



HUON VALLEY COUNCIL

HUON VALLEY COUNCIL SUBMISSION

Draft Tasmanian Planning Policies, June 2023

The Huon Valley Council (the Council) welcomes the opportunity to comment on the Draft Tasmanian Planning Policies (TPPs).

The Council provided a submission to the previous round of TPPs consultation in November 2022. The Council's earlier position has not changed, see the previous submission attached.

In addition to the previous submission the Council encourages the Commission to consider the following comments:

1.0 SETTLEMENT

Rural Residential Settlement

With regards to 1.1.3 Strategy 8, the Council is concerned with the lack of attention given to rural residential settlement areas located outside the urban growth boundary. While the policy rightly focuses on and prioritises settlement and growth within the urban growth boundary, it is essential that the policy addresses the needs and development considerations of rural residential areas as well.

Rural residential is becoming a popular housing choice in Huon Valley in recent years and should be recognised for its contribution towards residential growth in TPPs. Rural residential settlements play a vital role in maintaining the fabric of our communities, preserving natural landscapes, and supporting sustainable agriculture and rural industries. By overlooking the specific challenges and opportunities of these areas, the policy may inadvertently neglect the well-being and development potential of rural communities.

To ensure comprehensive and equitable planning, the Council recommends the following principles be incorporated into the policy:

1. **Planning Framework: Recognise the Importance of Rural Residential Settlements**, and explicitly acknowledge the significance of rural residential areas in the policy document. Highlight the unique characteristics and value they bring to the overall regional development strategy, including their cultural heritage, environmental assets, and economic contributions.
2. **Define a clear Vision and Objectives for Rural Residential Settlements**: Establish a clear vision for the sustainable development of rural residential areas, aligned with the broader goals of the policy. Define specific objectives that cater to the unique needs and aspirations of these communities, such as preserving rural character, supporting local economies, and ensuring access to essential services.
3. **Tailor Planning Strategies for Rural Residential Areas**: Develop planning strategies that address the challenges and opportunities specific to rural residential settlements. Consider factors such as land use diversity, agricultural compatibility, infrastructure requirements, environmental

stewardship, and community connectivity. This tailored approach will facilitate appropriate and sustainable development in these areas.

4. **Infrastructure Provision:** Ensure that adequate infrastructure provisions are made for rural residential areas, including access to essential services such as roads, utilities, water supply, and sanitation. Recognise the challenges associated with providing infrastructure in remote or sparsely populated areas and develop strategies to address these challenges effectively. It is understood that developer contribution is mentioned in the draft TPPs, however, it can be further explored as to how the cost can be distributed reasonably between developers, utility providers and the Council.
5. **Environmental Protection:** Emphasise the preservation of natural resources and environmentally sensitive areas within and surrounding rural residential settlements. Implement measures to safeguard water bodies, wildlife habitats, and agricultural lands, taking into account the specific ecological characteristics of the region.
6. **Economic Opportunities:** Recognise and support economic opportunities within rural residential areas. Encourage the development of local businesses, agricultural initiatives, tourism, and other industries that can contribute to the economic sustainability and vibrancy of these communities.
7. **Encourage Community Engagement:** Foster meaningful engagement with rural residents and community stakeholders during the planning process. Seek their input, feedback, and local knowledge to ensure that the policies and strategies reflect the needs, aspirations, and values of the rural communities. Emphasise the importance of collaboration and partnership between local government authorities and rural residents.
8. **Provide Support and Resources:** Allocate adequate resources, technical assistance, and funding opportunities to assist rural residential communities in implementing sustainable development practices. Offer guidance and incentives for initiatives such as agricultural diversification, environmental conservation, heritage preservation, and small-scale entrepreneurship in rural areas.

By incorporating these principles, we can ensure that the needs and potential of rural residential settlements are appropriately recognised and addressed. This inclusive approach will foster balanced regional development, promote community resilience, and preserve the unique character of our rural areas.

Housing Design

In 1.6.3, the Design policy (Section 1.6) provides valuable strategies for creating functional and sustainable urban spaces. However, it is crucial to emphasise the importance of implementation and enforcement to ensure that these strategies are effectively translated into action. Currently, the policy lacks specific guidelines or provisions for implementation.

To address this, it is recommended to include implementation guidelines that clearly state the requirement for incorporating energy-efficient and future-proofed housing design. These guidelines should emphasise the integration of these principles into the State Planning Provisions or Tasmanian Building Codes. By doing so, it will ensure that these considerations are not merely optional but are legally mandated and enforced in all relevant development projects. It will facilitate the incorporation of energy-efficient and sustainable design practices into the planning and construction processes, ultimately leading to tangible outcomes in terms of reduced carbon emissions and increased resilience to future challenges.

In 1.6.3 – 8(f), it is suggested to modify this beyond stormwater management alone to “maintaining water quality by promoting best practice monitoring systems, stormwater management, wastewater treatment in general onsite and reticulated approaches”.

2.0 ENVIRONMENTAL VALUES

Waterways, Wetlands and Estuaries

In 2.2.3 - 4, while Strategy 4 focuses on minimising impacts from use and development "in and around waterways, wetlands, and estuaries," it is important to recognise that impacts can occur beyond these immediate areas. Development activities can have indirect effects on waterways through groundwater and stormwater infrastructure.

To ensure comprehensive protection of water resources, it is recommended to expand the scope of Strategy 4 to address potential impacts from development activities throughout the catchment area. This includes considering the conveyance of pollutants via groundwater and stormwater infrastructure, which can affect water quality even from areas located at a distance from surface waters. By broadening the scope of Strategy 4 to encompass these considerations, the policy will better address the potential indirect impacts of development on waterways, wetlands, and estuaries, ensuring a more comprehensive and effective approach to water resource protection.

4.0 SUSTAINABLE ECONOMIC DEVELOPMENT

Sustainable Economic Development

In 4.0, The Sustainable Economic Development policy should consider revising the language around economic "growth" to align with the goals of climate change policies, wellbeing, and sustainability objectives. The term "growth" on its own can be perceived as incompatible with the need to address climate change and promote equality.

Instead of focusing solely on economic growth, the policy could also emphasise the concepts of economic resilience, transformation, and sustainability. This would reflect the recognition that unchecked growth is unsustainable and can contribute to exceeding planetary boundaries. By promoting a more balanced and holistic approach, the policy can better align with the objectives of addressing climate change, promoting wellbeing, and ensuring a more equitable distribution of resources and opportunities.

Furthermore, the policy could integrate principles of a circular economy, which emphasises reducing waste, recycling materials, and promoting resource efficiency. This approach would help minimise environmental impacts while fostering innovation and economic development.

Renewable Energy

In 4.5, regarding the Renewable Energy policy, it is important to note that not all forms of "bioenergy" are inherently carbon-neutral or environmentally friendly and can have negative environmental impacts. Additionally, certain bioenergy processes may generate emissions during their use, unlike true renewable energy sources.

Therefore, it is crucial to ensure that the promotion of bioenergy aligns with sustainable practices and avoids activities that contribute to environmental degradation. Emphasising the distinction between truly renewable energy sources and bioenergy can help prevent misleading perceptions and ensure a focus on environmentally beneficial solutions with following positive economic outcomes.

5.0 PHYSICAL INFRASTRUCTURE

Passenger Transport Modes

In 5.4.3 – 5, Physical Infrastructure - The policy should include the development of an active transport network in both urban and rural areas. Active transport is essential for promoting mode shift and sustainable transportation options in all regions. Rural populations can greatly benefit from dedicated walking and cycling infrastructure, especially considering the challenges posed by unsealed roads and the absence of designated pedestrian and cycling paths. Including active transport tracks in rural areas will contribute to achieving mode shift goals and improving accessibility for non-motorised transportation in these communities.



1 November 2022

Our Ref: 17/74

Your Ref:

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Dear Mr Risby,

Draft Tasmanian Planning Policies (TPP)

Thank you for the opportunity to provide a submission on the draft Tasmanian Planning Policies (TPPs).

It is pleasing to see progress on the development of the TPPs as there has been a lack of a comprehensive overarching planning State-wide policy framework to guide planning authorities in undertaking strategic land use and planning in the regions. The TPPs will guide the future development of our State and to further inform planning outcomes delivered through the TPS and the regional strategy (STRLUS).

Effectiveness of TPPs

Apart from the specific application of the TPPs as required by the *Land Use Planning and Approvals Act 1993* (Act), for example, Section 34(2), it is unclear as to the extent planning authorities will be able to comprehensively apply policy requirements of the TPPs at a local level.

This is due to the fact that the Act does not clearly enable the TPPs to be more directly taken into account in relation to local use and development decisions made by planning authorities.

There are no apparent direct links provided from the TPPs to use and development regulatory controls.

Without the explicit links, the concern is that the TPPs may become an aspirational 'wish list' and therefore not provide a best possible planning outcomes.

The Productivity Commission has over the last decade undertaken periodic reviews of land use planning regulatory issues, and recommended important '*leading practices*' (as distinct from 'best' practices) to be applied at the State or Territory, regional and municipal area level based on the submissions provided to its reviews.

In a 2021 report, *Plan to identify planning and zoning reforms*, the Commission recommends:

State planning policies should provide clear guidance on how Local Government plans should be developed, including specification of policy priorities, preferred methods for achieving them, and the relevance of State planning policies to which local council must have regard. (page 8)

It is considered the draft TPPs do not provide adequate overall guidance on how they can be applied by a planning authority at a municipal level.

The draft TPPs recognise the various values of different regions, however, they do not specify the methodology to determine the priority for each region or municipal area.

It is understood that the intent of the TPPs is that they are to apply in their entirety, with all relevant strategies applying equally. As such, no strategy should be read in isolation from the others to imply a particular outcome.

However, this is considered potentially difficult to achieve.

A good policy should inform the trade-offs among objectives and identify where and in what sequence strategic land use and development changes, infrastructure and servicing needs should arise.

It is also noted that the some of the policies are quite detailed and hence would require the local response to be set regionally via guiding principles or directions.

The extent of work required within a region to give effect to a TPP could be extensive, which may lead to potential delay to future LPS revisions.

It is also possible that the complexity of the TPPs may unnecessarily constrain local level planning.

As such, an innovative or place-based response that delivers good planning outcomes through the TPPs and based on *leading practice* methodology should be incorporated into relevant policies.

On that basis, therefore, a clear Implementation Guideline that balances these competing planning requirements, becomes essential and necessary.

Implementation Guidelines

The guideline should address the planning process at the local level (municipal area) and should incorporate, at minimum:

- Measures to align local and State planning policy requirements in Implementation Guidelines;
- Provide methodologies to inform the planning authority decisions including when there are conflicting objectives;
- Figures similar to the explanatory diagram below which is an extract from the Victorian Planning Policy Framework.



(extracted from [AN71-Amendment-VC148-Planning-Policy-Framework-PPF.pdf](#))

Additionally, more resources need to be allocated with specific responsibilities to facilitate alignment of the TPPs and State Planning Policies in partnership with planning authorities, to realise leading practice outcomes such as **consistency** and **integration** between local, regional and State strategic planning land use strategies and plans. This resourcing is essential to ensure good strategic planning outcomes can also be achieved across regions and within municipal areas.

More engagement with planning authority representatives

As per Schedule 1 of the Act which encourages public involvement in policy making to achieve effective outcomes, as councils have considerable expertise in implementing planning provisions it is considered there needs to be greater and more regular engagement with planning authority representatives in the development and implementation of the TPPs.

It is respectfully requested the State Planning Office dedicate more time and resources to directly engage with planning authority representatives before further statutory steps are taken in the implementation of these policies.

This should include a series of targeted workshops for more opportunities to engage on this important initiative, and for more opportunities for planning and other expertise to have input and 'buy in' in the development of the policies.

Embed resilience in planning

Resilience considers a system's ability to prepare for threats, to absorb impacts, to recover and adapt after disruptive events. Strengthening resilience reduces the costs of recovery and rebuilding and helps communities to take control of how they want to grow or change.

A resilience lens tackles uncertainty by considering scenarios and testing diverse and adaptable planning approaches – rather than just relying on the projection of past experience.

Embedding resilience also recognises expectations for improved standards of environmental performance – so that responding to climate change or other shocks

does not reduce biodiversity, heritage or other qualities of the natural or cultural environment.

The TPPs should strengthen the 'elements of resilient systems'. This means embedding resilience throughout each section - not just as discrete section (section 3.0 under Environmental hazards). The TPPs should set up policy guidance to consider 'when' as well 'what' decisions should be made when responding to different scenarios; allow decision-making responsibility to the least centralised capable level; and set standards for environmental and biodiversity performance.

Smart Cities Initiative

'Smart cities' is used to describe the technology (e.g. computers and networked sensors) integrated into the built environment and daily life. All these things generate huge amounts of data (big data) enabling real-time insights into local city environments that have never been possible before.

'Smart cities' mean better data and understanding around the infrastructure demand projections for new development.

As such, there is a great opportunity to include a TPP which promotes the 'smart cities' initiative.

The policy should provide a high level overview to assist all levels of governments to develop the goals and plans to which they should aspire to achieve, and the features and functions its smart infrastructure should deliver.

The Monitoring and Evaluation of the TPPs

Whilst the TPPs are required to be reviewed every five years by the Minister, it is noted that there is no reference made to the monitoring and evaluation of the TPPs.

- How are TPPs going to be measured as part of their review?
- Who will undertake the review?
- What are the methods and criteria to evaluate their effectiveness?

The TPPs should be evaluated to ensure they demonstrate they further Part 1 and Part 2 objectives set out in Schedule 1 of the Act.

Again, the Productivity Commission has previously undertaken comprehensive reviews of benchmarking indicators and provided *leading practice* recommendations for application by relevant stakeholders based on the advice provide to the Commission.

Therefore, performance evaluation criterion (performance indicators) needs also to be developed prior to finalisation of the TPPs to determine the effectiveness of each policy after they commence and assist in determining whether policy changes are required.

This will provide an objective basis to judge the performance of the respective policies in achieving specific policy outcomes, and provide a basis to consider refinements and reviews to relevant polices in consultation with stakeholders.

It is also noted that with any policy work and strategic planning work there needs to be allocate ongoing resources available State-wide to facilitate continual review and improvement of the TPPs.

Reference documentation

It would be useful have on the SPO website a list of the main documentation that has been considered in and informed the preparation of the draft TPPs to date.

Please advise if this can be arranged as it would be of interest to many stakeholders.

The opportunity to provide further feedback on the draft Tasmanian Planning Policies is appreciated to assist with revisions to the draft policies for the improvements as set out above before the policies are finalised.

Please do not hesitate to contact Council's Strategic Land Use Planning Officer Rong Zheng on 6264 9467 should you require further comment or clarification.

Yours faithfully



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