



2 May 2023

Tasmanian Planning Commission
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Tasmanian Planning Policies consultation

Thank you for the opportunity to comment on the Tasmanian Planning Policies (TPPs), their inclusion in the planning laws provide much needed direction to help bring all transport modes onto a more level playing field.

Bicycle Network made a submission to the government's Scoping Paper and it was pleasing to see that the issues raised in it were accommodated in the draft TPPs and this version of the TPPs lodged with the commission.

We know that we need separated cycleways if more people are going to choose to ride instead of drive. Researchers have shown that the majority of the population – up to 60% of people – are interested in riding more often but are concerned about their safety if made to ride with traffic with no physical protection.

Likewise, secure bike parking is needed if people are going to invest in good quality bicycles they can rely on for transport. Few people are going to invest thousands of dollars in an electric bicycle if they can't be sure it's not going to be stolen when they are at work, home, or visiting shops and services.

However, the statewide planning system has taken us backwards in provision of this infrastructure. We are looking to the introduction of the TPPs and the revised State Planning Provisions (SPPs) to rectify the mistakes in statewide planning reform to date.

Language could be tighter

The TPPs are clearly written in plain English and well-structured for easy reference.

Bicycle Network made the suggestion for stronger language in some sections when the draft TPPs were released so that elements which we were being "encouraged" and "promoted" were changed to "required".

However, the policy drafters have kept the language in the final TPPs broad, saying in the policies background paper:

“The TPPs are an expression of policy, they are not a regulatory planning instrument and therefore are not drafted in a definitive or absolute way.

“The TPP strategies are typically drafted with a verb at the beginning of the sentence. These are mostly expressed as encouraging verbs that help the strategies work towards achieving the aspirational outcomes expressed through the objective of the policy. The verb used helps set the direction, strength and intent of the policy statement.”

The devil is of course in the detail. The intent of the TPPs is to be commended but how they are interpreted for implementation through the SPPs and Regional Land Use Strategies is still a concern. This is why we’d prefer stronger language in the TPPs to ensure there is less wriggle room for different interpretation further down the hierarchy of regulation.

Technical changes to the SPPs under the current legislative 5-year review will be undertaken with a view to another round of policy changes following the adoption of the TPPs.

Until that happens, we won’t know how useful the TPPs are in changing the planning environment to ensure there are safe cycleways that people of all ages and abilities can use, and secure end-of-trip facilities and bicycle parking for all employees, apartment owners and visitors.

For example, the current statewide policy on bike parking doesn’t specify that employee parking be undercover and secure with access to showers and lockers, so employers can provide a few hoops anywhere on their property and they have complied with the scheme. This is not adequate infrastructure to help people make the switch from car travel to bike riding. We want to ensure this changes under the new TPPs and revised SPPs so that we can go back to a system where the standard of bicycle parking and end-of-trip facilities and of safe, all ages and abilities cycleway infrastructure are mandated.

Likewise, for apartment buildings there is no requirement to provide secure bicycle parking. So when developers put out imagery of happy looking people riding their bicycles past their new apartment, they don’t have to back it up with adequate parking. If people are going to ride bicycles for transport more often, they need a secure bike parking area at street level that is easily accessible and doesn’t involve lifting bikes or dragging them up and down stairs.

Settlement and Physical Infrastructure policies

The overall intent of the TPPs is a much-needed change, encouraging more active transport infrastructure in new and retrofitted developments.

The Climate Change statement in the Physical Infrastructure Policy is particularly welcomed as we need the infrastructure that will help more people ride instead of drive:

“The Physical Infrastructure TPP supports the provision of well-planned and well-designed infrastructure that can reduce emissions and take advantage of emerging opportunities in a low emissions future by: better sharing of road space to support increased uptake of more sustainable transport modes.”

As is the recognition in the same policy that the provision of cheap, ample car parking prevents the shifts we need to sustainable transport modes like cycling. While most of the wording in these policies makes it clear that provision of active transport infrastructure is the outcome, a few of the sections aren't so clear.

In these sections we'd like to see a greater requirement for such infrastructure rather than just consideration or encouragement, which is where our suggested wording changes come from. We'd like to see changes made so it's clear that policies are what must be followed rather than just considered or promoted.

Settlement Policy

Under 1.1 Growth:

- structure plans to ~~consider~~ **include** “movement networks, including street hierarchy and pedestrian and cycling paths for active transport modes” (1.1.3-6c).

Under 1.6 Design:

- “~~Encourage~~ **Ensure** the design and siting of buildings to positively contribute to: ... safe access and egress for pedestrian, cyclists and vehicles.” (1.6.3-1f).
- “~~Promote~~ **Ensure** subdivision design that considers the existing and future surrounding pattern of development and provides for connection and integration of street networks, pedestrian and bicycle paths and the efficient provision of services.” (1.6.3-7).
- “~~Promote~~ **Ensure** subdivision design that provides a functional lot layout that: ... provides safe active transport” (1.6.3-8g).

Physical Infrastructure Policy

Under 5.4 Transport Modes:

- “~~Encourage~~ **Ensure** public transport corridors **are to be** supported by **current or planned** active transport networks and bus stops that are safe, accessible and provide for better passenger amenity.”
(5.4.3-6)

Thank you for considering our concerns and desire for definitive language to ensure the intent of the TPPs is carried out in practice.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alison Hetherington', with a long horizontal flourish extending to the right.

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