

## Tasmanian Planning Policies – Scoping Paper Submissions

No	Name	Position	Organisation
101	Lionel Morrell	President	Tasmanian Ratepayers Association Inc
102	Rebecca Ellston	TAS Executive Director	Property Council of Australia
103	Jennifer Nichols	Executive Director, Tasmanian Chapter	Australian Institute of Architects
104	Sean Terry	Executive Director	Renewables Tasmania
105	Katherine Morgan-Wicks	Secretary	Department of Health
106	Jenny Gale	Secretary	Department of Premier and Cabinet
107	Petra Wilden	Lab Technician	
108	Dion Lester	Chief Executive Director	Local Government Association of Tasmania
109	John Ramsay	Acting Executive Commissioner	Tasmanian Planning Commission

**Tasmanian Ratepayers' Association Inc.**  
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29 October 2021

Planning Policy Unit  
Department Justice

Tasmanian Government    by email to [have your say @justice.tas.gov.au](mailto:have_your_say@justice.tas.gov.au)

**Re:   Scoping Paper of the Draft Tasmanian Planning Policies**

We refer to the relative advertisements published in The Examiner Newspaper, and our earlier correspondence dated 22 October regarding an extension of time to make our submission.

We share the view already put to you by others, that our preference is for development of State Policies (SPs) rather than Tasmanian Planning Policies (TPPs), as SPs provide for a whole of Government approach and are more transparent as they are signed off the Tasmanian Parliament. Never-the-less , we welcome efforts to develop policies and hope that submissions you receive will help to guide Government in finalizing its policies.

TRA Inc. are participating members in Planning Matters Tasmania and accordingly we present our support for the PMAT submission already put to you, see link below.

Climate change is by our assessment and observation the most singular and important issue before the Australian community, and we stress the importance of the incorporation of how climate change should be best dealt with in the Tasmanian planning system. The creation of a specific Climate Change TPP, must ensure the reduction of emissions of greenhouse gases, and mitigation of the impacts of the climate crisis and disruption on the Tasmanian community. The importance of climate change and enormous impact it will have on the Tasmanian community cannot be exaggerated, and the development of a specific Climate Change SP, is fundamentally essential.

There is no doubt that the Tasmanian community is firm in its support for governments to deal with and ameliorate the impacts and effects of climate change on its living environment and standards, and of course its economic stability.

The encouragement and facilitation of public comment and participation in the climate change discussion is the only way that a unilateral view and support for a government can be progressed. We reiterate the PMAT submission that **“Simply placing documents on a website and advertising in local papers, is not enough to create community engagement and discussion on such critically important policies for Tasmania’s future well-being.”**

We look forward to future opportunities to contribute our views and opinions to your new Tasmanian Draft Policies when they are released for exhibition in 2022.

Yours faithfully

President, for and on behalf of  
**Tasmanian Ratepayers Association Inc.**

[PMAT Submission TPPs Oct 2021 FINAL.pdf \(mcusercontent.com\)](#)



Australia's property industry  
**Creating for Generations**

Property Council of Australia  
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1 November 2021

Planning Policy Unit

**By Email:** [Planning.Unit@justice.tas.gov.au](mailto:Planning.Unit@justice.tas.gov.au)

To whom it may concern,

#### **SCOPING PAPER FOR DRAFT TPPs**

The Tasmanian Division of the Property Council of Australia thanks the State Government and the Department of Justice for the opportunity to provide comments on the Tasmanian Planning Policies Scoping Paper for draft TPPs.

The Property Council previously welcomed the concept of a suite of Tasmanian Planning Policies when first proposed in 2017.

The policies contained within the draft scoping paper are robust and expansive, however the Property Council holds some concerns, due to the amount of resourcing it would require to draft, action and implement all of the proposed draft topics, which make it unlikely to result in timely changes.

The Property Council has further uneasiness regarding the introduction of a new layer of planning policy and directive through the implementation of the proposed TPP's, at a time when members are asking for urgent finalisation of the state-wide planning scheme and reform of the Regional Land Use Strategies.

Members believe that the proposed TPP's could instead be captured as State Policies under the *State Policies and Projects Act 1993* replacing or adding to the current policies under the Act. Members support the scope of the policies meeting the requirements of Schedule 1 which are the objectives of the Resource Management and Planning System (RMPS). Additionally, given the range of new environmental issues along with the government's focus on climate change, the Property Council suggests revisiting the objectives within the RMPS is not outside the remit of this discussion paper.



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The Property Council strongly believes there needs to be a greater focus on ensuring there is consistency between state, regional, and metropolitan planning policies. While the current Regional Land Use policies give a sound basis for State Policies, it's imperative that there is not a conflict with the Metropolitan Plan objectives as part of the Greater Hobart Act. It is also crucial, as it is not currently evident, that there is coordination between the review of the Southern Regional Land Use Strategy and the Metropolitan plan for greater Hobart.

The Tasmanian Division of the Property Council is again appreciative for the opportunity to comment on the draft Suite of Tasmanian Planning Policies and will welcome any further opportunity to provide input to support positive changes to our planning system.

Should you have any queries, please do not hesitate to contact me  
to discuss further.

Yours sincerely

**Rebecca Ellston**

Executive Director, Tasmania

Property Council of Australia

Department of Justice  
Office of the Secretary  
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Date: 29.10.2021

By email to: [haveyoursay@justice.tas.gov.au](mailto:haveyoursay@justice.tas.gov.au)

To whom it may concern,

**RE: TASMANIAN PLANNING POLICIES – SCOPING PAPER FOR DRAFT TPPS**

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) welcomes the opportunity to contribute to the development of the Tasmanian Planning Policies (TPPs).

The Institute acknowledges the twin crises of climate breakdown and biodiversity loss as the most serious issue of our time (see the [Institute's endorsement of Architects' Declare](#)). Recognition of this, and a pandemic-prone future, demand the TPPs are tested against rapidly evolving circumstances, and not merely as an extension of existing criteria and assumed outcomes. Human health and wellbeing have never been more central to the role of planning in the state.

While it is appreciated that the policies are aspirational in scope, their role in influencing regional strategies and planning scheme provisions, demand they are based on specific regional understanding and, in the context of anticipated change, the pressing issues that each region faces.

The Institute anticipates the TPPs will be based on rigorous regional strategic planning and modelling, beyond the land-use derived strategies of the recent past. Existing development patterns are not necessarily appropriate moving forward. The issue of population growth should be considered, and with exponentially increasing settlement footprints impacting cultural, environmental, and agricultural landscapes, the Institute recognises that a state-wide settlement policy is long overdue. To adequately respond to the outline topics identified, appropriate resourcing will be needed, ensuring the objectives of the policies are based on thorough analysis and spatial assessment, leading to an integrated strategic vision for the state.

The Institute considers that understanding critical existing landscape values (both built and natural) provides a 'frame' through which urban planning strategies can be

developed and architecture and landscape architecture responses can be considered, with the ultimate aim of achieving sustainable and thriving communities.

The Institute would like to make the following suggestions in response to the scope of the proposed TPP topics and issues.

The Institute suggests the additional of three new topics under Liveable Settlements:

1. **Regional Landscape Values**

These recognise the location of the **Liveable Settlements**, not merely their physical or built presence. They would identify the landform character of settlement locations and their environmental values, to assist in distinguishing regional identity, to underpin establishment of **Regional Urban Design Values**. These are 'urban' spatial values that will for example consider 'scenic protection' and 'landscape heritage' within a settlement context.

2. **Regional Urban Design Values**

These are values which seek to improve the resilience and ecological integrity of Tasmania's settlements. These would be achieved by thorough analysis and understanding of existing and potential settlement areas, for the purpose of planning sustainable settlement growth and where appropriate, densification. Outcomes would aim to strengthen existing urban areas and establish urban and regional growth boundaries based on measured data, rather than on 'vacant' land availability, through re-assessment and re-determination of appropriate land use. Consideration would be given to such criteria as current and projected populations and demographics, services locations, sustainable transport, appropriate building heights, preservation of environmental, cultural and scenic landscapes (identified in **Regional Landscape Values**), improving biodiversity and planning for hazards threats etc.

3. **Strategic Planning of Existing & Proposed Settlement Areas**

This will determine the direction of future development in all areas, including infill development, relevant density, and new subdivision. This holistic and pro-active approach encompasses a breadth of criteria with the aim of achieving sustainable and thriving future communities.

The basis for this would be work undertaken to determine the **Regional Landscape Values** and **Regional Urban Design Values** of specific places.

Design values must be included in standards for subdivision for residential, commercial and industrial development to achieve outcomes that contribute positively to the health, wellbeing and living conditions of occupants. Currently pragmatics such as lot size, frontage width and access to roads and infrastructure services are the determining controls.

Design values may include criteria such as:

- 'the 20 minute neighbourhood',

- street hierarchies, reducing vehicle speeds and favouring pedestrians in residential planning,
- Water Sensitive Urban Design Principles (WSUD),
- restoring pre-existing ecologies and waterways, rehabilitating degraded landscapes,
- orientation of streets in response to topography and microclimatic conditions of the specific site (summer cooling, winter wind protection, rainfall etc),
- orientation of lots to maximise passive heating & cooling of buildings,
- reducing radiant heat emissions through controls on landscape cover and landscape design, dwelling typologies and densities,
- community services,
- maximising existing infrastructure,
- adaptive reuse of redundant or underutilised places of local historic heritage,
- health & wellbeing – recreation & open space and connection to nature, community gardens.

The application of these values is not generic, but specific to regions and contexts (i.e. a subdivision or re-development site in Queenstown would be designed differently to a site with the same requirements in Brighton).

The Victorian State Government has published [\*20-Minute Neighbourhoods: Creating a more liveable Melbourne\*](#), that contains strategies to enhance the liveability of neighbourhoods while accommodating for population growth. Similarly, the NSW Government Architect has published [\*Better Placed\*](#), which is:

*...an integrated design policy for the built environment in NSW. It seeks to capture our collective aspiration and expectations for the places where we work, live and play. It creates a clear approach to ensure we get the good design that will deliver the architecture, public places and environments we want to inhabit now, and those we make for the future.*

In addition to the above topics, the Institute makes the following suggestions to the listed TPP Topics and Issues, as listed in green below:



TPP Topic	Issues (to be addressed under each TPP Topic)
Environmental Protection & Ecological Restoration	<ul style="list-style-type: none"> <li>• Biodiversity – flora and fauna habitat protection, weed management, fire management</li> <li>• Waterways and wetlands – water quality <ul style="list-style-type: none"> <li>• <i>Ground water protection &amp; quality</i></li> <li>• <i>Soil protection – erosion &amp; salinity</i></li> <li>• <i>Animal pests &amp; diseases</i></li> <li>• <i>Weed management &amp; diseases</i></li> </ul> </li> <li>• Catchment management</li> <li>• Coastal &amp; estuarine processes, <i>ecologies</i> and landforms</li> <li>• Applying the precautionary principle <ul style="list-style-type: none"> <li>• <i>Restoration, re-vegetation &amp; rehabilitation (including carbon sequestration).</i></li> <li>• <i>Improving ecological integrity &amp; resilience (including waterways, coastal &amp; estuarine environments)</i></li> <li>• <i>Climate change</i></li> </ul> </li> </ul>
Hazards and risks	<ul style="list-style-type: none"> <li>• <i>Climate change effects, net zero carbon targets &amp; carbon sequestration</i></li> <li>• Natural hazards – bushfire</li> <li>• Flooding <ul style="list-style-type: none"> <li>• <i>Drought</i></li> </ul> </li> <li>• Sea level rise coastal inundation and erosion</li> <li>• Landslide</li> <li>• Acid sulphate soils, <i>soil health, soil erosion</i></li> <li>• Man-made hazards – emissions, contaminated land, soil quality/risks</li> </ul>
Ethical & Sustainable Economic Development	<ul style="list-style-type: none"> <li>• Industry and business</li> <li>• Tourism – <i>managing growth</i></li> <li>• Agriculture – <i>ethical &amp; sustainable food production</i></li> <li>• <del>Mining and minerals</del> <i>Extractive industries where not incompatible with environmental protection, ecological and human health</i> <ul style="list-style-type: none"> <li>• <i>Appropriate Use and development in the coastal zone</i></li> <li>• <i>The circular economy</i></li> <li>• <i>Investment in ethical &amp; green technologies</i></li> <li>• <i>Climate change</i></li> </ul> </li> </ul>

Liveable Settlements	<ul style="list-style-type: none"> <li>• <i>Regional landscape values</i></li> <li>• <i>Population growth &amp; changing demographics</i></li> <li>• <i>Regional urban design values</i></li> <li>• <i>Strategic planning of existing and proposed settlement areas incorporating:</i> <ul style="list-style-type: none"> <li>- <i>subdivision design, residential design &amp; amenity</i></li> <li>- <i>orientation of streets and lots</i></li> <li>- <i>dwelling typologies &amp; densities</i></li> <li>- <i>sustainable transport &amp; mobility</i></li> <li>- <i>recreation and open space opportunities,</i></li> <li>- <i>connection to nature (&amp; ecological restoration areas).</i></li> <li>- <i>community services – health and education</i></li> </ul> </li> <li>• <i>Food security</i></li> <li>• <i>Climate change</i></li> </ul>
Heritage Protection	<ul style="list-style-type: none"> <li>• <i>Aboriginal heritage – (impacts on Aboriginal Heritage to be included in development assessment process in the Tasmanian Planning Scheme)</i></li> <li>• <b>Cultural heritage</b> <ul style="list-style-type: none"> <li>• <i>Cultural landscapes</i></li> </ul> </li> <li>• <b>Landscape heritage – scenic protection, including tourist routes</b> <ul style="list-style-type: none"> <li>• <i>Adaptive reuse</i></li> <li>• <i>Infill development</i></li> <li>• <i>Climate change, sustainability and embodied energy</i></li> </ul> </li> </ul>
Infrastructure to support the economy and create liveable communities	<ul style="list-style-type: none"> <li>• Airports / Sea ports / Railways</li> <li>• Roads, car parking, cycleways and walkways</li> <li>• Public transport</li> <li>• Telecommunications</li> <li>• Electricity and energy</li> <li>• Irrigation, water, sewerage and stormwater</li> <li>• Waste management</li> <li>• <i>Climate change</i></li> </ul>
Public engagement in planning processes	<ul style="list-style-type: none"> <li>• Consultation</li> <li>• Strategic planning</li> <li>• Ongoing</li> </ul>

The Institute agrees that the climates change adaption and mitigation, along with biodiversity loss needs to be incorporated into all relevant TPPs as a matter of urgency.

It is important to note that the issues and topics covered in the TPPs should not be looked at in isolation, and it is critical that they are developed to inform the regional land use strategies and expand the State Planning Provisions. The Institute notes that the regional land use strategies and the State Planning Provisions will be reviewed and revised following the implementation of the TPPs and would welcome involvement in the

review of these. Testing of the implementation of the TPPs and their integration with the regional land use strategies and State Planning Provisions is also of importance, and the Institute would welcome the opportunity to assist in the testing of this.

The Institute are supportive of this development and review of the TPPs that address planning issues to ensure a sustainable and prosperous future for all Tasmanians, while protecting and enhancing the values and characteristics which define our unique cultural landscapes. The Institute are hopeful that the TPPs result in better design outcomes through better understanding of our place and the integration of urban design values and design controls through the planning mechanisms.

The Institute would welcome the opportunity to discuss any of the above further and look forward to reviewing the new suite of draft TPPs when they are released for public exhibition.

Kind regards,

Jennifer Nichols  
Executive Director, Tasmanian Chapter  
Australian Institute of Architects

# Department of State Growth

## RENEWABLES TASMANIA

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Minister for Local Government and Planning  
Department of Justice  
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### **Submission on the Scoping Paper for the draft Tasmanian Planning Policies**

Dear Minister

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

Renewables Tasmania has reviewed the draft Scoping Paper, focusing on the key topics and issues related to renewable energy and emissions reduction portfolios. Our submission is outlined in Attachment I.

Our submission highlights the critical role of strategic land use planning to support the full and timely realisation of the Government's renewable energy and emissions reduction commitments. These include achieving its legislated Tasmanian Renewable Energy Target of 200% by 2040 and the recently announced plan to legislate a target of net-zero emissions from 2030.

Alignment of the Government's energy and emissions reduction commitments with the State's strategic land use planning framework is identified as a key action under the Draft Renewable Energy Coordination Framework.

Renewables are also a key economic driver for Tasmania, including COVID recovery in line with the recommendations from the Premier's Economic and Social Recovery Advisory Council.

We look forward to consulting further on the drafting of the TPPs and implementation measures.

Please note Renewables Tasmania will be part of a new entity, Renewables, Climate and Future Industries Tasmania, from 31 October 2021.

If you have any further questions, please do not hesitate to contact

Yours sincerely

Sean Terry  
**Executive Director**  
**Renewables Tasmania**

29 October 2021

## SUBMISSION TO POLICY PLANNING UNIT ON DRAFT TASMANIAN PLANNING POLICIES

### Background - Scope of the TPP reforms

The TPPs will not be used directly in assessing individual developments but will be given effect through the Tasmanian regional land-use strategies and the Tasmanian Planning Scheme (TPS).

Under the *Land Use Planning and Approvals Act 1993* (LUPAA), the TPPs may relate to:

- the sustainable use, development, protection or conservation of land;
- environmental protection;
- liveability, health and wellbeing of the community;
- any other matter that may be included in a planning scheme or a regional land use strategy.

The TPPs must be consistent with State Policy and further the Resource Management and Planning System Objectives, as outlined in Schedule 1 of LUPAA. The objectives of the resource management and planning system of Tasmania are:

- *to promote the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity;*
- *to provide for the fair, orderly and sustainable use and development of air, land and water;*
- *to encourage public involvement in resource management and planning;*
- *to facilitate economic development (in accordance with the three objectives set out above); and*
- *to promote the sharing of responsibility for resource management and planning between the different spheres of Government, the community and industry in the State.*

To further the LUPAA requirements, the PPU Scoping Paper identifies topics that the TPPs should cover. 'Electricity and Energy' is covered as part of the TPP Topic: *'Infrastructure to support the economy and create liveable communities.'*

Climate change and COVID-19 recovery measures (as per the Premier's PESRAC report) will be incorporated as issues under the various relevant topics, rather than as stand-alone TPPs. 'Advancing our renewable energy capability' is one of six priority areas outlined in Tasmania's current Climate Change Action Plan.

### Submission Summary

Thank you for the opportunity to provide input on the inclusion of renewable energy and emissions reduction priorities in the Draft Tasmanian Planning Policies (TPPs). This submission raises the following key points for consideration in developing the TPPs:

- The scope of the TPPs relating to energy and electricity should be expanded to include a stand-alone renewable energy TPP as in other jurisdictions and consistent with the LUPAA requirements.
- If a stand-alone TPP is not supported, the draft Infrastructure or economic development topics should be expanded to include renewables and emissions reduction expressly.
- The TPP scope is broad, and some prioritisation is recommended, aligning with the Government's economic development priorities such as renewable energy.
- As a new entity, Renewable, Climate and Future Industries Tasmania, from 31 October 2021, we look forward to working on a draft TPP with the PPU and subsequent implementation through the RLUS and LPS reviews.

## **The Importance of Planning Reform to Tasmania's Economic Development Priorities & Government's Energy and Emissions Reduction Vision**

Land use planning is critical to support the full and timely realisation of the States' renewable energy and emissions reduction vision, including achieving its legislated Tasmanian Renewable Energy Target of 200% by 2040 and recently announced plan to legislate a target of net-zero emissions from 2030.

Renewables is also a key economic and emissions reduction driver for Tasmania and nationally. It is also important as part of COVID recovery - as highlighted in the recent PESRAC Final Recommendations Report.<sup>1</sup>

The total economic contribution to Tasmania from Project Marinus, Battery of the Nation, and broader renewable investment is estimated to be up to \$7.1 billion. This investment can lead to up to 1400 Tasmanian jobs during peak construction and unlock up to 2350 jobs from broader renewable energy projects. These projects will also significantly contribute to Australia's emissions reduction ambitions, leading to savings of up to 70 million tonnes of CO2 equivalent.

The scale of investment and number of renewable energy projects in Tasmania is unprecedented, with several projects already in the design and approvals phase and a number in the feasibility phase. However, the efficient rollout of this development pipeline to align with the State's priorities, including Marinus Link's development and emerging Hydrogen industry, will depend on contemporary and facilitative planning processes guided by the TPPs.

Aligning the Government's renewables agenda with the land use planning frameworks is specifically identified as a key action under the Draft Renewable Energy Coordination Framework (A deliverable of the Tasmanian Renewable Energy Action Plan):

*'Alignment of energy and land use, environmental and social policies and strategies (e.g. Tasmanian Planning Policies) to enable appropriate development in pursuit of renewable policy objectives.'*

This alignment of planning and energy policy frameworks is consistent with other jurisdictions. For example, state-wide planning policies promote the appropriate development of renewable energy facilities in South Australia<sup>2</sup>, Victoria<sup>3</sup> and WA<sup>4</sup>.

Given the importance of renewable energy to facilitate the Government's economic development and emissions reduction priorities, it is recommended that there is a standalone renewables TPP, or as a minimum, an expanded infrastructure or economic development topics to expressly include renewables.

Key policy outcomes derived from a renewable energy TPP, which would further the LUPAA requirements, include to:

- support the ongoing provision of sustainable, reliable, and affordable energy to meet the community, business, and industry needs.

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<sup>1</sup> P25 [Premier's Economic & Social Recovery Advisory Council Final Report \(pesrac.tas.gov.au\)](https://pesrac.tas.gov.au), March 2021

<sup>2</sup> P62 State Planning Policy 12; Energy [State Planning Policies for South Australia - 23 May 2019.pdf](#)

<sup>3</sup> [Victorian Planning Provisions – Renewable energy](#)

<sup>4</sup> [Position statement renewable energy facilities \(www.wa.gov.au\)](https://www.wa.gov.au)



- guide the of development to support the achievement of the Government's renewable policy objectives in a manner that that has regard to appropriate siting and design considerations
- promote consistent consideration and assessment of renewable energy facilities
- minimise potential impacts on the environment, natural landscape, and sensitive uses.
- Facilitate economic development consistent with the objectives above.

Consultation feedback and market research on renewables confirm that while people's support for renewable energy and emissions reduction is high, it is contingent on meeting local expectations on how a policy or project should be developed and what it should deliver. Therefore, a renewable energy TPP is of crucial importance – not only for government implementing policy but also for industry and community.

### **What should the TPP's address?**

An immediate priority is to provide for the full scope of current renewables policy under the Tasmanian Renewable Energy Action Plan (TREAP), the Tasmanian Renewable Energy Target (TRET) and the Renewable Hydrogen Action Plan (RHAP).

As well as provision for more established wind, solar and pumped hydro projects, the potential development and investment pipeline for Tasmania may include new technologies like hydrogen, biofuels (biomass & bioenergy) offshore (wind, tidal, wave) and battery storage projects. The TPPs need to be sufficiently flexible to allow for these technologies' evolving nature and enable innovative energy demand and supply solutions.

A TPP is also important to provide for the sustainable development of this infrastructure. The TPPs are, therefore, an opportunity to provide improved guidance regarding the intensity, location and impacts of these developments and to:

- provide improved guidance for appropriate planning, siting and design consideration;
- provide greater direction, clarity and efficiency in our planning system;
- to assist in responding to emerging opportunities and challenges; and
- minimising the potential impacts on communities and the environment through provision for visual amenity, health, noise, public safety, maintenance, design, and location.

The specific site requirements and impacts of these projects will also need to be considered as part of the implementation of the TPP through the regional land use strategies (e.g., Renewable Energy Zones) and planning provisions (e.g., visual impact standards).

The implications of inadequate strategic planning on renewables development are significant. They could include loss of social licence, costly delays and legal action that could compromise the profitability of projects or investment in new projects. Community submissions in Tasmania have already highlighted the perceived lack of strategic planning policy in Tasmania. The draft Renewable Energy Coordination Framework also highlights that a project-by-project approach is no longer appropriate given the number and scale of projects in the pipeline.

A sound planning approach to renewables is one of the key mechanisms for addressing these concerns.



## **Intersecting TPPs/competing land uses**

The TPP Consultation Draft acknowledges the challenge of *‘protecting energy infrastructure, resources and corridors against competing or even conflicting uses for energy corridors by competing and incompatible use and development’*. This principle is also provided for in the Victorian State Planning Policy Framework. This recognises the existence of competing land uses, the potential to prioritise some uses – and energy and electricity status as critical infrastructure.

The TPP framework should be consistent with principles or criteria developed by the Government to manage competing land uses, including primary industry or minerals and resources. Other TPP topics that Renewable Energy are impacted by or impact on include Climate Change, Strategic Transport Infrastructure, Emissions and Hazardous Activities, and Primary Industry.

## **Implementation of Renewable Energy TPPs**

Given the dynamic and rapidly evolving nature of renewable energy markets and policy, it is appropriate that the Renewable Energy TPPs remain high-level principles, as in other jurisdictions, to avoid the need for regular review and update. However, we believe that implementing the high-level principles into supporting planning policy will require ongoing input from this agency and other key stakeholders/experts, given this policy area's dynamic and technically complex nature.

Accordingly, we suggest that the PPU consult with ReCFIT and other appropriate stakeholders/experts into the planning and processes for TPP drafting prior to release for public consultation, including consultation on interrelated TPP, such as climate change and COVID recovery measures. This consultation should also continue throughout the implementation phase.

For TPP implementation, we note that in addition to planning instruments, the regulation of renewables may also need to reference the potential for the publication of guidelines or position statements that may set out more detailed provisions/positions on complex technical requirements for renewable energy projects. This approach is common in other jurisdictions, e.g., wind farms, but would require further consideration within the Tasmanian Resource Management and Planning System context.

## **Gap Analysis of Consultation Draft TPPs**

The Consultation Draft TPPS provides a sound foundation for Energy and Electricity TPPs, reflecting key examples in other jurisdictions. However, we suggest that the Victorian TPPs provide a useful model to update the draft TPPs and focus more on the rapidly emerging renewables industry. A comparison of the draft against other planning policies is provided in Attachment 1.

The draft TPPS could have a more express focus on:

- Renewable energy, as well as maintenance of the current energy infrastructure for gas and electricity. This should include the scope of all potential projects, e.g. Hydrogen, offshore, biofuels etc.
- Providing for potential renewable energy zones with multiple renewable projects collocated around shared transmission and connection infrastructure.
- Facilitating the development of lowest cost transmission and connection infrastructure to consumers.
- Consideration of potential environmental impacts on renewable energy developments and transmission corridors (eg the likelihood of extreme weather or bushfire impacts).

It is suggested that the substance of the existing points in the consultation draft should be retained:

- 'Maximising the use of existing energy infrastructure, prior to extending energy networks'
- 'Protect energy infrastructure, resources and corridors against competing and incompatible use and development.'

However, this latter point could be more explicit as in the Queensland's strategy 'Existing and approved future major electricity infrastructure locations and corridors (including easements and electricity substations), and bulk water supply infrastructure locations and corridors (including easements) are protected from development that would compromise the corridor integrity, and the efficient delivery and functioning of the infrastructure' to minimise interpretation issues around broad terms like 'incompatible'.

It is also suggested that the strategies adopted under the TPPs include a provision, similar to that used in the South Australian Planning Policies: 'Facilitate renewable sources of energy supply, such as solar and wind, at the local level' this should ensure that the TPPs are broad enough to provide for community scale distributed energy developments such as community batteries which are a relatively new and expanding renewables technology.

ReCFIT can work with the PPU to update and revise a renewable energy and emissions reduction TPP in accordance with this submission (a response to the consultation paper questions is also provided in Attachment 2). Noting the scope of the TPP, a prioritisation of those that enable the Government's economic development priorities is recommended. This includes the renewables energy TPP, not only to enable state policy - but the National energy transition, and the need for timely implementation to influence the existing infrastructure pipeline – the strongest the State has seen since hydro electrification of the energy system.

## APPENDIX 1 - TASMANIAN ENERGY TPP

We provide the following as examples of provisions that a Tasmanian Energy TPP could contain.

### Overview Statement [If required]

*“A safe, reliable and affordable energy supply is critical to meeting community needs and is a key part in retaining major industries and attracting new investment. The planning system can support the timely, safe and cost-efficient provision of existing and new energy opportunities.” – 2017 Consultation Draft TPP.*

*Comment: Suggest this should have a more renewables and emissions reduction focus.*

### Key Objective of Reforms:

Tas Consultation Draft	SA State Planning Policies	Vic Planning Policies	Qld Planning Policies	WA Renewable Energy Position Statement
To recognise and protect current and future strategic energy infrastructure, resources and corridors. To facilitate the efficient and timely development of existing and new energy opportunities.	To support the ongoing provision of sustainable, reliable and affordable energy options that meet the needs of the community, business and industry	To promote the provision of renewable energy in a manner that ensures appropriate siting and design considerations are met.	The timely, safe, affordable and reliable provision and operation of electricity and water supply infrastructure are supported, and renewable energy development is enabled.	The policy identifies assessment measures to facilitate the appropriate development of renewable energy facilities. It seeks to ensure these facilities are in areas that minimise the potential impact upon the environment, natural landscape and urban areas while maximising energy production returns and operational efficiency.

**Strategies** [For discussion – relevant examples from interstate planning policies below]

Tas Consultation Draft	SA State Planning Policies	Vic Planning Policies	Qld Planning Policies	<ul style="list-style-type: none"> <li><b>WA Renewable Energy Position Statement</b></li> </ul>
<ul style="list-style-type: none"> <li>Plan for and facilitate energy-related use and development in appropriate locations.</li> <li>Protect energy infrastructure, resources and corridors against competing and incompatible use and development.</li> <li>Maximise the use of existing energy infrastructure, prior to extending energy networks.</li> <li>Contribute to improved energy efficiency through urban design and urban settlement pattern, and support for the use of alternative transport modes.</li> </ul>	<ul style="list-style-type: none"> <li>Development of energy assets and infrastructure (including ancillary facilities) where the impact on surrounding land uses, regional communities and the natural and built environment can be minimised.</li> <li>Facilitate renewable sources of energy supply, such as solar and wind, at the local level.</li> <li>Provide for strategic energy infrastructure corridors to support the interconnection between South Australia and the National Electricity Market.</li> <li>Development in the vicinity of major energy infrastructure locations and corridors (including easements) is planned and implemented to maintain the safe and efficient delivery and function of the infrastructure.</li> <li>Enable industries to reduce carbon emissions by supporting energy efficient urban and building designs.</li> <li>Facilitate energy technologies that support a stable energy market and continued energy supply and do not adversely affect the amenity of regional communities.</li> </ul>	<ul style="list-style-type: none"> <li>Facilitate renewable energy development in appropriate locations.</li> <li>Protect energy infrastructure against competing and incompatible uses.</li> <li>Develop appropriate infrastructure to meet community demand for energy services.</li> <li>Set aside suitable land for future energy infrastructure.</li> <li>Consider the economic and environmental benefits to the broader community of renewable energy generation while also considering the need to minimise the effects of a proposal on the local community and environment.</li> <li>Recognise that economically viable wind energy facilities are dependent on locations with consistently strong winds over the year.</li> </ul>	<ul style="list-style-type: none"> <li>Existing and approved future major electricity infrastructure locations and corridors (including easements and electricity substations) and bulk water supply infrastructure locations and corridors (including easements) are protected from development that would compromise the corridor integrity and the efficient delivery and functioning of the infrastructure.</li> <li>Major electricity infrastructure and bulk water supply infrastructure such as pump stations, water quality facilities and electricity substations are protected from encroachment by sensitive land use where practicable.</li> <li>Development of major electricity infrastructure and bulk water supply infrastructure avoids or otherwise minimises adverse impacts on surrounding land uses and the natural environment.</li> <li>The development and supply of renewable energy at the regional, local and individual scale is enabled in appropriate locations.</li> </ul>	<ul style="list-style-type: none"> <li>To guide the establishment of renewable energy facilities to support the State Energy Transformation Strategy (March 2019)</li> <li>To outline key planning and environmental considerations for the location, siting and design of renewable energy facilities</li> <li>Promote the consistent consideration and assessment of renewable energy facilities</li> <li>Facilitate appropriate development of renewable energy facilities while minimising any potential impact upon the environment, natural landscape, and urban areas</li> <li>Encourage informed public engagement early in the renewable energy facility planning process.</li> </ul>

## **Appendix 2 - RESPONSE TO SCOPING PAPER CONSULTATION QUESTIONS**

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

Energy and Electricity is a priority issue for three topic areas:

- critical infrastructure with security and safety implications
- economic development
- environmental protection

Sound strategic planning is essential in ensuring the delivery of the Government's objectives in Energy/Renewable energy against each of these objectives. Energy/Renewable Energy is also directly interrelated with the topics for public engagement in planning processes, heritage protection and hazards and risks.

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

Energy/Electricity should be broadened to include renewable energy and emissions reduction.

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

No specific comments.

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

Yes, this is strongly supported, noting that the reason for the creation of ReCFIT is to ensure the coordination of these interrelated policy areas.

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

We would suggest that more information be provided under the Strategy part of the TPPs as per other jurisdictions with less focus on the implementation into strategic and statutory planning as this is likely to be subject to a higher degree of change and hence require updating. As discussed above, more detail in respect to implementation could be provided through policy or guideline documents or through direct consultation with the relevant agencies to ensure that the information is current and technically.

Contact:  
Phone:  
E-mail:  
File: F21/1311-2  
WITS: 123327

Hon Roger Jaensch MP  
Minister for Local Government and Planning  
GPO Box 825  
HOBART TAS 7001

Email: [haveyoursay@justice.tas.gov.au](mailto:haveyoursay@justice.tas.gov.au)

Dear Minister

**Subject: Scoping Paper for the draft Tasmanian Planning Policies**

Thank you for the opportunity to comment on the scope of the draft Tasmanian Planning Policies (TPPs). The TPPs represent an important step in strengthening strategic land use planning outcomes in Tasmania, including informing future changes to the State Planning Provisions and review of the regional land use strategies.

The Department of Health owns and manages significant health infrastructure assets across the State and is also responsible to deliver an extensive range of health services. These assets and services are distributed throughout Tasmania, from major urban and regional centres, to rural and remote locations. They are critical to supporting the health needs of the Tasmanian community.

The Department has the following broad areas of interest in relation to the TPPs including -

- recognising and protecting key tertiary hospitals and emergency services facilities
- aligning population and demographic trends to health facilities and services, particularly in rural locations
- liveable communities and
- social infrastructure.

These issues could be addressed under the TPP topics and issues outlined in the scoping paper, including *Liveable settlements* and *Infrastructure to support the economy and create liveable communities*. Alternatively, the issues may warrant a new health policy topic.

The Department would welcome the opportunity to further engage with the Planning Policy Unit on the TPPs, ensuring the importance of the state's public health system and the community's health needs are recognised and represented within this important new strategic planning framework.

Please contact Shane Gregory, Deputy Secretary Infrastructure who can direct you to Department of Health officers with expertise relating to the matters outlined above.

Yours sincerely

Kathrine Morgan-Wicks  
Secretary

8 November 2021





## Department of Premier and Cabinet

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Department of Justice  
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10 NOV 2021

### Submission: Tasmanian Planning Policies: Scoping Paper for draft TPPs

The Department of Premier and Cabinet (DPAC) welcomes the opportunity to provide a submission on the Tasmanian Planning Policies: Scoping Paper for draft TPPs (September 2021).

DPAC supports the approach of a single suite of mutually consistent policies which inform one another as an appropriate means to deliver an effective Whole of Government approach to land use planning. Implemented, this framework will drive and inform consistent, sophisticated planning, shaping prosperity, social cohesion and environmental sustainability. The proposed TPPs will provide clear strategic direction for the planning system in Tasmania.

The terminology used for the Heritage Protection Topic, which currently lists Aboriginal heritage, cultural heritage, and landscape heritage (scenic protection, including tourist routes), could be further considered.

Specifically, 'landscape heritage' could be widened beyond the protection of scenery and tourist routes to include components of the natural environment that have diverse 'natural heritage' values, including aesthetic, historic, scientific and social significance, for which Tasmania is widely renowned. Protecting and enhancing biodiversity through innovative and ecologically focussed planning is an important consideration.

DPAC supports the proposed approach to embed climate change considerations across the suite of TPP topics, rather than establishing a stand-alone climate change policy. The proposed approach recognises the relevance of emissions reduction and climate change adaptation across the land use planning policy area and establishes a consistent embedded integrated approach.

The development of the TPPs presents an important opportunity to support the Tasmanian Government's climate change commitments by:

- enabling climate change adaptation measures to build climate resilience (eg. integration of climate projections into key frameworks);
- promoting action to reduce emissions across the economy (eg. support the transition to a low carbon economy); and
- increasing carbon storage in the landscape (eg. agroforestry and carbon farming).

I understand the proposed structure of the TPPs will be a suite of separate policies, like chapters in a book. It is suggested that an introductory section of the TPPs highlights the opportunity for the TPPs to support emissions reduction and climate change adaptation action. It is also suggested that the

introductory section highlight the Tasmanian Government's climate change commitments and the key findings from the IPCC Sixth Assessment Report and Climate Futures for Tasmania.

#### Opportunities for the Tasmanian Planning Policies to support climate change adaptation

Tasmania is projected to experience an increase in the severity and frequency of extreme weather events. Higher temperatures will increase the frequency of extreme heat events and the intensity and frequency of bushfires. Likewise, storm events will increase and result in heavier and more sustained rainfall, high winds and coastal flooding and erosion, which will be exacerbated by sea level rise.

Through the integration of climate change considerations into the TPPs and review of the Regional Land Use Strategies, the Tasmanian Government has an opportunity to strengthen the State's ability to prepare for and manage the impacts of climate change and create a more climate-resilient economy, community and natural environment by:

- minimising the need for future climate change adaptation by considering the best available climate science and climate change projections to inform Government decision-making. This includes strengthening the Tasmanian Government's framework for identifying areas likely to be subject to impacts of natural hazards such as coastal erosion, flooding and bushfire;
- strengthening the Tasmanian Government's framework for identifying the appropriate location of land use and development, and inclusion of risk mitigation measures; and
- strengthening the Tasmanian Government's policy framework for coastal hazards adaptation planning.

#### Opportunities for the Tasmanian Planning Policies to support emissions reduction

Tasmania has a unique and low emissions profile due to a high proportion of renewable energy generation and the carbon sink of the State's managed forest estate. The latest greenhouse gas data shows that Tasmania has achieved net zero emissions in 6 of the last 7 years.

The 2021 Tasmanian Emissions Pathway Review, highlights that there are a range of factors that can influence Tasmania's emissions profile over time, and that actions to reduce emissions across all sectors are required over the coming decades to ensure Tasmania maintains its net zero emissions status and meets its proposed new emissions reduction target of net zero emissions from 2030.

The TPPs can support the Tasmanian Government's efforts to drive emissions reduction by:

- promoting active travel and walkability and increasing the use of public transport;
- encouraging water-sensitive urban design and green infrastructure to make urban environments more liveable and cooler;
- promoting energy-efficient building design; and
- supporting the development of future industries and technologies.

Thank you again for the opportunity to comment.

Yours sincerely

Jenny Gale  
Secretary

**From:** [Petra Wilden](#)  
**To:** [Planning Unit](#)  
**Subject:** Tasmanian planning policies  
**Date:** Tuesday, 16 November 2021 3:05:56 PM

---

Planning Unit,

I know I've just missed the submission date, but I've come across an email about the NSW government and how they are in the process of changing their planning rules that determine the environmental performance of new buildings and developments.

The new Design and Place State Environmental Planning Policy (SEPP) will set requirements for energy efficiency, electrification, tree canopy cover, greenspace and more.

Some essential points are:

- no developer loopholes and strong mandatory environmental performance standards
- maximising energy efficiency and renewable energy to achieve net zero emissions for all new buildings
- full electrification – no new fossil fuel gas connections
- recognising embodied carbon in building materials, with a pathway to regulation
- comprehensive electric vehicle charging and cycling infrastructure
- maximum mature tree and bushland retention, canopy cover and green space
- urban heat-ready buildings, which plan for future heat stress in a warming climate.

Unfortunately I don't think the Tasmanian Government and their newly released Planning scheme have focussed on these important points enough, which is a huge loss for the future. Can you tell me if I'm wrong in that opinion (I hope so) and can you please focus on reducing emissions from new buildings, as well as making them cheaper to run and healthier for people and a dominant focus on bushland retention to curb our biodiversity crisis in your TPP's. Think 'sustainability'.

Kind regards,

**Petra Wilden**  
Lab Technician

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This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system.

24 November 2021

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

Via email: [haveyoursay@justice.tas.gov.au](mailto:haveyoursay@justice.tas.gov.au)

Dear Sir/Madam

### **Scope of the Draft Tasmanian Planning Policies**

Thank you for the opportunity to provide a submission to the Department of Justice's Scope of the Draft Tasmanian Planning Policies (TPPs).

This submission has been prepared by the Local Government Association of Tasmania (LGAT) on behalf of the local government sector. LGAT is incorporated under the *Local Government Act 1993* and is the representative body, and advocate, for local government in Tasmania.

We have consulted our member councils and make the following broad observations:

1. **A solid basis** – there is a general level of support with the draft suite of topics and issues. This indicates that the Tasmanian Government has done a good job of broadly capturing a significant proportion of the issues necessary for a successful set of policies. Our submission makes suggestions on how this base can be extended.
2. **Effectiveness remains a concern** – without explicit, direct links to development regulation there is a concern among councils, and in the planning profession, that the TPPs may become an aspirational 'wishlist', and do not make a tangible difference to development outcomes. Rather than 'standing the test of time', the TPPs must help Tasmania address our challenges and seize the opportunities. Careful attention is needed to ensure they are drafted to be effective and successful.
3. **A valuable opportunity to modernise** – it is close to 30 years since the inception of the Resource Management and Planning System of Tasmania (RMPS). While the framework has served us adequately and the themes still relevant, it is difficult to determine the extent to which the objectives have been successfully met in development. The revised TPPs are an opportunity to bring the objectives to better

effect through updating our strategic framework with modern planning, development knowledge and best practice.

4. **Climate change is the greatest test** – whatever the final form of the TPPs, climate change will be the greatest test to the development our towns, cities and communities, and our planning system. The drafting of the TPPs is a major opportunity to set the framework for adapting to the 21st century's most significant challenge.
5. **Success depends on consultation** – local government will be largely responsible for implementing the TPPs through their planning schemes and have extensive planning and development expertise. It is critical that this resource be drawn upon, to avoid undermining the effectiveness of the TPPs. The current consultation is an adequate start, the success of the TPPs will hinge upon the quality of engagement with professions involved in development.

We urge the Tasmanian Government to be ambitious in developing the Tasmanian Planning Policies and fully draw upon the expertise that exists in the local government sector and beyond. This needs meaningful cross-sector engagement that includes industry, academia, and especially the daily implementors of the planning system, local government.

### **An effective strategic framework**

Tasmanian councils are pleased that work on the Tasmanian Planning Policies has begun. However, there is a level of concern amongst councils and in the broader planning profession that strategic documents that have limited links to development assessment may have limited effectiveness. We outline strategies below to avoid this.

#### ***Efficient and relevant***

Strategic documents can easily be overburdened with aspirational statements that are outside the document's primary purpose or ability to affect. We recommend that the TPPs are drafted to be efficient and concise. The TPPs should be drafted to be focused on what they can do and their purpose in the planning system. That is to inform the drafting of two statutory planning components: the Tasmanian Planning Scheme and the regional land use strategies.

Councils want the TPPs to provide ambitious aims for our communities, but they must also be meaningful and inform planning practice. To keep the TPPs sharp and focused it may be useful to apply this criterion.

### ***Based on principles and contemporary best practice***

Local government wants planning policies that are based on up-to-date and contemporary principles and good practice. Drafting the TPPs is an opportunity to progressively modernise our 30-year old planning framework, using the lessons learn from other jurisdictions. The sector supports the Tasmanian Government to be ambitious on this aspect.

Drawing on principles applied in other states, specifically Queensland and South Australia, the following set of guiding principles drafted by a member council provide a sound basis:

#### **Example Principles**

***Efficient*** – regulation is the minimum necessary to address impacts and the level of assessment and public engagement is proportional to the potential impacts and scale of development. External impacts to environment or infrastructure are considered.

***Integrated*** – well considered and expressed policy, coordinated systems that are efficient and effective, coupled up deliver mechanisms and upgrading of infrastructure or public spaces.

***Outcome focused (effective)*** – performance outcomes are clearly expressed and supported by placed-based objectives, focus on sustainable development and support of employment and economic growth.

***Accountable*** – reflect balanced community views and aspirations, clear and transparent regulation, access to information is simple and direct.

***Positive*** – wellbeing and resilience are promoted, contemporary challenges are addressed, high quality design and urban renewal is required, plans use clear, concise and positive language to describes outcomes to be sought.

The existence of the current State Planning Provisions should not prejudice or constrain the construction of the TPPs. The TPPs are intended to inform and guide the development of the SPPs (which now refers to their update), not the other way around.

### ***Meaningful cross-sector engagement***

To modernise our strategic planning framework and achieve an effective and relevant set of policies will require meaningful engagement across sectors. Individual council submissions have provided finer detail that requires consideration by the Tasmanian Government, in particular issues around urban form and design, and climate change.

Councils have considerable expertise in implementing planning development regulation, so are a valuable resource for how effectively principles might translate into practice. Industry can provide an important reference for the effect of these principles on



development. The University of Tasmania provides an ideal source of the latest academic knowledge to modernise Tasmania's planning principles and practice and need to be actively engaged.

Consultation must be deep and genuine, rather than basic 'informing' or 'consulting'. The Tasmanian Government needs to build an internal sense of the experience across different sectors, in engaging with, and implementing the Tasmanian planning system. We urge the Tasmanian Government to increase its focus on engagement as the TPPs are being drafted, and before the statutory consultation phase of the Tasmanian Planning Commission. We recommend targeted workshops and would be very happy to assist in informing high quality engagement with local government to draw on the sector's expertise.

## Content

The Tasmanian Planning Policies should be drafted to ready our state, through the planning system, for 21st century challenges. In LGAT's view, the top three issues are: climate change, Tasmania's growth and housing.

### ***Lead with climate change, embed action***

The Tasmanian Government has taken a bold approach with climate change through the revised, draft Climate Change (State Action) Action Bill, that seizes opportunities and adapts to its challenges. The TPPs should do the same and lead on addressing climate change. Leading with climate change will enhance the relevance of the TPPs and move toward embedding climate action in the planning system.

Tasmanian councils have a resolved position in support of urgent and coordinated action on climate change. At the July 2019 LGAT General Meeting, Tasmanian councils resolved the following:

*That the LGAT call upon the Federal and Tasmanian State Governments and Parliaments urging them to:*

- a) Acknowledge the urgency created by climate change that requires immediate and collaborative action across all tiers of government;*
- b) Acknowledge that the world climate crisis is an issue of social and environmental injustice and, to a great extent, the burden of the frontline impacts of climate change fall on low income communities, vulnerable groups and future generations; and*
- c) Facilitate emergency action to address the climate crisis, reduce greenhouse gas emissions and meet or exceed targets in the Paris Agreement.*

Bold action on climate change within the TPPs, in collaboration with councils, is consistent with this motion. LGAT recommends that the Tasmanian Government conduct a workshop with local government planning and climate change professionals to delve into what this should look like.

There is also an important nuance in how we the TPPs should approach this issue. Climate change has a long history of being approached ineffectually, promising some and delivering far less. In our experience, this often occurs when climate change is treated as its own standalone problem requiring specific and separate treatment. We believe that to take proper and effective steps to addressing climate change, actions must be embedded in everyday tasks and operations.

For the TPPs, this means that climate change must be embedded within other policies, rather than a standalone policy that may be ineffective as a result of its disconnect from the functional areas. All the effective actions related to climate change should be embedded in other policies, such as those to do with hazards, or transport planning, or settlement planning. Any planning operation or task with implications for climate change adaptation or mitigation should contain a provision relating to climate change.

A separate, standalone policy on climate change may still be needed to communicate to Tasmanians that it is being treated seriously and addressed. However, that policy should link to and communicate the provisions embedded across other policies.

### ***Ready for growth***

Tasmania's growth and economy continue to boom, and this is not expected to relent as borders closures during the COVID-19 pandemic begin to ease. This growth is good for Tasmania, but comes with pressures and challenges that we must plan for and address. The TPPs should adopt policy settings that ready Tasmania for growth.

Most of the pressures will be on, and addressed by, infrastructure. Managing this growth requires infrastructure planning and delivery to cater for it, and this requires adequate financing. Developer contributions, or infrastructure charges, are an effective way to finance infrastructure delivery. They reduce the pressure that growth imposes on council rates, as they are directly linked to the rate and scale of growth. As a growth-ready policy setting, the TPPs should be constructed to support the implementation of infrastructure charging.

### ***Address housing, acknowledge limitations***

Access to secure, affordable housing is a critical issue across Australia, but particularly acute in the smaller housing and construction markets of Tasmania. As we ready ourselves for continued growth in Tasmania, this problem will not dissolve on its own and planning



must take up its role to ensure supply-side issues are dealt with. This means strategic planning that reflects supply constraints and timely amendments to statutory planning instruments, including Local Provisions Schedules and the regional land use strategies.

However, the TPPs should make it clear that planning is part of addressing the housing affordability issues we are experiencing, not the panacea, and that there are limits to what it can do. This is increasingly being recognised across Australia<sup>1</sup>. Indeed, local planning can do nothing about the demand-side factors of the housing crisis with these almost entirely the result of national policy settings within the hands of the Australian Government. Planning can also not change private market factors, such as land banking or reluctance to sell in a rapidly escalating market. Without effective national action on demand-side factors or measures to reduce sale reluctance, state and local planning will continue to come under pressure to simply supply more land, at any cost.

Acknowledging the limits to planning will avoid overpromising to the community and help achieve the right policy settings across all levels of government.

### ***Planning techniques, urban form, design, and standards***

Tasmania is booming now, yet this has not always been the case, with many of our planning and development practices, techniques and standards developed in a low-growth environment. There is a need to ensure these components and their supporting resources are up to the task of managing today's growth.

Therefore, the TPPs need to address the planning and urban design practices needed to plan for growth and harmoniously integrate new development into existing settlements. Issues that should be covered include:

1. Structure planning – as an evidentiary requirement for rezoning applications.
2. Urban design and standards – streetscape and landscaping principles and objectives.
3. Urban form – particularly hierarchies of urban components, such as:
  - settlement hierarchies
  - road hierarchies and transport nodes
  - commercial/activity centre hierarchies
  - park and open space hierarchies.

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<sup>1</sup> For example: <https://www.smh.com.au/national/nsw/planning-alone-will-not-fix-sydney-s-housing-affordability-crisis-20210914-p58rhv.html>

This area is detailed and complex. We urge the Tasmanian Government to pay particular attention to engaging with councils on this matter. Again, workshops would be ideal, and we would be happy to assist in engaging with the sector.

## Structure

Consistent with our call to be ambitious with the TPPs, we suggest that the Tasmanian Government consider innovative approaches to how the TPPs are grouped and structured.

We offer the following structure, grouped into themes that connect with the points in our submission, as an indicator of how the TPPs might be constructed to provide a planning narrative for Tasmania. In addition to climate change being embedded, liveability and health must also be embedded across policy themes. Other issues from the Scoping Paper not included below would fit into the identified themes.

Policy Theme (or Topic)	Topics (or Issues)	Comments
<b>1. Ready for climate change</b>	<ul style="list-style-type: none"> <li>Climate change</li> </ul>	Leading policy Sets up framework for action in other policies Communication only – reference action under other areas Avoids standalone, unintegrated actions
<b>2. Ready for growth</b>	<ul style="list-style-type: none"> <li>Settlement planning</li> <li>Infrastructure planning</li> <li>Housing affordability and security</li> <li>Urban design and standards</li> <li>Planning for healthy communities</li> </ul>	Climate change mitigation embedded, e.g. in efficient land use and transport Integrated land use and transport planning All forms of infrastructure Support for charging schemes Hierarchies Health and wellbeing
<b>3. Maintaining our values</b>	<ul style="list-style-type: none"> <li>Environmental values</li> <li>Environmental amenity</li> <li>Coastal access and development</li> <li>Heritage values</li> </ul>	This policy theme area combined Environmental and Heritage protection Climate change adaptation embedded Indigenous and non-indigenous cultural heritage
<b>4. Resilient to threats</b>	<ul style="list-style-type: none"> <li>Bushfire hazard</li> <li>Flood hazard</li> <li>Coastal hazards and sea level rise</li> <li>Landslide hazard</li> </ul>	Climate change adaptation embedded across all topics

Policy Theme (or Topic)	Topics (or Issues)	Comments
<b>5. Realising opportunities</b>	<ul style="list-style-type: none"> <li>• Economic development</li> <li>• Energy</li> <li>• Tourism</li> <li>• Agriculture</li> <li>• Resources</li> <li>• Industry and productivity</li> </ul>	Climate change actions embedded
<b>6. Best practice planning</b>	<ul style="list-style-type: none"> <li>• Principles</li> <li>• Consultation and engagement</li> <li>• Strategic planning</li> <li>• Plan review and maintenance</li> <li>• Evidence in planning</li> </ul>	

## Overall

Thank you for the opportunity to comment on the scope of the draft Tasmanian Planning Policies. We believe the Tasmanian Government has made a solid start that provides the basis for more ambition. There is a need to address concerns around relevance and the effectiveness of the end product. We urge that the Government lift the level of engagement during the drafting phase and before the statutory consultation phase to ensure the best outcome. This is particularly important for local government, who will be the authors of future Local Provisions Schedules and implementors of the TPPs outcomes through development assessment.

If you have any questions or would like further information, please contact Michael Edrich at [REDACTED] or on [REDACTED].

Yours sincerely

[REDACTED]

Dion Lester  
CHIEF EXECUTIVE OFFICER

# TASMANIAN PLANNING COMMISSION



Our ref: [REDACTED]  
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8 October 2021

Hon Roger Jaensch  
MP Minister for Planning

By email: [Minister.Jaensch@dpac.tas.gov.au](mailto:Minister.Jaensch@dpac.tas.gov.au)

Dear Minister

## **Commission response to the TPP Consultation**

Thank you for your letter received on 6 October 2021.

The Commission has no comment to make on the scope of matters that should be the subject of Tasmanian Planning Policies (TPPs).

The Commission appreciates that the Draft TPPs in Appendix 1 of the paper are examples only.

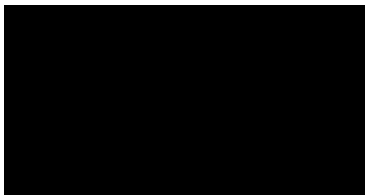
The Commission notes that section 12B(3) of the *Land Use Planning and Approvals Act 1993* (the Act) indicates that TPPs may specify the manner in which TPPs are implemented into SPPs, LPSs and regional land use strategies.

The Commission considers that it is appropriate to raise at this early stage of the process, the importance of drafting the TPPs in a way that enables the statutory decision making obligations of both the Commission and planning authorities to be effectively discharged in relation to the content of TPPs.

The key and most likely most used statutory test for the Commission and planning authorities in relation to TPPs, is currently contained in section 34(2)(da) of the Act, whereby TPPs are included in the LPS criteria, so that amendments to LPSs must satisfy the relevant criteria in relation to TPPs.

Clarity of the drafting of the criteria in the TPPs will assist the efficiency of planning authority and Commission assessment and decision making.

Yours sincerely



John Ramsay  
**Executive Commissioner**