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9 February 2024

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

By email: engagement@eraplanning.com.au, stateplanning@dpac.tas.gov.au

Dear State Planning Office,

RE: PMAT Submission - Discussion Paper to inform the *Improving Residential Standards in Tasmania* project

The [Planning Matters Alliance Tasmania](http://www.planningmatterstas.org.au) (PMAT) thanks the State Planning Office for the opportunity to comment on the *Improving Residential Standards in Tasmania* project.

PMAT was identified as a key stakeholder and was asked to provide feedback on the Discussion Paper to inform the project moving forward.

Comment was invited between 8 December 2023 and 2 February 2024. PMAT appreciates having an extension of time to make our submission.

PMAT has been engaged in advocating for improving Tasmania's residential standards for eight years - since 2016. In 2018, PMAT commissioned a video highlighting residential standard planning issues. Watch video [here](#). In July 2020, we made a submission as part of GHD's survey on residential standards. Then in 2022, we made a submission on the first stage of the State Planning Provisions Review. Our 2022 submission also engaged expert planner Heidi Goess from [Plan Place](#) to write part of our submission on improving Tasmania's residential standards (both attached).

The Improving Residential Standards in Tasmania project

The State Planning Office is progressing the review of Tasmania's residential use and development standards within the State Planning Provisions (SPPs). The *Improving Residential Standards in Tasmania* project aims to develop recommendations that will inform future amendments to the SPPs.

A discussion paper entitled *Improving residential standards in Tasmania Discussion paper For stakeholder engagement, December 2023* was prepared by [ERA Planning and Environment](#). It was released on the 8 December 2023 for comment and was the first step in delivering the Project. It sets the context, supposedly highlights best practice, and plots the methodology for developing and testing recommendations.



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The Discussion Paper contains the following:

- Introduction to the project and background context
- Analysis of Tasmania's housing profile and best practice planning review across Australia
- Conversation starters for potential change
- Proposed methodology for testing recommendations

Case Studies were also provided for comment, as ideas for improving residential standards in Tasmania.

PMAT's submission

PMAT's submission covers:

1. What is PMAT; and
2. PMAT's Key comments.

Yours sincerely,

Kerry

Kerry Burns
State President – Planning Matters Alliance
Tasmania
E: kburns@netspace.net.au
M: 0400 908 930
www.planningmatterstas.org.au

Sophie

Sophie Underwood
State Director – Planning Matters Alliance
Tasmania
E: sophie_underwood@hotmail.com
M: 0407501999
www.planningmatterstas.org.au



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1. WHAT IS PMAT

The [Planning Matters Alliance Tasmania](#) (PMAT) is a growing network of [almost 70 community groups](#) from across *lutruwita* /Tasmania which is committed to a vision for Tasmania to be a global leader in planning excellence. Our Alliance is united in common concern over the new Tasmanian state planning laws and what they mean for Tasmania's future. The level of collaboration and solidarity emerging within the advocacy campaign of PMAT, as well as the number of groups involved is unprecedented in Tasmania and crosses community group genres: recreation, environment, urban/local community associations, historic built heritage, ratepayers and 'Friends of ' groups.

Land use planning impacts every inch of Tasmania. We hold that good planning is fundamental to our way of life and democracy. PMAT works hard to raise community awareness about planning and Local Government and encourages community engagement in the relevant processes.

PMAT is an independent, apolitical, not-for-profit [incorporated association](#), governed by a [skills-based Board](#). PMAT is funded entirely [by donations](#).

In 2020 PMAT was named Australia's Planning Champion, a prestigious honour awarded by the Planning Institute of Australia that recognises non-planners for their advocacy and for making a significant contribution and lasting presence to the urban and regional environment. PMAT was awarded the Tasmanian Planning Champion title in 2019.

PMAT's purpose is to achieve a values-based, fair and equitable planning scheme implemented across Tasmania, informed by [PMAT's Platform Principles](#) and delivering the objectives of the *Land Use Planning and Approvals Act 1993*.

As outlined in [PMAT's Strategic Plan 2021–2023](#), 'PMAT's vision is for Tasmania to be a global leader in planning excellence. We believe best practice planning must embrace and respect all Tasmanians, enhance community well-being, health and prosperity, nourish and care for Tasmania's outstanding natural values, recognise and enrich our cultural heritage and, through democratic and transparent processes, deliver sustainable, integrated development in harmony with the surrounding environment.'

Land use planning must offer a balance between development, individual rights and community amenity, and not just make it easier for development and growth at the cost of community well-being and natural and cultural values. PMAT aims to ensure that Tasmanians have a say in a planning system that prioritises the health and well-being of the whole community, the liveability of our cities, towns and rural areas, and the protection of the natural environment and cultural heritage. PMAT considers that the incoming [Tasmanian Planning Scheme](#) and the 'planning reform' in general will weaken the protections for places where we live and places we love around Tasmania.



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2. PMAT'S KEY COMMENTS

PMAT endorses the attached submission by the Tasmanian Planning Information Network (TasPIN) in its submission on the Discussion Paper.

Furrher to TasPIN's submission, PMAT's key comments are outlined below:

1. The Paper is intended to guide the overall review of Residential Standards but appears to be focussed largely on medium density and especially the apartment code. The review should take a comprehensive approach to looking at residential standards. In this context it is also unclear how the review sees the future standards taking into account the varying requirements across the different residential zones (eg Low Density Residential compared with Urban Mixed Use). PMAT supports the creation of additional zone(s) to better deal with medium density development in some situations.
2. It is important that the Review of Residential Standards is informed by the draft Tasmanian Planning Policies (TPPs) and especially the proposed Settlement Policy. Although the TPPs are not yet finalised they are intended to provide strategic guidance to the wider planning system including the State Planning Provisions (SPPs) and Residential Standards.
3. Quality design should be a central part of Residential Standards and broader planning system. This is essential for liveability of new dwellings, neighbourhood amenity and environmental outcomes. Access to green space, private and communal open areas and design for water management and climate change mitigation are important in this context.
4. While it is recognised that review of SPPs is still in progress, the current provisions provide limited scope for delivering good design in new residential developments, liveability, and neighbourhood amenity. It can be argued that the 'lowest common denominator' approach of using acceptable solutions works against good neighbourhood design and optimum community outcomes. We do need significant reform of the SPPs.
5. Demand for housing – and especially affordable housing - is a key concern of the Discussion Paper. Two specific aspects be that should be considered are:
 - Better regulation of Short-stay accommodation to reduce its impact on rental availability – especially in urban areas; and
 - Mandating a proportion of affordable housing for all medium density developments over a minimum size.
6. In 2022 PMAT provided a comprehensive submission to the Review of SPPs which was supported by independent reports commissioned from expert consultants in three areas. One of these consultant reports prepared by *Plan Place Pty Ltd* deals largely with residential



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standards. PMAT recommends that both our overall submission (Attached) and the *Plan Place Pty Ltd* report (Attached) be considered as part of the current residential standards review.

7. It appears that there has been only targeted stakeholder consultation on the *Discussion Paper to inform the Improving Residential Standards in Tasmania project*. There has been no broad public comment. Please clarify why only targeted consultation has been conducted as opposed to public consultation. To ensure transparency, a list of the targeted stakeholders should also be publicly disclosed so it is clear who is being consulted with.
8. Any changes to our residential standards should be informed by learnings from the failings of mainland Australia. This week, The Age/Sydney Morning Herald published '[rabbit-warrens-and-bottlenecks' Labor councils join chorus of criticism over Minns housing plan](#)'. The article states that Canterbury-Bankstown and Inner West councils criticised the government because the proposed changes to low and medium density housing. **They say the proposed changes will reduce living standards:** Two Labor councils in Sydney have joined a growing chorus of opposition to the Minns government's proposed housing reforms, arguing the overhaul of the state's planning system is "overly simplistic" and will reduce living standards. The Innes Examiner also published [Housing revolt erupts over NSW plan to ramp up building](#) on the 7 February 2024.
9. Rather than focusing on infill development, the emphasis should be on a regenerative place-based approach as per for example that taken by [Village Well](#). The Village Well difference is that it is:
 - Human experience-led, not design-led
 - Their ground plane experience visions create buy-in, attract investment and generate return
 - Collaboration, not consultation
 - Their regenerative urban strategies and engagement solutions position projects for enduring success
10. As per conversation starters and the baseline criteria and measures we would suggest they could include, but not restricted to the below. Note that these dot points were raised in our 19 August 2022 submission on the SPPs of the 19 August 2022.

The Planning Matters Alliance Tasmania, in their platform seek to improve the liveability and wellbeing of all Tasmanians, engaged Plan Place Pty Ltd to prepare a submission to the State Planning Provisions (SPPs) 5-year review concerning the following zones:

- General Residential Zone (GRZ);
- Inner Residential Zone (IRZ); and
- Low Density Residential Zone (LDRZ).



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The terms of reference of the submission considers these zones and their statutory function in the context of:

- Adapting provisions to respond to climate change in urban and sub-urban settings;
- Improving residential amenity and the liveability for Tasmanians;
- Subdivision standards and improving the quality of new residential lots through the provision of street trees;
- Improving the quality of densification;
- Improving health outcomes, including mental health for Tasmanians;
- Facilitating an increased supply of housing choice and social justice;
- Achieving a higher standard of building design, to provide community with more certainty in the planning process;
- Supporting and encouraging the long-term security of natural biodiversity, regenerate native endemic habitat, protect old-growth trees, bush and forests, and value and encourage space for gardens, food security and nature, by offering incentives and planning gains, as appropriate;
- Improving terms and definitions within the SPPs;
- Benchmark the above against the world's best practice residential standards (e.g. The Living Community Challenge); and
- Exemptions at Clause 4.0 of the SPPs.

Our August 2022 submission to the SPPs called on the review to modify the SPPs, highlighting the need for action. Recommendations are stated in each section and in the conclusion in Attachment 3 of our submission. The submission recommends changes to the SPPs for the four residential zones to improve integration of liveability principles and to respond appropriately to climate change.

Also note that the baseline criteria could be based on placemaking perspective rather than a 'baseline criteria and measures' perspective. Thus the intention/focus could be on the actual place we are trying to create as the starting point rather than just clinical measures etc As per Village Well's definition of place making: *Placemaking is the art of creating meaningful, inclusive and connected places. It is the collaborative process of making places that benefit all people, everyday. A thriving place is a place where the environment and community are vibrant, vital and resilient.* See [here](#).



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Placemaking thinking. Source: <https://www.villagewell.org/the-new-local-masterclass>

We could also learn from country centred knowledge systems. The Monash University [Whyte Lecture 2020 – Learning from Country centred knowledge systems](#) – was a ‘*compelling and insightful yarn about the characteristics and modern application of Australian Aboriginal knowledge systems and what we can all learn from the world’s oldest continuous culture. The yarn covered the critical importance of connecting to Country, the inherent benefits and characteristics of embodied and relational knowledge systems, the concept of framing humans in context rather than in a human centred view, and includes practical examples of Country Centred Design applied to anything from Artificial Intelligence to urban planning.*’

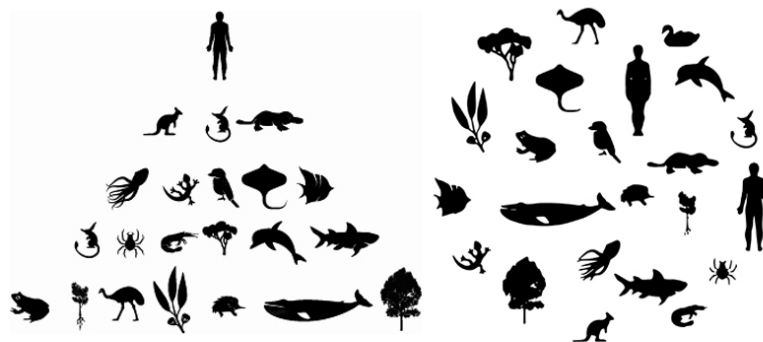


Image: Copyright Old Ways, New Pty Ltd

In Western worldviews, man positions themselves in a hierarchical relationship above all non-human beings. All Western systems are typically based on this world view: social, justice, financial, political, cultural and built environment systems. Indigenous worldviews understand humans are part of the environment in a reciprocal and symbiotic relationship with all that is in it. It is relational in structure and dynamics. Country Centered Design embodies these principles through a design process which enables the development of systems, places, experiences and services.

11. PMAT’s feedback on the Discussion Paper will inform the *Improving Residential Standards in Tasmania* project moving forward. It would be very useful to the community, that what is



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proposed is provided in written form as well as visual form/renders. It is very difficult for the average person to understand planning terminology/language.

12. Human population numbers are a critical factor in any assessment of good planning and the journey to a sustainable society.

We question the assumptions in the Discussion paper, namely that Tasmania's population densities are not meeting the targets of the Land Use Strategies. Who decides these targets?

The community consultation period on the Tasmanian Government's Refreshing Tasmania's Population Strategy Consultation Paper closed in March 2023. A report on the consultation findings has still not been publicly released. For more information see [here](#).

It is also interesting to note that a recent article published in The Mercury on the 1 February 2024, [Demographer Lisa Denny: Tasmania's slowing population growth a 'new phenomenon'](#) stated that Tasmania's annual population growth is down almost 75 per cent on the decade average, and a leading demographer to says the situation is "a new phenomenon".

'Dr Lisa Denny, a demographer who is an adjunct associate professor at the University of Tasmania's Institute for Social Change, said the decline was being driven by increasing interstate departures from the island, which she said "started before the pandemic and has continued".

"It's a new phenomenon for Tasmania as usually when we have relatively good economic performance we see arrivals increase and departures decrease but now we have slowing arrivals and increasing departures and skill/labour shortages," she said.

Dr Denny is currently undertaking a survey on interstate migration from Tasmania, seeking to determine why about 15,500 people are leaving the state every year'.

13. Our State Planning Provisions must ensure the public has a meaningful right of say and access to appeal rights across the residential zones, in particular by amending what is "permitted" and "discretionary" use and development. The requirements for notifying an adjoining neighbour that a Development Application has been lodged should be reinstated. Our planning system must include meaningful public consultation that is timely, effective, open and transparent.