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20 October 2021

To Whom It May Concern,

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

Thank you for the opportunity to comment on the Tasmanian Government's [Tasmanian Planning Policies Scoping Paper for draft TPPs](#) which is out for public comment between the 8 September and 22 October 2021, also see [here](#).

Strategic statewide policies are the missing component of the Resource Management and Planning System and are critical as they provide the intention of the planning system.

While PMAT's preference is for the development of State Policies (SPs) rather than TPPs – as SPs provide for a whole of Government approach and are more transparent as they are signed off by the Tasmanian Parliament - we do welcome efforts to develop strategic policies. Having two strategic layers is also confusing thus it would be beneficial for you to explain the relationship between the SPs and TPPs.

The TPPs, although creating another layer of complexity to the planning system, are important as they will influence the future of Tasmania by shaping the planning system.

The TPPs will inform both the upcoming review of the Tasmanian Planning Scheme and Tasmania's three Regional Land Use Strategies. For example, the review of the State Planning Provisions (SPPs) is due to commence in March 2022.

From reading your documentation, we understand that the Tasmanian Planning Policies will set out **what we need**; the Regional Land Use Strategies will show **where that need should be located** and the Tasmanian Planning Scheme will outline **how this may be achieved and provide the appropriate zoning in the Local Provisions Schedule**. It would be useful to further provide an explanation of



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'*need*' and how you are defining '*need*'. Public consultation should also be part of any new legislative framework for the development of the Regional Land Use Strategies. Presently, there is no guarantee of public comment on these critically important strategies.

Another concern is that holistic integrated planning is not possible in Tasmania as key land uses are currently exempt or partly exempt from Tasmania's planning laws. For example mining, dams, forestry (public and private land) and aquaculture sit wholly or partly outside the planning system. This is why PMAT's Principle 5 of our [Platform](#) calls for integration: '***Principle 5: Integration: Provide an integrated assessment process across all types of developments (including mining, forestry, aquaculture, dams and tourism developments) on all land tenures (including reserved land (e.g. national parks), public land allocated to timber production (formerly known as state forest), and the marine environment) which includes consistent provision of mediation, public comment and appeal rights.***'

As per Schedule 1 of the *Land Use Planning and Approvals Act 1993*, which includes encouraging public involvement in resource management and planning, we respectfully request that the Tasmanian Government dedicate more resources to community education and engagement regarding the importance of the TPPs, and why it is critical for the community to have their say on the TPPs. It is our understanding that nationally, Tasmania allocates the lowest amount of resources for strategic planning.

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.

It is noted that the Minister for Planning's recent media release, [Giving Tasmanians an opportunity to help set the direction of future planning policies](#), September 2021, stated (emphasis added) that '*Together with other reforms currently underway, the TPPs will help us deliver an efficient and up-to-date state-wide planning system that reflects our collective vision for Tasmania's future.*' It will be difficult for the Tasmanian Government to state that the TPPs reflect a 'collective' vision, if the community does not understand the planning system, where the TPPs fit into that system, let alone not engaging with their development.

We also respectfully request that the Tasmanian Government ***listen and respond*** to community feedback in line with, for example, the [United Nations Brisbane Declaration on Community Engagement](#), also see [here](#). This Declaration was developed in 2005 at the first United Nations



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Conference on Community Engagement. The Declaration presents a robust definition of Community Engagement and principles for defining what makes for good engagement.

Also, what are your priorities for TPP development? As public engagement is a key part of the planning process (including TPP development) we would suggest that that the 'Public Engagement in Planning Processes TPP' is one of the first to be developed.

We look forward to the Tasmanian community being invited to have their say on the actual content and implementation statements when the new draft Tasmanian Planning Policies are released for public exhibition in early 2022.

Yours sincerely,

Sophie

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## ***The Planning Matters Alliance Tasmania***

The [Planning Matters Alliance Tasmania](#) (PMAT) is a growing network of almost 70 community groups from across Tasmania advocating for a strategic, sustainable, transparent and integrated planning system which will serve to protect the values that make Tasmania a special place to live and visit.

PMAT considers that, to achieve the best future for Tasmania and all Tasmanians, the planning system must be underpinned by six key principles, which are outlined in our founding [Platform](#) document. Principle 2 relates to 'strategic vision', hence we have a special interest in planning policy development:

**PMAT Platform Principle 2: Strategic Vision: Establish and implement a community endorsed, sustainable, long-term strategic vision for Tasmania.**

Our Platform states that the vision should include social, economic and environmental goals and should be supported by community endorsed state and/or regional policies on a wide range of issues such as affordable housing, biodiversity, fire management, climate change, coastal development, energy efficiency, equity, health, infrastructure, population, public transport, residential amenity, good design, social inclusion, visual amenity, wastewater and water quality.

PMAT would also like to see the development of a community driven values based planning system which serves to protect Tasmania's unique and special natural environment, heritage, lifestyle and democracy.

## ***Strategic Statewide Policies – the missing component of the Planning System***

Strategic statewide policies are the missing component of the Resource Management and Planning System.

One of PMAT's founding concerns was that the Tasmanian Planning Scheme was developed in the wrong order and in a policy vacuum. That is the vision for Tasmania needed to be captured through community consultation (i.e. through the development of State Policies), and THEN a planning scheme developed to implement that vision. See PMAT's presentation [here](#) given at the Planning Institute of Australia Conference 2018 entitled '*State Policies - developing a vision to deliver community will*'.



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The TPPs have the potential to provide some long awaited policy direction to the Tasmanian Planning System – which is welcome. However, PMAT will continue to advocate for development of SPs to address the most important issues facing Tasmania. A mix of SPs and TPPs will deliver the best results for the planning system and Tasmania’s future.

### ***What is the Difference between State Polices and Tasmanian Planning Policies?***

The main difference is that SPs are signed off by the Tasmanian Parliament and provide a whole-of-government approach on particular issues. Whereas the TPPs are signed off by the Planning Minister and affect Tasmania’s land use planning system only. See the difference between SPs and TPPs in more detail [here](#).

It is noted that the TPPs must be consistent with SPs.

#### ***State Polices***

PMAT’s preference is for the development of SPs as they:

- Set a clear vision and priorities for Tasmania’s future;
- Provide whole-of-government strategic policies on various issues e.g. Settlement, Transport and Infrastructure;
- Are intended to create consistency in planning and development decision-making, so must be considered when making a planning scheme, and can be written in a manner that is self-executing (that is, it can be an offence to not comply with a SP, regardless of what a planning scheme says);
- Must be approved by parliament, following consultation with the public and assessment by the Tasmanian Planning Commission and
- SPs have longevity, as they have survived successive Governments.

The development of a full suite of SPs stopped around 2009. We only have three SPs which relate to the protection of agricultural land (*State Policy on the Protection of Agricultural land 2009*), coastal development (*State Coastal Policy 1996*) and protection of water quality (*State Policy on Water Quality Management 1997*).



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### ***Tasmanian Planning Polices***

The TPPs are a new part of the planning system introduced in 2018. PMAT helped secure eight amendments to the *Land Use Planning Approvals Amendment (Tasmanian Planning Policies and Miscellaneous Amendments) Bill 2018*, which passed with tri-partisan support in the Tasmanian Parliament in November 2018.

The amendments PMAT helped secure enhanced accountability and transparency by increasing the role of Parliament, the Tasmanian Planning Commission and the community in the development of Tasmanian Planning Policies.

Although PMAT's preference is for the development of SPs [we welcomed](#) efforts to develop strategic policies.

Tasmanian Planning Polices may relate to:

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

As the Tasmanian Government's [Tasmanian Planning Policies Scoping Paper for draft TPPs](#) states (emphasis added) **'The TPPs will articulate the fundamental vision and principles upon which all planning decisions and future changes in land use will be based.'**

The TPPs must also further the Resource Management and Planning System Objectives, as outlined in Schedule 1 of the [Land Use Planning and Approvals Act 1993](#).

The Tasmanian Government states on the Department of Justice website:

*'The TPPs are being developed to provide the first comprehensive, high-level policy framework for the planning system. The TPPs will shape the future for Tasmania through informing strategic land use planning and the planning rules in the Tasmanian Planning Scheme. The TPPs will also guide the comprehensive review of the 3 regional land use strategies in line with the recommendations from the [Premier's Economic and Social Recovery Advisory Council \(PESRAC\)](#) report released in March 2021. The TPPs will cover important issues not just for planners and decision makers, but for all Tasmanians.'*



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### ***Have Your Say***

To help the community respond, the Tasmanian Government invited us to consider the following five questions with regard to the scope/content and structure of the TPPs:

1. Do you agree with the scope of proposed TPP topics?
2. Do you agree with the scope of the proposed TPP issues?
3. What other topics and/or issues do you think the TPPs should cover?
4. Do you agree that climate change should be integrated into all relevant TPPs?
5. Do you think that the proposed template is appropriate?

Please see our comments below which address these questions. The questions have been combined where appropriate.



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***Do you agree with the scope of proposed TPP topics? What other topics do you think the TPPs should cover?***

Page 9 (Figure 1) of the [Tasmanian Planning Policies Scoping Paper for draft TPPs](#), September 2021, outlines proposed topics that the TPPs could cover.

**What topics should the TPPs cover?**

LUPAA describes the minimum content required in order for the TPPs to guide future strategic land use planning through the regional land use strategies and the Tasmanian Planning Scheme.

To further the LUPAA requirements, draft TPPs should be developed for each of the following topics:

TPP Topic	Issues (to be addressed under each TPP Topic)
Environmental Protection	<ul style="list-style-type: none"> <li>Biodiversity – flora and fauna habitat protection, weed management, fire management</li> <li>Waterways and wetlands – water quality</li> <li>Catchment management</li> <li>Coastal processes and landforms</li> <li>Applying the precautionary principle</li> </ul>
Hazards and risks	<ul style="list-style-type: none"> <li>Natural hazards – bushfire</li> <li>Flooding</li> <li>Landslide</li> <li>Sea level rise coastal inundation and erosion</li> <li>Acid sulphate soils</li> <li>Man-made hazards – emissions, contaminated land, soil quality/risks</li> </ul>
Economic Development	<ul style="list-style-type: none"> <li>Industry and business</li> <li>Tourism</li> <li>Agriculture</li> <li>Mining and minerals</li> <li>Use and development in the coastal zone</li> </ul>
Liveable Settlements	<ul style="list-style-type: none"> <li>Planned and contained settlements</li> <li>Pleasant places to live – amenity and avoiding land use conflicts</li> <li>Integrating land use and transport</li> <li>Health and wellbeing – recreation and open space opportunities</li> <li>Community – health services and education</li> </ul>
Heritage Protection	<ul style="list-style-type: none"> <li>Aboriginal heritage</li> <li>Cultural heritage</li> <li>Landscape heritage – scenic protection, including tourist routes</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> </ul>
Public engagement in planning processes	<ul style="list-style-type: none"> <li>Consultation</li> <li>Strategic planning</li> <li>Ongoing review</li> </ul>

Tasmanian Planning Policies Scoping Paper for draft TPPs – September 2021



Figure 1 – Proposed topics and issues the TPPs could cover.

Source: The [Tasmanian Planning Policies Scoping Paper for draft TPPs, September 2021](#), page.9.





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## **General Comments**

### **Planning should be for well-being and prosperity and not just growth**

Principle 1 of [PMAT's platform](#), which 66 community groups have now signed onto, states that 'Community and Environment: Prioritise the health and well-being of the whole community, the liveability of cities, towns and rural areas, and the protection of the natural environment and cultural heritage'. PMAT's Strategic Plan 2021 – 2023 also states that '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.'

### **Gender-inclusive Language**

The TPPs should use gender-inclusive language as for example set out in the [United Nations Guidelines for gender-inclusive language in English](#). Using such statements as 'man-made hazards' should be replaced with for example 'human-made hazards' or 'artificially-made hazards'.

### **Language to be consistent with the *Land Use Planning and Approvals Act 1993***

Given that the TPPs seek to further Part 1 and Part 2 objectives set out in Schedule 1 of the [Land Use Planning and Approvals Act 1993](#), the TPP's language should be consistent with the language of these objectives. See example next.

### **Economic Development**

It is suggested that the topic name 'Economic Development' be replaced with 'Sustainable Development' so it is consistent with Part 1 and Part 2 objectives set out in Schedule 1 of the [Land Use Planning and Approvals Act 1993](#) which focuses on 'sustainable development' rather than 'economic development'. Sustainable development could also adopt of circular economy principles. According to the [United Nations Economic Commission for Europe](#) for example, circular economy refers to a new and inclusive economic paradigm, which aims to minimize pollution and waste, extend product lifecycles and enable broad sharing of physical and natural assets.



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### ***Suggested New Planning Policy Topics***

Six new TPP topics are suggested, which are outlined in more detail below: Human Health and Well-being TPP, Ecological Restoration TPP, Scenic Landscape Protection TPP, Good Design TPP, Sustainable Transport and Mobility TPP and Monitoring, Evaluation and Reporting TPP.

#### **Human Health and Well-being TPP**

It is suggested that a new 'Human Health and Well-being' TPP topic be included. Given its overarching importance, an SP might however, be the best approach. See details in the section below.

#### **Ecological Restoration TPP**

The restoration and rehabilitation of degraded land is an important tool in dealing with climate change impacts and loss of biodiversity. This policy is seen as additional to an Environmental Protection Policy as it focuses with improving degraded land to reduce climate change impacts and reverse biodiversity loss rather than just protecting remaining values. Environmental restoration has the capacity to increase habitat area for native species, improve water quality by reducing runoff and providing natural filtration, provide linkages between areas of intact vegetation, provide natural pest control, engaging people with nature and empowering them to be part of repairing the environment. It would also help raise the standards of conservation land management across Tasmania.

An Ecological Restoration TPP would also help further the objectives of the [UN Decade on Ecosystem Restoration \(2021 – 2030\)](#), which aims to prevent, halt and reverse the degradation of ecosystems on every continent and in every ocean. We should also be aiming for ecological integrity and resilience across the landscape – known as *landscape continuum*.

The Society for Ecological Restorations published the [National Standards for the Practice of Ecological Restoration in Australia](#), should also be incorporated into all land use across Tasmania.

#### **Scenic Landscape Protection TPP**

It is suggested that a new 'Scenic Landscape Protection' TPP topic be included.

The 2003 State of the Environment Report for Tasmania is still relevant today as it made the following statements about Tasmania's scenic landscapes. These demonstrate the importance of our scenic landscapes to our natural values, economy and well-being:



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*'Scenic landscape includes the properties of the land, such as landform, landcover and land use, arising from a number of natural and cultural processes. Landscape has much to contribute to the debate on sustainable development in Tasmania because it is integrated and people focussed. Maintaining the condition of scenic landscape values is important for Tasmania because:*

- *There are strong cultural ties to landscape and feelings for the visual beauty of the mountains, lakes, coasts and forests of Tasmania are a common bond among people.*
- *The landscape values of the State remain a major drawcard for the State's tourism industry and these landscapes should be managed as a key component of tourism infrastructure.*
- *Landscape values have an association with environmental and natural resource quality: the values that people typically appreciate in a landscape are often also important ecologically. In other words, protecting landscape values can also help to protect a range of other environmental services.'*

*'Tasmania's landscape is highly diverse and noteworthy for its spectacular beauty—shaped by geological forces, influenced by extremes of climate, mantled in a range of vegetation types and modified by the activities of humans. Landscape has much to contribute to the debate on sustainable development in Tasmania because it is integrated (it spans land tenures and land uses) and people focussed (we all enjoy a good view).*

*The condition of scenic landscape values is important for Tasmania because of the following.*

- *Protecting landscape values can sometimes help to protect a range of other environmental services. Landscape values often have an association with environmental and natural resource quality: [They also provide for connectivity being natural areas which are important for gene flow and protection/enhancement of biodiversity]. The values that people appreciate in a landscape are often also important ecologically.*
- *There are strong cultural ties to landscape and feelings for the visual beauty of the mountains, lakes, coasts and forests of Tasmania are a common bond among people.*
- *There are links between healthy landscapes and healthy lifestyles through the recreational opportunities they provide.*
- *The landscape values of the State remain a major drawcard for the tourism industry and these landscapes should be managed as a key component of tourism infrastructure. '*

*'Landscape inventories—linked to planning and development controls—provide the means to plan to avoid or lessen the impacts on landscape values arising from changes to the ways society uses or manages its land resources.'*



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### Good Design TPP

Tasmania should include an integrated design policy for the built environment such as for example the NSW [Better Placed Policy](#). This statewide built environment design policy was released by the Government Architect NSW (GANSW) in 2017. GANSW *'provides strategic design leadership in architecture, urban design and landscape architecture.'*

As part of this Good Design TPP approach, the Tasmanian Government should also reinstate the State Architect position. In 2009 Peter Poulet was announced as Tasmania's first government architect. The Australian Institute of Architects said at the time *"[The state architect will help ensure good design outcomes for all major public and private projects in Tasmania, notably the Hobart waterfront](#)".* Unfortunately, the position was not reinstated by the Liberals when they took government in 2014.

**Tasmania is the only Australian state or territory that does not have a Government Architect.** See the Government Architects Network of Australia [here](#). This is all the more concerning given the unprecedented amount of development taking place across Tasmania.

The NSW Better Placed Policy, for example, *'...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.'*

GANSW's Better Placed, as per the below, defines seven objectives for good design: Better fit (contextual, local and of its place), Better Performance (sustainable, adaptable and durable), Better for community (inclusive, connected and diverse), Better for people (safe, comfortable and liveable), Better working (functional, efficient and fit for purpose), Better value (creating and adding value), Better look and feel (engaging, inviting and attractive).

A Good Design TPP should also consider the natural environment and provide for interaction between the natural world and our built environments. This can have multiple benefit in terms of providing a connection between people and nature, providing recreational spaces, providing urban habitat for common flora and fauna species, providing shade and temperature regulation benefits.



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OBJECTIVE 1.	OBJECTIVE 2.	OBJECTIVE 3.	OBJECTIVE 4.	OBJECTIVE 5.	OBJECTIVE 6.	OBJECTIVE 7.
<b>Better fit</b> contextual, local and of its place	<b>Better performance</b> sustainable, adaptable and durable	<b>Better for community</b> inclusive, connected and diverse	<b>Better for people</b> safe, comfortable and liveable	<b>Better working</b> functional, efficient and fit for purpose	<b>Better value</b> creating and adding value	<b>Better look and feel</b> engaging, inviting and attractive

Source: <https://www.governmentarchitect.nsw.gov.au/policies/better-placed>

### Sustainable Transport and Mobility TPP

It is suggested that a new 'Sustainable Transport and Mobility' TPP topic be included. Transport and mobility deserve their own TPP rather than including it as part of 'Infrastructure to support the economy and create liveable communities'. The new Sustainable Transport and Mobility TPP could include various issues, which are outlined in the section below. 'Transport' would include any forms of transport e.g. cars, buses, bicycles etc. 'Mobility' refers to smaller transport devices such as e-scooters, skateboards, rollerblades, electric chairs and scooters and other disability aids.

### Monitoring, Evaluation and Reporting TPP

It is suggested that a new 'Monitoring, Evaluation and Reporting' TPP topic be included. Consistent with other statutory planning in Tasmania, such as the monitoring, evaluation and reporting of the management effectiveness of the Tasmanian Wilderness World Heritage Management Plan, Tasmania's resource management and planning system should also be evaluated to ensure it is furthering Part 1 and Part 2 objectives set out in Schedule 1 of the [Land Use Planning and Approvals Act 1993](#).

Monitoring, evaluation and reporting also applies to planning schemes. As the Planning Institute of Australia states [here](#) 'Planning schemes should have performance evaluation criteria to determine whether the policy of the scheme is working or whether changes are required. This provides an objective basis to judge the performance of the scheme in implementing the intended policy, and is a basis to refine and review the scheme.'

The Monitoring, Evaluation and Reporting TPP should also be linked to State of the Environment Reporting both at the State and National level.

Under the *State Policies and Projects Act 1993* Tasmania must release a State of Environment Report (SoE) every five years and the Minister must table it in Parliament. So far, three Tasmanian State of



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the Environment reports have been prepared: 1997, 2003 and 2009. The SoE reports provide a strategic view to shape policy and action. **However, it has been twelve years since the last SoE was released.**

The Australian Government also conducts a comprehensive review of the [state of the Australian environment](#) based on twelve environmental themes: Air quality, Antarctica, Biodiversity, Climate, Coasts, Extreme events, Heritage, Indigenous knowledge, Inland water, Land, Marine and Urban environments. The next National SoE report is due in early 2022.



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***Do you agree with the scope of the proposed TPP issues? What other issues do you think the TPPs should cover?***

Page 9 (Figure 1) of the [Tasmanian Planning Policies Scoping Paper for draft TPPs](#), September 2021, outlines suggested issues that the TPPs could include. The *issues* are outlined under each *topic*.

### **Suggested New Policy Issues**

The proposed issues, as per Figure 1, need expanding. The new suggested issues below for example further Part 1 and Part 2 objectives set out in Schedule 1 of the [Land Use Planning and Approvals Act 1993](#).

#### **Environmental Protection TPP**

This TPP topic should also include the following new issues:

- Geodiversity and geoconservation
- Air quality
- Soil protection – erosion, salinity
- Ground water
- Animal pests and diseases
- Weed management and diseases
- Maintenance of ecological processes and genetic diversity
- Coastal processes and landforms should include coastal and estuarine

#### **Ecological Restoration TPP**

This proposed TPP topic should include the following issues:

- Standards and guiding principles
- Restoration, Revegetation and Rehabilitation
- Restoring and providing landscape scale connectivity
- Improving ecological integrity and resilience

#### **Hazards and Risks TPP**

This TPP topic should also include the following new issues:

- Erosion, not just associated with sea-level rise
- Heatwaves



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- Droughts

### **Sustainable Development TPP**

This proposed TPP topic should include the following new issues:

- The circular economy

### **Liveable Settlements TPP**

This TPP topic should also include the following new issues:

- Population
- Public or social housing and affordable housing
- Commercial and residential indoor air quality
- Food security
- Outline the minimum amenity for residential developments
- Social inclusion
- Neighbourhood character
- Urban greening/street trees/canopy cover targets

TPP issues could also be consistent with the [2021 Australian Liveability Census](#) which, over the last five years, has asked over 40,000 Australian residents what is most important to them in their ideal neighbourhood.

The top 15 liveability values in order of importance are:

1. Elements of natural environment are retained or incorporated into the urban fabric as way to define local character or uniqueness
2. General condition of public open space
3. Walking/jogging/bike paths that connect housing to communal amenity
4. Sense of personal safety
5. Access to neighbourhood amenities
6. Local businesses that provide for daily needs
7. Sense of neighbourhood safety
8. Landscaping and natural elements
9. Quality of public space
10. Protection of the natural environment
11. Access and safety of walking, cycling and/or public transport
12. Locally owned and operated businesses





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13. Sense of belonging in the community
14. Connectivity
15. Sustainable urban design

### **Heritage Protection TPP**

The TPP topic includes Aboriginal heritage, which is welcome. However, there should be further review and discussion around the need for Aboriginal heritage values to be included in development assessment. At present, under the provisions in the Tasmanian Planning Scheme, there is no provision for impacts on Aboriginal heritage to be considered in a development assessment. The practical effect of this is that proposed developments cannot be appealed on the basis of Aboriginal heritage. It is reasonable to expect, that Aboriginal heritage is treated in the same way as European heritage. **There is a State Planning Provision for European heritage but not for Aboriginal heritage.**

### **Sustainable Transport and Mobility TPP**

This proposed TPP topic should include the following issues:

- Roads, bike and car parking, cycleways and walkways
- Public Transport

### **Public Engagement in Planning Processes TPP**

Given that the objectives of the resource management and planning system of Tasmania are to provide for the **fair**, orderly and sustainable use and development of air, land and water, this TPP topic should include the issues of **transparency, fairness and independence**.

Principle 3 of PMAT's Platform, which is now supported by 66 community groups from across Tasmania, also highlights the importance of transparency and independence within the planning system: *'Transparency & Independence: Ensure that planning and decision-making processes are open and transparent (e), and overseen by an independent commission, with appeals heard by an independent tribunal.'*

### **Monitoring and Evaluation TPP**

This proposed TPP topic should include the following issues:

- Review
- Targets/Indicators
- SoE Reporting



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

The Intergovernmental Panel on Climate Change (IPCC) is the UN body for assessing the science related to climate change and is the world's most authoritative body on climate science.

In August 2021, the most comprehensive climate report ever released by the IPCC entitled '*Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*' was declared a "code red for humanity", by United Nations secretary-general Antonio Guterres. As the [Tasmanian Planning Policies Scoping Paper for draft TPPs](#) states, climate change '*is a complex issue that will have impacts on all aspects of our community, economy and environment. The development of the TPPs provides a unique opportunity to properly integrate the principles of climate change adaptation and mitigation into Tasmania's land use planning system.*'

At minimum, we would like to see the creation of a specific climate change TPP, integrated into all other relevant TPPs, to ensure reduction of emissions of greenhouse gases, and mitigation of the impacts of the climate crisis and disruption on the Tasmanian community. Given the enormity and importance of climate change, the development of a Climate Change SP is also essential.

**State Polices for Climate Change and Human Health and Well-being**

Given the magnitude of issues that the Tasmanian community is likely to face living with the climate crisis, there should also be a dedicated Climate Change SP. A Climate Change SP would ensure, in theory, an internally consistent whole of Government approach to one of the biggest issues ever to face Tasmania.

The same can be said for Human Health and Well-being. It is interesting to note that around 2019; The Heart Foundation released a [DRAFT for a State Policy for Healthy Spaces and Places](#). The purpose of the Policy was '*To encourage the use and development of land that builds healthy communities through the provision of healthy spaces and places in the built environment of Tasmanian cities and towns.*' Its objective was '*To create healthy spaces and places which provide equitable access to opportunities for active living, active travel and healthy food.*'

It is suggested the Tasmanian Government adopt this State Policy.



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### **Legislated Greenhouse Gas Emission Target and its Practical Effect**

Whether climate change is an SP or a TPP or both, the climate change policy should refer to Tasmania's legislated greenhouse gas emissions target. It should then also detail how the State Planning Provisions and the Regional Land Use Strategies will be practically required to achieve this target.



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***Do you think that the proposed template is appropriate?***

Page 8 (Figure 2) of the *Tasmanian Planning Policies Scoping Paper for draft TPPs*, September 2021, outlines the suggested TPP template.

**An example of what a TPP might look like**

To assist in determining the range of topics and issues that the TPPs should cover, it is important to understand what form they will take and how they will be incorporated into the other parts of the planning system. To achieve this, each TPP should have a clear statement of intent and implementation.

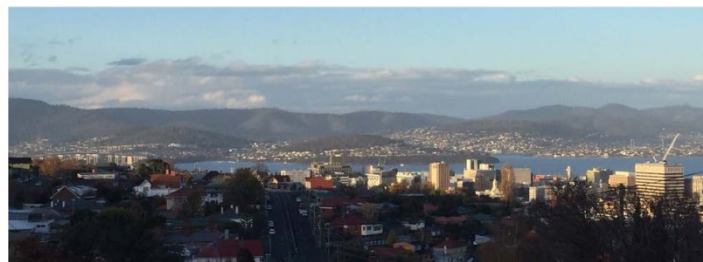
The proposed TPP template includes the following components:

TPP Topic	The name of the particular topic covered by the TPP
Issue	Sets out the particular issue(s) under the TPP Topic
Objective	Describes the broad intent of what the issue aims to address
Strategies	Describes how the objective will be achieved – there may be multiple strategies
Implementation Statements	Describes how each individual strategy will be delivered into the planning system, either through strategic planning such as regional land use strategies, or through statutory planning in the Tasmanian Planning Scheme (State Planning Provisions and Local Provision Schedules)

Appendix I provides an example to illustrate the proposed template and structure of a TPP.

Together, the TPPs will be an integrated suite of land use planning policies and objectives, organised under logical themes: like a book with several chapters, rather than a series of stand-alone documents. They will also include guidance for their implementation into the planning system.

The TPPs will not apply to individual development applications.



Tasmanian Planning Policies Scoping Paper for draft TPPs – September 2021

Figure 2 - Proposed TPP template.

Source: The Tasmanian Planning Policies Scoping Paper for draft TPPs, September 2021, page.9.



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### **Implementation Statements**

In 2017, the Department of Justice released indicative draft TPPs that were prepared as part of the public consultation on the *Land Use Planning and Approvals Amendment (Tasmanian Planning Policies and Miscellaneous Amendments) Bill 2017*. The indicative draft TPPs are available at [Tasmanian Planning Policies and Overview - Consultation Draft April 2017](#).

Since the indicative 2017 draft TPPs, the proposed 2021 TPP template includes a new component entitled 'Implementation Statements'. This new layer is supported. However, there is no guarantee how each TPP will be implemented. It is also unclear, how each strategy will be implemented through the Tasmanian Planning Scheme.

### **Monitoring and Evaluation**

We would also support the creation of an additional component of the TPP template that would sit below the *Implementation Statements*, entitled something like *Monitoring and Evaluation*. This new component could potentially outline performance evaluation criteria (including agreed targets) to determine whether the policy is working or whether changes are required. Agreed targets for example would provide the basis for monitoring and evaluation.