

Representation No. 21

From: Jane Arnold
Sent: Wed, 8 Apr 2020 13:20:17 +1000
To: Circular Head Council;Development
Subject: Updated contact details for submission Planning Scheme from Tarkine Coast Progress Group

As per my telephone conversation today, I wish to advise that the submission issued from the Tarkine Coast Progress Group in relation to the Draft Circular Head Local Provision Schedule to Tasmanian Planning Scheme the incorrect letterhead was used. My apologies for this inconvenience and trust that our correct contact details of email will be noted. If you have any concerns please do not hesitate to contact me.

Please note that our contact details are as below

EMAIL: info@tarkinecoastpg.org.au and **not** info@chprogress.org.au

Kind Regards
Jane Arnold
Administration Officer



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From: council@circularhead.tas.gov.au <council@circularhead.tas.gov.au>

Sent: Tuesday, 7 April 2020 8:36 PM

To: Circular Head Council <council@circularhead.tas.gov.au>

Subject: Draft Planning Scheme Feedback Form

Contact Details

First Name: Tarkine Coast Progress Group

Last Name: John McNab President

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Comments: Please find an attachment giving our response to the Draft LPS

Attach File: LPS-Response_Tarkine-Coast-Progress-Group.pdf, type application/pdf, 2.2 MB



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The Tarkine Coast Progress Group is an incorporated association with its Mission to identify and build on, and foster economic, community, recreation, cultural and development opportunities for the people of the Circular Head Region.

It is our endeavor to support the progress of our much loved Tarkine Coast region. It is our close relationship with council and our significant interest in the opportunities that planning reform might bring to our region, that has us focused on this critical opportunity to communicate with the process.

This response to the Circular Head draft Local Provisions Schedule takes seriously this first and potentially last opportunity for the public to comment on the scheme.

This response is framed on the basis that; the Tarkine Progress Group is in complete support of the council's vision to grow and develop our municipality recognizing our area needs to grow in population. We need more people to support the existing opportunities we have, and we need new people with skills and ideas to develop new opportunities. We need every ability to continue to grow in being the food, clean energy, wood production and natural values resource that we are for the state.

Thus we are confident that;
we have plan for growth,
we have a community that is united,
we have a demand for new opportunities and diversity in living,
we have industry and opportunities now that demand a growth population and a serious change in keeping our people in community.

What we are not confident with, is the ability for the state planning scheme template to truly provide for the planning needs of rural and non-city communities and municipalities. There is well founded concern that a focus on "good planning" can actually bring poor planning outcomes.

It is clear from the LPS Supporting Report, that considerable variations have occurred without adequate consultation.

How the state scheme will actually work in a rural municipality, and what effect it will have on a remote rural municipality has never been really worked out. Yes, we have had

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the state scheme provisions for a while but, when the process requires the development of the maps to remain secret until the prescribed 60 day period of public comment, there is no real consideration to be had.

Now that we have the opportunity to comment the Tarkine Coast Progress Group does so with the support of the industry and community it serves.

The Circular Head Council team that has been working on this, can only be commended in their focus on growing the population, supporting industry, and pointing the municipality towards sustainability. This is despite the out of date approach of the Regional Strategy, the poorly applied Protection of Agricultural Land Policy, and the limitations of the Local Provisions Framework. They have delivered a LPS that attempts to describe a will to encourage diverse and innovative uses that support industry, expand of our localities with coastal and rural living opportunities, and grow new opportunities in tourism and conservation.

Unfortunately, the technical planning team have had to, with very little technical assistance from the Tasmanian Planning Commission, deliver this vision to fit into the city centric template. The effect is that highly valued local objectives such as "encourage uses that support the coastal lifestyle, or rural lifestyle, or transition from shacks to residential" as written, all lose their effectiveness because they can only relate to a specific, mapped and only per zone section of a locality. The question remains, why have the opportunity to write local objectives, if they only can relate to existing mapped clusters of lots that carry a specific zone that is only there because of like for like zoning.

Dealing with local areas as specific mapped portions of localities, leaves the opportunity to place meaningful objectives against our localities, begging. For example; a local objective has been provided for Irishtown encouraging both diverse and innovative uses that recognises it is a locality and village that is not far from the regional centre of Smithton and very much about primary industry. So why then is it, that this vision only gets applied to the tiny number of existing zoned village lots within but not to the actual locality that is Irishtown. The effect of the objective is as though the area zoned as village is a specific area, and the value of well written objective to the actual locality is lost.

This is simply not good enough given that, in these many years of planning reform, local objectives were always promoted context that locality relevant input is vital to truly make this a State Scheme. The foreword for the Tasmanian Planning Scheme gives a sense of how important local objectives are; they are high up the list. The State Provisions also requires that local area objectives should be considered in any discretionary situation, in that sense they clearly are important and should be for a local area not a cluster of mapped lots.

In attempting to see how local objectives will work we have considered what other municipalities are doing, but there are simply no examples available. When we were looking at this in February, a search of the online system was pretty dire; 29 councils in

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progress, 18 assessments listed as being underway, 6 exhibited, of which only 1 has an example of local objectives.

The Brighton Local Area Objectives example uses words like "to Develop" which is encouraging. The specific area approach for Cove Hill and Green Point kind of works for the two specific general business areas, even if their listing of business types will likely be an issue for them in the future. However, the language for Brighton Town Centre suggests that they are trying to develop Brighton as town that influences the surrounds, but if the objective stands only for the general business zoned area in the middle how can the objective be of any real help to the surrounding region.

In comparison the actual Local Provisions, developed by Circular Head Council, are on a better track, they intend to be able to define our localities and encourage diversity within them. They would be suitable if it wasn't for the area description being placed into hardline mapped portions of the localities per zone.

The matter of localities has been a focus of the demand and growth thinking that council has engaged with our group on over the past 18 months. Our understanding of our municipal localities is the same as of council. It isn't just about a few shacks constrained between the highway and the coastal reserve within the greater coastal living locality of Hellyer/ Rocky Cape, nor is it only the actual village zoned lots in our rural villages of Forest, and Irishtown. A proper and full understanding of localities must provide opportunity to describe local objectives to them. To have to describe a local area as being only very specific, like zoned parts of a locality only reinforces a mapped/ prescribed/ acceptable criteria approach rather than allow good planning to be applied by discretion.

This is particularly important when considering that the transfer of existing scheme mapping should in the first instance, be like for like into the state scheme template. When the lower density residential zones, rural zone and agricultural zone are all about limitations on use, not having local objectives relating to a real locality will result in no discretion or support for a use or development that specifically responds to a local objective but falls just outside of the line.

Beyond the issue of constrained local objectives the other key issue that needs addressing is the need to maintain flexibility in use throughout the municipality. The village zone itself is great, it has a broad range of discretionary uses, it is a good "mixed use" zone. Whilst urban environments have similar opportunity in the Urban mixed-use zone the SPP's forgets to think mixed use for broad open landscapes such as the rural resource zone should be.

What is clear is that that Rural Zone has only been considered primarily as restricting conflict in uses by avoiding a true mixed use opportunity. Potential land use conflicts in our huge landscape can be a matter for discretionary planning to consider, but the need for the SPP's to reduce uses for good planning reasons actually impedes the opportunities for the community and industry. This issue goes up a notch with the

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Agriculture Zone, the number of possible uses is further shortened, particularly anything that is not linked to farming is out, there are qualifications that act to prohibit.

Then there is the Agriculture Zone mapping issue, in that we are seriously concerned with how land use planning will actually translate on 95% of our municipality. When it is proposed to rezone anything that has grass from rural resource to agriculture a significant ratchetting of limitations, is applied again. The key point of transferring the interim scheme into the new scheme is to map like for like.

For the TPC to recommend the local planning team remap most of our municipality to Environmental Management Zone and Agriculture Zone we feel that they have not seriously looked at the implications for a small population/ large land area municipality such as ours. Using the Irishtown example again; the small 10ha of village zone part of the hamlet is such that is not appropriate for a light industrial use, a storage or a use that might have an amenity impact. But the surrounding agricultural zone prohibits anything that is not directly agricultural. No new ideas in Irishtown then, just people working on farms. This should not be the case.

However, if you are from Irishtown and want to own your own home, maybe on your own small holding farm you can't. If people have to move from where they live they just as likely move out of the area entirely. Our greatest concern with the remapping to agriculture is the seemingly deliberate shutdown on anyone living wanting to live in these areas. When 50% of us don't live in town this limitation becomes one that has serious impact on the opportunity for us to grow our municipality to the 10,000 strong number that is required for us to be sustainable. Our municipality can be the food bowl for our state but we need people to be living in the farming districts. When the dream is to be able to own and live in your own house, the limitations on living brought by rezoning to agriculture will be a hurdle too large for almost all existing community and certainly everyone who we try to attract to the region.

This challenge for providing new opportunities for living on the Tarkine Coast region, is front of mind for the Progress group and council. Whilst planning reform is not necessarily the process by which land rezoning and provision of new desirable living opportunities across the far north west coast is provided, the process of planning reform did commence with regional strategy, the first being the North West Region. This strategy remains well out of date and continues to hold language that makes it all too easy to shut down new land release, ignoring the need for new and real residential land in localities from the Sisters Hills to Arthur River..

When our industries are calling out for more workers, when drive in drive out workers are an increasingly representative part of our human resource, and when we struggle to find new professionals to move to our area because they can't find suitable quality living options, then we can be sure that the regional strategy has not delivered for us.

The Regional Land Use Strategy needs a serious review given all the opportunities facing the Tarkine Region

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Existing Rural Living potentially also been remapped, subject to further constraint in the remapping exercise for the local provisions. To prescribe which of the 4 Rural Living Zones any lot is by how the cadaster sits now, locks down more of our desirable living to further limit opportunity. On the other hand correctly mapping Landscape Conservation to small holdings that are effectively environmental living does provide for people to live in the landscape.

The Tarkine Coast Progress Group is aware of the complexity that exists in the rezoning from recreation current to the SPP's for the Stanley golf course development lot. In that case, councils recommended remapping to remain in recreation would in the SPP's would devalue the land due to a shortening of available uses. The recommendation to Landscape Conversion Zone as a holding zone until the proposed development if finalized is OK as long as it is recognized that a landscape conservation purpose is not the reason for the change. The remap could just have rightfully been Rural Zone, the pathway to provide for at least a home on the lot is available.

Being one of the first municipalities going through the LPS process, and certainly one of the very first rural remote LPS's, we believe we have right to call out what we think has been a city-out approach to the planning reform process. Take for example the Use Class Vehicle Fuel Sales. Basically, the scheme decides that you can sell fuel in a village, but not in a rural or agriculture zone. Now that the fuel operation at the Stanley turnoff has quit, it can never be replaced.

The same goes for the Hellyer/ Rocky Cape servicing connected along the Bass highway. If the fuel shut it could not be replaced, if the tavern shut it could not be replaced. Basically, the way the scheme will operate, we can provide for tourists in rural and agriculture, just not our own community needs. This is not really acceptable. The villages exist because of the way the community evolved in the past. But the way forward is based on the backbone, that the Bass Highway is for our district, and the changing needs of industry, working families and a connected world.

We feel strongly that the state and local provisions must serve to enhance Land Use Planning. We in the far north west, plan to use our land, not just how we are using it now, but with a forward thinking vision that acknowledges we can't foresee the future, only ensure we don't stand in its way.

As discussed, the most significant vision we see to contribute to the Tarkine Coast is population growth. Council is highly commended for being particularly active in this space. Inspired by the Tasmanian Growth Strategy we support your active planning the pathway the turns our numbers around from 7,000 and falling, to a growth trajectory that targets 10,000 in the short to medium future.

It is good to acknowledge that the Tasmanian Population Growth Strategy is targeting growth through job creation/ workforce development, though migration and liveability. The strategy's stated objective is to build and promote Tasmania's liveability including fostering a culture that is vibrant, inclusive, respectful and supportive.

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Similarly we completely support council to ensure our local objectives for our living localities should speak to liveability and also to the support of diverse and innovative uses in the unique context of each locality, be they the regional centre, a main town or coastal living locality, a rural township, a remote coastal community or rural hamlet.

Local Area Objectives must be based on the localities for which they are written, not separated into individual sections of each mapped against zone.

Local Objectives should be reverted to localities so as to give real opportunity for them to reflect the attributes and future focus for each. This is particularly crucial for the localities and population centres that are not "big town".

Current Rural Resource land should be Rural Zone on the basis that the stated zone purpose and use table provides for most of what a low population/ large land area municipality requires. To move parts of the municipality to Agriculture Zone may certainly be suitable but when significant agriculture Zone is not used in the existing scheme, it is hard to justify this move for anything other than the highest classification agricultural land.

Detailed assessment is required to move up a notch, a broad visual map assessment of all the freehold land that results in a rezoning of grass to agriculture and forestry to rural does not consider the actual need for our rural resource land.

We look forward to an urgent review of the LPS, and stand ready to assist in this process.



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