

Tasmanian Active Living Coalition
Submission to Tasmanian Planning Policies
Review (Phase 2)

June 2023



Tasmanian Active Living Coalition

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To The Tasmanian Planning Commission

Subject: Tasmanian Planning Policies Review (Phase 2)

Thank you for the opportunity to provide feedback on phase one of the Tasmanian Planning Policies Review (Phase 2). On behalf of members of the Tasmanian Active Living Coalition please find a consultation submission attached in response to Phase 2.

The Tasmanian Active Living Coalition works together to influence and inform policies, decisions and strategies encouraging the creation of active living environments, food security and social inclusion benefiting health and wellbeing.

TALC is also consulted by the Premier's Health and Wellbeing Advisory Council for its expert views on the above matters.

Yours sincerely

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Introduction

The Tasmanian Active Living Coalition (TALC) welcomes the opportunity to submit feedback on the Draft Tasmanian Planning Policies (TPPs).

The objective of TALC's submission is to embed health and wellbeing in the TPPs. TALC proposes this can be achieved by putting a 'health in all policies' lens on the TPPs and including improved or additional policy/policies supporting and promoting active living, access to open space, food security and social inclusion.

This submission follows on from previous relevant TALC publications and submissions, and is particularly relevant to the following (see Appendices A and B):

- Tasmanian Active Living Coalition, Submission to Draft TPPs – Phase I, November 2022
- Tasmanian Active Living Coalition, *Tasmania's Planning System: Opportunities for Health and Wellbeing*, 2021

The rationale and supporting evidence for the recommended amendments is detailed throughout the submission. Individual TALC members have contributed to this submission and may have also made separate submissions on behalf of their organisations.

This submission has been approved by TALC's Chair and endorsed by TALC's membership.

About the Tasmanian Active Living Coalition

TALC is an independent, not-for-profit coalition made up of representatives from a broad range of non-Government and Government organisations with an interest in active living. TALC members work together to influence and inform policies, decisions and strategies that encourage the creation of active living environments.

TALC's aim is to lead, support and promote the creation of environments supporting active living, and to add value by providing a mechanism for an integrated approach and potentially drive behaviour change in relation to active living.

TALC's purpose is to:

- Support the translation of evidence into policy and practice;
- build and strengthen new and existing partnerships to foster collaboration across sectors and within and across state and local government partnerships and develop new partnerships as required;
- raise the profile of active living; and

- support, advise and advocate for improvements in the policy, built and natural environments.

The principal interest of TALC is for the TPPs to enhance (and not hinder) active living (including physical activity and active travel) and access to healthy food for community health and wellbeing. Therefore, TALC advocates to have *health and wellbeing* as priority outcomes from land use planning as regulated through the Tasmanian Planning System.

Definitions

The following terms included in this submission are defined as

Active living - a way of life that integrates physical activity into daily routines (Heart Foundation, 2016).

Active travel/transport - travel modes that involve physical activity such as walking and cycling and includes the use of public transport that is accessed via walking or cycling and may allow for integration of multi-modal transport in the course of a day (Heart Foundation, 2016).

Built environment - the structures and places in which we live, work, shop, learn, travel and play, including land uses, transportation systems and design features (National Heart Foundation of Australia, 2017).

Food security - the ability of individuals, households, and communities to physically and economically access food that is healthy, sustainable, affordable, and culturally appropriate. The domains of food security include supply, demand, utilisation, and access (financial and physical) (Heart Foundation, 2016).

Health - a state of complete physical, mental, and social wellbeing and not merely the absence of disease (World Health Organization, 2022a).

Liveability - a liveable community is one that is safe, socially cohesive, inclusive, and environmentally sustainable. Highly liveable areas provide affordable housing that is well serviced by public transport, walking, and cycling infrastructure (Department of Agriculture Water and the Environment, 2021). They have good access to employment, education, shops and services, POSs, and social, cultural, and recreational facilities (Department of Agriculture Water and the Environment, 2021).

Physical activity - any bodily movement produced by skeletal muscles that requires energy expenditure encompassing all movement during leisure time, for transport to get to and from places, or as part of a person's work (World Health Organization, 2022b).

Social inclusion – is a term used to describe how government, community, business, services, and individuals can work together to make sure that all people have the best opportunities to enjoy life and do well in society. It is about making sure that no one is left out or forgotten in our community (Social Inclusion Unit, 2008).

Wellbeing – mental health is a state in which an individual can realise their own potential cope with normal stresses, work productively and contribute to their community (World Health Organization, 2022a).¹



¹ TALC acknowledges that Tasmania will likely develop its own definition of wellbeing as part of the development of Tasmanian Health and Wellbeing Framework.

Active Living Overview

The TPPs are a key mechanism for applying healthy planning principles to the built environment in Tasmania to create liveable locations which promote physical activity, healthy eating, and social connection. TALC provides the following overview of key aspects of active living which are directly related to development of the TPPs. TALC advocates for policies providing the implementation bridge between State Policies under the *State Policies and Projects Act 1993* and regional land use strategies and the Tasmanian Planning Scheme (TPS).

The Built Environment

The way the environment is planned, designed, and built can directly affect the health and wellbeing of people who use and inhabit the space. A series in *The Lancet*, one of the top-ranking medical journals in the world, *Urban Design and Transport to Promote Healthy Lives* recognises the importance of the built environment for active living (Goenka and Andersen, 2016). The series recommends creating compact cities that locate shops, schools, other services, parks, and recreational facilities, as well as jobs near homes, and providing highly connective street networks making it easy for people to walk and cycle to places (Goenka and Andersen, 2016). The Heart Foundation of Australia's *Healthy Active by Design* framework (National Heart Foundation of Australia, 2017) notes planning for active living calls for a commitment to applying healthy planning principles to all levels of the planning system, at every stage of the planning process and in every planning project and policy initiative' (National Heart Foundation of Australia, 2017).

There are many co-benefits of improving planning for active living including reductions in greenhouse gas emissions, improved air quality, reduced traffic congestion, more sustainable infrastructure, increased economic productivity, improved social capital and more liveable towns and cities (Goenka and Andersen, 2016).

The COVID-19 pandemic required people to stay close to home, further highlighting the importance of how the built environment can support health and wellbeing. The living with COVID-19 landscape provides a unique opportunity to prioritise the development of built environments supportive of health and wellbeing by embedding these principles within the TPP policies.

Physical Activity

Physical activity is fundamental for good physical and mental health and wellbeing. Physical activity can help prevent heart disease, type two diabetes, numerous cancers, dementia, weight gain, gestational diabetes, and anxiety and depression (Bellew et al., 2020). Being physically active improves sleep and improves brain function at all ages (Bellew et al., 2020).

Despite this, almost half of all Tasmanians aged 18 and over do not do enough physical activity for good health (Australian Bureau of Statistics, 2016). Tasmania is below the national average and is ranked sixth out of the eight states and territories (Australian Bureau of Statistics, 2016).

Internationally, the World Health Organization's *Global Action Plan on Physical Activity 2018-2030* has as one of its four key pillars a priority focus to 'create active environments' (World Health Organization, 2018). This includes strengthening the integration of urban and transport planning policies, delivering highly connected neighbourhoods to support active and public transport, improving walking, and cycling network infrastructure, accelerating implementation of policy actions to improve road and personal safety for active and public transport users, strengthening access to public and green open spaces, and strengthening policy, regulatory, and design guidelines and frameworks. The International Society for Physical Activity and Health recommend eight key investments to address physical inactivity (International Society for Physical Activity and Health, 2020). The eight investment areas are the evidence-based domains where Governments and organisations can get the best return on investment to improve health and wellbeing through increasing physical activity. Of the eight identified domains, those that can be directly influenced by the Tasmanian Planning Policies (TPPs) include: active travel, active urban design, and workplaces (International Society for Physical Activity and Health, 2020)

The Planning Institute of Australia (Tasmania) noted in their submission to the Tasmanian Planning Policies (TPPs) Scoping Paper the following which is supported by TALC:

On an international level, the United Nations Sustainable Development Goals (SDGs) were adopted as a "blueprint for a more sustainable future for all". While the SDGs are intended to be achieved by 2030, they provide a holistic summary of the elements which contribute to planning and building of sustainable communities. By aligning the TPPs with the relevant SDGs, this allows for the work of planners to contribute to a more sustainable world, and guidance of how planners can direct efforts to a more sustainable future in line with a coherent framework adopted by government and business alike.

Incorporation of SDGs into strategic planning is not novel in Australia; a recent example is Victoria's new Guidelines for Precinct Structure Planning, which interlinks the SDGs with planning principles. Similarly, the Tasmanian Government's recent commitment to the recommendations from the Premier's Economic & Social Recovery Advisory Council (PESRAC) demonstrates clear linkages to the aspects covered by the SDGs. In addition, the PESRAC report clearly recommends alignment of its Sustainability Vision with the SDGs and support for government wide adoption of the SDGs. (Planning Institute of Australia, 2021)

Nationally, the Heart Foundation's *Blueprint for an Active Australia* states 'reshaping the built environments in which most Australians live, work, learn and recreate can significantly increase daily physical activity levels. Community and neighbourhood design impacts on local walking, cycling and public transport use, as well as on recreational walking and physical activity' (National Heart Foundation of Australia, 2019). The Getting Australia Active III report identified eight policy domains for systems level action on physical activity, notably transport, the built environment, and workplaces (Bellew et. al., 2020).

It is within this context of national and international best practice evidence that TALC asserts the TPPs can make a powerful contribution to the health and wellbeing of the Tasmanian community. Other co-benefits of environments supporting physical activity include economic growth, strengthening communities, liveability, environmental sustainability/climate change mitigation, and safety.

Liveability

The Heart Foundation's 2020-21 *What Australia Wants* survey measured community sentiment around qualities of active neighbourhoods and support for initiatives to increase infrastructure for physical activity in and around neighbourhoods (National Heart Foundation of Australia, 2020). Tasmanians expressed a desire to live close to shops and amenities, and in a safe area that is quiet and away from main roads. Tasmanians prioritise access to healthy food, housing diversity and a sense of place (that is, safety, community, natural elements as the most important design features) (National Heart Foundation of Australia, 2020). The report noted only 31% of Tasmanians believe their neighbourhood helps them a lot in being active (National Heart Foundation of Australia, 2020). Support for government investment in active infrastructure (67%) and public transport funding (64%) was strong, as was support for speed limit reductions in neighbourhood streets (59%) was strong (National Heart Foundation of Australia, 2020). Being close to amenities, shops and services, safety/low crime, and having fresh food close by were important considerations for Tasmanians when deciding where to live. However, the results also indicate these attributes are not always accessible to Tasmanians and should be embedded within the planning system. The TPPs have the opportunity to shape all of these elements.

In 2021, Place Score ran the Australian Liveability Census, the largest social research project in Australia which included 3,200 records gathered from community members in Tasmania (Malshe et al., 2021). The census explored what was most important in terms of neighbourhood liveability and current performance (Malshe et al., 2021). Ideas for improving local neighbourhoods were collected and included improving walkability to local amenities and open spaces (Malshe et al., 2021). Nationally, walking/jogging/bike paths that connect housing to community amenity was selected as

being most important to their ideal neighbourhood by 55 per cent of respondents, again highlighting the value placed on liveability and the built environment by communities.

Integrated Policies in Health and Wellbeing

Improving health and wellbeing by supporting Tasmanians to live active lives requires a coordinated approach across government agencies and sectors as called for in the World Health Organization's (WHO) 'Health in All Policies' approach to preventative health (World Health Organization, 2022c). In Tasmania, key existing policies which reference active living and are relevant to the TPPs are detailed as follows to provide context and background to the existing policy landscape.

The *Tasmania Statement* supports the connection between health and wellbeing enhanced by natural open spaces. It further notes the opportunities available as Tasmania grows to plan communities to create healthy, liveable, and connected spaces (Premier's Health and Wellbeing Advisory Council, 2021). The *Tasmania Statement* creates an authorising environment for those working within the Tasmanian Government to support health and wellbeing considerations within the planning scheme.

The *Healthy Tasmania Five Year Strategic Plan 2022-26* advocates for a health in all policies approach, including an analysis of the systems outside the health sector which influence the health status of populations (Department of Health and Human Services, 2022). The plan focuses on systems and supporting active living initiatives, particularly through planning and building places that support health, wellbeing, and physical activity, and by building infrastructure that makes walking, cycling, accessibility, and public transport safe and viable alternatives to driving (Department of Health and Human Services, 2022). This builds on earlier work under Tasmania's Plan for Physical Activity 2011-2021 which aimed to 'create built and natural environments that enable and encourage physical activity (Department of Infrastructure, 2010).

TALC Recommendations on the Draft TPPs

TALC's feedback and recommendations pertaining to the updated draft TPPs are presented here. These recommendations follow on from the submission responding to phase-I of review of the draft TPPs in November 2022. In that submission we responded in detail to each of the relevant policies providing evidence-based context to our recommendations. In our review of this round of draft TPPs (phase 2) we consider how the TPPs have incorporated our initial round of recommendations and offer further considerations and recommendations where required. Consequently, we recommend reference to this first document which can be found in Appendix A.

TALC's interest in the TPPs is primarily related to the 'Settlement' and 'Physical Infrastructure' policies and 'Planning Processes' considerations, though there are also some suggestions for the 'Natural Hazards' policies. Detailed comments are provided under each policy area relevant to TALC's key objectives to encourage active lifestyles for human health.

Overall, TALC appreciates that there have been improvements to the first draft of TPPs and notes there has been good attention to the suggestions for improvements made from the first round of feedback. However, TALC is concerned about the following higher order planning system matters, in particular, how the TPPs will take effect in Regional Land Use Strategy (RLUS) planning and the Tasmanian Planning Scheme (TPS). We make the following suggestions:

1. The TPPs should seek to present an effective application bridge between State Policies, RLUS planning and the TPS as without this bridge the TPPs will be less effective than they could be. For example, it is noted that the TPPs appear in their own policy vacuum of State Policies with no recognition of the State Policy on Water Quality Management 1997 and the State Policy on the Protection of Agriculture Land 2009. In addition, whilst the State Coastal Policy is identified in the TPPs it is effectively limited to restating some of the coastal policy outcomes. These examples show a weak relationship between State Policies and TPPs.
2. The individual policies comprising the TPPs should be tested in terms of how they can effectively be used in RLUS planning and the TPS. This testing could be by replacing words such as 'protect', 'support', 'facilitate' etc., with 'require'. Policies that do not meet this test should be revised.
3. The appearance of structure plans in the draft TPPs is questioned on the capacity for the planning regime to deal with another element in the planning system. Sufficient pointers as to what the Government is seeking on land use should ideally be capable of being delivered through existing statutory mechanisms unless there is significant investment in funding for structure planning to occur effectively.

Section 1.0 – Settlement

TALC offers the following comments and suggestions pertaining to this section.

We note that sections ‘Growth’ (1.1), ‘Liveability’ (1.2), and ‘Social Infrastructure’ (1.3) apply to both existing and future settlements, though exclude rural residential settlements. There is evidence that rural communities generally have lower incomes, lower educational attainment, higher unemployment, as well as poorer infrastructure in the built environment (such as that for walking, riding and access to green space). While it is acknowledged that many residents in rural residential settlements are there by preference, some rural residential communities (or very low density residential on urban fringes) are home for lower income communities with little choice and there should be a requirement for a greater level of infrastructure for enabling local active travel where possible. This is especially the case for lower density residential areas that are likely to increase in density over time. Therefore, TALC recommends acknowledgement of these circumstances and needs in the TPP ‘Settlements’ section.

Section 1.0.2 Climate change statement

The Climate Change statement in the Settlement Policy is appreciated. There are several co-benefits for public health in addressing climate change risk and promoting emission reduction through transport actions.

TALC recommends that the co-benefits for health and active travel should be mentioned more firmly in the statement on encouraging urban vegetation.

Paragraph 4 p.9:

‘Encouraging urban vegetation contributes to carbon storage in the urban landscape and allows urban environments to better tolerate extreme heat events through providing shade and cleaner air, while urban vegetation also provides a range of other ecosystem services (i.e., stormwater management). These actions help to reduce the impact of climate change and, in doing so, also create liveable environments that support active use of the public realm.’

Section 1.1 Growth

With reference to strategy 1.1.3:

We are pleased to see that the mention of integration with existing transport systems has been placed higher in the list of strategies for planning for growth but the meaning of ‘transport systems’ in 1.1.3-2c and 3f should be clarified to include ‘road, passenger and active travel’ to ensure land use development does not simply focus on private motor vehicle transport as has been the tendency in the past.

Suggestions relating to 1.1.3-2c and 1.1.3-3f

2. Plan for growth that will:

c) integrate with existing transport systems (road, passenger, and active travel modes); and (1.1.3-2c)

3. Identify regional settlement hierarchies based on:

f) efficient and accessible transport systems (road, passenger, and active travel modes); and (1.1.3-3f)

In addition to this emphasis, policy should also reflect the need for improved quality in integrated transport to support liveability. Further suggestions are made in section 5.0 on Physical Infrastructure.

Further, the word 'considers' in 1.1.3-6c is quite a weak word and thus open to structure plans not including that which might have been 'considered' even if it is reasonable. Point 1.1.3-6 is suggesting that minimum standards be established in structure plans. Therefore, we recommend using a stronger word than 'considers'.

Suggestion relating to 1.1.3-6c

6. Promote the preparation of structure plans that provide for the effective planning and management of land use and development within a settlement, or part of a settlement, that, as a minimum, includes:

c) movement networks, including street hierarchy and pedestrian and cycling paths for active travel;

Section 1.2 Liveability

With reference to strategy 1.2.3-2a:

2. Facilitate access to, and a diverse range of, employment opportunities in settlements by:

a) promoting the provision of, and access to, safe and efficient public transport (1.2.3-2a)

The strategy 1.2.3-2a needs to be supported by investment in public transport services in settlements, and where settlements are new, public transport and good quality active travel infrastructure and services provided early in development stages to provide a range of transport options for residents and workers. Without such investment early in settlement development, dominant motor vehicle-based travel behaviours are likely to become entrenched, after which it is difficult to alter travel behaviours and promote health through more active modes. Further opportunities regarding this issue are discussed on page 17 (section on State policy and developer contributions).

With reference to strategy I.2.3-3b, TALC appreciates the clearer wording in this compared to early drafts in section statement I.2.3-3. Regarding point I.2.3-3b, TALC considers that such land uses (tertiary education/vocational training) should firstly be in places highly accessible by public transport (usually central areas) foremost. Some residential areas may be proximate and therefore should have good connectivity to these institutions, however, all Tasmanians, regardless of where they live or their socioeconomic circumstances, should be able to access tertiary and vocational training facilities. Stressing good accessibility by public transport is especially important to enhancing access to tertiary institutions for those of lower socioeconomic status which aligns with other State educational improvement objectives. TALC makes the following suggestion to reorder elements of the statement to emphasise the significance of access to public transport as a priority.

Suggestion relating to I.2.3-3b

- 3. Support growth in the skilled workforce and increase opportunities for innovation, research, and technology by encouraging tertiary education and vocational training institutions to be located:*
- b) within close proximity of residential areas, or highly accessible by public transport in areas highly accessible by public transport foremost, and with good active travel connectivity to neighbouring residential areas. (I.2.3-3b)*

In section I.2.3-4 and I.2.3-5 we recommend including safety where provision of accessible and connected open spaces and infrastructure is mentioned to support the encouragement of active mode choice.

Suggestions relating to I.2.3-4 and I.2.3-5:

- 4. Provide for a network of accessible, interlinked, safe, and inviting open and green spaces close to and within residential areas and activity centres to encourage active lifestyles, connection with nature and social interaction. (I.2.3-4)*
- 5. Provide for connectivity within settlements, especially between residential areas, activity centres and open space networks, through a network of legible, safe, and accessible infrastructure dedicated to active travel modes, including end of trip facilities. (I.2.3-5)*

TALC appreciates the promotion of place-making approaches mentioned in I.2.3-11, as these approaches present the opportunity for integrated planning and design for quality outcomes.

Section I.3 Social infrastructure

Section I.3.3-1 references some social infrastructure (namely, schools, health care, libraries, social services and child and aged care). However, references could also be made to other social infrastructure that more explicitly relates to active living. For example, multi-use sports facilities,

public open spaces, and other recreation areas servicing population catchments such as district playing fields, neighbourhood ovals, neighbourhood parks/playgrounds, community centres and courts and skate facilities (SGS Economics and Planning 2019).

With an increasing emphasis upon urban infill and increased densities under the Greater Hobart Plan, provision of public open space is likely to become increasingly piecemeal. Although one-off sites may not be as effective in providing tree canopy cover and other vegetation as more substantial areas of public open space (i.e., Greenfield development), smaller pockets (i.e., neighbourhood parks) can contribute to liveability and active living, for example, through mitigation of the urban heat island effect (Dimoudia et al. 2013, Osmond et al. 2017). The placement of numerous, smaller vegetation patches can be more effective in cooling the surrounding urban landscape than larger but fewer vegetation patches. This is due to increased exchanges of energy with adjacent areas and alignment with wind flow to disperse cool air from vegetation (Yan et al. 2019, Zhang et al. 2019).

Section 1.5 Housing

Section 1.5.3-3 could be expanded upon to emphasise greater equity in housing provision to support health and wellbeing outcomes for a range of demographic cohorts. For instance, there is evidence that Tasmania has a higher proportion of people living with a disability and chronic illness (Campbell et al. 2021, Australian Bureau of Statistics 2018, Department of Health 2018). There are associations between these conditions and poorer quality of the built environment (Austin et al. 2011, Davison et al. 2012, Kirkpatrick et al. 2007). This could be through explicit statement of measures such as inclusionary zoning and other measures to increase affordable housing within areas of proximity to services and social infrastructure (incl. recreation areas), enabling improved health and cost of living outcomes. Measures to increase affordable housing are further offered in TALC's 2022 Housing Strategy submission (appendix C).

1.5.3-4c seeks to support quality of private open space. This should emphasise landscaping requirements and encourage lot configurations that support tree canopy cover through adequate spacing and soil zones to enable private open space to support liveability, such as environments amenable to mitigation of the urban heat island effect and seasonal produce.

Section 1.6 Design

TALC would like to see more mention of the need to design for people living with a range of abilities. The suggestion that this is the case is perhaps implied in the strategies, but it is not explicit and therefore runs the risk of not being considered important as development occurs. TALC also would like to see the strengthening of some strategy statements, shifting from passive words such as 'encourage', 'consider' or 'promote' to more active/action-oriented words that make it clearer that policies should be followed to their best intent rather than

simply considered. For instance, in strategy 8g 'safe access and egress for pedestrians, cyclists and vehicles' should be required, not just promoted.

Suggestions relating to I.6.3-5, I.6.3-6, I.6.3-7, and I.6.3-8:

5. Require public places that are designed to promote:
 - a) equal access and opportunity and to cater for the various needs and abilities of the community, including the needs of people living with a disability; and (I.6.3-5a)
6. Require 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. (I.6.3-6)
7. Require subdivision design that provides a functional lot layout that:
 - c) supports efficient and effective public transport access;
 - d) provides safe active transport; (I.6.3-7c-d)
8. Require the design, siting, and construction of buildings to positively contribute to:
 - g) safe access and egress for pedestrian, cyclists, vehicles, and disability mobility devices. (I.6.3-8g)

I.6.3-3a seeks to reduce the impact of extreme heat conditions. In addition to urban greening other measures that ameliorate extreme heat conditions in the urban environment should also be incorporated, for instance, urban geometry of building forms and orientation of roads.

Suggestion relating to I.6.3-3a:

3. *Require sustainable design practices that are energy and resource efficient, address temperature extremes and reduce carbon emissions, including:*
 - a) *reduce the urban heat island effect by promoting the greening of streets, buildings and open space with vegetation, preferably native species where appropriate, and consideration of building and road infrastructure orientation and design.*

I.6.3-7j refers to allowing passive surveillance of buildings, however, crime prevention through environmental design strategies could be referenced more broadly. For instance, designing subdivision roads to limit through traffic and designing well connected and visible walkways (NIBC 2018).

Suggestion relating to I.6.3-7j

7. *Require subdivision design that provides a functional lot layout that:*

j) incorporates environmental design crime prevention principles allowing passive surveillance of public spaces promoting community safety; (1.6.3-7j)

3.0 Environmental Hazards

Section 3. 3 Flooding

The climate change statement identifies that storm surge is a key risk. Specifically, southeast Tasmania is projected to have greater vulnerability to storm surge compared to the north coast, presenting inundation impacts across the region. When combined with projected population growth in the Greater Hobart area, which will place pressure on land use through demand for new housing development (Jacobs et al. 2019) and public open spaces, the vulnerability is much enhanced.

There are opportunities to combine recreational activity with flood management measures at the interface of land with riparian areas and the sea, however (Zavar 2015), ensuring that recreational zones are not lost due to hazard risk assessment and instead well designed to consider flood risk, suitable context specific approaches should be considered that can provide dual recreation and tourism functions whilst guarding against storm surge and flooding (e.g., bermed parklands (DuPuis et al. 2019)), sustainable wetland management (Klein et al. 1998), and enlargement of river cross sections (Schultz et al. 2008). These hazard design considerations should be encouraged and reflected in wording under strategies in section 3.3.3. A suggested strategy statement is:

Suggested new 3.3.3-10

Developed well designed flood mitigation approaches that have social and environmental co-benefits such as the provision of recreation or tourism functions (e.g., guarding against storm surge through use of bermed parklands, and boardwalks on wetlands).

Section 5.0 – Physical Infrastructure

TALC notes that while the Physical Infrastructure TPPs refer to roads (section 5.3) and passenger transport modes (section 5.4) there is no dedicated section for active travel modes. For instance, infrastructure for public transport, walking and cycling modes may not always be most suited to routes allocated for road traffic and there may be circumstances when dedicated off-road spaces or routes may be safer, more efficient, and more pleasant. This will still require committed physical infrastructure (i.e., cycleways). Active travel infrastructure will be taken more seriously than it currently is if the TPPs included either a dedicated section for active travel or at least a statement

about the importance of active travel infrastructure, its co-benefits, the need for good integration with road and passenger infrastructure, and the need for quality infrastructure, then.

Further, active mode infrastructure also plays a role in the successful uptake of improved public transport services, especially in corridors of higher residential density where public transport services are most successful. Research has shown that the uptake of public and active travel modes (such as buses and cycleways) will not be achieved without attention to the quality of active mode infrastructure and services so that they deliver safety, comfort, proximity, and efficient connectivity. (Bauman et al. 2008, Dédélé et al. 2021, De Nazelle et al. 2011, Pucher et al. 2008). Importantly, improving active mode infrastructure is highly likely to improve land value uplift in designated public transport corridors. As sales prices of residential properties are higher in proximity to public transit corridors, government can capture a proportion of this value to reinvest in public transport (Mulley et al. 2016).

Further suggestions around the need for integrated transport infrastructure policy are made on page 17.

Section 5.0.2 Climate change statement

Regarding section 5.0.2 (Climate Change statement), a statement is made about the Physical Infrastructure TPP supporting 'the provision of well-planned and well-designed infrastructure that can reduce emissions and take advantage of emerging opportunities in a low-emissions future' (p.46) In the list of opportunities, 'better sharing of road space to support increased uptake of more sustainable transport modes' is offered as the last point.

This is the last point in a list of emission reducing opportunities, with most other points referring to road-based vehicles (freight and private transport). There is no mention of passenger transport infrastructure and the opportunity this provides (either improvement to the quality of the bus service network and/or opportunities to expand the passenger transport system to include other passenger modes in the future). The last point also assumes that active and passenger transport modes of transport (ones that are lowest in emissions) should also share the road corridors rather than have their own dedicated spaces alongside, or separate to, these corridors.

TALC recommends that mention of the opportunity afforded by improving passenger transport and enhancing active travel infrastructure also be included in this list of opportunities for a low-emission future. These also have complementary health, social, and economic efficiency benefits.

Section 5.3 Roads

TALC greatly appreciates that there is a strategy to provide for the upgrading of road infrastructure on key urban and local corridors to allocate space for public transport, walking and cycling. We

would like to add that consideration be made to the provision of dedicated spaces that maximize safety and minimize inter-mode conflict.

Suggestion relating to 5.3.3-5

5. *Provide for new and upgraded road infrastructure on key urban and local corridors to allocate space for servicing infrastructure, and safe and efficient spaces for public transport, walking and cycling modes (5.3.3-5)*

Section 5.4 Passenger Transport Modes

TALC greatly appreciates the intent of this policy and the improvements made to the strategies. We recommend the following suggestions to strengthen and clarify the meaning of the following two strategies and with the intent of being more specific about what entails a quality integrated passenger and active travel system, as discussed earlier.

Suggestions relating to 5.4.3-2, 5.4.3-3, and 5.4.3-6

2. *Promote medium to high density development and mixed use in proximity to high frequency passenger transport corridors supported by active travel connectivity to neighbourhoods. (5.4.3-2)*
3. *Integrate land use with existing and planned passenger transport infrastructure and services and provide an active travel network within key urban areas that is integrated across State and local government networks, and which includes dedicated infrastructure, appropriate signage (including real time information), and end of trip facilities. (5.4.3-3)*
6. *Ensure public transport corridors are supported by active travel networks and bus stops that are safe, accessible, and provide for better passenger amenity, including for people living with a disability. (5.4.3-6)*

Section 7.0 Planning Processes

Section 7.2 Strategic Planning

Section 5A (6) of the Land Use Planning and Approvals Act (LUPAA) requires that ‘The Minister must keep all regional land use strategies under regular and periodic review.’ In the last 10 years the regional land use strategies have not had a comprehensive review.

Consequently, to ensure the TPPs appropriately filter through to regional land use strategies to effectively deliver their intent according to current and emerging community needs, TALC advocates

comprehensive reviews of the current regional land use strategies as a matter of urgency following the endorsement of these TPPs, and from thereon, timely regular reviews.

Consequently, TALC suggests the following amendment to 7.2.3-8.

8. Ensure the regular review of land use strategies so that they remain current, adaptive, and responsive to planning issues as they arise. (7.2.3-8)

Other opportunities to support the intent of the TPPs and ensure that regional land use strategies are reviewed and kept up to date with economic, social, and environmental change, and community demands are suggested in the following section on page 19.

Other opportunities to support the intent of the TPPs

Infrastructure – State Policy and developer contributions

Fragmented land ownership and the significant cost of trunk infrastructure (including roads, pathways, cycleways, ferry terminals, bus stops, public parks etc) means it may not be feasible for any one developer, landowner, or government entity to fund the trunk infrastructure required to service the area. In other jurisdictions there are infrastructure contribution frameworks that provide for the cost of trunk infrastructure to be shared equitably between the users of the infrastructure based on forward planning (e.g., structure plans). Currently there is no infrastructure contributions framework in Tasmania. In the absence of an infrastructure contributions framework, it is generally a 'first user pays' system, which is costly and inequitable. There is a reluctance for first movers to invest in liveability elements if they are paying for utility infrastructure that will benefit future developers. There is also a lack of forward planning about what social infrastructure is needed in existing and greenfield development areas.

With respect to encouraging greater use of public transport and promoting healthy lifestyles enabled by good quality active travel infrastructure, investments in these services and infrastructure is essential. This is especially the case in new urban developments where good quality and well-connected services and infrastructure early on in development stages is known to influence travel behaviour, ensuring that the motor-vehicle option is not the only choice for residents or employees and facilitating active modes for short neighbourhood trips.

TALC recommends the State Government seriously consider the constraint on the delivery of liveable and sustainable urban environments without policy to support the development of infrastructure and improvement of public transport networks. An option to address the issue could be the creation of a State Policy that would direct more equitable infrastructure outcomes and costs.

Travel plans

Internationally, and in Victoria and NSW, travel plans can be required for major new residential developments or major site developments (i.e., employment/activity hubs) as part of the land use planning and approvals process. (De Gruyter, Rose & Currie, 2014). The aim is to manage car use of residents/employees by providing a package of initiatives and facilities that support the use of more sustainable forms of transport (initiatives may include car sharing facilities, limited and/or unbundled car parking, the offering of free public transport periods in early establishment stages of development, promotion of local transport options, and other rewards or incentives). Research has

demonstrated that residents living in developments with travel plans have lower car ownership and higher levels of walking and cycling compared with residents living in developments without travel plans. (De Gruyter, Rose & Currie, 2016). A survey of Victorian councils found that a key challenge for councils who wanted to encourage travel plans was the lack of supporting state planning policy. (De Gruyter, Rose & Currie, 2014).

TALC notes that travel plans, particularly for major developments, are not mentioned in the TPPs. We suggest that their value for major developments (whether site specific or large subdivision developments) be strongly considered as valuable tools in developing liveable, sustainable, and higher amenity settlements going forward.

Strategic planning

TALC's discussion paper, *Tasmania's Planning System: Opportunities for Health and Wellbeing* (see appendix B), raises several concerns about strategic land use planning. Regional land use strategies exist for the three Tasmanian regions (south, north, northwest). We understand these are due for review by the State Government after completion of the Tasmanian Planning Policies. TALC is concerned about the irregular and tardy review of these important strategies. As an example, the last Southern Tasmania Regional Land Use Strategy (STRLUS) was declared in 2011 and has not been updated since. The current STRLUS uses data from the 2006 ABS Census and therefore does not capture significant changes in the region in the intervening years (such as the impact of MONA, economic growth, population change, and housing demand and supply) which makes decision making about development and current and emerging community needs very difficult for councils.

Section 5A (6) of the Land Use Planning and Approvals Act (LUPAA) requires that 'The Minister must keep all regional land use strategies under regular and periodic review.' In the last 10 years the regional land use strategies have not had a comprehensive review.

In addition to the amendment to the TPP strategy statement 7.2.3-8, TALC suggests that consideration be made to legislate this requirement, amending the LUPAA to require the Minister review the regional land use strategies at least every five years.

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Appendix A – TALC, Submission to Draft TPPs – Phase I, Nov 2022



Final- TALC
submission - Draft T

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Appendix B – TALC, Tasmania's Planning System: Opportunities for Health and Wellbeing, 2021



TALC Planning
Report Final.pdf

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Appendix C – TALC Submission to the 2022 Housing Strategy



FINAL TALC
submission - Tasmania

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