Government authorities), which Form Planning and Projects Pty Ltd has not independently verified or checked beyond the agreed scope of work. Form Planning and Projects Pty Ltd does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

Form Planning and Projects Pty Ltd take no responsibility or obligation to update this document to account for events or changes occurring subsequent to the date that the document was prepared.

Property report for 1047 ACTON RD CAMBRIDGE TAS 7170



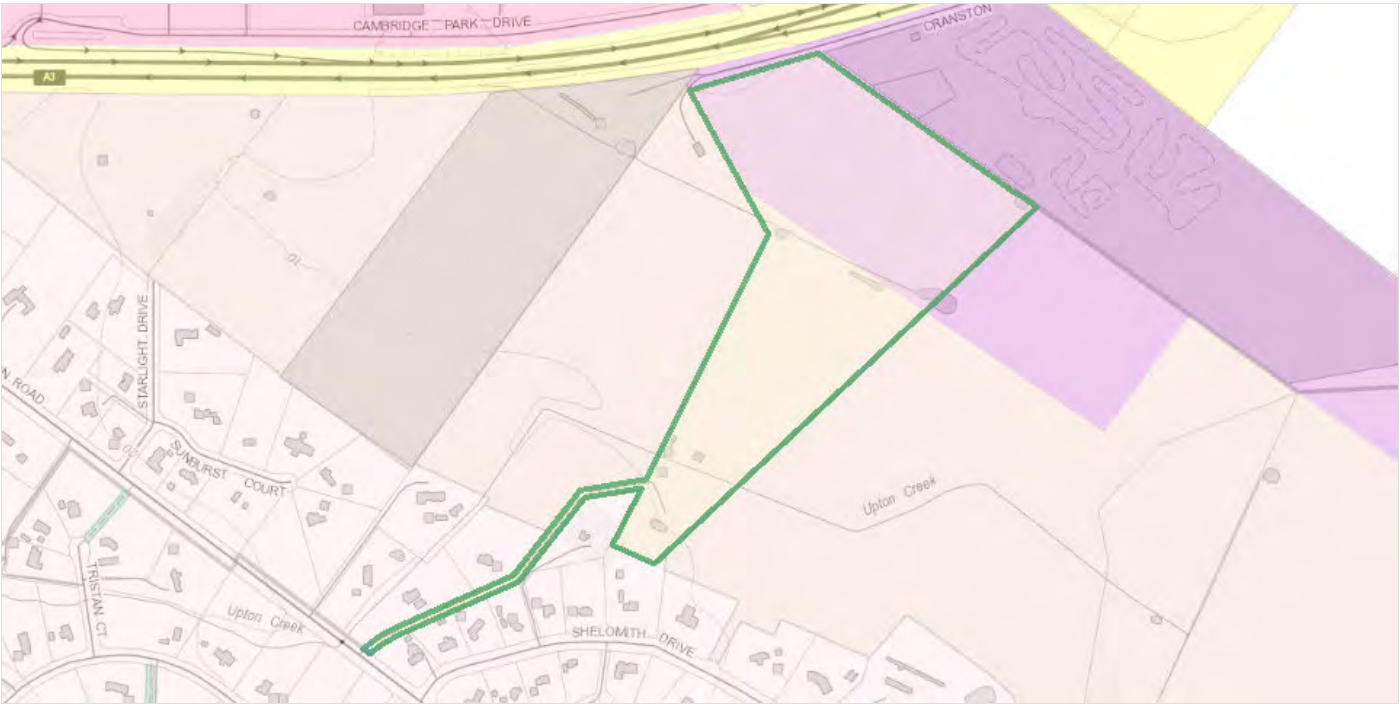
Property Identification Number	Certificate of Title Reference (Volume/Folio)
7903448	107856/2
Locality	Municipality
Cambridge	Clarence
Planning Zones	Planning Codes Overlay
Rural, Light Industrial	Waterway and coastal protection area, Bushfire prone areas, Airport obstacle limitation area, Airport noise exposure area, Flood prone areas, Road or railway attenuation area
Total Area	Planning Scheme
189700 sqm	Tasmanian Planning Scheme

This property is in the **Rural, Light Industrial** planning zones under the Tasmanian Planning Scheme.

The Tasmanian Planning Scheme consists of state wide provisions to ensure consistency across Tasmania, and local provisions which spatially apply those through zoning maps along with specific provisions for unique places in each municipality to address local issues.

Location Information

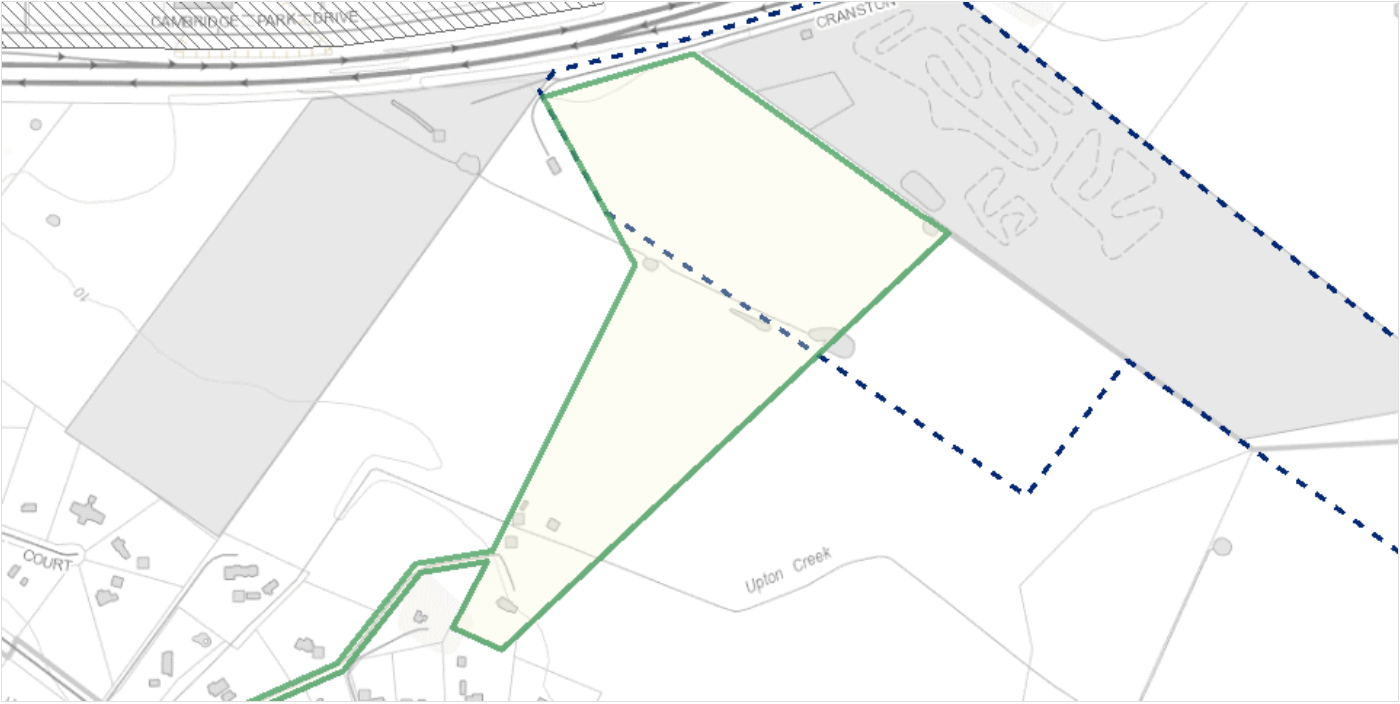
Planning Zone



Tasmanian Planning Zone

Zone Number	18
Zone	Light Industrial
Zone Number	20
Zone	Rural

Local Provisions Schedule

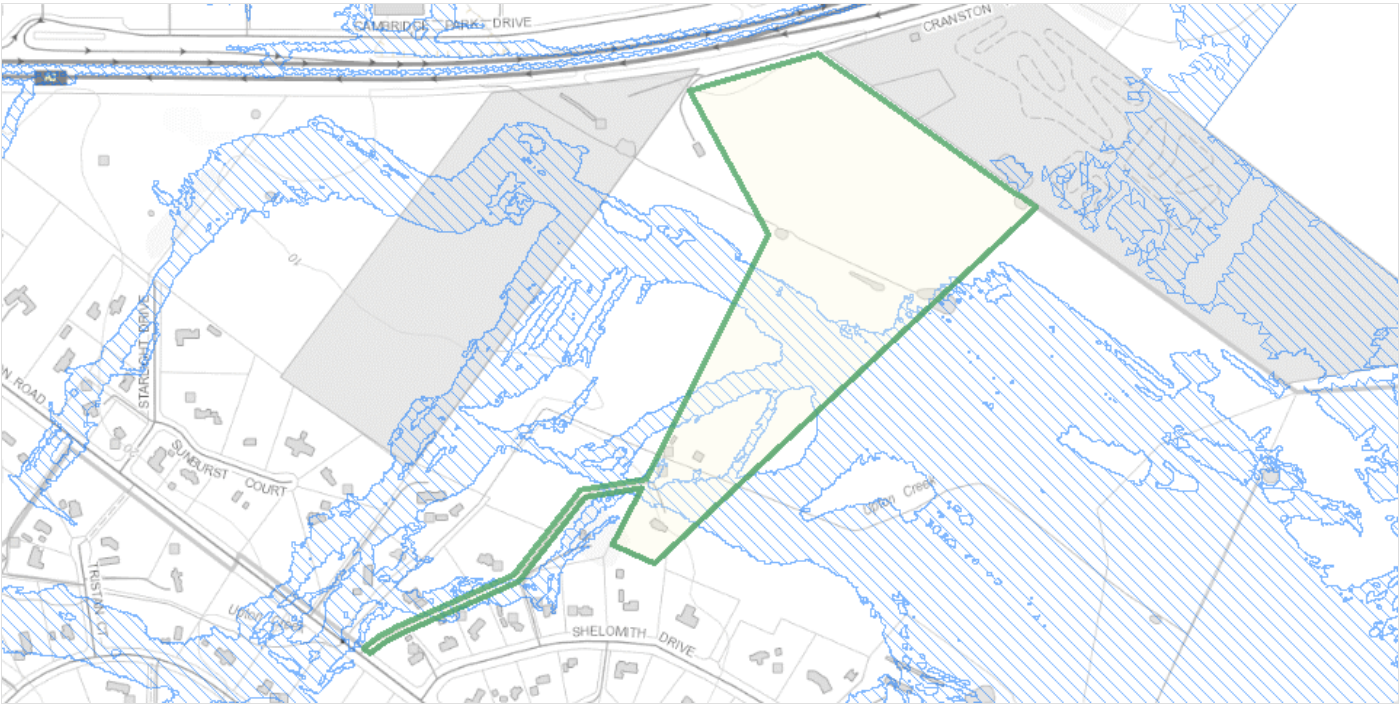


Tasmanian Planning General Overlays

The General Overlay will show where specific local planning requirements may apply. This overlay will contain local area objectives and any planning controls for unique places specific to the local area. These unique areas can be in the form of particular purpose zones, specific area plans, and site specific qualifications.

Local Provision Schedule	Clarence Local Provisions Schedule
Overlay Type	Specific Area Plan
Overlay Name	Cranston Parade Specific Area Plan
LPS Reference Number	CLA S9.0

Flood-Prone Area

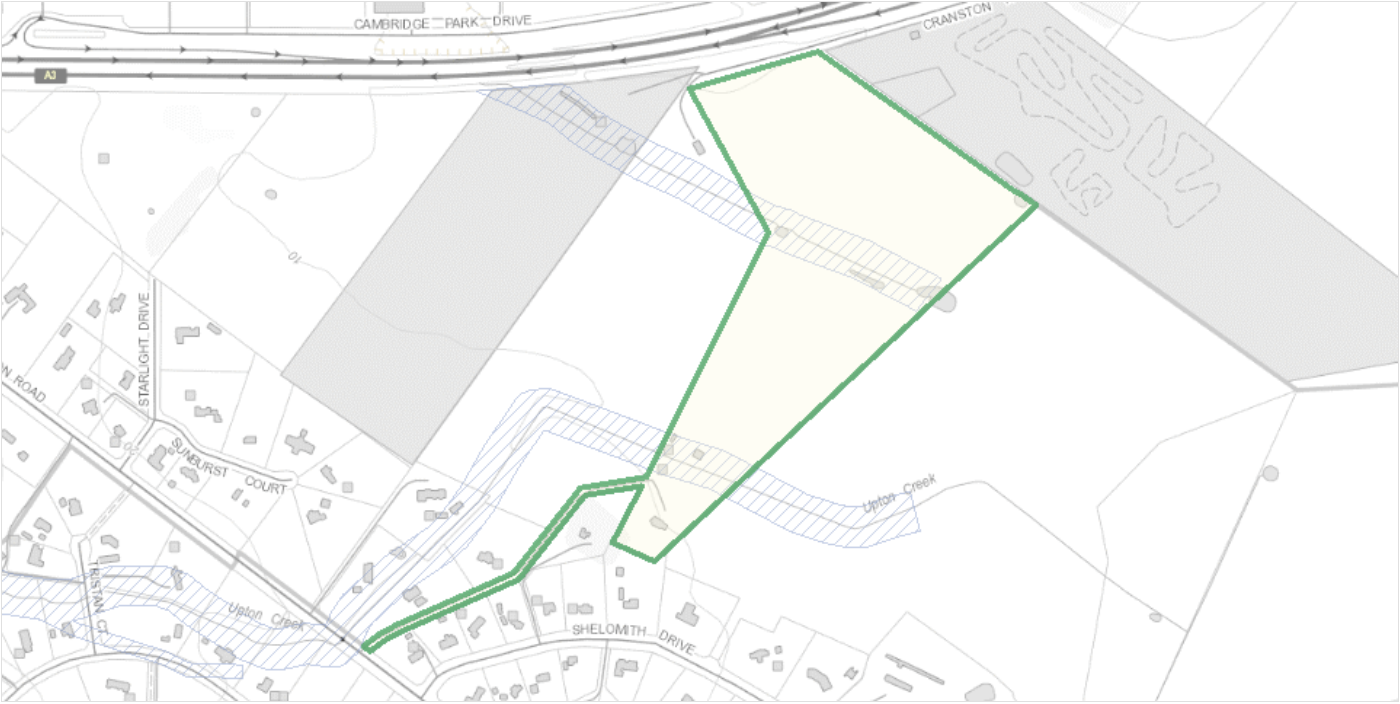


Flood-prone areas

The flood prone hazard area overlay is applied to areas known to be prone to flooding, particularly areas known to be within the 1 per cent annual exceedance probability (AEP) level.

Description	Amendment reference: PDPSAMEND 2021 022806
Overlay Name	Flood prone areas
LPS Reference	C12.0

Waterway and Coastal Protection Area

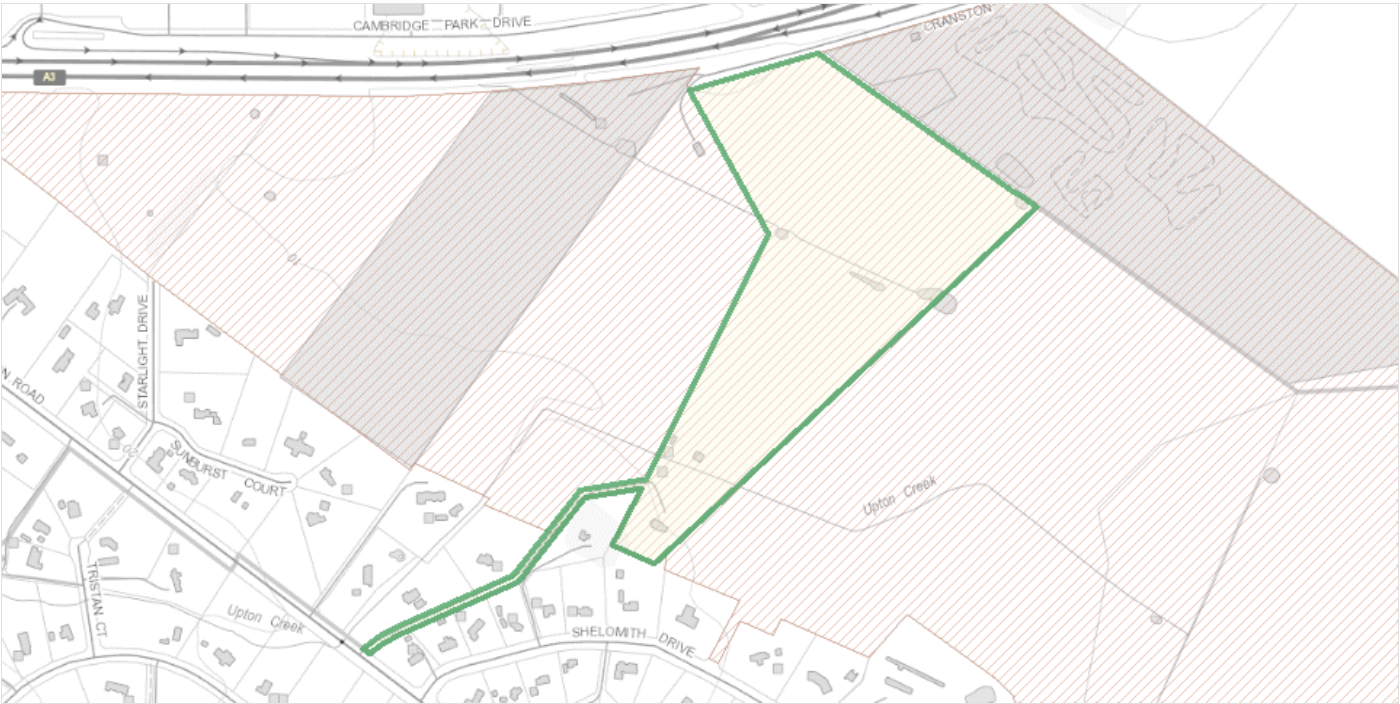


Waterway and coastal protection area

The waterway and coastal protection area overlay includes land within a specified buffer distance from Class 1 to 4 watercourses and wetlands, including Ramsar wetlands. Class 1 watercourses include lakes and tidal waters.

Description	
Overlay Name	Waterway and coastal protection area
LPS Reference	C 7.0

Bushfire Prone Area

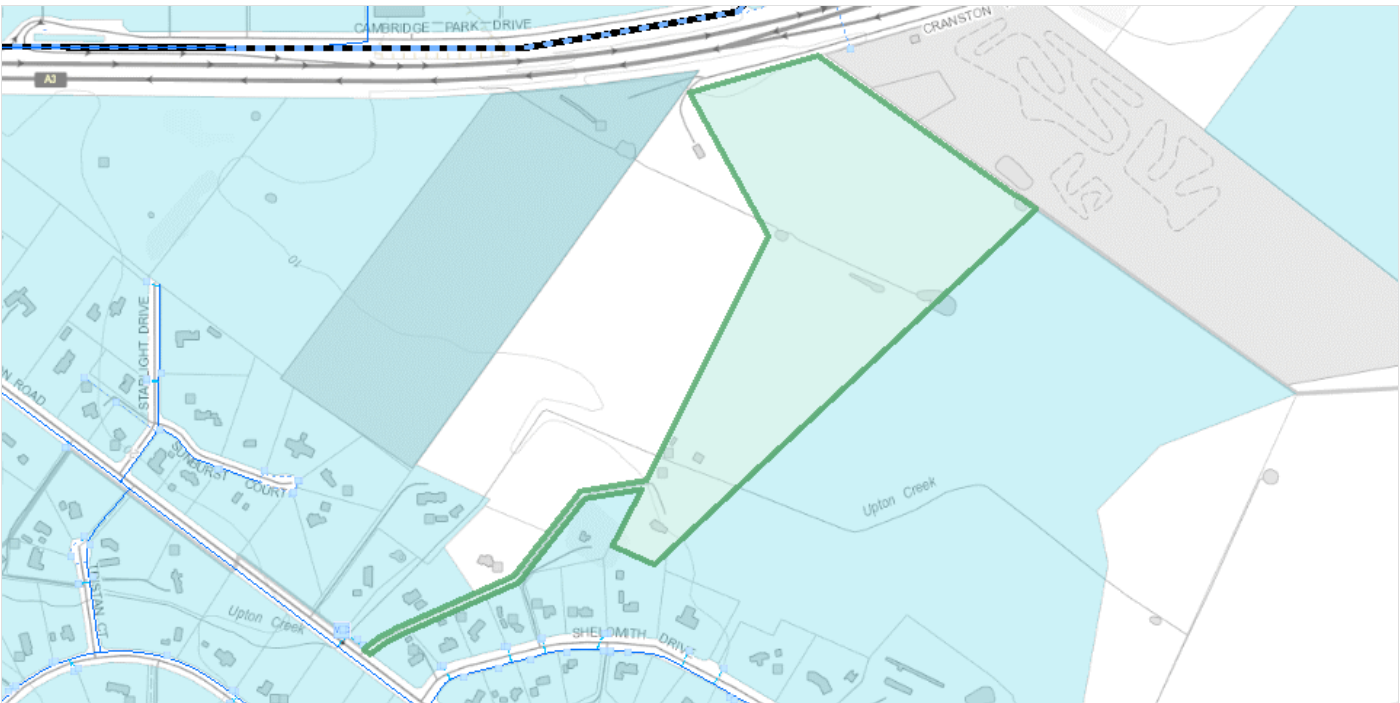


Bushfire-prone areas

The bushfire prone area overlay applies in accordance with any overlay map approved by the Tasmania Fire Service for the relevant municipal area. The purpose of the bushfire prone code is to ensure that use and development is appropriately designed, located, serviced, and constructed, to reduce the risk to human life and property, and the cost to the community, caused by bushfires.

Overlay Name	Bushfire prone areas
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TasWater - Water Service

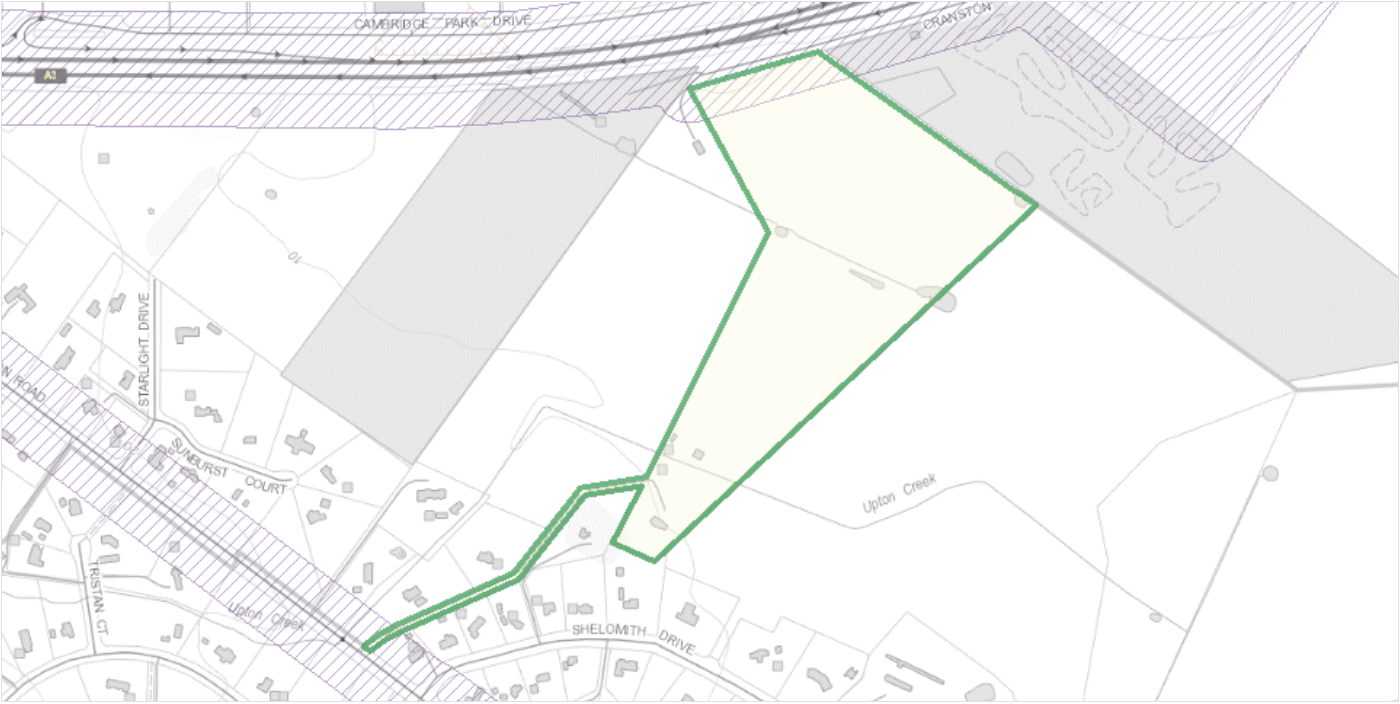


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Service Type	Full Service
--------------	--------------

Road and Railway assets



Road and railway assets: Road or railway attenuation area

A road or railway attenuation area overlay applies to land within a relevant overlay, or, in the absence of an overlay, to land within 50m of the boundary of a major road, rail network, future major road or future railway.

Description	Tasman Highway
Overlay Name	Road or railway attenuation area
LPS Reference	CLA C3.0
Description	Acton Road
Overlay Name	Road or railway attenuation area
LPS Reference	CLA C3.0

Safeguarding of airports code



Airport obstacle limitation area

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Description	Hobart Airport OLS AHD data. Alterations of electronic planning map made under s.800 of LUPAA
Overlay Name	Airport obstacle limitation area
LPS Reference	CLA C16.0

Airport noise exposure area

The airport noise exposure area overlay is based on the relevant airport noise contours contained in the airport master plan or those otherwise adopted by the relevant airport owner of operator for the relevant airport in accordance with any accepted guidelines. It includes the land within the 20 Australian Noise Exposure Forecast (ANEF) contour and all land within higher ANEF contours.

Description	N contour 20p00n2 N60day_2035wRE plus Sandy Point and Five Mile Beach to MHWM
Overlay Name	Airport noise exposure area
LPS Reference	CLA C16.0

Council Details

The local council where your property is located can provide advice on a proposed project.

Consult

Clarence City Council

Mailing address

38 Bligh Street
Rosny Park Tasmania 7018

Work:

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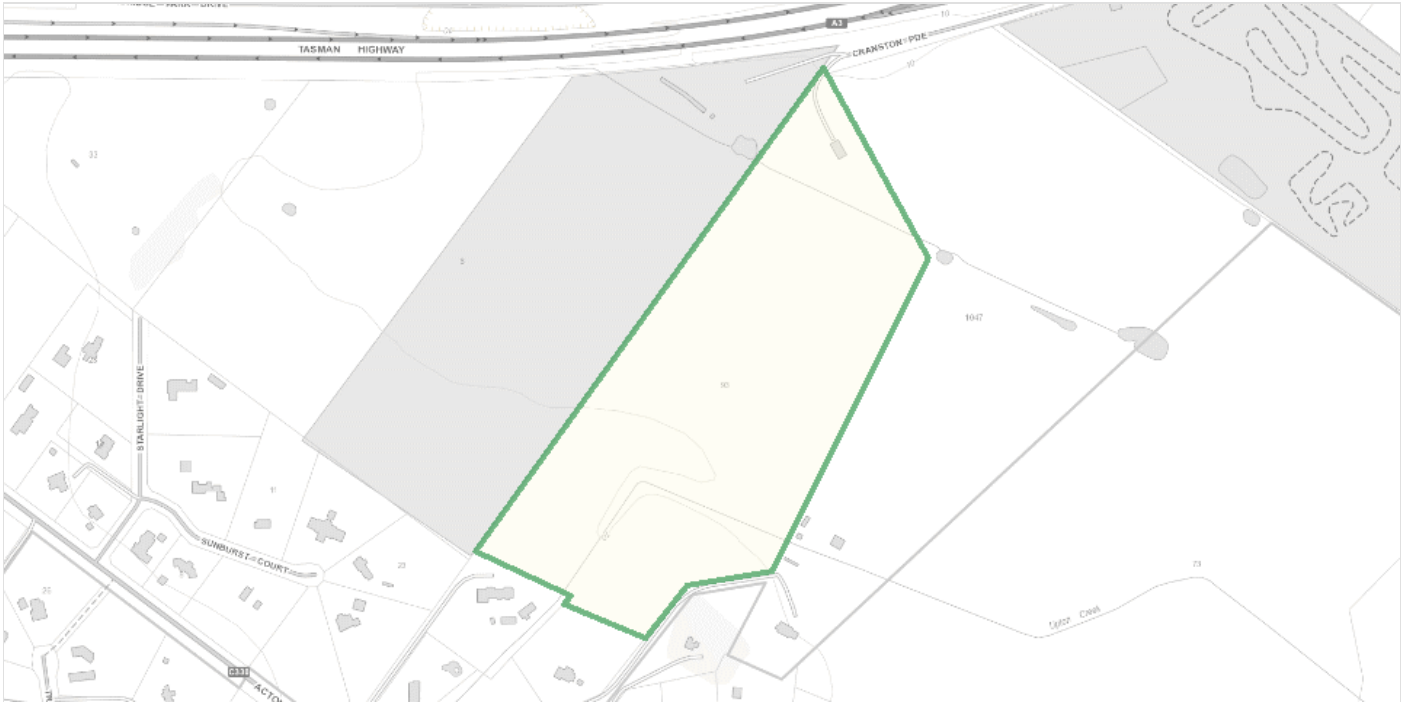
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- an independent Licensed Professional

Property report for 93 CRANSTON PDE CAMBRIDGE TAS 7170



Property Identification Number

2970473

Locality

Cambridge

Planning Zones

Rural

Total Area

153500 sqm

Certificate of Title Reference (Volume/Folio)

156582/1

Municipality

Clarence

Planning Codes Overlay

Waterway and coastal protection area, Bushfire prone areas, Airport obstacle limitation area, Airport noise exposure area, Flood prone areas, Road or railway attenuation area

Planning Scheme

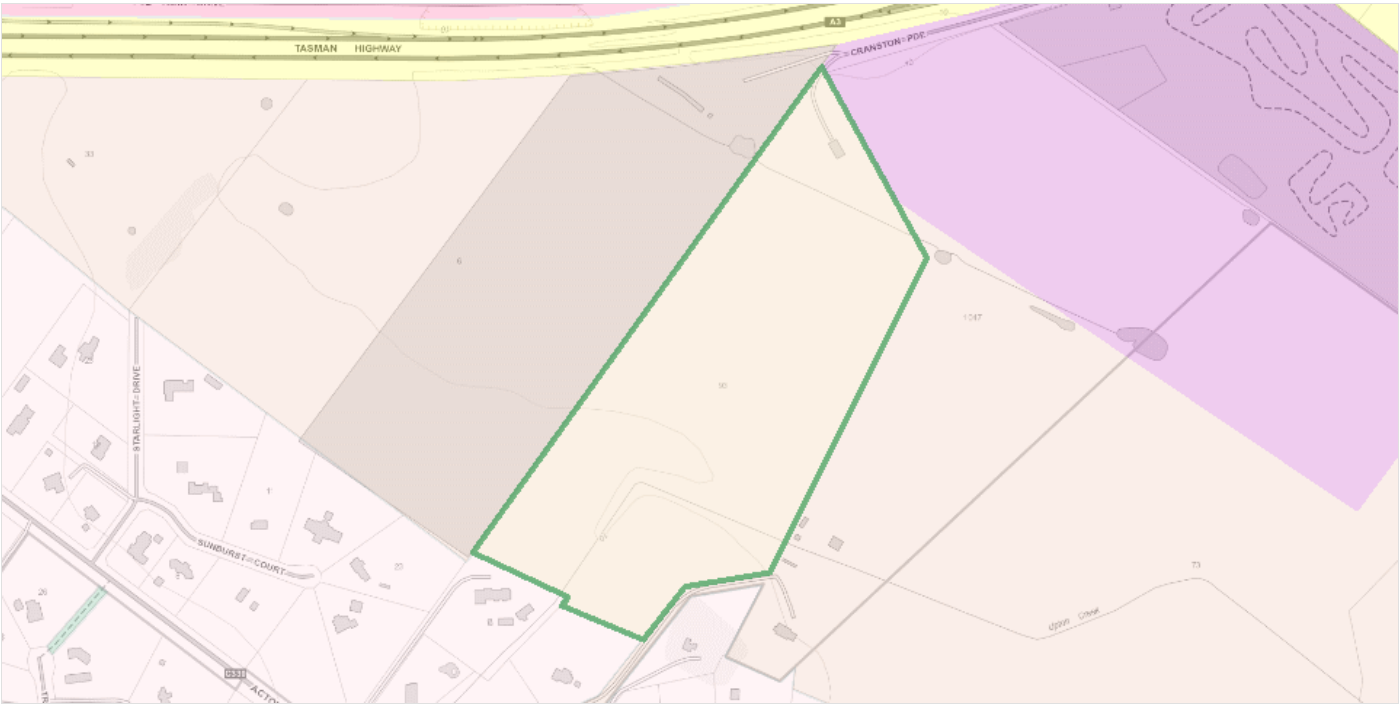
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The Tasmanian Planning Scheme consists of state wide provisions to ensure consistency across Tasmania, and local provisions which spatially apply those through zoning maps along with specific provisions for unique places in each municipality to address local issues.

Location Information

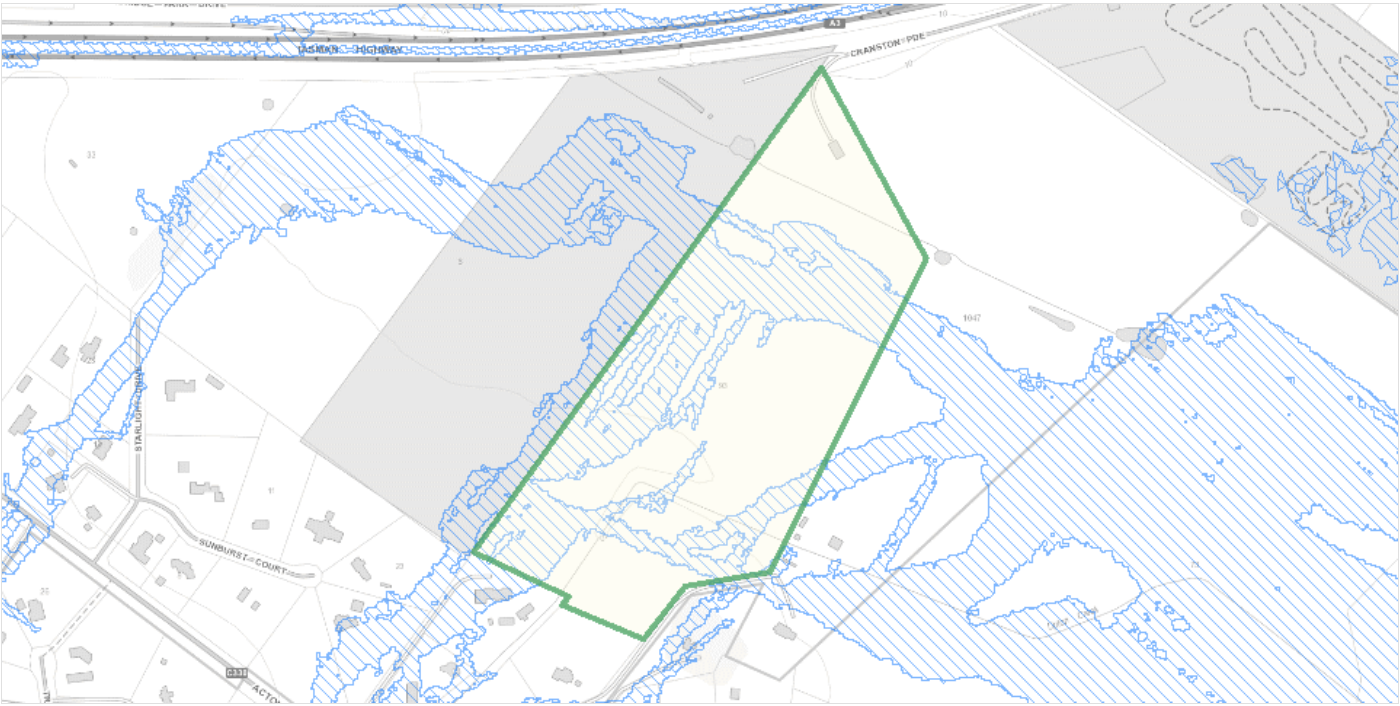
Planning Zone



Tasmanian Planning Zone

Zone Number	20
Zone	Rural

Flood-Prone Area

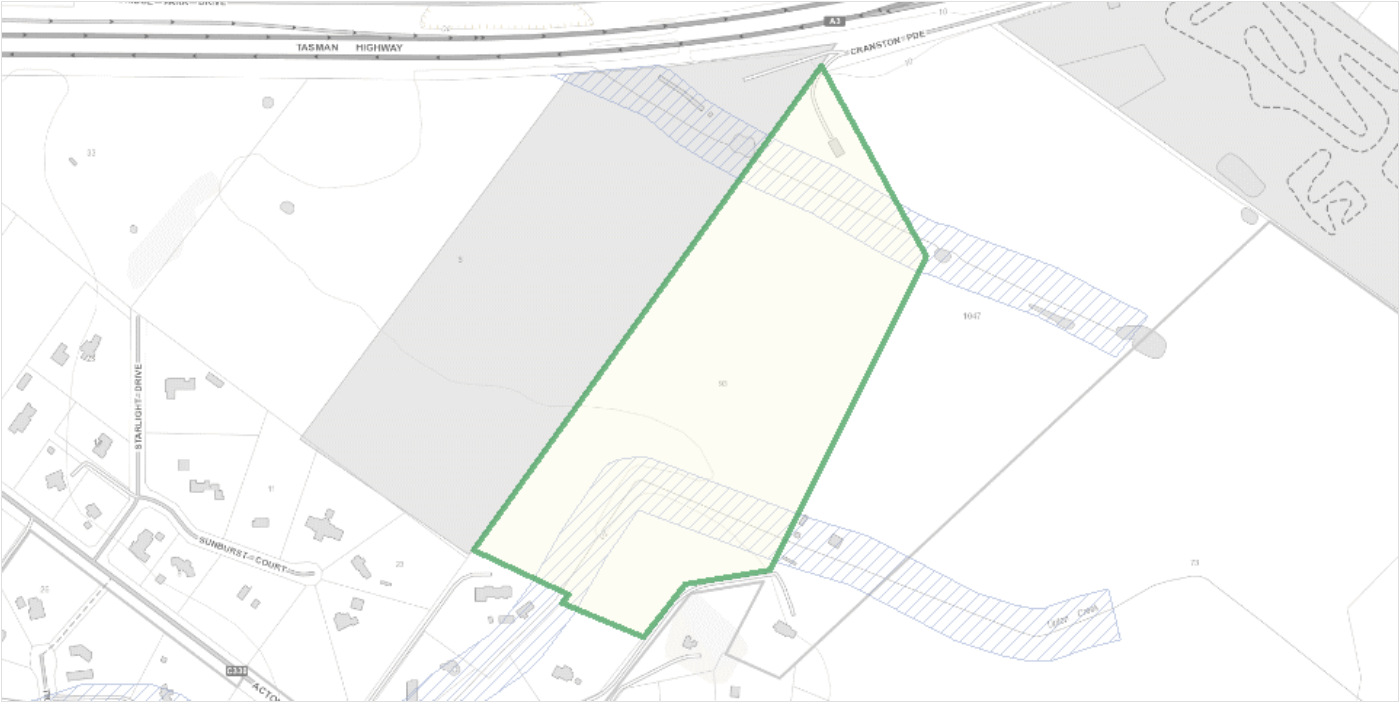


Flood-prone areas

The flood prone hazard area overlay is applied to areas known to be prone to flooding, particularly areas known to be within the 1 per cent annual exceedance probability (AEP) level.

Description	Amendment reference: PDPSAMEND 2021 022806
Overlay Name	Flood prone areas
LPS Reference	C12.0

Waterway and Coastal Protection Area

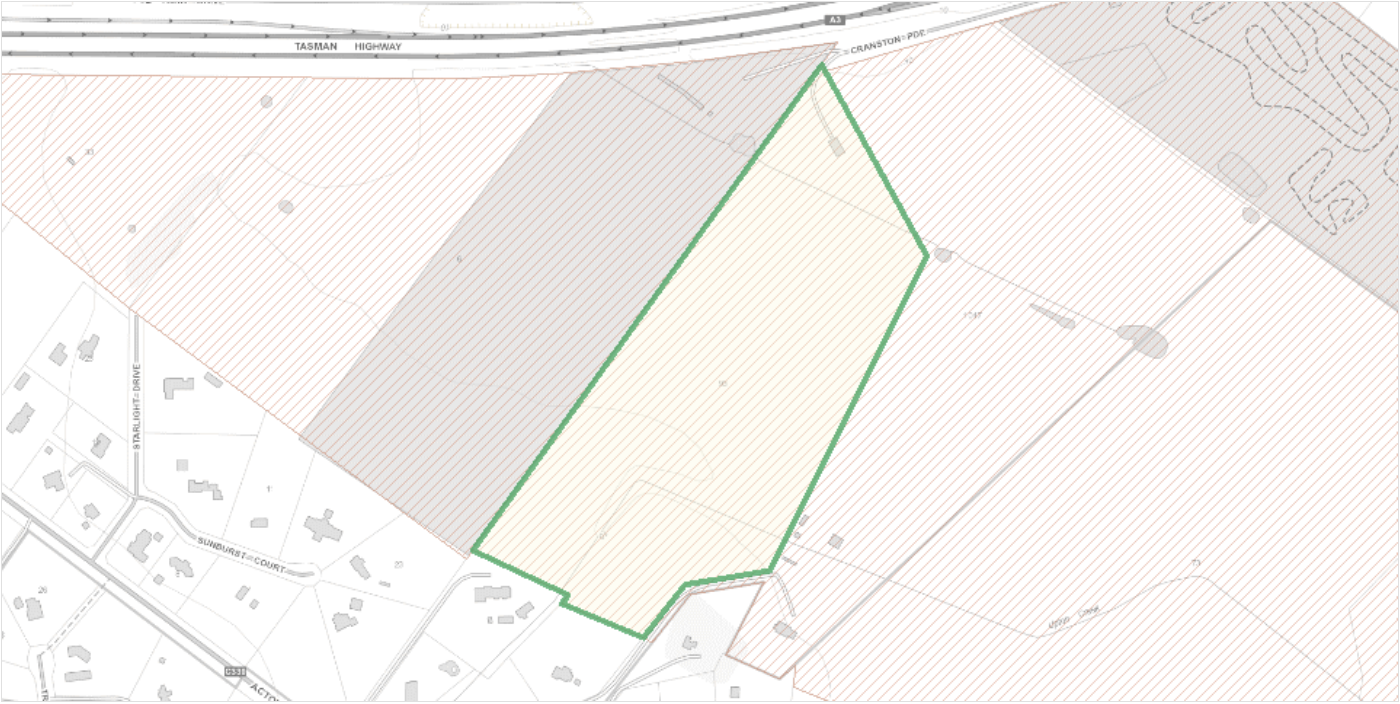


Waterway and coastal protection area

The waterway and coastal protection area overlay includes land within a specified buffer distance from Class 1 to 4 watercourses and wetlands, including Ramsar wetlands. Class 1 watercourses include lakes and tidal waters.

Description	
Overlay Name	Waterway and coastal protection area
LPS Reference	C 7.0

Bushfire Prone Area

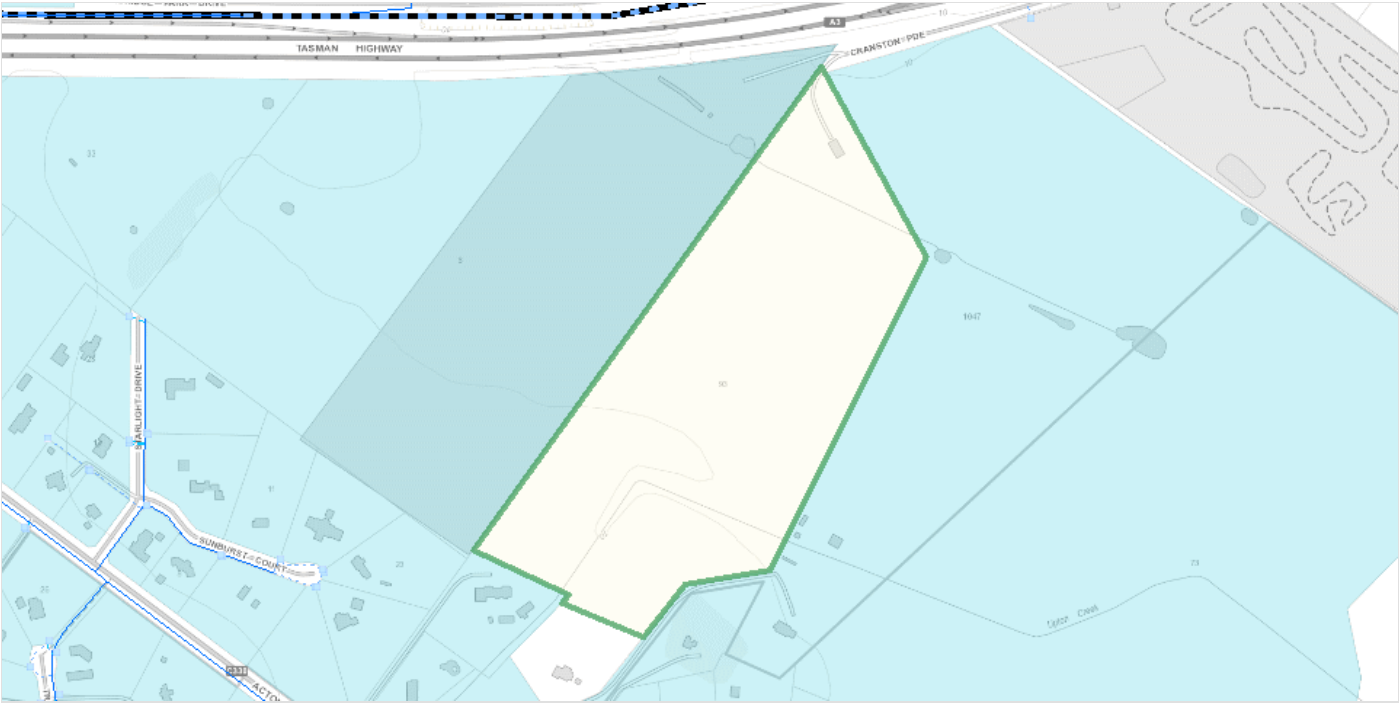


Bushfire-prone areas

The bushfire prone area overlay applies in accordance with any overlay map approved by the Tasmania Fire Service for the relevant municipal area. The purpose of the bushfire prone code is to ensure that use and development is appropriately designed, located, serviced, and constructed, to reduce the risk to human life and property, and the cost to the community, caused by bushfires.

Overlay Name Bushfire prone areas

TasWater - Water Service

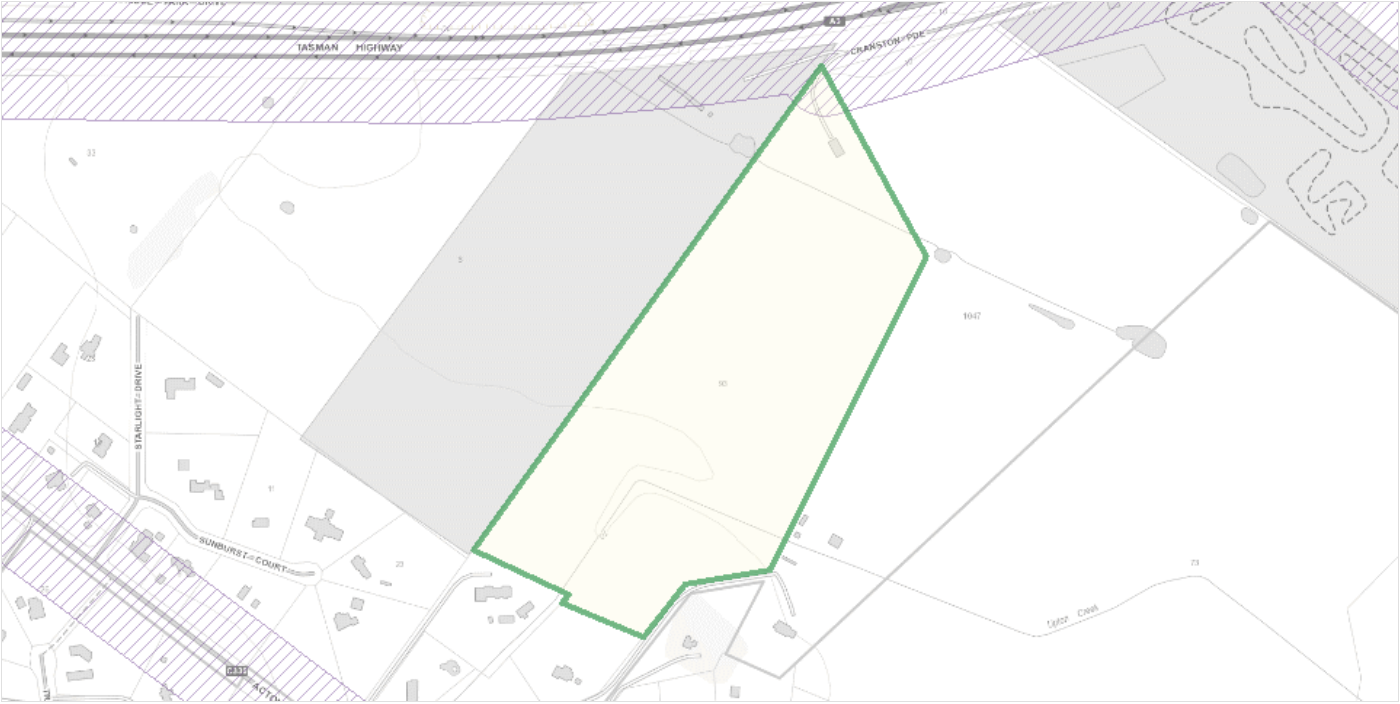


TasWater - Water Serviced Land

Serviced Land is the land which TasWater will permit to be connected to its water and sewerage infrastructure. The blue shading on the map indicates water serviced properties. The property is connected to, or is able to connect to the TasWater water supply network. Development assessments will be required to be undertaken prior to undertaking any work on TasWater Infrastructure. See https://www.taswater.com.au/Customers/Serviced_Land for further information.

Service Type Full Service

Road and Railway assets

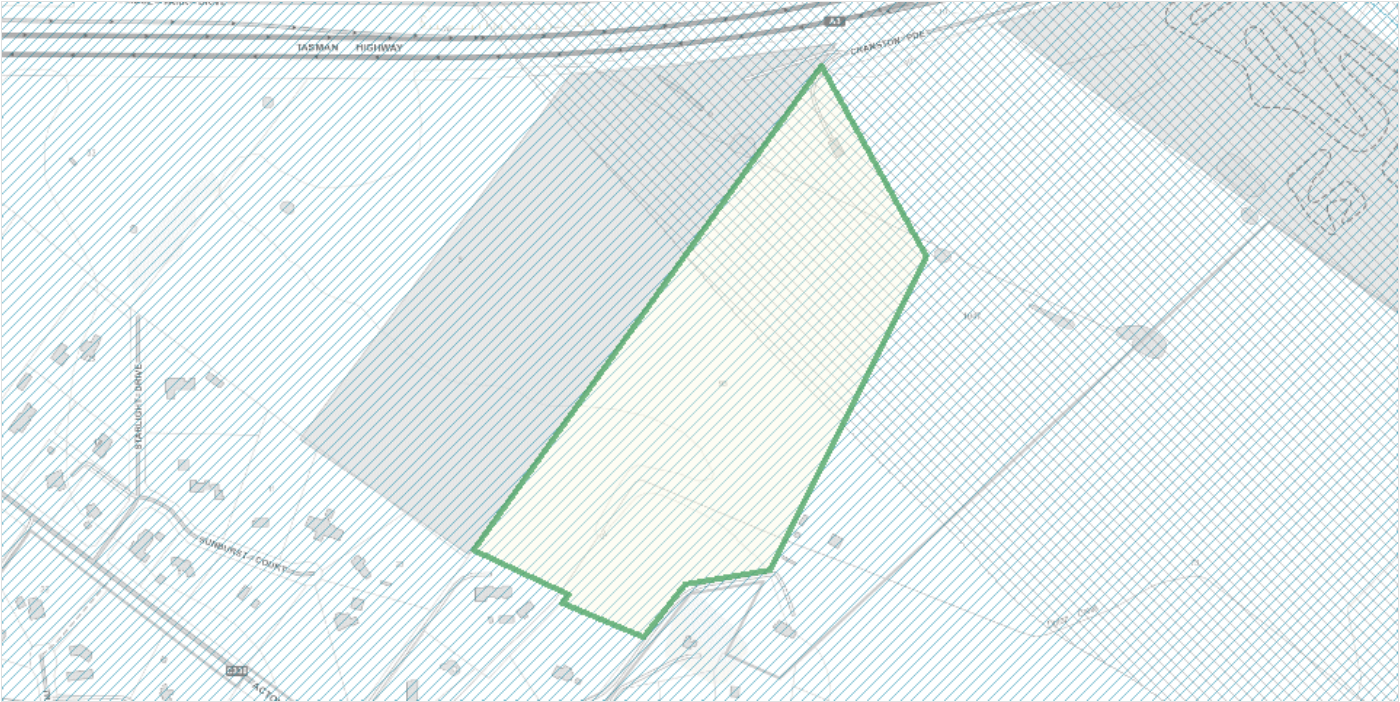


Road and railway assets: Road or railway attenuation area

A road or railway attenuation area overlay applies to land within a relevant overlay, or, in the absence of an overlay, to land within 50m of the boundary of a major road, rail network, future major road or future railway.

Description	Tasman Highway
Overlay Name	Road or railway attenuation area
LPS Reference	CLA C3.0

Safeguarding of airports code



Airport noise exposure area

The airport noise exposure area overlay is based on the relevant airport noise contours contained in the airport master plan or those otherwise adopted by the relevant airport owner of operator for the relevant airport in accordance with any accepted guidelines. It includes the land within the 20 Australian Noise Exposure Forecast (ANEF) contour and all land within higher ANEF contours.

Description	N contour 20p00n2 N60day_2035wRE plus Sandy Point and Five Mile Beach to MHWM
Overlay Name	Airport noise exposure area
LPS Reference	CLA C16.0

Airport obstacle limitation area

The airport obstacle limitation area overlay is based on the Obstacle Limitation Surfaces (OLS) and Procedures for Air Navigation Services Aircraft Operations (PANS OPS) contained in the airport master plan or those otherwise adopted by the relevant airport owner of operator for the relevant airport in accordance with any accepted guidelines. It identifies the specified height limit on the land within the overlay by reference to AHD.

Description	Hobart Airport OLS AHD data. Alterations of electronic planning map made under s.80O of LUPAA
Overlay Name	Airport obstacle limitation area
LPS Reference	CLA C16.0

Council Details

The local council where your property is located can provide advice on a proposed project.

Consult

Clarence City Council

Mailing address

38 Bligh Street
Rosny Park Tasmania 7018

Work:

(03) 6217 9500

Disclaimer

This enquiry tool is a guide only and is not a substitute for professional advice.

This enquiry tool only provides information for common developments undertaken individually, for example, building a deck.

The Tasmanian Planning Commission, a court, council or other relevant authority may have an interpretation of the law that is different from the information provided as part of this enquiry tool.

You should always confirm that you are permitted to commence a development by contacting a relevant authority who may be:

- the local council; or
- an independent Licensed Professional

From: Kate
Sent: Friday, 14 March 2025 3:10 PM
To: State Planning Office Your Say
Subject: Urban Growth Boundary Change Proposal Margate

Dear State Planning Team,

I would like to give feedback on the proposed change in urban growth boundary for Margate in the February 2025 consultation paper. As a resident of Margate for the last 8 years I disagree with the proposed changes for the following reasons:

1. Margate and surrounding areas do not have sufficient services to support a significant increase in population. If the projected 588 dwellings are built on the land described, this will lead to a population increase of 1,411 (based on average 2.4 people per dwelling in Tasmania). This is a significant population increase for Margate (4,239 in the 2021 census), in an area where people already struggle to access GP services. The local school zone already excludes parts of Margate that are on Van Morey Road, with people hence driving past Margate Primary to take their children to Snug Primary due to high student numbers. The majority of workers in Kingborough already commute into Hobart, with traffic already causing significant issues even before the planned addition of new dwellings in the Huntingfield Development. A large population increase in Margate will therefore worsen existing issues with accessing health and education services, and further exacerbate existing traffic issues.
2. There will be a significant effect on amenity for surrounding properties. Please note that I am not directly affected by this.
3. Margate is the gateway to the scenic Channel region, which has significant tourist appeal. The area proposed for development is an area of natural beauty, with scenic views over farmland and the Channel towards Bruny Island. A development in this area will adversely impact the attractive rural character of the town, turning it into further suburban urban sprawl.
4. There is a popular local walking track, the Margate Tramway Track, around the area behind Merediths, which will be adversely affected. Encouraging outdoor activity is important in the community, and it would be sad to have an attractive rural walking track hemmed in by urban sprawl, likely decreasing its use.
5. If the urban boundary changes do go ahead, I strongly encourage State Planning to consider lower density zoning more in keeping with surrounding properties, and to allow areas of open space for recreation. Apart from Dru Point (which is not accessible on foot for much of Margate), Margate does not have open space near the town centre, and this could be an opportunity to provide this.

Kind regards,
Kate Wilson

14 March 2025

State Planning Office
Department of State Growth
GPO Box 536
Hobart TAS 7001

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

Dear State Planning Office Staff,

SUBMISSION – SOUTHERN TASMANIA REGIONAL LAND USE STRATEGY - URBAN GROWTH BOUNDARY PROPOSED UPDATE

We would like to thank the State Planning Office for providing an opportunity to lodge a submission in response to the Southern Tasmania Regional Land Use Strategy (STRLUS) - Urban Growth Boundary (UGB) proposed update ('the update').

Located within Central Hobart, on Molle Street, Niche Studio has a keen and vested interest in the STRLUS and UGB expansion from both a local and professional planning perspective. Niche is a specialist planning and urban design consultancy operating across Australia with offices in Tasmania, Victoria and Western Australia. We provide a variety of statutory, strategic and urban design services to multiple governments, advocacy groups and private organisations across Australia. Much of our work, particularly within Tasmania, is residentially based, from regional higher density projects to precinct planning and greenfield planning.

We strongly support and commend the reinvigorated focus by the Tasmanian Government on strategic planning across the state, in this instance as it specifically relates to the Southern Region. Based on its ever-growing population and need for structured development, Southern Tasmania has long been in need of a cohesive strategic direction. We have closely followed the development process of the STRLUS and the strategic directions of the State more broadly, with specific interest in the STRLUS area, where we operate intensively.

As identified in the STRLUS State of Play Report, a concerted effort must be taken to ensure that the cultural, environmental, economic, demographic, infrastructural, social and physical factors that influence the region are considered cohesively. However, we believe the link between the broader strategic work being done to update the STRLUS and the proposed further expansion of the UGB is not clearly articulated. Specifically, we would like to further understand the reasoning behind the selection process in choosing the specific areas for expansion.

Over the following pages, we have summarised several concerns we have regarding this proposed expansion, for your kind consideration.

Planning and Urban Design

ABN 35 334 392 034
W nicheplanningstudio.com.au

VIC BOONWURRUNG COUNTRY

Unit 1, 286 Ferrars Street
South Melbourne VIC 3205

WADAWURRUNG & DJA DJA WURRUNG COUNTRY

Suite 8, 11 Davey Street
Ballarat Central VIC 3350

WA WHADJUK NOONGAR COUNTRY

Level 2, 896 Canning Highway
Applecross WA 6153

TAS PALAWA COUNTRY

Level 1, 14 Molle Street
Hobart, TAS, 7000

1. The decision-making process in selecting these particular sites

In any planning process, transparency and justification regarding decisions made for the public are of paramount importance. Especially in an all-encompassing task like the expansion of urban growth boundaries which has permanent and major long-term impacts, transparency is essential to facilitate public trust, equitable growth, and evidence-based outcomes. Decisions must be guided by data and demonstrated need, thus preventing politically driven expansions that could lead to urban sprawl.

Based on the limited information provided on the engagement website, it is unclear whether the strategic justification for the implied settlement and development pattern has been explored. Strategic or statistical background in the form of housing supply studies and serviceability analysis used to justify this expansion should be provided for the public to be comprehensively informed.

Further to the above, the selection process determining the areas identified for expansion should be detailed as part of a transparent planning process. The data that informed the decision to propose this expansion and the method in which the specific areas were chosen must be made public, in order to ensure evidence-based planning decisions are made in collaboration with Tasmanian residents. We encourage the State Planning Office to publish the information regarding the site-selection process before making any decisions on the expansion.

2. Local Community and Council consultation

While we understand that the State Planning Office is currently welcoming feedback on the proposed areas of expansion through this current process, we do not have information on whether the local communities where these areas have been proposed have had any input into the initial selection process of expansion areas.

It will be important to understand whether the local residents have requested or advocated for further expansion and development. If so, has this been tested to check whether they are legitimate concerns?

Further, we would like to understand whether the community and local Councils have contributed their local knowledge regarding each site's opportunities and constraints based on lived experience. This information will be critical in ensuring that information pertinent to each site is duly considered, which a 'desktop' analysis cannot reveal.

Community support will be critical in implementing any form of growth-related planning outcomes, and we recommend that in the future, the Office consults with residents and local Councils early in the process before selecting expansion areas to avoid delays further down the road.

3. Suitability for expansion

When considering the areas proposed for expansion, it is important to consider their suitability. The characteristics of the areas that would make an area suitable for inclusion into the UGB include:

Continuity and Logical Extension

- Directly adjacent to existing urban areas.
- Provides a natural or efficient expansion of the urban footprint and avoids disconnected or leapfrog development.
- Logical inclusions that 'complete' a missing link in an area that is otherwise developed.

Infrastructure Feasibility and Constraints

- Can be easily serviced by existing or planned infrastructure (roads, public transport, water, sewer, electricity).
- Cost-effective for governments and developers to extend services.
- Takes advantage of existing or planned infrastructure upgrades.

Environmental Sensitivities and Climate Risks

- Avoids disaster-prone zones.
- Protects significant biodiversity corridors and is not in areas with significant environmental value (wetlands, floodplains, biodiversity hotspots).

Land Use Suitability and Agricultural Protection

- Predominantly underutilized, fragmented, or non-viable agricultural land.
- Balances rural lifestyle demand with urban growth pressures, particularly in the urban fringes where the expansion is proposed.

Market Demand and Housing Supply

- Growth areas should align with housing demand, particularly for affordable and diverse housing.
- Has demonstrable demand for urban land supply.

Policy Alignment and Strategic Fit

- Aligns with the Southern Tasmanian Regional Land Use Strategy (STRLUS) directions and local planning scheme policies.

Logical Boundaries and Containment

- Uses natural barriers (e.g., Derwent River, Wellington Range) and major transport corridors (e.g., Midland Highway, Tasman Highway) to define boundaries.
- Expansion should avoid creating ribbon development along key transit corridors, ensuring efficient urban form.
- Prevents excessive sprawl into scenic landscapes, protecting the region's character and tourism appeal.

In line with these factors among others, care must be taken to select the areas in a considerate and thoughtful manner that is backed by evidence and serviceability.

4. Implementation plan for infrastructure, servicing and funding

Often, we have noticed the reason why expansion and growth plans fail is the ill-timed delivery of servicing and infrastructure, stymied by funding and resourcing issues across both the public and private sectors.

Therefore, it will be of paramount importance to research, justify and demonstrate that the infrastructure provision in any proposed expansion areas occurs hand-in-hand- with residential development.

We recommend that the documents for proposed expansion include implementation details regarding servicing and future community infrastructure development, *including* funding mechanisms, timing and staging. The relevant developers and state bodies must be held accountable to these timeframes, in order to ensure that all future residents have equitable access to services and required infrastructure.

CONCLUSION

To conclude, Niche acknowledges the importance of providing sustainable housing growth across the state. Upon reviewing the limited information provided on the consultation website, we do not have all the information to provide a fully informed response regarding the impetus to expand the UGB beyond those areas identified within the STRLUS update document's Map 10.

In addition to concerns elaborated in the previous pages about the selection process in choosing the areas for expansion, we would like to understand the necessity for bringing forward the addition of these specific areas to the UGB at this point in time, as opposed to including them in the ongoing updates to the STRLUS, whose process is due to finish in just a few months later this year. If there is a specific reasoning for this, we would recommend that this be made plain within the consultation website. At this stage, we do not believe there is an urgent enough necessity to bring forward this process ahead of the official gazettal of the STRLUS document later this year.

In summary, whilst we support the *intent* of the proposal to improve housing supply, we suggest that the State Planning Office does **not** support the Minister's move to expand the UGB even further, without stronger justification and analysis.

Niche Studio has substantial experience with working in the regions and urban fringes of Tasmania and given our familiarity with the Councils within the scope of this proposal, we welcome the opportunity to discuss the points made here within this submission and provide further planning and urban design advice to the State Planning Office.

Should you have any queries, please contact Nivedita Ravindran via email at
and we would be happy to discuss any aspects of our submission.

Yours sincerely,

Nivedita Ravindran
Senior Urban Designer
Niche Studio

**Office of the
Fire and Emergency Services Commissioner**



File No: A25/59513

Mr Anthony Reid
Director State Planning
Department of State Growth - State Planning Office

Via email: SPO@stateplanning.tas.gov.au

Dear Mr Reid

**TASMANIA FIRE SERVICE AND STATE EMERGENCY SERVICE SUBMISSION TO THE
STRLUS URBAN GROWTH BOUNDARY UPDATE – CONSULTATION PAPER
FEBRUARY 2025**

Thank you for the opportunity to provide a submission on the *Southern Tasmania Regional Land Use Strategy (STRLUS) Urban Growth Boundary Update – Consultation Paper February 2025*.

I note that the proposed amendments to the STRLUS seek to update the Urban Growth Boundary (UGB) and comments are being sought from the Tasmania Fire Service (TFS) and State Emergency Service (SES) as a relevant State Agency on the proposed changes.

Tasmania Fire Service Considerations

Some of the updates would allow for existing low density residential areas to be rezoned and subdivided further in future (infill development). Others would allow for expansion of existing settlement areas.

Future subdivision and building work within these growth areas will be subject to minimum development standards for bushfire protection.

Additionally, development on the edges of pre-existing urban areas may have some benefit of reducing the exposure of older building stock to bushfire attack.

Therefore, there are no issues that need to be raised from a TFS perspective in relation to the proposed Urban Growth Boundary updates.

State Emergency Service Considerations

The below addresses matters related to flood and coastal inundation hazards for the proposed amendments. The comments are provided in a tabulated response for each of the subject areas (see **Attachment 1**).

The SES comments are aligned with the *draft Tasmanian Planning Policies* and the STRLUS regional policy MRH 2.1 intent to avoid locating or intensifying incompatible use and development on land subject to flood and coastal inundation hazards.

The Tasmanian Strategic Flood Map (TSFM) 1% AEP with climate change combined riverine and overland flood hazard mapping, has been used as the flood data source to inform these comments. The mapping classifies the flood hazard into six (6) nationally recognised categories (H1 to H6) that are a function of the peak depth and peak velocity of the modelled flood waters. A description of each hazard category is contained in **Attachment 2**. This approach is consistent with the flood hazard data currently being used to inform the comprehensive review of the STRLUS.

Should you require any further information, please do not hesitate to contact our office.

Yours sincerely

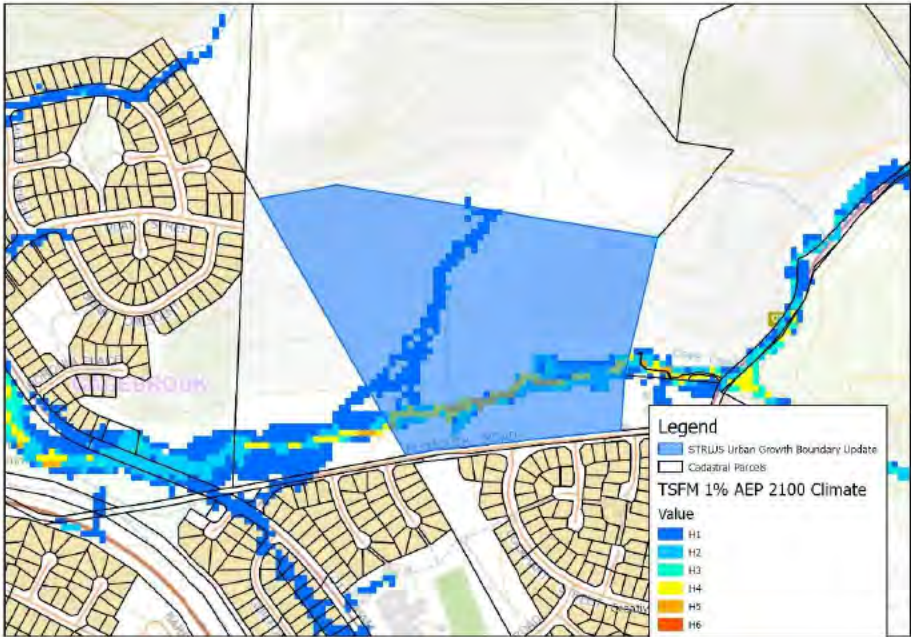
Matthew Lowe

ACTING FIRE AND EMERGENCY SERVICES COMMISSIONER

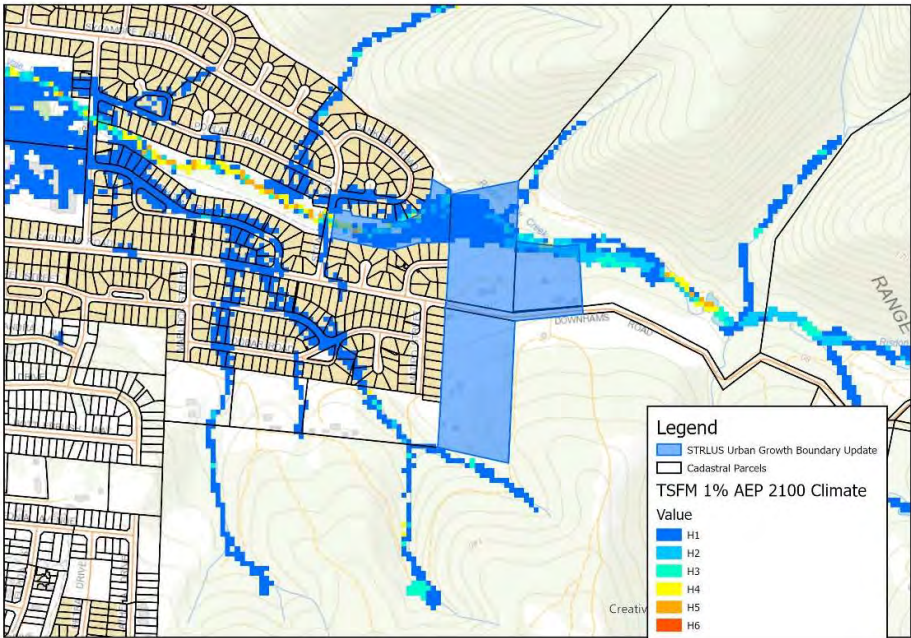
ATTACHMENT 1

Brighton

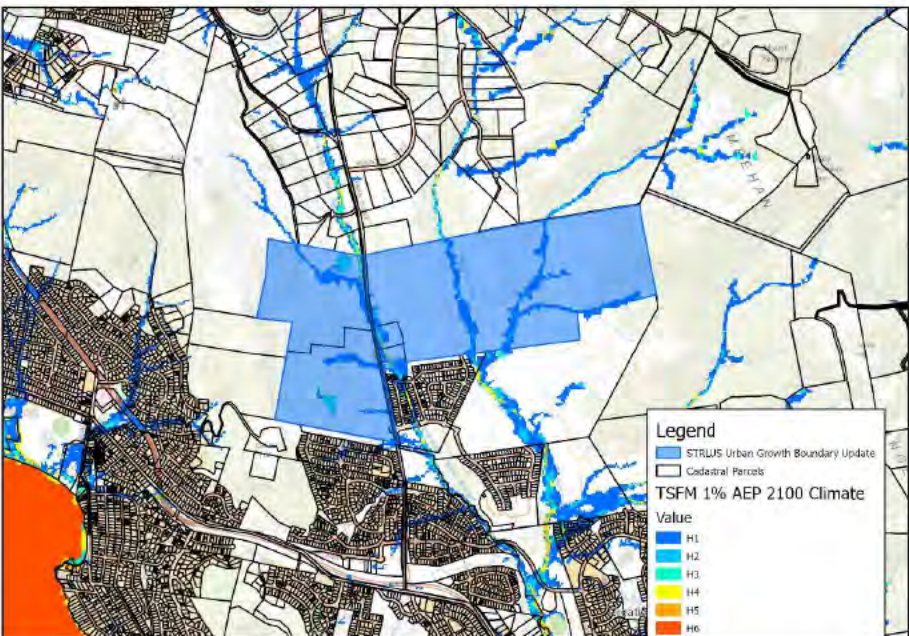
Area	Reference	SES comments
1	Cartwright Street, Brighton	<p>SES note some H1-H2 flood hazard exists in Area 1 (Brighton).</p> <p>The flood hazards in Area 1 could be managed through appropriate stormwater drainage design, appropriate building location and flood free access/egress to the site.</p> <p>A flood report may be required at the sub-division stage to inform where to locate buildings, stormwater and road drainage to avoid blocking overland flows.</p>
2	Brighton Road, Brighton.	<p>SES note some H1-H2 flood hazard exists in Area 2 (Brighton).</p> <p>The flood hazards in Area 2 could be managed through appropriate stormwater drainage design, appropriate building location and flood free access/egress to the site.</p> <p>A flood report may be required at the sub-division stage to inform where to locate buildings, stormwater and road drainage to avoid blocking overland flows.</p>

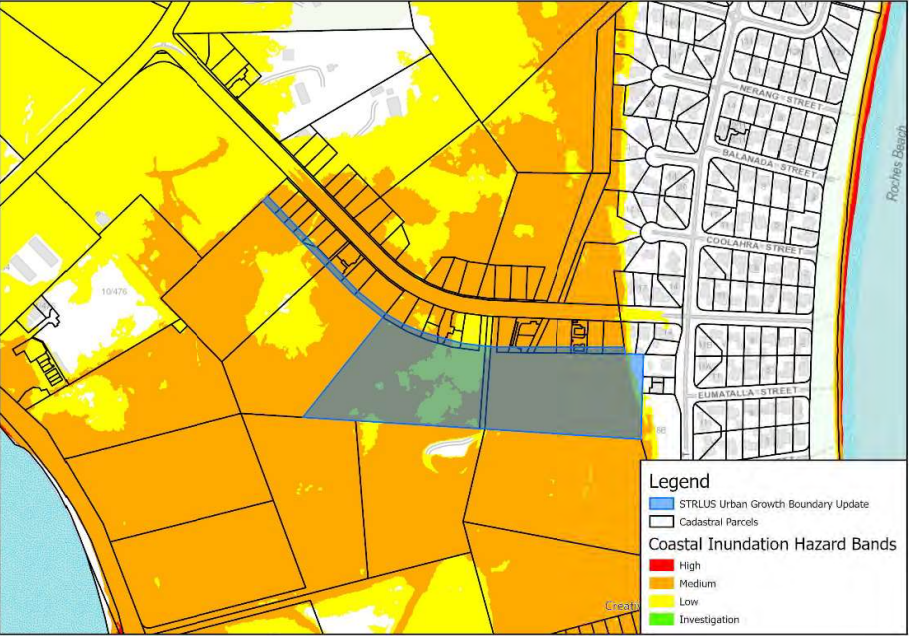
3	Plymouth Road, Gagebrook	<p>SES note that a complex H1-H5 flood hazard exists in Area 3 (Brighton). Cove Creek crosses the entirety of Area 3 from east to west, including the road access/egress. A tributary of Cove Creek crosses Area 3 from the north to south-west corner.</p> <p>SES note that there is an existing flood risk in the adjacent developed Gagebrook locality where flood free access/egress from Deak Street, Tottenham Road and Laurence Place can be compromised in certain flood events. Further intensification of development in Area 3 would compound this issue.</p> <p>There is some flood free land in Area 3, that would be suitable for development if flood free access/egress could be achieved and if the flood-prone portion of the parcels could be excised and retained as public open space or a use compatible with the flood risk.</p> <p>SES recommends that further detailed flood analysis is undertaken before a decision on including this area in the UGB is made..</p>	
4	Baskerville Road, Old Beach.	<p>There are no flood hazards in Area 4 (Brighton) that constrain it from being included in the proposed amendment.</p>	

Clarence

Area	Reference	SES comments	Maps
1	Downhams Road, Risdon Vale	<p>SES note the consultation paper shows four parcels of land are included in proposed Area 1 (Clarence) – three parcels to the north of Downhams Road, and one to the south of Downhams Road.</p> <p>All three of the parcels to the north of Downhams Road have H1-H5 flood hazards present from Risdon Vale Creek. One parcel with Property ID 2815553, appears to be in Council ownership. SES does not recommend the inclusion of Property ID 2815553 in proposed Area 1 due to its flood constraints.</p> <p>The southern portion of the remaining two parcels north of Downhams Road appear to be flood free. If the northern portions of these parcels that are flood-prone could be excised from Area 1 and retained as public open space or a use compatible with the flood risk, then the southern</p>	 <p>The map displays the proposed urban growth boundary for Area 1 (Clarence) in blue. It shows the location of Downhams Road and Risdon Vale Creek. The map is overlaid with flood hazard zones (H1-H6) from a TFSM 1% AEP 2100 Climate analysis. The legend indicates that the blue area represents the STRLUS Urban Growth Boundary Update, and the yellow/orange areas represent flood hazards. The map also shows cadastral parcels and the location of the 'Creative' precinct.</p>

		<p>flood free portions could be retained for intensification of use and development in Area 1.</p> <p>There are no flood constraints to the parcel south of Downhams Road at 21 Matipo Street, assuming that there are no flood isolation issues posed by flooded access/egress along Gardenia Road.</p> <p>SES recommends that further detailed flood analysis is undertaken before a decision on including this area in the UGB is made.</p>	
2	Sugarloaf Road, Risdon Vale	There are no flood hazards in Area 2 (Clarence) that constrain it from being included in the proposed amendment.	
3	Pass Road (North), Rokeby	<p>SES note some H1-H2 flood hazard exists in the proposed Area 3 (Clarence).</p> <p>The flood hazards in Area 3 could be managed through appropriate stormwater drainage design, appropriate building location and flood free access/egress to the site.</p> <p>A flood report may be required at the sub-division stage to inform where to locate buildings, stormwater and road drainage to avoid blocking overland flows.</p>	

4	Pass Road, (South), Rokeby	<p>SES note that there are H1 – H5 flood hazards across proposed Area 4 (Clarence) that are complex and require further analysis, including flood hazards from Clarence Plains Rivulet and Stokell Creek.</p> <p>Intensifying use and development in this large area and increasing impervious surfaces to a location already under flood hazard pressure would need to be further studied and understood prior to rezoning or subdivision.</p> <p>SES recommends that further detailed flood analysis is undertaken before a decision on including this area in the UGB is made.</p>	
5	Acton Road and South Arm Road, Acton Park and Lauderdale	<p>There are no flood hazards in Area 5 (Clarence) that constrain it from being included in the proposed amendment.</p>	

6	Mannata Street, Lauderdale	<p>There are two parcels included in Area 6 (Clarence) including 46 Mannata Street and 34 Mannata Street.</p> <p>Both parcels have a medium coastal inundation hazard constraining the land that may make them unsuitable for inclusion in the proposed amendment.</p> <p>34 Mannata Street has H1-H4 flood hazard across almost the entire parcel.</p> <p>SES does not support 34 Mannata Street for inclusion in the proposed amendment due to the combined coastal inundation and flood hazards.</p> <p>Parts of 46 Mannata Street might be suitable for inclusion in the proposed amendment, however, further investigation into coastal inundation hazard and flood hazard would be required to demonstrate that no increased risk of flooding or inundation to neighbouring land is posed by intensification of the use and development of the land and that flood free access/egress could be achieved.</p>	 <p>Legend</p> <ul style="list-style-type: none"> STRLUS Urban Growth Boundary Update Cadastral Parcels Coastal Inundation Hazard Bands <ul style="list-style-type: none"> High Medium Low Investigation
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		SES recommends that further detailed flood and coastal inundation analysis is undertaken before a decision on including this area in the UGB is made.	
7	Richardsons Road, Sandford	<p>There are H1 – H5 flood hazards along the western boundary and to the south of Area 7 (Clarence). There are medium-low coastal inundation hazards for a large portion of the western part of Area 7.</p> <p>If the flood hazard and coastal inundation hazard portion of the parcels could be excised from Area 7 and retained as public open space or a use compatible with the flood risk, then parts of Area 7 might be suitable for inclusion in the proposed amendment, however, further investigation into coastal inundation hazard and flood hazard would be required to demonstrate that no increased risk of flooding or coastal inundation to neighbouring land is posed by intensification of the use and development of the land and that flood free access/egress could be achieved.</p>	<p>The map displays the coastal area around Area 7, highlighting flood and coastal inundation hazards. The legend identifies the following elements:</p> <ul style="list-style-type: none"> STRLUS Urban Growth Boundary Update: Represented by a blue shaded area. Cadastral Parcels: Represented by black lines. Coastal Inundation Hazard Bands: <ul style="list-style-type: none"> High: Red shaded area. Medium: Orange shaded area. Low: Yellow shaded area. Investigation: Green shaded area. <p>Geographical labels on the map include Ralphs Bay, Maydona Bay, Mays Road, Richardson Road, Sandford Road, and Clarence.</p>

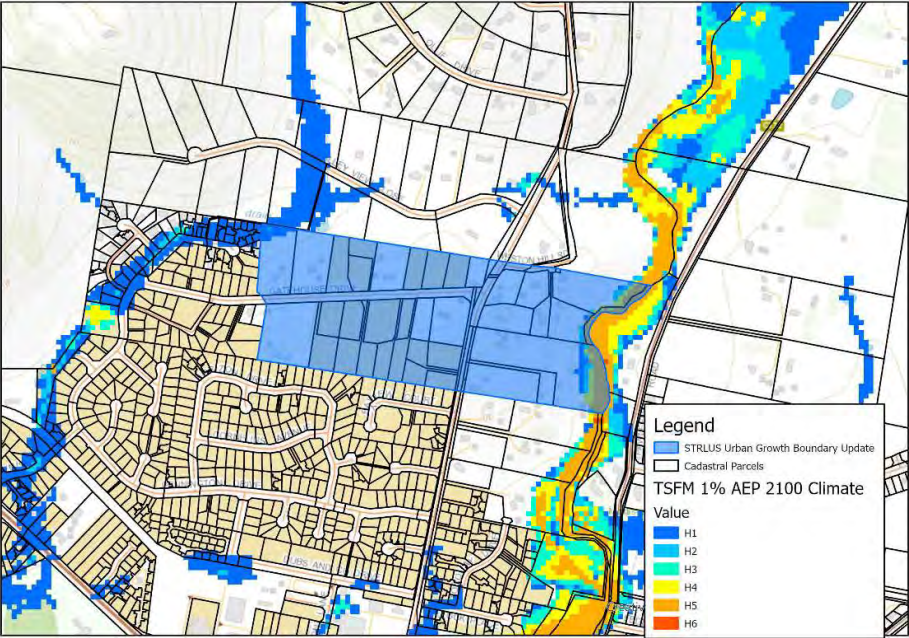
		SES recommends that further detailed flood and coastal inundation analysis is undertaken before a decision on including this area in the UGB is made..	
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Kingborough

Area	Reference	SES comments
1	Channel Highway, Margate	There are no flood hazards in Area 1 (Kingborough) that constrain it from being included in the proposed amendment.

Sorell

Area	Reference	SES comments Maps
1	Tasman Highway, Sorell	<p>SES note some H1 flood hazard exists in the proposed Area 1 (Sorell).</p> <p>The flood hazards in Area 1 could be managed through appropriate stormwater drainage design, appropriate building location and flood free access/egress to the site.</p> <p>A flood report may be required at the sub-division stage to inform where to locate buildings, stormwater and road drainage to avoid blocking overland flows.</p>

2	Gatehouse Drive and Weston Hill Road, Sorell	<p>SES note some H1-H2 flood hazard exists in the proposed Area 2 (Sorell) in the northern most corner at 19 Gatehouse Drive.</p> <p>The flood hazards in Area 2 at 19 Gatehouse Drive could be managed through appropriate stormwater drainage design, appropriate building location and flood free access/egress to the site.</p> <p>A flood report may be required to inform where to locate buildings, stormwater and road drainage to avoid blocking overland flows.</p> <p>There are H1 – H5 flood hazards from Sorell Rivulet across the eastern boundary of Area 2 at 73 Weston Hill Road, 71A Weston Hill Road, and 59 Weston Hill Road. If the portions of these parcels that are flood-prone could be excised from Area 2 and retained as public open space or a use compatible with the flood risk, then the flood free portions could be retained for intensification of use and development in Area 2.</p> <p>There are no flood hazards in the remainder of the parcels in Area 2 that constrain them from being included in the proposed amendment.</p>	
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		SES recommends that further detailed flood analysis is undertaken before a decision on including this area in the UGB is made.	
3	Arthur Highway, Sorell	<p>SES note some H1 flood hazard exists in the proposed Area 3 (Sorell).</p> <p>The flood hazards in Area 3 could be managed through appropriate stormwater drainage design, appropriate building location and flood free access/egress to the site.</p> <p>A flood report may be required at the sub-division stage to inform where to locate buildings, stormwater and road drainage to avoid blocking overland flows.</p>	

Attachment 2: Flood Hazard Categories

The General flood hazard vulnerability curves provided below, are a useful tool for carrying out a preliminary assessment of risks as part of a strategic land use planning process. The Australian Rainfall and Run Off Guidelines (V4.2) – Book 6 Flood Hydraulics – chapter 7 Safety Design Criteria provide more detailed and nuanced information about the use of flood hazard categories.

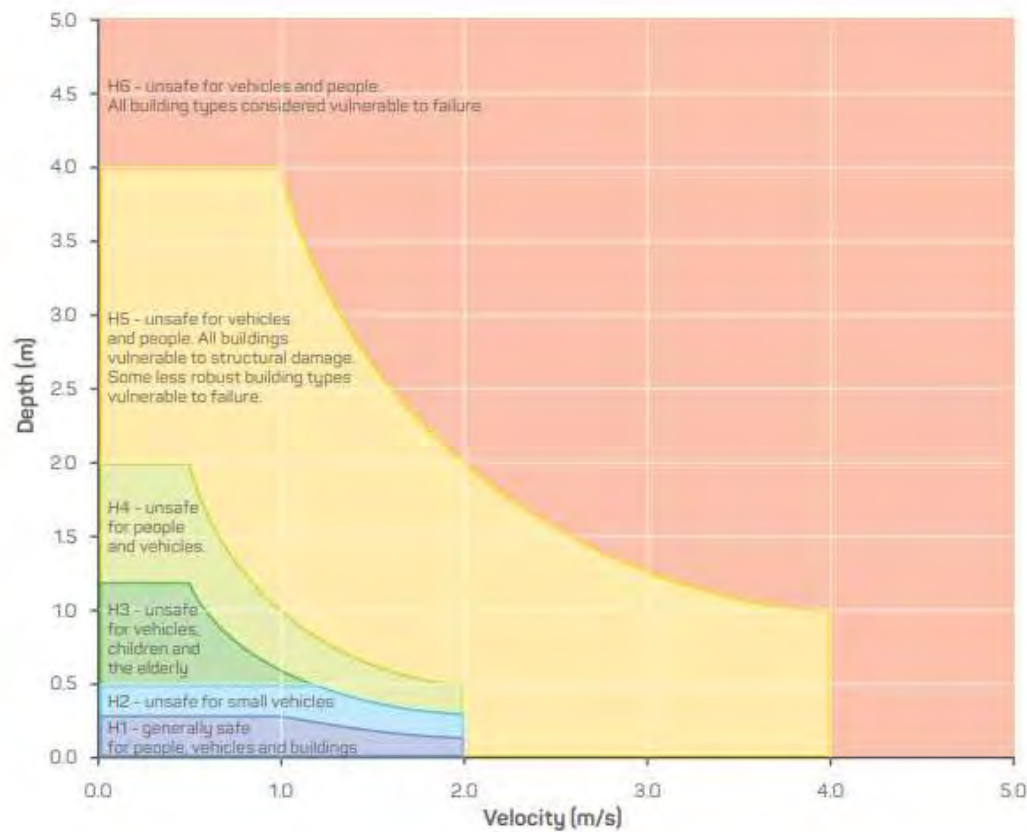


Figure 1: General flood hazard vulnerability curves (source Australian Institute for Disaster Resilience Handbook Collection (2017) - Guideline 7-3 - Flood Hazards)

Table 1: Combined hazard curves – vulnerability thresholds

Hazard Vulnerability Classification	Description
H1	Generally safe for vehicles, people and buildings.
H2	Unsafe for small vehicles.
H3	Unsafe for vehicles, children and the elderly.
H4	Unsafe for vehicles and people.
H5	Unsafe for vehicles and people. All building types vulnerable to structural damage. Some less robust building types vulnerable to failure.
H6	Unsafe for vehicles and people. All building types considered vulnerable to failure.

Figure 2: Combined hazard curves - vulnerability thresholds (source Australian Institute for Disaster Resilience Handbook Collection (2017) - Guideline 7-3 - Flood Hazards)

Department of Health

GPO Box 125, HOBART TAS 7001, Australia
Web: www.health.tas.gov.au



Contact: Andrew Hargrave, Deputy Secretary Infrastructure
Phone:
E-mail:
File: SEC25/194

Mr Sean McPhail
Acting Director
State Planning Office
haveyoursay@stateplanning.tas.gov.au

Dear Mr McPhail

**Subject: Southern Tasmanian Regional Land Use Strategy 2010 - 2035
Consultation on proposed Changes to Urban Growth Boundary (Map 10)**

Thank you for the opportunity to review and provide a submission on the Southern Tasmanian Regional Land Use Strategy 2010 - 2035 (STRLUS) Urban Growth Boundary Update Consultation Paper which outlines one potential scenario for the future extent of urban development across greater Hobart.

The Department of Health (the Department) owns and manages significant health infrastructure assets in the southern region which enables the delivery of high-quality, safe and sustainable health services for all Tasmanians. It is actively engaged in positive reforms to provide care and services for patients and clients in the best possible way through an integrated system that is people-focused and supports individuals and communities to be active in their own health and wellbeing management.

Health planning for the delivery of infrastructure and services is based on detailed demographic and clinical needs analysis, including at the local area level. It is critical that future residential development is planned in locations where there are existing or planned health services, and/or which have good access to public transport services. The lack of a coordinated approach has the potential to affect ease of access to health services and overall health outcomes.

The Department provides the following specific comments on the discussion paper.

Settlement patterns and health services

Tasmania has a small and dispersed population which creates challenges for the delivery of health services and particularly to the portion of the population with higher needs, particularly for those who reside at the periphery of, or in isolated, settlements.

Tasmania's rural councils often support small populations over wide geographic catchments, which can make the sustainability of health program development and service delivery challenging.

As in other rural parts of Australia, Tasmanians can experience higher levels of disadvantage, including lower levels of education, and a lower life expectancy, when compared to urban areas. For example, Tasmania has more people with disabilities in the working age range, smokers, and people with chronic health issues such as obesity, diabetes, mental illness, and heart and lung disease.

Tasmania's population is ageing. Older age cohorts, particularly those over 85 years are the fastest growing segment of the Tasmanian population. This cohort has nearly four times as many consultations with GPs per year than the average number of consultations across all age groups. It is also more reliant on public and private transport services.

The Department supports an approach to the allocation of land for housing that prioritises the consolidation of settlements where health service delivery is greatest rather than reinforcing a dispersed population. The Department's [*Long-Term Plan for Healthcare in Tasmania 2040*](#) reinforces the importance of delivering the right care, in the right place, at the right time. This includes the optimisation and leveraging of existing services within rural communities to safely and appropriately meet the needs of local populations.

Ideally, Tasmanians with health issues, or within a cohort at risk of developing health issues, should have the opportunity to live within or easily access established urban centres, with good access to a wide range of health services and high frequency, affordable public transport.

Planning for older age cohorts highlights the importance of well-located housing

- Well-located housing, supported by safe walking infrastructure, can prolong independent living and delay progression to nursing home type care.
- Older cohorts should be provided with a range of living opportunities, including residential aged care, within easy walking distance of community health centres or hospital services, GP clinics or high frequency public transport services.
- Consolidation within existing metropolitan areas and smaller towns
 - enables the efficient delivery of home care packages and services, which is a growing model of care, and
 - reduces isolation for older and disadvantaged individuals and households.

Preferred approach to extending the Urban Growth Boundary

- Meaningful engagement with social infrastructure and service providers to consider the strategic direction and needs of their clients:
 - The provision of accurate and accessible information to departments responsible for the delivery of infrastructure and services relating to residential supply and demand will support more informed engagement on this issue. It is also unclear if the proposed land supply includes land that might be allocated for opportunities to infill.

- It is proposed that prior to finalising the metro and town UGBs, further engagement with entities and agencies responsible for delivering social infrastructure and services is undertaken so that the implications of projected growth can be weighed up against, longer term development programs, masterplans and infrastructure pipelines.
- Enable opportunities to better understand what type of housing people want.
 - It is expected that the majority of the cohorts referred to in this submission; a large percentage of the Tasmanian population, will want to live in accessible and convenient locations with good health services, schools, high-quality open spaces and recreational activities.
- Careful analysis of the cumulative impact of all preferred expansion boundaries.
 - Planning does not often consider the cumulative impact of small developments on surrounding services. A single development may not have a significant impact, but when developments are considered cumulatively, the impact on services and facilities can be an issue.

While the Department is supportive of the rectification of anomalies, errors and moderate but logical extensions to the UGB, the proposed changes are more substantial. We recommend that each of the proposed expansion areas is reviewed in the context of available health services, public transport and other social services, as well as other service and infrastructure requirements.

We would also encourage further consideration as to how the proposed expansion will affect the delivery of infill and higher density housing within existing suburbs.

A more detailed discussion of the proposed changes between relevant departments and infrastructure and service providers, may be useful to fully understand the implications of the proposed changes to the Urban Growth Boundary.

The Department looks forward to this further discussion. Please contact the Deputy Secretary Infrastructure's office on _____ or via email at _____ to organise meeting arrangements.

Yours sincerely

Sally Badcock
Associate Secretary

18 March 2025



An Australian Government Initiative



Regional
Development
Australia

TASMANIA

Southern Tasmania Regional Land Use Strategy Urban Growth Boundary Proposed Update

SUBMISSION

March 2023

Introduction

Regional Development Australia Tasmania (RDA Tasmania) welcomes the opportunity to provide this submission to the State Planning Office.

The Regional Development Australia program is an Australian Government initiative established to encourage partnership between all levels of government to enhance the growth and development of Australia's regional communities. RDA committees operate under the national RDA Charter and report to the Australian Government on key outcomes. A national network of RDA committees cover the nation and RDA Tasmania represents the entire state of Tasmania.

Planning and Regional Development

RDA Tasmania has been involved in the Southern Tasmanian Land Use Strategy (STRLUS) project as part of our support for the Southern Tasmanian Councils Authority, and from the interconnection of planning and economic development.

As a region, southern Tasmania is characterised by the State's largest urban centre and capital of Greater Hobart, surrounded by peri-urban, and rural and remote communities. While Hobart is the key population and employment centre, the southern region is large and contains 12 of the State's 29 councils with a wide diversity of size and capacity.

Planning is a cornerstone of economic development, and well-planned cities are a key economic driver for a region. Effective settlement and density planning supports liveability and productivity, while ensuring efficient access to and utilisation of service infrastructure.

Infrastructure Victoria, the independent infrastructure advisor to the Victorian government states¹:

Our research finds that more compact cities are better overall for Victorians and our economy. By living closer together, people can have better a quality of life, higher incomes and a more sustainable environment.

It is more expensive to provide infrastructure for a dispersed city where people live further away from the city centre. There is also a cost to our environment and quality of life.

National Urban Policy, November 2024²:

Increases to productivity can also be driven by planning and zoning decisions that support business entry and competition, improve the feasibility of increased density and support mixed-use developments and industrial agglomeration.

*Principle 4 - **Deliver high-quality places with appropriate density**: Develop high-quality and functional urban places with appropriate density that enables easy access to services and transport infrastructure and promotes social cohesion.*

Southern Tasmania Regional Land Use Strategy (STRLUS)

Tasmania is currently undertaking the significant project of updating the three regional land use strategies. The Southern Tasmania Regional Land Use Strategy (STRLUS) is the long-term plan for managing growth and change in Southern Tasmania while protecting our liveability, access to services and natural environment. It brings together data such as population projections, industry growth, transport flows, flood and fire risk and service infrastructure provision to guide and support community and industry development.

The STRLUS is a collaboration between the State Government and the 12 southern councils with support from the Southern Tasmanian Councils Authority. The project, managed by the Steering Committee and Regional Planning Coordinator, has used proven planning methodology and data to review and update southern planning parameters, including the settlement boundaries across all twelve councils. RDA Tasmania has been very actively involved in supporting the process and the development of effective land use outcomes.

High demand for housing has a significant impact on liveability and growth, so increasing the supply of housing is important. However, we believe further clarity is required in how separating out Greater Hobart's Urban Growth Boundary planning from the STRLUS process will more effectively achieve improved and effective housing supply development. It interrupts the considered land use planning process that protects from future risk and unintended consequences that is already significantly progressed.

¹ [Infrastructure Victoria | Cities](#)

² <https://www.infrastructure.gov.au/sites/default/files/documents/national-urban-policy.pdf>

Proposed settlement boundaries in the STRLUS have been developed through established planning methodology applied consistently across the region. Introducing a separate methodology for urban boundaries at this late stage in the project seems contrary to common planning principles and could lead to poorly planned development. The extensive work done through the STRLUS to develop future planning of settlements with councils and communities is now in question.

The Local Government Authority of Tasmania (LGAT) held a Climate Change Forum on 12 March that included presentations from local and internationally renowned climate experts. This reinforced the vital role of government in managing infrastructure and community risk from climate events such as flood, fire and coastal hazards. All these risks are applicable to southern Tasmania and should be seriously considered when defining spatial zoning and settlement, to ensure investor confidence and mitigate future liability to government from housing development in areas of known risk.

Conclusion

RDA Tasmania commends the focus of the Tasmanian Government on planning reform and the revision of the regional land use strategies along with the push to increase housing development.

Certainty, predictability and consistency is a foundation for investment and regional development, and while the intent is to fast track the process and encourage housing development; we believe the impact of separating urban boundaries out from the STRLUS process may instead cause further delays, confusion and uncertainty.

The recent announcements of further support and resourcing of the Regional Land Use Strategies and the State Planning Office are welcomed, and RDA Tasmania looks forward to continuing to work with State and Local Government to make our region one with contemporary, consistent and evidence-based planning that generates confidence and attracts the right investment in the right place.

For further information and to expand on any issues, please contact:

James McKee

Chief Executive Officer

Regional Development Australia - Tasmania

By Email Only: haveyoursay@stateplanning.tas.gov.au

Good afternoon,

Re: STRLUS Urban Growth Boundary

Thank you for the opportunity to comment on the proposed amendment to the Southern Tasmania Regional Land Use Strategy (STRLUS) Urban Growth Boundary.

The Property Council is a strong supporter for balanced development outcomes, including infill development as well as opportunities to grow the urban form of our local government areas.

The Property Council believes the proposed amendment would contribute to balanced development outcomes and has the potential to encourage both greenfield and infill residential projects which will play a role in improving people's lifestyle, whilst creating healthy people, sustainable economies, sustainable environments and sustainable communities.

Outdated growth boundaries and land use strategies can have significant adverse implications for long-term housing affordability and housing choices placing upward pressure on house prices.

Outdated boundaries can also hinder smart population growth, particularly at a time when our state needs growth and economic stimulus.

We look forward to continuing to discuss the STRLUS with you.

Yours Sincerely,

Heather Mason
Property Council of Australia Tasmanian President

Rebecca Ellston
Property Council of Australia Tasmanian Executive Director

Department of Natural Resources and Environment Tasmania

OFFICE OF THE SECRETARY

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Inquiries: Richard Cuskelly

Phone:

Email:

Our ref U25-481/8



Mr Anthony Reid

Director

State Planning Office

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

Dear Mr Reid

Southern Tasmania Regional Land Use Strategy Urban Growth Boundary Update February 2025

Thank you for the opportunity to comment on the proposed amendments to the Urban Growth Boundary (UGB) of the Southern Tasmania Regional Land Use Strategy (STRLUS). In accordance with section 5A of the *Land Use Planning and Approvals Act 1993* (LUPAA) and in our capacity as a relevant State Agency, the Department of Natural Resources and Environment (NRE Tas) has the following comments to make.

NRE Tas supports the intention of the UGB update in providing for settlement growth in Hobart. It is also acknowledged that capacity to rezone land within the areas identified will be subject to all other requirements being met for a planning scheme amendment, including all other STRLUS policies, State Policies and other requirements of the LUPAA.

Detailed advice is provided in Attachment 1. The attached advice contains sensitive information about cultural values, and NRE Tas requests that it is not published.

NRE Tas will continue to work with the State Planning Office and relevant planning authorities where proposed rezoning has the potential to impact on natural and cultural heritage values.

Should the State Planning Office have any questions in relation to this matter, please contact Mr Richard Cuskelly, Project and Policy Officer. Mr Cuskelly can be reached via phone at or via email at

Yours sincerely

Jason Jacobi
SECRETARY

19 March 2025

Attachment

1. STRLUS Urban Growth Boundary - Consultation Paper - NRE Tas Feedback



30 Burnett St
North Hobart TAS 7000
PO Box 346 North Hobart TAS 7002
03 6230 4600

21 March 2025

Tasmanian Government
State Planning Office
Department of Premier and Cabinet
Submitted via email
yoursay.planning@dpac.tas.gov.au

HIA Submission in response to Southern Tasmania Regional Land Use Strategy - Urban Growth Boundary proposed update

Thank you for the opportunity to provide comment in response to the Southern Tasmania Regional Land Use Strategy (STRLUS) - Urban Growth Boundary Update.

HIA welcomes consultation with the residential construction industry on these important planning matters. HIA recognise Tasmania's suite of Regional Land Use Strategies (RLUS) are an integral component of Tasmania's Resource Management and Planning System / Tasmanian Planning Policies to guide land use and development in the long term. We value being able to contribute to proposed amendments and updates.

About the Housing Industry Association (HIA)

The HIA is Australia's only national industry association representing the interests of the residential building industry, including new home builders, renovators, trade contractors, land developers, related building professionals, and suppliers and manufacturers of building products.

As the voice of the residential building industry, HIA represents a membership of 60,000 across Australia. HIA members are involved in land development, detached home building, home renovations, low & medium-density housing, high-rise apartment buildings and building product manufacturing.

HIA members are comprised of a mix of residential builders, including the Housing 100 volume builders, small to medium builders and renovators, residential developers, trade contractors, major building product manufacturers and suppliers and consultants to the industry. HIA members construct over 85 per cent of the nation's new building stock.

HIA comment and feedback re the STRLUS Urban Growth Boundary Update, Consultation Paper February 2025

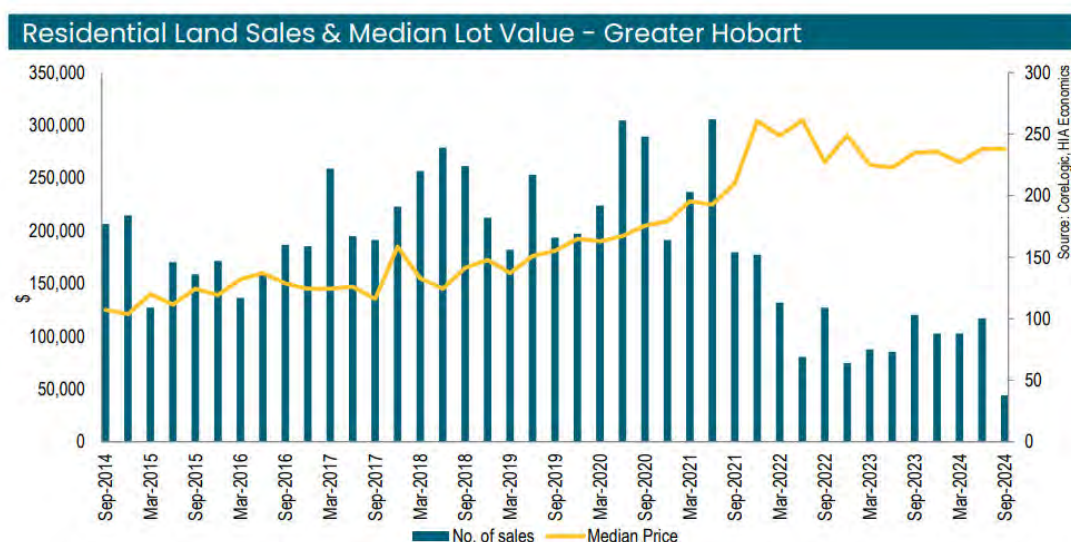
1. Support for UGB Expansion

Following review and consideration of the Consultation Paper we provide the following comment and feedback.

HIAs primary position is that strategic mechanisms other than UGBs should be used to manage urban land supplies. For example, metropolitan strategies that focus on structure, implementation and communication with communities so there is a clear expectation of the type of residential development that may be allowed in an area.

In instances where UGBs exist, HIA is of the view these must be transparent and subject to regular review processes that do not rely on legislative or Parliamentary consideration and involve consultation with the community and housing industry.

Accordingly, HIA supports the proposed expansion of the Urban Growth Boundary as a means to speed up the delivery of much needed land for housing in Tasmania. Greater supply also has the potential to put downward pressure on land prices assisting industry to deliver more affordable housing. Since June 2021 reduced sales/supply has contributed to higher land prices (see Table).



2. Encourage housing diversity

It is understood the UGB boundary is to be extended in the following 15 locations:

- Brighton – at 4 locations
- Clarence – at 7 locations
- Kingsborough – at 1 location
- Sorell – at 3 locations

Based on data in the Consultation Paper, 5.0 Approximate Maximum Dwelling Yield Summary, it is noted the following Average lot area and Average lots per hectare will be as follows:

Local Council	A) Average lot area	B) Average lots per hectare
Brighton	563m ²	17.76
Clarence	600m ²	16.66
Kingsborough	563m ²	17.76
Sorell	563m ²	17.76
This has been derived by: A) Dividing the Approximate total land area in square metres by the Approximate maximum dwelling yield, and B) Dividing 10,000m ² (1.0 hectare) by the Average lot area		

Table A.

As reported in the HIA-CoreLogic Residential Land Report, January 2025 (attached) between 2014-2024 Hobart has recorded an annual increase in the median size of lots sold, from 637m² to 666m² (Page 6). Notwithstanding the Average lot areas in Column A of Table A are below the 666m².

Given the housing crisis that is being experienced across the nation and the pressure that is being applied from the Federal government for all states and territories to meet their share of the National Housing Accord target of 1.2 million homes by 2029 - HIA questions if the Tasmanian government, , should be aiming to reduce the Average lot area and increase the Average lots per hectare in these extended UGB areas.

HIA asserts that there is merit in the Tasmanian government providing guidance for the future development of land in the 15 locations. HIA further considers that this should be expressed in a range of lot areas per location – for example:

- Brighton – 400m²-550m²
- Clarence – 450m²-600m²
- Kingsborough – 400m²-550m²
- Sorell – 400m²-550m²

Expressing preferred lot areas in this way will create opportunity for housing diversity. Government could extend the guidance to nominating certain lots that are suitable for a medium or higher density development.

3. Future planning and streamlined subdivision approval

It is noted that amending the UGB will not change the zoning of the affected land. For this to occur further strategic work undertaken by the respective local councils in accordance with the LUPPA will be required.

HIA considers now would be an opportune time to put processes in place to enable council when undertaking a rezoning to do so in a coordinated (between tiers of government) and streamlined manner.

Whilst it is understood the processes are different for amending the UGB and rezoning land, it is submitted the strategic objective and intent are similar, and it would therefore be prudent to ensure that regulatory processes are not duplicated or the rezoning process become protracted leading to delays in getting shovel ready land to market.

4. State planning reform in the context of the National Housing Accord

To meet its housing delivery targets in accordance with the National Housing Accord (NHA), Tasmania will be required to construct 26,117 well located homes over 5 years from mid-2024 (5,223 annually). To put this in context, the volume of housing delivered over the previous 5-year period (2019-2023) totalled 16,483 homes. This is 9,634 homes short of that required. Refer Graph 1.1 below.



Graph 1.1 – Tasmania's share of 1.2 million home over 5 years starting mid 2024 compared with previous years

For this target to be achieved, it is imperative that a range of planning reforms are implemented that facilitate development opportunities.

This can only be achieved with genuine planning reform, in accordance with that committed to by states and territory governments to support deliver of the 1.2 million homes target:

- undertaking expedited zoning, planning and land release to deliver on the housing target.
- working with Local Governments to deliver planning and land-use reforms that will make housing supply more responsive to demand over time ensuring achievement of targets for social and affordable housing are met.

The primary objective of planning reform must be to ensure development is facilitated and certainty is provided for industry. We recognise and acknowledge that the Tasmanian government has publicly committed to reducing red tape, streamlining approval systems and timeframes, and eliminating regulatory duplication with recent Ministerial announcements supporting this position. It is only by providing the proper settings and planning framework that land and housing supply targets will be met into the future.

HIA also encourages the state government to pursue existing policies around infill development that will complement the release of new greenfield land. A dual approach will deliver the best affordable housing supply outcomes for Tasmania.

Thank you for the opportunity to provide comment at this stage. HIA would appreciate being consulted as the life cycle of the Southern Tasmania Regional Land Use Strategy Urban Growth Boundary Update continues.

Please do not hesitate to contact us if you wish to discuss matters raised in this correspondence – Mike Hermon HIA Executive Director - Planning & Environment
or Stuart Collins /

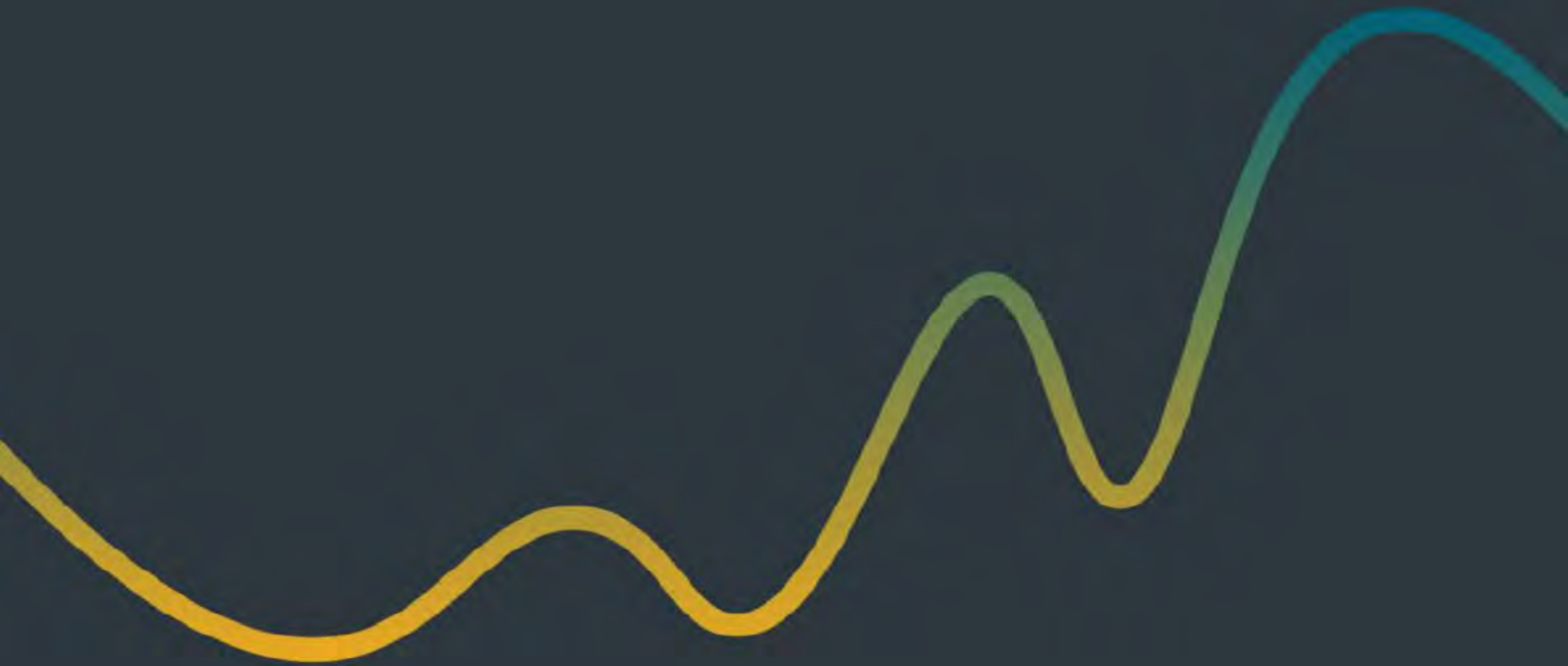
Yours sincerely
HOUSING INDUSTRY ASSOCIATION LIMITED

Stuart Collins
Executive Director
Tasmania

cc:
Ben Price



CoreLogic



HIA–CoreLogic

Residential Land Report

A quarterly update on the sale of residential land

January 2025

LAND PRICES GROWING FASTER THAN CPI

and construction costs

The high price tag of shovel-ready residential land continues to be an impediment to increasing housing supply.

The median price of residential land sold nationally in the September quarter 2024 was \$366,510, which is 7.6 per cent higher compared to the previous year. This is more than double the rise in all household goods and services in the economy as measured by the Consumer Price Index (CPI) and five times the increase seen in home building material costs, as measured by the Producer Price Index (PPI) over the same period.

The different land markets have decoupled from the synchronised national trend of recent years, amid anticipated changes to interest-rate settings. Shifting interstate and intercity migration patterns, employment opportunities and ongoing high demand for more affordable house and land packages are factors driving this divergence. In recent years, Queensland, South Australia and Western Australia's land markets have benefitted from residents moving out of New South Wales and Victoria, particularly those from Sydney and Melbourne.

Capital city land prices grew the fastest in Perth, Brisbane and Adelaide over the year to the September quarter 2024, with buyers becoming increasingly active in these new home markets. Perth recorded the sharpest increase in price on both a 'per-parcel' and a 'per-square-metre' basis. Brisbane came second on a 'per-parcel' basis, while Adelaide grew faster than Brisbane on a unit-price basis. This comes as Adelaide saw an increase in lot sales and a decrease in the median size of lots sold.

Lot sizes in Australia have continued to shrink compared to a decade ago, with smaller cuts of land becoming more commonly sold in the capital cities. Adelaide, in the 2000s, was the first to record a median land size below 500 square metres, which coincided with Adelaide being the most affordable capital city for house and land packages. It was also the first to record a median land size under the 400 square metre mark, back in the 2010s, well-ahead of the other capital cities.

While land size alone is not a sole indicator of buyer behaviour, the prevalence of smaller block sales does suggest that some buyers are turning towards more compact lots in order to afford land in the cities and regions that they want to live in. For instance, the median size of land sold in Melbourne shrank by 8.5 per cent over the year to the September quarter 2024, while the median price fell by 4.2 per cent over the same period.

Despite "Location, Location, Location" remaining a key driver of prices, the latest land sales data also revealed the continued popularity of some regions and cities such as Illawarra, Newcastle and Lake Macquarie, the Hunter Region and Geelong. Lot sales in these cities have increased as buyers seek more affordable land and homeownership opportunities outside of Sydney and Melbourne. Prices in these regional cities have grown rapidly in recent years but remain comparatively more affordable than buying land in the two largest capital cities.

The high cost of delivering new land and subsequent limited supply in Sydney have resulted in ongoing growth in prices, despite relatively weaker home building activity and affordability constraints. Those who can still afford land in Sydney are buying whatever stock is in the market, with land prices still going up despite sales continuing to decline. As a result, the median price of lots sold in Sydney in the most recent quarter was about double that of the other capital cities.

Moderating the rate of growth in land prices is important to addressing housing unaffordability. This requires bringing adequate shovel-ready land to market in order to meet growing demand. Planning to build the infrastructure required to support land supply is needed, especially in key growth areas across Australia. To do so will require improved accuracy of Government agencies' population forecasts, as well as a commitment at all levels of government to reduce the tax burden associated with new residential development and prioritise the delivery of infrastructure needed to unlock land. Failure to do so will mean land supply will continue to be the number one constraint to increasing Australia's housing stock.

Key findings:

- The **median price of residential land** sold nationally in the September quarter 2024 was \$366,510. This was 4.5 per cent higher compared to the previous quarter and 7.6 per cent higher compared to the same time in the previous year.
- The median price of land sold in the **capital cities** grew by 6.8 per cent compared to the previous quarter to \$408,160, 9.2 per cent higher compared to the same time in the previous year.

- The median price of land sold in the regions fell by 1.6 per cent over the quarter to \$281,910 but remained 2.0 per cent higher compared to the previous year.
- Strong annual growth in capital city land prices was driven by price increases across five of the six capital cities, led by Perth (+38.6 per cent) and Brisbane (+21.2 per cent).
- The other capital cities trailed behind, with Adelaide recording a 9.2 per cent growth in its median lot price compared to the previous year, followed by Sydney (+7.2 per cent) and Hobart (+1.3 per cent). Melbourne was the only capital city to record an annual decline, down by 4.2 per cent.
- The **median lot size** sold nationally in the September quarter 2024 was 472 square metres, up by 4.1 per cent compared to the previous quarter but relatively unchanged compared to the same time in the previous year. Compared to a decade ago, the median lot size has fallen by 5.8 per cent.
- The median lot size across the capital cities in the September quarter 2024 was 392 square metres, up by 4.3 per cent compared to the previous quarter and relatively in line compared to the previous year (-0.6 per cent). Capital city lot sizes have fallen by 9.5 per cent compared to a decade ago.
- The median lot size in the regions increased by 3.7 per cent compared to the previous quarter and by 1.8 per cent compared to the previous year to 635 square metres.
- The **median price per square metre** of residential land sold nationally was \$884, which was 1.7 per cent higher compared to the previous quarter and 9.3 per cent higher compared to the same time in the previous year.
- **There were 9,364 land sales** recorded in the September quarter 2024, down by 20.3 per cent compared to the previous quarter and down by 18.4 per cent compared to the same time in the previous year.
- This leaves land sales in the twelve-month period to September 2024 at 44,741, which is 7.1 per cent higher compared to the previous twelve months.

Residential Land Sales & Median Lot Value – Australia



Federal funding can play a role in addressing land supply

The timely delivery of infrastructure drives regional growth, employment and housing development opportunities. With an impending federal election, both sides of politics have proposed funding for various infrastructure upgrades, and more is likely to follow.

The Australian Labor Party (ALP) has committed to improve the National Broadband Network (NBN) with a \$3 billion equity injection, \$7.2 billion in new funding for upgrades to the Bruce Highway and \$1 billion to improving arterial road access to the upcoming Western Sydney Airport.

The Coalition, on the other hand, has committed \$5 billion to fund trunk infrastructure to unlock 500,000 new homes, 30 per cent of which is allocated for Regional Housing. They have also committed to match the ALP's \$7.2 billion for the Bruce Highway upgrades.

Funding these commitments through general government revenue is important and promises from both sides to use federal money to do so is certainly welcome. The reality is that, at a state and local level, funding for community infrastructure (for the benefit of the general public) is increasingly borne by buyers of new land through excessive development levies.

Since the early 1990s, various state governments have pursued a policy to eliminate debt and in doing so have effectively transferred the cost for the delivery of public infrastructure, particularly local, onto new home buyers. This has resulted in an artificial increase in the price of land and, subsequently, of a new dwelling.

A recent policy example is the NSW Government's policy shift to allow Sydney Water to reintroduce infrastructure contributions, first capped at 25 per cent of the full contribution in 2024/25, 50 per cent in 2025/26 and full contributions from 1 July 2026.

Economics 101 teaches us that when the cost of producing anything increases, we get fewer of it. When the cost of land rises through increasing taxes and levies, there becomes less of it, which exacerbates land and housing supply issues.

That is not to say that developers (and the final buyer of the land) should not have to pay for infrastructure to create new lots. There is a range of development-specific infrastructure that is rightly borne by developers and makes up the final price of the land for buyers who derives a 'private' benefit from this infrastructure.

However, HIA is of the long held view that where the beneficiaries of new infrastructure are the whole community, meaning 'public benefit', the cost of that benefit, should be equitably shared by funding through more holistic mechanisms including:

- Government direct funding,
- Government borrowings,
- Tax-effective infrastructure bonds (including those raised by public subscription),
- Public private partnerships that demonstrate clear public interest,
- General rate levies across the whole community, or
- User-pay charges.

Infrastructure provision via up-front funding by new home buyers needs to have a minimal impact on the affordability of new housing. The funding of infrastructure should be calculated over the full life of the asset and recognise the true beneficiaries over the life of that infrastructure.

While local and state governments are the primary drivers of land and housing supply, including infrastructure funding and delivery, that is not to say that there is no role for the Australian Government. Enabling infrastructure needs to be funded in a timely and equitable way, and federal commitments to help with these currently exist, including the \$1.5 billion Housing Support Program (HSP), \$500 million of which is allocated to states and local governments over 2023/24 and 2024/25. This was designed to fund trunk infrastructure such as water, power, sewerage and roads.

The Australian Government should be open to discussions around increasing this funding commitment in order to help state and local governments fulfill their duty of providing community infrastructure that benefits all Australians. This will be key to addressing one of the biggest impediments to achieving the Australian Government's target to build 1.2 million homes over the next five years.

Capital City Land Markets

The chart below shows the median price of residential land across the capital cities in the September quarter 2024 and compares them to median prices recorded in the same period a decade ago.

The median price of lots sold across the six capital cities in the third quarter of 2024 was \$408,160. This is 6.8 per cent higher compared to the previous quarter and 9.2 per cent higher compared to the same time in the previous year. When compared to the same period a decade ago, capital city land prices have increased by 73.1 per cent.

Hobart saw the **strongest decade growth** in its median land sale price, up by 122.0 per cent to \$277,500. Much of the growth in this capital city came later in the decade as shifts in population, particularly during the pandemic, saw strong demand for housing and land. The reversal of this pandemic trend has resulted in relatively slower annual price growth, up by just 1.3 per cent compared to the previous year.

Perth recorded the **strongest annual growth** in its median land price, up by 38.6 per cent compared to the same time in the previous year to \$352,000. Compared to a decade ago, the median land price in Perth has increased by 40.8 per cent. Elevated interstate migration into Perth and regional Western Australia in the last four years and the return of above-average overseas migrants have resulted in strong demand for new housing stock in Western Australia. Despite the strong pace of growth in the last twelve months, land in Perth remains relatively more affordable than Sydney, Melbourne and Brisbane.

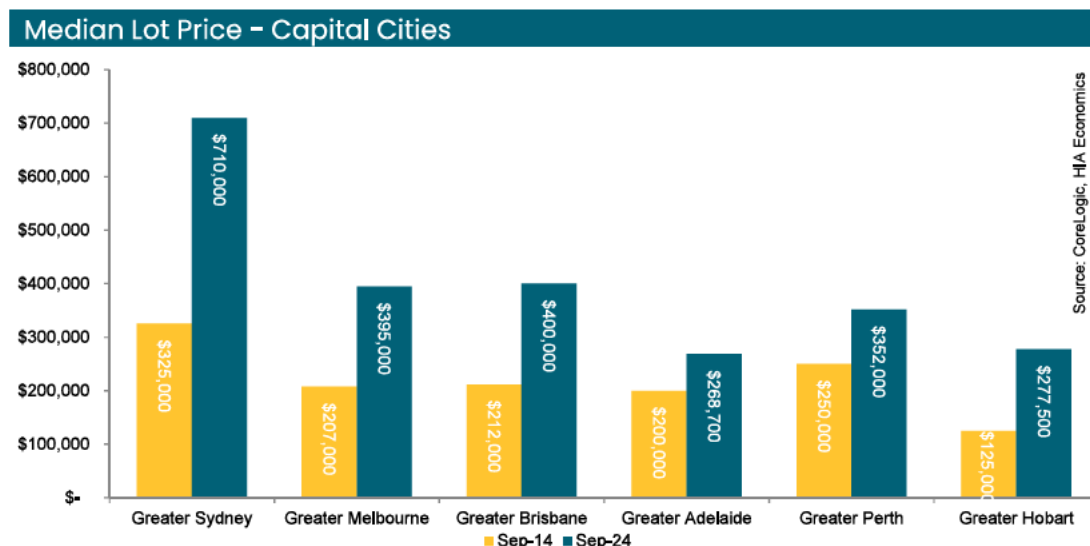
Sydney remains the **most expensive capital city market** for land in Australia, with a median sale price of \$710,000 in the September quarter 2024. Land prices in Sydney rose by 7.2 per cent compared to the same time in the previous year and has more than doubled (+118.5 per cent) compared to a decade prior.

Brisbane saw the **second strongest annual growth** median land prices among the capitals, up by 21.2 per cent compared to the previous year to \$400,000. This placed Brisbane as the second most expensive capital city land market, overtaking Melbourne. Similar to Perth, growing demand for housing from interstate migrants has seen land prices pick up.

Adelaide's median land price of \$268,700 was relatively unchanged compared to the June quarter (-0.5 per cent) but shifted 9.2 per cent higher compared to the same period in the previous year. Adelaide shares a similar trend to Brisbane and Perth's housing markets, with ongoing established house price growth and early indicators of rising home building activity pointing towards strong demand for land. The median lot price in Adelaide has risen by 34.4 per cent compared to ten years ago, the weakest decade growth across the capital cities.

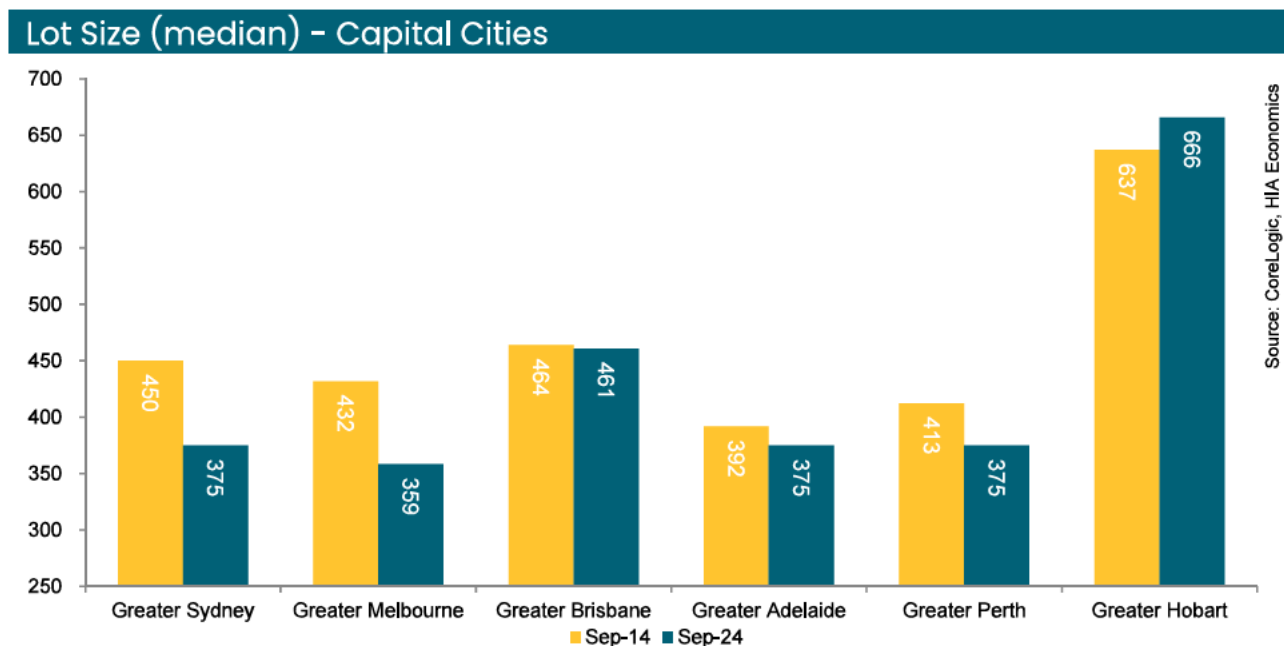
Adelaide's weaker price growth (relative to Brisbane and Perth) could be attributed to a rising number of **smaller lot sales**. There were 1,470 lots sold in the September quarter 2024, which is 32.6 per cent higher compared to the same time in the previous year. Over the same period, Adelaide's median land size shrunk from 385 square meters to 375 square meters. In contrast, sales in Perth fell by 62.3 per cent and in Brisbane by 37.0 per cent over the same period.

Melbourne was the only capital city market to record an **annual decline** in its median land price, down by 4.2 per cent, to \$395,000. This is in part due to the smaller cuts of land sold in Melbourne this quarter compared to the previous year, as well as a lower (-2.6 per cent) price per square metre. Land sales in Melbourne increased by 2.0 per cent compared to the previous year, joining Adelaide as one of only two capital cities to record an annual increase in land sales.



Median Lot Size:

The chart below shows the median size of residential land sold in the September quarter 2024 across the capital cities and compares them to the median recorded in the same quarter a decade ago.



Australia's population growth over the last decade has been concentrated in its capital cities, supporting strong demand for house and land packages. With land supply in the capitals failing to keep up with growing demand, it has become evident that buyers are increasingly turning to smaller cuts of land. The median size of lots sold across the capital cities has fallen by 9.5 per cent compared to a decade ago, from 433 to 392 square metres.

This is especially evident in the two largest capital cities, where the median lot size sold has shrunk by 17.0 per cent in Melbourne and 16.7 per cent in Sydney over the past decade. These cumulative declines saw Melbourne record the smallest median lot size across the capitals, at 359 square metres in the September quarter 2024, 8.5 per cent smaller compared to the September quarter 2023.

Sydney, Adelaide and Perth all had median lot sizes of 375 square in the September quarter 2024. When compared to the same time in the previous year, lot sizes in Sydney (+0.3 per cent) and Perth (0.0 per cent) remained relatively unchanged, while Adelaide recorded a 2.6 per cent decline over the same period. Compared to a decade ago, the median lot size in Perth has shrunk by 9.1 per cent and in Adelaide by 4.3 per cent. In the early 2010s, Adelaide was the only capital city to record a median lot size under 400 square metres, which helps explain the relatively modest declines seen over the last decade.

The remaining two capital cities of Brisbane and Hobart were the only ones to record an annual increase in the median size of lots sold. Brisbane recorded a 9.8 per cent increase in its median lot size over the year to 461 square metres, over 100 square metres larger than Melbourne's median. Hobart's median lot size is almost double that of the median size in Melbourne at 666 square metres, up 12.9 per cent over the year to September 2024.

Prices per square metre:

** Low sales volumes and differences in lot characteristics can create volatility in quarter-to-quarter price movements, which can be partly addressed by considering movements in per-square-metre (unit) prices.*

The weighted **median unit price** of lots sold across the capital cities in the September quarter 2024 was \$1,090, a new record high. This was 4.1 per cent higher compared to the previous quarter, to be 10.5 per cent higher than at the same time in the previous year.

The **largest quarterly and annual increase** in unit prices was recorded in Perth, where the median unit price of land broke the \$1,000-mark for the first time on record, coming in at \$1,090. This took the median unit price in Perth 21.9 per cent higher compared to the previous quarter, 44.4 per cent higher than at the same time in the previous year and 59.9 per cent above the level recorded 10 years ago. It also places Perth in third place (after Sydney and Melbourne) among the capitals in terms of prices per square metre. If Perth continues to grow at this pace, it could very well overtake Melbourne on this metric in the coming quarters.

Sydney continued to be at the top of the ranks in terms of prices from both a 'per-parcel' and a 'per-square-metre' basis, with a median unit price of \$2,011. This was the first time that Sydney had recorded a median unit price above the \$2,000-mark, making it almost twice as expensive as Melbourne and Perth. The median unit price in Sydney has risen by 4.1 per cent compared to the previous quarter, 9.3 per cent compared to the same time in the previous year and 162.7 per cent compared to a decade ago.

Melbourne followed Sydney by a distant margin to come in second, with a median unit price of \$1,071. This was 1.6 per cent lower compared to the previous quarter and 2.6 per cent lower compared to the previous year. Melbourne was joined by Hobart as one of two capital cities that recorded annual declines in prices per square metre. Despite the recent slowdown declines, Melbourne has seen the second fastest decade growth in prices per square metre, up by 118.1 per cent.

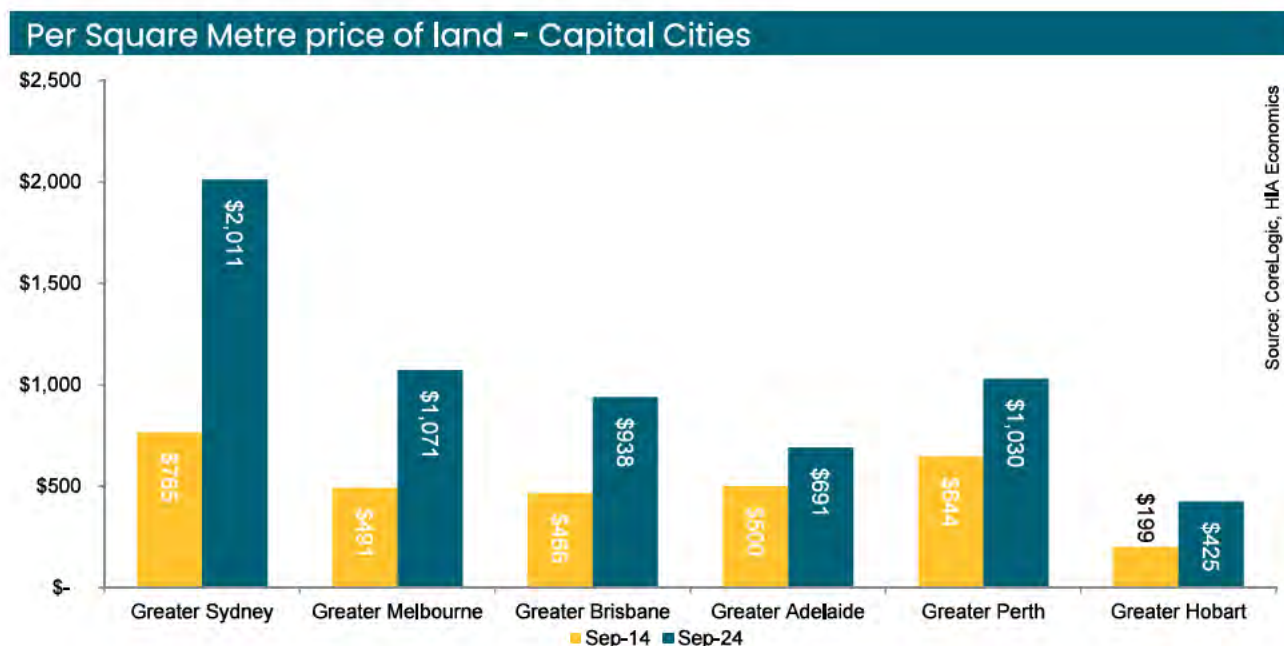
The median unit price of land sold in Hobart in the September quarter 2024 was \$425, down 13.5 per cent compared to the previous quarter, to be 6.6 per cent lower than in the previous year. Compared to a decade prior, unit prices have more than doubled (+113.3 per cent) in Hobart, the third fastest across all capital cities. This strong decade growth comes off a very low base, from just \$199 per square metre in the September quarter 2014. Hobart remains the most affordable capital city to purchase land on a per-square-metre basis but not on a per-parcel basis with Adelaide still holding the lowest median lot price across the six capital cities.

The median price per square metre in Adelaide rose by 18.9 per cent over the year to \$691 per square metre, roughly double the 9.2 per cent annual growth in the median price of land sales. The sale of relatively smaller lots compared to the previous year explains in part this disparity. Adelaide also recorded the weakest decade growth in price per square metre, up by just 38.1 per cent.

In Brisbane, the median price per square metre increased by 2.1 per cent compared to the previous quarter and 14.3 per cent compared to the previous year to \$938. Brisbane saw the opposite of Adelaide's unit price trend, with buyer demand appearing to have turned towards relatively larger cuts of land with a higher price tag.

Growth in Capital City land prices (per sqm)		
Rank	Region	% change - Year to Sep '24
1	Greater Perth	44.4%
2	Greater Adelaide	18.9%
3	Greater Brisbane	14.3%
4	Greater Sydney	9.3%
5	Greater Melbourne	-2.6%
6	Greater Hobart	-6.6%

Source: CoreLogic, HIA Economics



Regional Land Markets

Median Sale Price

The tables below rank the ten most expensive and the ten least expensive regional markets according to median residential lot prices in the September quarter 2024.

The median price of land in Australia's regions remains more affordable than in the capital cities, at just \$281,910 in the September quarter 2024. This is 1.6 per cent lower compared to the previous quarter but 2.0 per cent higher compared to the previous year.

Lower prices in some regional land markets compared to their respective capital cities make them better value for some buyers looking to get into the market. Newcastle and Lake Macquarie and Illawarra, for example, have a median land price approximately \$200,000 lower than in nearby Sydney. As new lots created and sold in Sydney move further out from the city centre, moving to the major regional centres of Newcastle and Wollongong has increasingly become more attractive. This trend is not unique to Sydney and regional New South Wales.

Some buyers of land in Melbourne and Brisbane are also likely considering purchasing land in Geelong and Ipswich as alternatives. Employment and economic opportunities, flexible working arrangements and the need to only commute to their Central Business Districts (CBDs) occasionally have enticed buyers into these regions, where they can get larger lots and similar amenities to the capital cities for a lower price tag. Geelong remains more affordable than Melbourne, with median lot prices around \$22,000 lower. The median lot price in Ipswich was also \$39,550 lower than in Brisbane, while Mandurah was \$94,000 lower than Perth.

Rank	Region	Median Lot Price (\$)
1	Gold Coast (QLD)	970,000
2	Richmond - Tweed (NSW)	655,000
2	Mornington Peninsula (VIC)	652,500
4	Sunshine Coast (QLD)	554,000
5	Central Coast (NSW)	517,250
6	Newcastle and Lake Macquarie (NSW)	505,250
7	Southern Highlands and Shoalhaven (NSW)	490,000
8	Illawarra (NSW)	485,000
9	Coffs Harbour - Grafton (NSW)	450,000
10	Logan - Beaudesert (QLD)	388,050

Source: CoreLogic, HIA Economics

Rank	Region	Median Lot Price (\$)
1	South Australia - Outback (SA)	110,000
2	Western Australia - Wheat Belt (WA)	142,500
3	Central Queensland (QLD)	155,000
4	North West (VIC)	158,750
5	Riverina (NSW)	170,000
6	Warramboul and South West (VIC)	181,500
7	New England and North West (NSW)	182,500
8	Barossa - Yorke - Mid North (SA)	185,000
9	Mackay - Isaac - Whitsunday (QLD)	195,000
10	South Australia - South East (SA)	196,250

Source: CoreLogic, HIA Economics

The number of lots sold in Geelong and the Illawarra have increased by more than 50 per cent in the September quarter 2024 compared to the previous year, indicating continued buyer interest in these large regional markets.

However, not all regional markets are more affordable than their respective capital cities. Compared to Brisbane, the median price of lots sold in the Sunshine Coast was 38.5 per cent higher, while the Gold Coast's median was more than twice as expensive.

The Gold Coast also took out the top spot as the **most expensive land market** in Australia in the September quarter 2024, well-ahead of Sydney (+\$260,000) at \$970,000. In the more than three decades since CoreLogic and HIA started tracking land prices, there have only been three instances where the median price in the Gold Coast was ahead of Sydney's, in the March and June quarters of 2022 and in the most recent quarter. Over the year, Gold Coast's median lot price rose by 52.8 per cent.

The second most expensive regional land market was Richmond - Tweed, bordering the Gold Coast, south of the New South Wales border. Median lot prices across these two markets have historically trended together, with Richmond - Tweed also recording a 20.2 per cent annual increase to \$655,000. Coming in closely behind in third place was the Mornington Peninsula in Victoria, with a median of \$652,500, 65.2 per cent more expensive compared to Melbourne.

The **most affordable regional markets** were more geographically spread, with Outback - South Australia taking the top spot with a median sale price of just \$110,000. This was followed by the Wheatbelt region in Western Australia (\$142,500) and Central Queensland (\$155,000). Three of the least expensive regional markets were in South Australia, while New South Wales, Victoria and Queensland each claimed two and Western Australia had one.

* The Central Coast in New South Wales and the Mornington Peninsula in Victoria are considered part of the Greater Capital City regions. For the purposes of this section of the Report, they are considered regional areas as they have different market characteristics to Sydney and Melbourne. They are however included in calculations for the Greater Capital City areas and not regional areas.

Median Lot Size

The median size of lots sold across the regions in the September quarter 2024 rose by 3.7 per cent compared to the June quarter to 635 square metres. Compared to the same time in the previous year, the median lot size grew by 1.8 per cent.

New South Wales and Queensland each took out three of the top ten regional areas with the **largest median lot sizes**. Number one on the list was the Far West and Orana region in New South Wales with a median lot size of 821 square metres. This was followed by Shepparton in Victoria at 800 square metres and by Wide Bay in Queensland, at 774 square metres.

The **smallest median lot size** was found in the Illawarra region in New South Wales at 380 square metres. This was relatively close to the median lot size in Sydney (375 square metres) and points to growing housing demand, not only in the Sydney basin, but also in its surrounding regions. The availability of amenities and public transport options in cities such as Wollongong and Newcastle have likely continued to entice metropolitan residents out of Sydney, for a fraction of the price.

Largest median lot size – Regional areas		
Rank	Region	Median Lot Size (sqm)
1	Far West and Orana (NSW)	821
2	Shepparton (VIC)	800
3	Wide Bay (QLD)	774
4	New England and North West (NSW)	757
5	Western Australia - Outback (South) (WA)	743
6	Riverina (NSW)	740
7	Mackay - Isaac - Whitsunday (QLD)	738
8	West and North West (TAS)	732
9	Cairns (QLD)	728
10	Barossa - Yorke - Mid North (SA)	725

Source: CoreLogic, HIA Economics

Smallest median lot size – Regional areas		
Rank	Region	Median Lot Size (sqm)
1	Illawarra (NSW)	380
2	Geelong (VIC)	406
3	Ipswich (QLD)	418
4	Mandurah (WA)	450
5	Central Coast (NSW)	451
6	Logan - Beaudesert (QLD)	455
7	Ballarat (VIC)	464
8	Newcastle and Lake Macquarie (NSW)	501
9	Bunbury (WA)	510
10	Mornington Peninsula (VIC)	531

Source: CoreLogic, HIA Economics

Prices per square metre

* Low sales volumes and differences in lot characteristics can create volatility in quarter-to-quarter price movements, which can be partly addressed by considering movements in per-square-metre (unit) prices.

The tables below provide rankings of the highest and lowest regions by prices per square metre in the September quarter 2024.

On a per-square metre basis, the median lot price in the Gold Coast (\$1,969) is slightly below that of Sydney's \$2,011. This is because of larger lots sold in the Gold Coast, with a median of 659 square metres, almost double that of Sydney's 375 per meter median lot size.

Despite taking eighth place in terms of median land prices, the Illawarra took out second place in terms of unit prices, at \$1,500 per square metre. This is likely due to the smaller cuts of land sold in the region, with a median lot size of 380 square metres. Third place went to the Mornington Peninsula, where lots sold had a median unit price of \$1,296. Out of the top ten regional markets with the highest land prices per square metre, New South Wales held five, followed by Queensland with three and while the remaining two went to Victoria.

The least expensive market on a per square metre basis was Outback (South) in Western Australia at \$156 per square metre, followed by Outback - South Australia at \$159. Third place went to New England and North West region in New South Wales, with a median price of \$233 per square metre. New South Wales took the most spots (three) in the top ten regions with the lowest per square metre median price, with South Australia and Western Australia each taking two and Victoria, Queensland and Tasmania claiming one each.

Highest land prices per sqm – Regional markets		
Rank	Region	Price per SQM (\$)
1	Gold Coast (QLD)	1,969
2	Illawarra (NSW)	1,500
3	Mornington Peninsula (VIC)	1,296
4	Central Coast (NSW)	1,187
5	Newcastle and Lake Macquarie (NSW)	1,034
6	Richmond - Tweed (NSW)	1,005
7	Geelong (VIC)	958
8	Ipswich (QLD)	914
9	Southern Highlands and Shoalhaven (NSW)	899
10	Sunshine Coast (QLD)	813

Source: CoreLogic, HIA Economics

Lowest land prices per sqm – Regional markets		
Rank	Region	Price per SQM (\$)
1	Western Australia - Outback (South) (WA)	156
2	South Australia - Outback (SA)	159
3	New England and North West (NSW)	233
4	Central Queensland (QLD)	239
5	North West (VIC)	247
6	Barossa - Yorke - Mid North (SA)	251
7	West and North West (TAS)	255
7	Western Australia - Wheat Belt (WA)	265
9	Riverina (NSW)	279
10	Far West and Orana (NSW)	279

Source: CoreLogic, HIA Economics

Sydney

Residential Land Sales & Median Lot Value - Greater Sydney



Greater Sydney Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Central Coast	No. of sales	52	38	36	57	40
	Median Price	\$580,000	\$537,500	\$499,750	\$500,000	\$517,250
Sydney - Baulkham Hills and Hawkesbury	No. of sales	191	189	153	203	117
	Median Price	\$750,000	\$810,000	\$790,000	\$800,000	\$815,000
Sydney - Blacktown	No. of sales	132	98	146	181	98
	Median Price	\$682,000	\$690,000	\$693,000	\$676,300	\$787,000
Sydney - City and Inner South	No. of sales	8	7	5	2	2
	Median Price	\$0	\$0	\$0	\$0	\$0
Sydney - Eastern Suburbs	No. of sales	6	1	1	0	1
	Median Price	\$0	\$0	\$0	\$0	\$0
Sydney - Inner South West	No. of sales	14	14	14	14	16
	Median Price	\$825,200	\$1,086,250	\$1,184,500	\$1,375,000	\$1,133,000
Sydney - Inner West	No. of sales	4	5	7	5	7
	Median Price	\$0	\$0	\$0	\$0	\$0
Sydney - North Sydney and Hornsby	No. of sales	12	7	5	4	10
	Median Price	\$962,500	\$0	\$0	\$0	\$1,430,000
Sydney - Northern Beaches	No. of sales	11	10	8	7	4
	Median Price	\$1,472,500	\$678,400	\$0	\$0	\$0
Sydney - Outer South West	No. of sales	151	119	103	99	91
	Median Price	\$470,000	\$510,000	\$520,000	\$580,000	\$583,500
Sydney - Outer West and Blue Mountains	No. of sales	36	40	36	52	29
	Median Price	\$632,500	\$646,500	\$555,500	\$560,500	\$750,000
Sydney - Parramatta	No. of sales	15	7	6	14	14
	Median Price	\$1,020,000	\$0	\$0	\$1,225,000	\$1,200,000
Sydney - Ryde	No. of sales	6	5	3	2	4
	Median Price	\$0	\$0	\$0	\$0	\$0
Sydney - South West	No. of sales	188	178	166	260	154
	Median Price	\$652,750	\$630,000	\$613,000	\$650,000	\$650,000
Sydney - Sutherland	No. of sales	7	12	7	9	5
	Median Price	\$0	\$1,200,000	\$0	\$0	\$0
Greater Sydney	No. of sales	833	729	697	911	621
	Median Price	\$662,500	\$680,000	\$662,000	\$672,750	\$710,000

Source: CoreLogic, HIA Economics

Regional New South Wales

Residential Land Sales & Median Lot Value – Rest of NSW



Rest of NSW Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Capital Region	No. of sales	87	81	60	64	65
	Median Price	\$435,000	\$421,000	\$430,450	\$415,000	\$385,000
Central West	No. of sales	56	48	27	41	62
	Median Price	\$246,000	\$258,675	\$300,000	\$250,000	\$295,000
Coffs Harbour - Grafton	No. of sales	28	33	40	48	39
	Median Price	\$480,000	\$460,000	\$483,500	\$480,000	\$450,000
Far West and Orana	No. of sales	20	20	16	24	35
	Median Price	\$102,500	\$40,000	\$136,500	\$75,000	\$205,000
Hunter Valley exc Newcastle	No. of sales	133	129	96	165	160
	Median Price	\$370,000	\$377,000	\$368,750	\$380,000	\$354,000
Illawarra	No. of sales	49	69	44	76	76
	Median Price	\$520,000	\$487,000	\$520,500	\$507,000	\$485,000
Mid North Coast	No. of sales	75	58	64	86	72
	Median Price	\$385,000	\$407,500	\$376,500	\$375,000	\$380,500
Murray	No. of sales	63	48	48	47	48
	Median Price	\$202,000	\$232,500	\$227,500	\$198,500	\$227,000
New England and North West	No. of sales	67	25	33	42	44
	Median Price	\$185,000	\$150,000	\$185,000	\$200,000	\$182,500
Newcastle and Lake Macquarie	No. of sales	71	79	92	84	73
	Median Price	\$470,000	\$485,000	\$450,000	\$489,444	\$505,250
Richmond - Tweed	No. of sales	38	32	41	45	47
	Median Price	\$545,000	\$597,500	\$550,000	\$540,000	\$655,000
Riverina	No. of sales	49	32	37	30	34
	Median Price	\$220,000	\$226,000	\$240,000	\$220,000	\$170,000
Southern Highlands and Shoalhaven	No. of sales	40	49	40	43	38
	Median Price	\$497,250	\$369,600	\$460,000	\$460,600	\$490,000
Rest of NSW	No. of sales	776	703	638	818	797
	Median Price	\$356,250	\$385,000	\$385,000	\$399,900	\$365,000

Source: CoreLogic, HIA Economics

Melbourne

Residential Land Sales & Median Lot Value - Greater Melbourne



Greater Melbourne Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Melbourne - Inner	No. of sales	13	30	18	7	13
	Median Price	\$1,250,000	\$1,188,750	\$1,280,000	\$0	\$1,370,000
Melbourne - Inner East	No. of sales	20	32	9	10	9
	Median Price	\$1,695,000	\$1,483,000	\$0	\$1,810,000	\$0
Melbourne - Inner South	No. of sales	17	20	17	10	16
	Median Price	\$1,700,000	\$1,717,500	\$1,690,000	\$1,447,500	\$1,520,000
Melbourne - North East	No. of sales	237	171	211	189	238
	Median Price	\$351,000	\$360,000	\$354,000	\$350,000	\$371,000
Melbourne - North West	No. of sales	204	227	231	255	237
	Median Price	\$391,000	\$361,000	\$363,000	\$379,000	\$400,000
Melbourne - Outer East	No. of sales	52	52	46	32	24
	Median Price	\$702,750	\$642,500	\$781,000	\$700,000	\$727,000
Melbourne - South East	No. of sales	355	452	365	313	287
	Median Price	\$448,000	\$428,000	\$440,000	\$452,000	\$455,000
Melbourne - West	No. of sales	632	629	693	636	685
	Median Price	\$388,000	\$369,500	\$347,500	\$360,000	\$361,000
Mornington Peninsula	No. of sales	40	31	32	40	23
	Median Price	\$737,500	\$599,000	\$760,000	\$680,000	\$652,500
Greater Melbourne	No. of sales	1,555	1,648	1,647	1,594	1,587
	Median Price	\$412,500	\$400,000	\$380,000	\$390,000	\$395,000

Source: CoreLogic, HIA Economics

Regional Victoria

Residential Land Sales & Median Lot Value – Rest of VIC



Rest of Victoria Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Ballarat	No. of sales	83	77	71	75	65
	Median Price	\$300,000	\$295,000	\$285,000	\$273,225	\$260,000
Bendigo	No. of sales	37	39	35	37	33
	Median Price	\$285,000	\$285,000	\$260,000	\$270,000	\$297,500
Geelong	No. of sales	141	178	168	224	221
	Median Price	\$365,000	\$372,500	\$385,000	\$383,000	\$373,000
Hume	No. of sales	56	67	67	64	64
	Median Price	\$235,500	\$220,000	\$220,000	\$225,000	\$215,000
Latrobe - Gippsland	No. of sales	149	146	159	105	132
	Median Price	\$260,000	\$272,500	\$262,000	\$279,900	\$275,000
North West	No. of sales	67	48	46	39	32
	Median Price	\$175,000	\$154,500	\$167,000	\$165,000	\$158,750
Shepparton	No. of sales	38	35	33	48	42
	Median Price	\$250,000	\$250,000	\$212,500	\$232,500	\$257,475
Warrnambool and South West	No. of sales	26	30	40	23	25
	Median Price	\$265,000	\$252,500	\$257,500	\$230,000	\$181,500
Rest of Vic.	No. of sales	597	620	604	572	619
	Median Price	\$280,000	\$279,500	\$271,000	\$281,000	\$285,000

Source: CoreLogic, HIA Economics

Brisbane

Residential Land Sales & Median Lot Value - Greater Brisbane



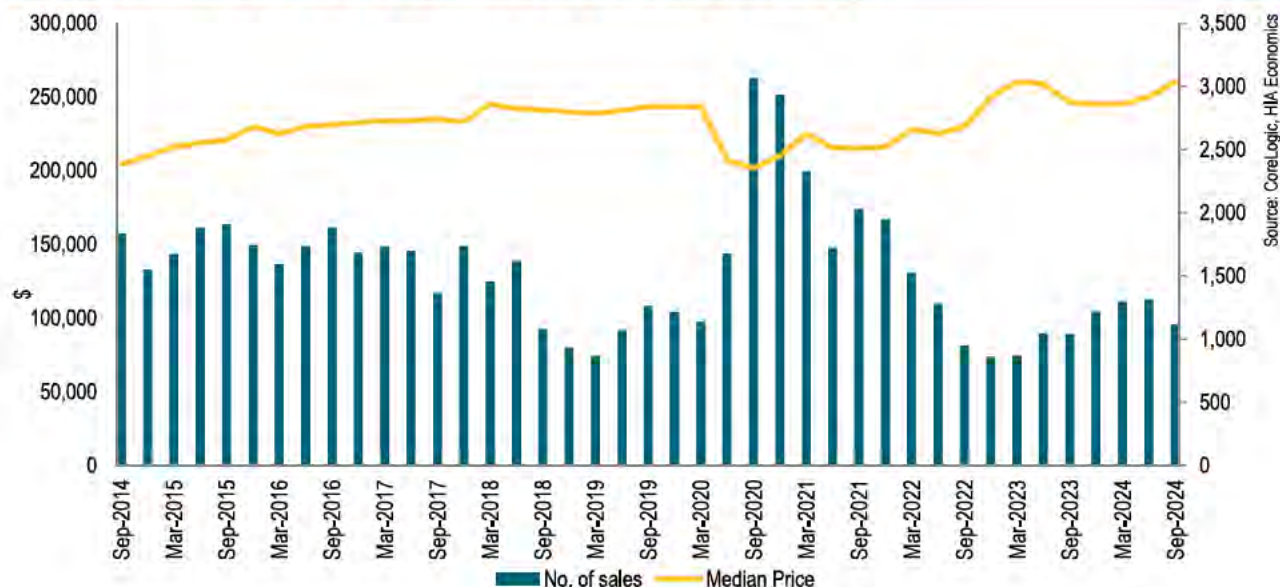
Greater Brisbane Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Brisbane - East	No. of sales	214	268	256	273	307
	Median Price	\$122,500	\$385,000	\$411,500	\$413,000	\$90,000
Brisbane - North	No. of sales	62	60	51	89	69
	Median Price	\$560,000	\$555,000	\$660,000	\$661,000	\$678,000
Brisbane - South	No. of sales	179	166	216	137	83
	Median Price	\$573,000	\$585,000	\$585,000	\$635,000	\$729,500
Brisbane - West	No. of sales	32	31	27	24	14
	Median Price	\$635,000	\$645,000	\$696,000	\$700,000	\$660,750
Brisbane Inner City	No. of sales	29	17	11	18	13
	Median Price	\$990,000	\$1,390,000	\$1,005,000	\$962,500	\$975,000
Ipswich	No. of sales	504	626	493	500	238
	Median Price	\$299,000	\$315,000	\$333,000	\$334,450	\$360,450
Logan - Beaudesert	No. of sales	777	813	722	588	295
	Median Price	\$320,000	\$318,000	\$327,000	\$343,000	\$388,050
Moreton Bay - North	No. of sales	339	434	533	455	237
	Median Price	\$345,000	\$359,700	\$370,000	\$375,000	\$412,500
Moreton Bay - South	No. of sales	69	84	91	67	77
	Median Price	\$470,000	\$490,000	\$495,000	\$490,000	\$505,000
Greater Brisbane	No. of sales	2,205	2,485	2,404	2,208	1,390
	Median Price	\$330,000	\$335,000	\$354,900	\$368,950	\$400,000

Source: CoreLogic, HIA Economics

Regional Queensland

Residential Land Sales & Median Lot Value – Rest of QLD



Rest of Queensland Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Cairns	No. of sales	146	140	147	121	113
	Median Price	\$225,000	\$234,000	\$236,000	\$256,000	\$261,250
Central Queensland	No. of sales	112	96	121	106	118
	Median Price	\$203,000	\$218,900	\$175,000	\$160,000	\$155,000
Darling Downs - Maranoa	No. of sales	31	19	26	33	26
	Median Price	\$62,500	\$135,000	\$70,000	\$105,000	\$102,500
Gold Coast	No. of sales	78	80	60	64	34
	Median Price	\$634,950	\$662,450	\$594,950	\$599,000	\$970,000
Mackay - Isaac - Whitsunday	No. of sales	64	66	94	70	77
	Median Price	\$225,000	\$213,500	\$205,000	\$202,500	\$195,000
Queensland - Outback	No. of sales	3	14	8	7	11
	Median Price	\$0	\$26,500	\$0	\$0	\$24,750
Sunshine Coast	No. of sales	207	286	264	227	126
	Median Price	\$437,000	\$396,750	\$404,000	\$420,000	\$554,000
Toowoomba	No. of sales	70	98	98	92	103
	Median Price	\$220,000	\$240,000	\$233,750	\$250,000	\$308,500
Townsville	No. of sales	94	141	155	185	212
	Median Price	\$182,900	\$189,000	\$189,000	\$199,900	\$195,000
Wide Bay	No. of sales	236	275	327	330	265
	Median Price	\$245,000	\$249,000	\$259,000	\$260,000	\$280,000
Rest of Qld	No. of sales	1,041	1,215	1,300	1,314	1,115
	Median Price	\$246,195	\$245,000	\$245,000	\$250,000	\$260,000

Source: CoreLogic, HIA Economics

Adelaide

Residential Land Sales & Median Lot Value - Greater Adelaide



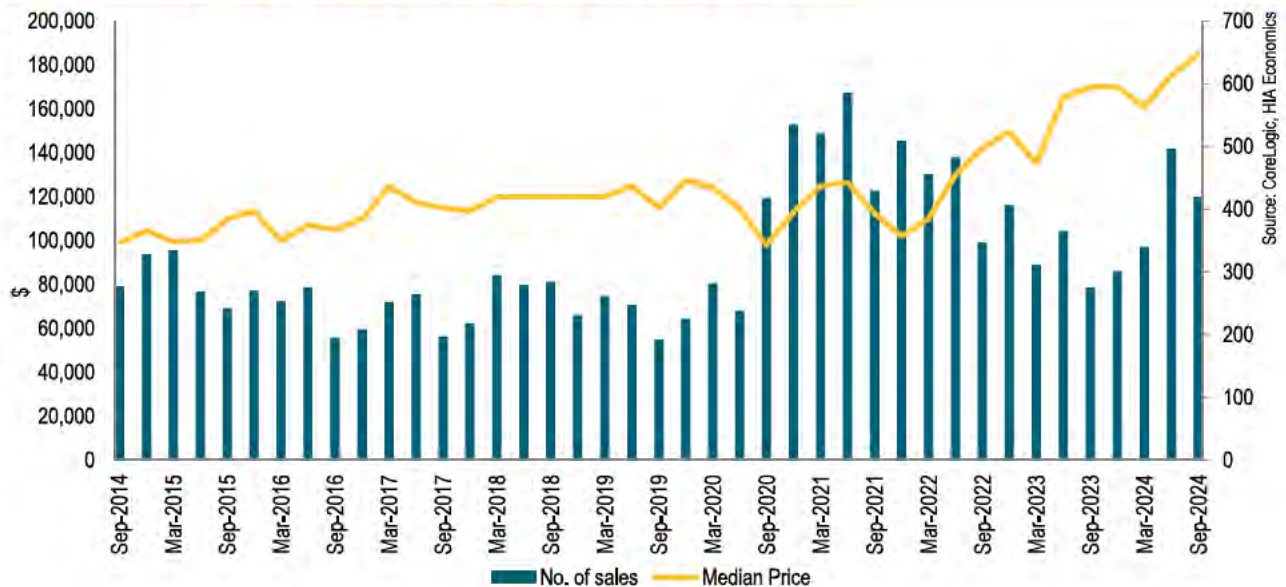
Greater Adelaide Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Adelaide - Central and Hills	No. of sales	188	177	141	271	265
	Median Price	\$260,000	\$260,000	\$291,250	\$287,500	\$285,000
Adelaide - North	No. of sales	657	792	600	821	789
	Median Price	\$219,500	\$233,334	\$241,500	\$244,000	\$247,000
Adelaide - South	No. of sales	176	227	239	284	178
	Median Price	\$340,000	\$345,000	\$350,250	\$324,000	\$331,500
Adelaide - West	No. of sales	87	223	115	158	134
	Median Price	\$336,345	\$268,251	\$352,949	\$350,000	\$360,500
Greater Adelaide	No. of sales	1,108	1,420	1,094	1,534	1,470
	Median Price	\$246,000	\$254,170	\$284,652	\$270,000	\$268,700

Source: CoreLogic, HIA Economics

Regional South Australia

Residential Land Sales & Median Lot Value - Rest of SA



Rest of South Australia Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Barossa - Yorke - Mid North	No. of sales	81	68	83	129	116
	Median Price	\$139,000	\$130,500	\$130,000	\$151,000	\$185,000
South Australia - Outback	No. of sales	24	36	38	50	44
	Median Price	\$97,500	\$71,250	\$88,500	\$100,000	\$110,000
South Australia - South East	No. of sales	170	197	219	314	260
	Median Price	\$180,000	\$180,000	\$179,000	\$188,000	\$196,250
Rest of SA	No. of sales	275	301	340	496	419
	Median Price	\$170,000	\$170,000	\$161,000	\$175,000	\$185,000

Source: CoreLogic, HIA Economics

Perth

Residential Land Sales & Median Lot Value - Greater Perth



Greater Perth Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Mandurah	No. of sales	183	238	248	280	95
	Median Price	\$205,000	\$200,000	\$217,000	\$235,000	\$258,000
Perth - Inner	No. of sales	43	14	26	30	16
	Median Price	\$705,000	\$640,000	\$1,220,000	\$909,500	\$1,220,000
Perth - North East	No. of sales	494	462	349	200	131
	Median Price	\$275,500	\$276,750	\$285,000	\$320,000	\$369,000
Perth - North West	No. of sales	568	591	494	394	229
	Median Price	\$276,625	\$276,000	\$300,000	\$315,000	\$371,000
Perth - South East	No. of sales	495	524	508	322	235
	Median Price	\$239,000	\$249,500	\$263,900	\$295,750	\$340,000
Perth - South West	No. of sales	752	650	603	427	258
	Median Price	\$240,000	\$256,000	\$275,000	\$286,000	\$365,000
Greater Perth	No. of sales	2,535	2,479	2,222	1,712	957
	Median Price	\$254,000	\$257,000	\$270,000	\$285,000	\$352,000

Source: CoreLogic, HIA Economics

Regional Western Australia

Residential Land Sales & Median Lot Value – Rest of WA



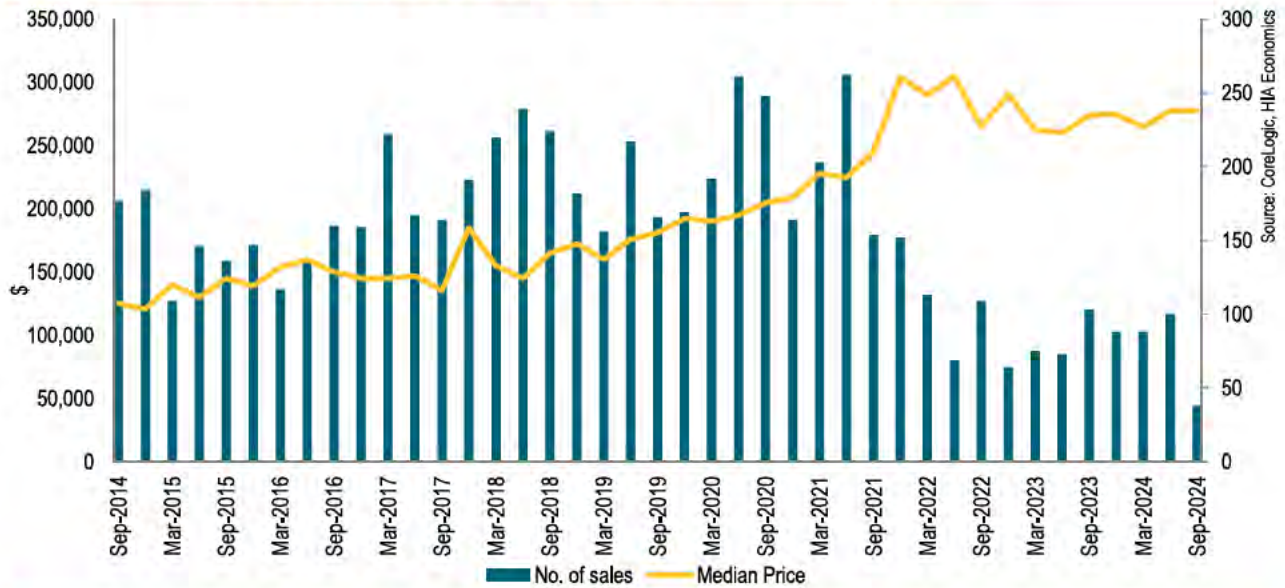
Rest of Western Australia Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Bunbury	No. of sales	193	184	238	223	126
	Median Price	\$206,000	\$226,250	\$215,000	\$212,500	\$237,500
Western Australia - Outback (North)	No. of sales	15	14	23	27	20
	Median Price	\$210,000	\$211,500	\$243,000	\$162,960	\$166,000
Western Australia - Outback (South)	No. of sales	60	48	35	52	66
	Median Price	\$90,000	\$95,500	\$82,000	\$102,000	\$110,000
Western Australia - Wheat Belt	No. of sales	53	63	44	51	70
	Median Price	\$125,000	\$135,000	\$138,000	\$95,000	\$142,500
Rest of WA	No. of sales	321	309	340	367	285
	Median Price	\$189,000	\$182,900	\$209,000	\$189,000	\$165,000

Source: CoreLogic, HIA Economics

Hobart & Regional Tasmania

Residential Land Sales & Median Lot Value - Greater Hobart



Residential Land Sales & Median Lot Value - Rest of TAS



Tasmania Regions

Region		Sep-23	Dec-23	Mar-24	Jun-24	Sep-24
Launceston and North East	No. of sales	49	48	47	47	34
	Median Price	\$230,000	\$202,500	\$245,000	\$210,000	\$277,500
South East	No. of sales	16	17	16	20	9
	Median Price	\$233,000	\$240,000	\$203,500	\$177,500	\$0
West and North West	No. of sales	59	63	64	58	35
	Median Price	\$190,000	\$175,000	\$187,500	\$175,000	\$202,500
Rest of Tas.	No. of sales	124	128	127	125	69
	Median Price	\$210,000	\$197,500	\$220,000	\$180,000	\$232,500
Greater Hobart	No. of sales	103	88	88	100	38
	Median Price	\$274,000	\$275,000	\$265,000	\$277,500	\$277,500

Source: CoreLogic, HIA Economics

Median Lot Value (\$)

Quarter	Greater Sydney	Greater Melbourne	Greater Brisbane	Greater Adelaide	Greater Perth	Greater Hobart	Weighted Median
Dec Qtr 20	450,000	309,900	244,000	209,375	240,000	209,000	298,523
Mar Qtr 21	475,000	315,000	248,500	210,000	250,000	228,000	306,865
Jun Qtr 21	520,000	324,000	247,500	199,650	246,500	225,000	315,712
Sep Qtr 21	560,000	335,000	247,000	222,000	248,000	245,000	327,669
Dec Qtr 21	630,000	354,000	259,900	210,000	245,000	304,000	345,862
Mar Qtr 22	638,000	370,000	272,000	218,500	249,000	290,000	353,908
Jun Qtr 22	640,000	378,000	311,000	210,000	236,500	305,000	359,791
Sep Qtr 22	640,000	393,000	310,000	236,000	229,000	265,100	363,087
Dec Qtr 22	640,000	388,000	300,000	240,000	235,000	290,500	358,523
Mar Qtr 23	657,000	391,000	315,000	230,000	245,000	262,500	362,555
Jun Qtr 23	615,000	392,000	325,000	239,000	247,000	260,000	359,212
Sep Qtr 23	662,500	412,500	330,000	246,000	254,000	274,000	373,794
Dec Qtr 23	680,000	400,000	335,000	254,170	257,000	275,000	372,706
Mar Qtr 24	662,000	380,000	354,900	284,652	270,000	265,000	373,380
Jun Qtr 24	672,750	390,000	368,950	270,000	285,000	277,500	382,257
Sep Qtr 24	710,000	395,000	400,000	268,700	352,000	277,500	408,164
% Change previous quarter	5.5%	1.3%	8.4%	-0.5%	23.5%	0.0%	6.8%
% Change previous year	7.2%	-4.2%	21.2%	9.2%	38.6%	1.3%	9.2%

Source: CoreLogic, HIA Economics

Median lot size (sqm) by region - Sep 2024 quarter

[illegible]

Source: CoreLogic, HIA Economics

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21 March 2025

State Planning Office
Department of Premier and Cabinet
GPO Box 123
Hobart Tasmania 7000

yoursay.planning@dpac.tas.gov.au

Submission - Southern Tasmania Regional Land Use Strategy, Urban Growth Boundary proposed update

Planning Institute of Australia, Tasmania Division, (PIA), provides this submission on the proposed updates to the Urban Growth Boundary (UGB) of the *Southern Tasmania Regional Land Use Strategy* (STRLUS), as outlined in the *STRLUS Urban Growth Boundary Update, Consultation Paper* (Consultation Paper)

PIA is the peak body representing urban and regional planning professionals and supports reform that improves planning processes and outcomes, especially through well-resourced strategic planning based on a strong evidence base consistent with PIA Australia's positions on liveability, health, [national and local settlement strategies](#), [climate conscious planning systems](#) and management of risk in a changing environment¹.

Summary statement

The updates to the UGB are considered to be a material change to the STRLUS. The process for decision making for the updates should be undertaken in a way that is clear, transparent and with a consistent approach to consultation.

Critically, in determining the appropriateness of updates to the UGB, it must be demonstrated that they further the Objectives of the Act and are consistent with the State Policies

Adequately resourcing, maintaining, and regularly reviewing the regional land use strategies is important to delivering strategic land use planning outcomes that are responsive to the needs of the community.

PIA encourages the Government to consider initiatives and incentives to deliver housing within the existing UGB as a priority, this can be achieved using mechanisms as outlined in PIAs national and local settlement strategy.

We support the commencement of maintenance of the STRLUS by the Minister, and hope this continues. This has been an under-resourced component of the system to date, causing problems for all users of the STRLUS.

¹ <https://www.planning.org.au/ourcampaigns>

While many of the additional areas were nominated following work completed by the STRLUS review, the supporting Discussion Paper was exceptionally brief and did not provide any assessment against the statutory criteria at Section 5A (7) of the Act. PIA cannot support areas that were not based on sound planning research, such as those nominated following discussions with developers. Such abstract nominations risk the future integrity and operation of the expanded Urban Growth Areas in managing future land use and provision of infrastructure.

We note the lack of clear assessment processes within Section 5A of the Act and suggest review is required to define that process and provide consistency with the Schedule 1 Objectives.

The lack of clear requirements for the assessment process, hearings and reporting requirements potentially undermines the credibility of the decision and potentially the STRLUS itself, through future decisions of the Tasmanian Planning Commission.

The lack of guidance in section 5A of the Act highlights the need to make decisions that clearly deliver good planning outcomes, supported by data and a transparent assessment process.

RECOMMENDATIONS

The following suggestions are recommended for consideration in the updates to the STRLUS:

- The minister obtains independent expert advice to inform decisions on this process, particularly considering the lack of guidance at Section 5A of the Act.
- The changes to the STRLUS must demonstrate that they further the Objectives of the Act and are consistent with the State Policies.
- The decision process demonstrates transparency and establishes the rationale behind proposed updates to the UGB.
- An assessment report is published and made publicly available.
- A clear process of consultation for the Regional Land Use Strategies should be established and included in LUPAA, including for any material changes that happen through reviews.
- The planning system including the STRLUS needs to be adequately resourced, maintained, and regularly reviewed to effectively meet the needs of the Tasmanian Community. It remains critical that resources are not diverted and do not delay the overall review of all three regional land use strategies.
- PIA strongly encourages the Government to implement initiatives and incentives to deliver housing within the existing UGB as a priority using mechanisms as outlined in PIA's national and local settlement strategy.

Thank you for the opportunity to make a submission. We would welcome any opportunity to further assist Government with changes related to the STRLUS.

Yours sincerely,

Mick Purves

President Tasmania
Planning Institute Australia

State Planning Office
Department of Premier and Cabinet
Executive Building
Level 7, 15 Murray Street, Hobart, TAS 7000
haveyoursay@stateplanning.tas.gov.au

Response to STRLUS Urban Growth Boundary Update Consultation Paper (2025)

Dear STRLUS Update Team,

Master Builders Tasmania (MBT) welcomes the opportunity to provide feedback on the proposed update to the Southern Tasmania Regional Land Use Strategy (STRLUS) Urban Growth Boundary (UGB).

The building and construction industry is a key driver of Tasmania's economy, and strategic land use planning is critical to ensuring a stable supply of developable land, sustainable growth, and housing affordability.

While MBT supports the UGB expansion as a means of addressing Tasmania's housing crisis, we strongly advocate for a well-planned, infrastructure-ready approach that does not exacerbate existing challenges faced by industry and the community.

Key Considerations for the UGB Expansion

Infrastructure Delivery Must Align with Growth

A major concern is that the proposed expansion areas do not appear to be supported by a detailed infrastructure strategy to ensure adequate servicing. Without proactive investment in roads, water, sewer, energy, and public transport, the new development areas could face delays, higher construction costs, and reduced housing affordability.

- MBT urges the State Government to coordinate infrastructure planning with land release, ensuring service provision is timely and cost-effective.
- The risk of developer-led infrastructure costs should be mitigated to avoid additional cost burdens on builders and home buyers.
- A clear funding framework is needed, to prevent costs from being unfairly passed on to industry and consumers.

Reduce Red Tape and Planning Delays

The industry continues to face protracted planning approval processes, which increase holding costs and extend project timelines. The UGB update must be supported by:

- Streamlined rezoning processes that enable a faster transition from rural to urban land use.
- Efficient development approvals that allow projects to commence without unnecessary regulatory delays.
- Flexibility in lot sizes and densities to encourage a mix of housing options and prevent fragmented development.

Workforce and Industry Capacity Must Be Considered

With an estimated 9,770 dwellings planned under the UGB expansion, Tasmania's building workforce must be equipped to meet demand. Current labour shortages in skilled trades and professional services could delay construction and increase costs.

MBT recommends:

- Increased investment in workforce training and apprenticeships, including direct incentives for building companies to assist with the costs of hiring and training apprentices, to ensure an adequate supply of skilled labour.
- Policies that incentivise efficient construction methods, such as modular and prefabricated building, including education and training support.
- Industry consultation on workforce forecasting, ensuring the UGB expansion aligns with realistic construction capacity and supply chain constraints.

Sustainable Urban Planning and Design

While MBT supports greenfield development, the expansion must prioritise strategic land use to prevent long-term issues associated with urban sprawl. The increased cost of infrastructure provision in fringe areas compared to infill development is well documented, with studies indicating:

- Higher government expenditure on roads, schools, emergency services, and public transport in newly developed areas.
- Social inequity concerns, where poorly serviced developments increase car dependence and reduce accessibility to essential services.

MBT supports master planning of new growth areas to ensure:

- Good urban design principles that improve liveability and long-term sustainability.
- Appropriate density planning to maximise infrastructure efficiency.
- Industry involvement in subdivision design to promote quality-built environments.
- Greater support for the redevelopment of existing areas, including incentives for infill and higher-density developments. This approach, in conjunction with UGB expansion, would allow for a more balanced and sustainable housing strategy. Achieving this would require greater government agency support, simplified approval processes, and targeted industry education to enable builders to effectively engage in these types of developments.

Addressing Housing Affordability

Land supply expansion should contribute to lower housing costs, but this can only be achieved if:

- Development costs are managed, including infrastructure contributions and compliance costs.
- Planning approvals are predictable and efficient, preventing unnecessary delays.
- Densification in inner-city areas is also supported, ensuring a balanced approach to growth.

Construction Site Security and Crime Prevention

MBT has recently raised concerns with the Minister for Housing, Minister for Justice, and the Police Commissioner regarding the significant increase in construction site thefts and vandalism in recent years. Expanding development areas into new greenfield subdivisions will only exacerbate these issues if proactive measures are not implemented.

MBT strongly recommends the following security measures for all new subdivisions:

- Mandatory installation and use of street lighting during construction to deter theft and vandalism.
- Increased policing presence and security patrols in high-risk development zones.
- Coordination with law enforcement and industry stakeholders to develop crime prevention strategies tailored to construction sites.

Failing to address these concerns will result in higher costs, project delays, and increased public safety risks, as unsecured sites left open following theft and vandalism pose hazards to surrounding communities.



Master Builders Tasmania supports the proposed UGB expansion, provided it is implemented with proper infrastructure planning, reduced regulatory barriers, and an industry-ready workforce strategy. Additionally, immediate action is needed to prevent construction site theft and vandalism, ensuring that new subdivisions are safe and secure for industry professionals and the wider community.

Furthermore, in conjunction with expanding the UGB, the Government should explore measures to make it easier and more cost-effective to redevelop existing areas. Encouraging higher-density developments and infill projects could improve housing supply while reducing the financial and logistical pressures associated with urban sprawl. However, achieving this would require better support from government agencies, streamlined processes, and increased education for industry stakeholders to ensure feasibility.

The Government must work closely with industry stakeholders to ensure that land release results in timely, cost-effective, and high-quality housing development that benefits both builders and the broader Tasmanian community.

Thank you for considering our submission. We look forward to further consultation on this matter.

Regards

Jessie Fiddymont
Acting Technical Manager
Master Builders Association of Tasmania



From: TasWater Development Mailbox <
Sent: Friday, 14 March 2025 3:16 PM
To: State Planning Office Shared Mailbox
Subject: TasWater Advice TWSI 2024/00220-HCC, TWDA 2025/00091-HCC, RE: State Planning Office - Have your say - STRLUS Urban Growth Boundary Update

Hi,

TasWater has no comments nor objections to add regarding the update.

If you have any queries, please contact me.

Al Cole

Senior Assessment Officer



From: State Planning Office <spo@stateplanning.tas.gov.au>
Sent: Monday, 3 February 2025 3:40 PM
To: Enquiries Mailbox <enquiries@taswater.com.au>
Subject: State Planning Office - Have your say - STRLUS Urban Growth Boundary Update

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Mr Sean McPhail
State Planning Office
Email: haveyoursay@stateplanning.tas.gov.au

Dear Mr McPhail

Thank you for your letter of 3 February 2025 regarding proposed changes to the Urban Growth Boundary (UGB) in the Southern Tasmania Regional Land Use Strategy (STRLUS).

The Department of State Growth (State Growth) is participating in the current review of the STRLUS and has provided comments on future settlement patterns and potential changes to the UGB through this review. State Growth also provides comments and advice on specific rezoning and subdivision proposals, focusing on strategic planning, housing, infrastructure and mining policy considerations. I note that some of these proposals have been included within the expanded UGB area.

State Growth recognises the challenges facing many Tasmanians in finding affordable housing and meeting cost of living pressures. However, it is important, to the extent possible, that housing is well-located, and in the context of current budget challenges, can be cost effectively activated without requiring significant up-front and ongoing infrastructure and services (for example, through uneconomical public transport services) and when not located along or close to existing or planned transport corridors.

Housing that maximises the use of existing infrastructure and is close to employment, health and other services, schools and other key destinations reduces government cost and minimises travel time and distances thereby reducing household travel costs. Urban fringe communities typically pay higher transport costs and Hobart has the second highest transport costs as a percentage of income in Australia.

The proposed expansion of the UGB will provide land for over 9,700 dwellings, with much of this land located in outer urban areas. This number of dwellings is around one third of the approximately 28,000 houses required to meet forecast demand in the Region over the next twenty-five years. Based on analysis undertaken through the STRLUS review, I understand this forecast demand can largely be met through existing residential and future urban zoned land within the existing UGB, together with a greater focus on infill.

Expansion of the UGB will have infrastructure and service impacts, noting development in greenfield and outer urban areas is a more costly form of development for both infrastructure and service providers and households.

The State Road network across Greater Hobart is close to capacity at peak times. Future demand on the State Road network in the region that is not accommodated by other modes will increase overall average travel times and decrease travel time reliability. Opportunities to cost effectively expand the State Road network to cater for growth in outer urban areas are limited, noting geographic, environmental, and adjacent land use constraints.

Modelling undertaken by State Growth indicates that the proposed expansion will see an increase in traffic volumes on many key roads, together with an increase in travel distances and travel times. Travel times are predicted to increase at a disproportionately higher rate compared to additional travel distances. This will particularly be an issue on the Tasman Highway.

In 2023/24, the Tasmanian Government directly spent \$113 million on bus services across Tasmania. There is no recurrent funding available to expand services to new growth areas, particularly those that cannot be easily serviced from existing public transport routes and/or which have low economies of scale. In the absence of growth funding the future focus of the network will be to provide more concentrated services on key corridors, not low frequency services in outer expansion areas.

Where possible, State Growth supports the delivery of housing near existing high frequency public transport corridors. This approach supports the viability of the public transport system, by providing economies of scale in service provision, and provides modal choice for households.

Noting the above, the need and timing to release additional land should be carefully considered. A sequenced approach, which identifies some of the proposed growth areas as future investigation areas would provide the opportunity to monitor land supply and demand over time, and to undertake further analysis of infrastructure and service provision and consider how the costs should be met. Specifically, this would be appropriate for proposed large growth areas along Pass Road (south) in Clarence, and the Arthur Highway at Sorell. Future investigation areas could be incorporated into the current review of the STRLUS.

Detailed comments on the new growth areas identified in the expanded UGB are included in Attachment 1.

Please contact Claire Armstrong, Senior Strategic Planner, by email at _____ or telephone on (_____) _____ for more information.

Yours sincerely

Craig Limkin
Secretary

26 March 2025

Attachment 1. Comments on individual growth areas

Key development sites

Pass Road (South), Rokeby (3,128 dwellings)

- Development of this land will have transport and infrastructure impacts, including increased congestion. Modelling indicates the growth will contribute to higher traffic volumes, increased travel times, and increased vehicle hours travelled.
- The closest existing public transport routes at Goodwins Road are beyond a reasonable walking distance (1.5 to 2.5 kilometers). There are currently no plans or funding to extend public transport services further north along Pass Road.
- This area is likely to be highly car dependent, even to access the proposed park and ride on Rokeby Road.

Arthur Highway, Sorell (South East Sorell) (2,951 dwellings)

- Development of this area will require the extension of infrastructure and services and is likely to have impacts on the State Road network. Modelling indicates the growth will contribute to higher traffic volumes, increased travel times, and increased vehicle hours travelled.
- The area is subject to an airport noise exposure area, creating significant amenity concerns.
- Many houses in the area would be located outside a comfortable walking distance to shops and schools in Sorell, resulting in a reliance on cars for local trips.
- It is likely that most residents will rely on car-based travel to meet employment needs, which will see traffic volumes along the Tasman Highway between Sorell and Hobart continue to increase, with potential impacts on travel reliability and travel time.
- Bus services from the southern beaches travel into and through Sorell, which also provides access to shops, employment and services. Bus services would not travel via the new Sorell Bypass.
- Council previously indicated this area was intended to be a long-term growth area, and it may be more appropriate to identify it as a future investigation area.

Channel Highway, Margate (588 dwellings)

- The location of the site relative to key employment, service and commercial centres is likely to lead to high car dependence.
- Impacts on the State Road network as a result of increased traffic volumes, is unclear.
- State Growth has no plans to alter existing bus services to deviate via the subject site.
- The development of the area may necessitate new bus stops and safe crossing points on the Channel Highway for access to existing services where capacity allows.

Pass Road (North), Mornington/Cambridge (243 dwellings)

- The area has limited local services, schools and employment opportunities, and limited public and active transport connections.
- There are limited opportunities, at least in the short term, to mitigate the impacts of increased traffic volumes along the Tasman and South Arm Highways.
- The area of land for a potential future new interchange connecting Pass Road with the Tasman Highway should be protected from development.

Richardsons Road (147 dwellings)

- The land has limited public transport services and is located well beyond a reasonable walking distance to local shops and services, and to higher frequency bus stops.
- The Rokeby/Clarendon Vale growth area (South Arm Highway corridor) is a higher priority for bus routes.
- Traffic generated by the full development of the site would result in substantial delays for right turn movements out of Bayview Road to South Arm Highway. A roundabout at this location would be difficult to deliver due to limited space.
- The proposed area has high prospectivity for Category 3 minerals (Construction Materials – Sand) and has been mapped as being underlain by Quaternary wind-blown sand deposits. Sand of this nature is of strategic significance for future construction and infrastructure projects. The potential of this resource should be investigated prior to any future development. If sand resources to the west were to be quarried in the future, it is likely a 500 to 750 metre attenuation zone would be required between any quarry and residential areas.

Mannata Street, Lauderdale (44 dwellings)

- Development outside the UGB has not been considered or catered for in future road corridor planning.
- The site is within a medium coastal erosion band and falls within the 2100 predicted sea level rise area.

Sites with public transport constraints

The following areas are located beyond a reasonable walking distance to bus stops and/or would be difficult to service with public transport.

- Cartwright Street, Brighton
- Brighton Road, Brighton
- Sugarloaf Road, Risdon Vale
- Gatehouse Drive and Weston Hill Road, Sorell
- Baskerville Road, Old Beach (*development of the area is likely to require upgrades to the East Derwent Highway*)