

22 June 2023

Tasmanian Planning Commission
GPO Box 1691, Hobart 7001
By email: tpc@planning.tas.gov.au

Dear Tasmanian Planning Commission

Submission regarding the draft State Planning Provisions amendment 01-2022

Please accept our submission regarding the draft State Planning Provisions amendment the Container Refund Scheme (CRS).

Launceston City Mission intends to operate depot style collection refund points in the CRS as social enterprises, supporting services we provide in the community, and to provide employment opportunities for people experiencing disadvantage. We are collaborating with several tenderers for the role of Network Operator in the Scheme and expect to have some operational involvement regardless of the outcome.

We suggest that the TPC reconsiders the planning permit pathway for manual or automated depot type collection refund points which are currently characterised as 'waste transfer stations'. This means they are restricted to General Industrial or Utilities Zones (and may be considered on a discretionary basis in Light Industrial or Rural Zones).

These zones for which depots are currently permitted are typically less accessible, less convenient, and less attractive to our likely customers who will be returning containers for a refund. In our view, restricting depot style collection refund points to these locations will reduce the number of customers using them, reduce the number of containers being returned and is not generally consistent with the aim of the CRS to maximise recycling.

Further, we don't believe it is necessary to place such a restriction on depot style collection refund points. If the actual use of depot style collection points is considered, they are very different to a typical waste transfer station. Depot collection refund points don't deal with hazardous or contaminated materials – they deal with a commodity which has a value and which customers bring from their homes or in some cases from commercial settings in exchange for payment.

Our advice is also that planning schemes in other states around Australia (including but not limited to Victoria and NSW) permit depot style collection points for container deposit schemes in commercial and other zones -- typically areas where bulky goods retail is present. We are not aware of a reason why Tasmania should be different in this regard.

We respectfully request a re-consideration of the treatment of depot style collection refund points to provide greater flexibility, particularly in commercial and light industrial zones where similar bulky goods use is typically found. This would enable Launceston City Mission to have a choice of more appropriate and convenient locations, supporting the success of our ventures and of the CRS in general.

Yours sincerely



Stephen Brown, Chief Executive Officer