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Tasmanian Planning Commission
GPO Box 1691
Hobart TAS 7001

**Tasmanian Planning
16 JUN 2023
Commission**

Dear Sir/Madam,

RE: DRAFT TASMANIAN PLANNING POLICIES

Brighton Council Officers ('Council Officers') welcome the opportunity to make a representation to the Tasmanian Planning Policies ('TPPs'). Council Officers maintain that, overall, the TPPs are well drafted and are a positive start to the process of strategic land use planning and policy reform in Tasmania.

Whilst supportive of the TPPs, we emphasise that it is critical that once the TPPs are approved and gazetted, the Regional Land Use Strategies and the State Planning Provisions ('SPPs') are reviewed and updated promptly as they are the mechanisms under the statute that deliver the TPPs.

We are pleased that the State Planning Office has had regard to our previous submissions and, in some cases, made changes to the TPPs accordingly.

However, there are matters that we have raised previously which have not resulted in changes and wish to briefly reiterate those in this representation.

Attachment A of this submission provides comments on specific TPPs that Council Officers still consider need reviewing or commenting on after SPO's changes.

Once again, Council Officers wish to thank the Tasmanian Planning Commission for the opportunity to comment on the Draft TPPs. Overall, the TPPs are a good step in the right direction and if they are implemented properly, we should have a far better planning system than what we have now.

If you have any queries about this submission, please contact Brian White on (03) 6268 7070 between 8:15 a.m. and 4:45 p.m. Monday to Friday or by email at brian.white@brighton.tas.gov.au.

Yours faithfully,

David Allingham
Acting General Manager

TPP Topic	Policy Area	Standard/ Section	Council Officers' Comments to SPO	Further Comment to TPC
Settlement	Growth	1.11 – Application	Brighton Council is in a unique situation where most major existing settlements in the municipality are typically surrounded by swathes of Rural Living zoned land which has the effect of limiting residential outward growth. Indeed, Brighton's recent Structure Plan identified several existing Rural Living zoned areas both within, and outside, the Urban Growth Boundary as future growth/ investigation areas for general residential/ low density zoned land. Such a restructuring of rural residential areas to be fully serviced at typical suburban settlements is difficult in terms of coordinating infrastructure upgrades and a current lack of policy direction at the regional and state level. Policy (2)(a) states that planning for growth will: <i>prioritise and encourage infill development, consolidation, redevelopment, reuse and intensification of under-utilised land within existing settlements, prior to allocating land for growth outside existing settlements.</i> In Brighton's context, such a reuse and intensification of under-utilised land within existing settlements would be a reference to rural living zoned land within the UGB as identified in the recent Structure Plan. It is therefore recommended that strategies around restructuring rural living areas to accommodate residential growth (especially where they are located within an urban growth boundary) should be included either in the	The SPO have responded to our previous comment and have amended '1.1.1 Application' to now allow the policy to apply to rural residential settlements within the urban growth boundary. The policy application now reads: <i>Applies to existing settlements and land that is proposed, allocated or identified for future settlement growth, with the exception of rural residential settlements not included within an urban growth boundary (emphasis added).</i> Council Officers support the proposed changes to the TPP. However, we still consider that there needs to be policy guidance within the TPPs around restructuring rural residential areas into urban densities where they are located within the UGB.

			Growth policy area or elsewhere in the TPPs for situations where rural residential land could be used for a better and more sustainable use.		Council Officers maintain this needs to be further addressed.
Social Infrastructure	1.3.3.	The TPPs need to:	- Require consideration of the impacts of development on the provision/ demand for social infrastructure. - Encourage master planning to consider social infrastructure provision when planning for growth areas (l.e., Greenfield and existing areas).		

			- Consider measures to retrieve costs/ seek contributions for providing the social infrastructure needed because of (residential) development. Examples include levy's in lieu of providing social infrastructure. - Consider measures to incentivise developers providing social infrastructure as part of developments. - Add "Ensure social infrastructure is delivered in the development process and in the right locations". For example, construction of, or contributions for active travel networks or community buildings. - Consider social infrastructure as a means of improving liveability.	
	1.4.3		The TPP needs to: - As per previous comments, this strategy needs to consider the restructuring of rural residential settlements where they are in an area strategically beneficial for consideration for future growth and/ or where they are a constraint for future growth. - Strategy should consider retaining and improving natural values in rural living areas and development that responds to natural and landscape values.	Council Officer maintain this issue still needs to be further addressed.
Housing	1.5.3		The TPP needs to: - facilitate planning incentives to increase the supply of social and affordable housing for every stage of life and in the right places. - To facilitate mandatory planning mechanisms (such as inclusionary zoning and payment in lieu of providing social/	Council Officers maintain this issue needs to be further addressed.

			affordable housing) to increase the supply of social and affordable housing. - Consider tenure mix and increasing social disadvantage when providing social housing. - Consider the impacts of short stay accommodation on housing supply in major centers. - Consider the impacts of the loss of existing affordable housing.		
	Design	1.6.3 (2), (3) and	The TPP needs to: - Encourage high quality medium to high density housing. - Include consideration of climate resilience in providing public places such as via water sensitive urban design etc. and revegetation. - incorporate best practice principles in planning for open spaces in new subdivisions. - Include reference to precinct planning.		Council Officers consider this issue still needs to be further addressed.
Environmental Values	Biodiversity	2.1.3.	The TPP still contains language similar to the existing Natural Assets Code of the State Planning Provisions which seems to suggest that only 'high biodiversity values' or 'significant values' should be considered when assigning land for use and development. This is seen in policy 2.1.3 (2). Such language is not consistent with the objectives of the Resource Management and Planning System of Tasmania; in particular: "to promote the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity".		Council Officers consider this issue still needs to be further addressed.

Environmental Hazards	Bushfire	3.1.3	The TPP needs to: - Consider socio- economic vulnerability of people in assessing risk of bushfire. - Take a precautionary approach to rezoning additional land for rural residential use in areas of bushfire risk.	Council Officers consider this issue still needs to be further addressed.
	Industry	4.5.3	The TPP needs to: include reference to place making for industrial areas.	Council Officers consider this issue still needs to be further addressed.
Physical Infrastructure	Provision of Services	5.1.3	The TPP needs to: 5.1.3 (5) - Expand to include "Provide a framework for development and infrastructure contributions through new legislation that facilitates and coordinates the delivery of all necessary infrastructure from the relevant authorities (e.g., water & sewer, road, stormwater, electricity, nbn, etc." and "Prepare development and infrastructure plans for key areas through new legislation to manage contributions toward infrastructure. - Include policy regarding the restructuring of underutilised land for higher densities such as existing rural residential settlements.	Council Officers consider this issue still needs to be further addressed.
Cultural Heritage	Aboriginal Cultural Heritage	6.1.3	The TPP needs to: Add "Ensure aboriginal heritage is considered early in the planning and development process". The system is currently not set up for aboriginal heritage to be detected until planning permits have already been discovered. Its best to locate and design of development to consider aboriginal heritage early.	Council Officers consider this issue still needs to be further addressed.

			• Add "Adequately resource and put in proper processes for assessing aboriginal heritage."	
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