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Tasmanian Planning Commission  
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## Consultation – Draft Tasmanian Planning Policies

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

Private Forests Tasmania (PFT) is an independent statutory authority established under the Tasmanian *Private Forests Act 1994*. We work to facilitate and expand the sustainable growth and development of the private forest resource in Tasmania. We do this through providing information to private forest growers, through research collaborations, advocacy, innovation and planning tools. Under our [Corporate Plan 2022-25](#) one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

In November 2022, PFT provided comments on an earlier version of the TPP's. We have since reviewed the latest version and strongly support the addition of **Timber Production** into the Sustainable Economic Development TPP (section 4.2). Forested land dedicated to timber production in Tasmania makes up 1.25 million hectares or nearly 18% of Tasmania's land area - 812,000 hectares of Permanent Timber Production Zone (PTPZ) on public land and 432,000 hectares of Private Timber Reserves (PTR) on private land. The timber industry is a major employer in our regions and worth more than \$1.2 billion annually to the State's economy. The protection of Tasmania's timber production land and the timber resources provided by that land warrants proper consideration from a comprehensive strategic land use planning perspective and should be recognised and acknowledged at all levels of the Tasmanian planning system.

PFT also supports the inclusion of timber production land into the climate change statement for that TPP (section 4.0.2). The contribution of Tasmania's production forests to emissions reduction is longstanding, and has been further recognised in the recently released [Tasmania's Climate Change Action Plan 2023-25](#) where actions to increase the extent of timber plantations and agroforestry which will make an important contribution to Tasmania's emission reduction targets.

Notwithstanding the above mentioned improvements to this draft of the TPP, PFT believe the following changes will improve the TPP even further.

1. To support agroforestry and the integration of trees on farms and improve carbon outcomes, this additional agricultural strategy is recommended under section 4.1.3.

*Support the integration of trees on farms through shelterbelt and small woodlot plantings to improve primary production outcomes while simultaneously improving the carbon balance and growing timber products.*

Rationale: Under the State Planning Provisions, plantation forestry is a discretionary or prohibited use in certain zones. PFT is aware there is some confusion in the community and amongst some local government planners that shelterbelts and small woodlots are a form of plantation forestry. However, under the definitions of plantation forestry in the Protection of Agricultural Land Policy and the SPP, these smaller plantings are excluded from the definition of plantation forestry. This

confusion leads some people to think shelterbelts and woodlots are discretionary or prohibited in these zones. The inclusion of the above new strategy in section 4.1.3 would help clarify that situation and support the integration of trees on farms and the multiple benefits (eg, carbon sequestration) that accrue from that.

2. As previously mentioned, PFT supports the intent of section 4.2. However, the following changes to the text are recommended (shown in red text as track changes).

## **4.2 Timber Production**

### **4.2.1 Application**

Statewide

### **4.2.2 Objective**

To ~~identify and protect~~ contribute to the protection of Tasmania's existing and potential timber resources.

### **4.2.3 Strategies**

1. ~~Encourage the protection of~~ Protect timber production areas including plantation and native forests by identifying land dedicated for timber production (PTPZ & PTR) and ~~support~~ designating that land for purposes that are compatible with timber production.

2. Encourage surrounding land, that is likely to be impacted by the activities associated with timber production on land dedicated for timber production, to:

a) be designated for purposes that are compatible with timber production; or

b) consider incorporating measures to mitigate, manage or avoid any environmental hazards and social and environmental impacts associated with timber production.

3. Support the development of future timber production on suitable land by, prior to designating/zoning the land for a purpose that is not consistent with timber production, consideration of the following:

o the nature and scale of the existing and potential timber resource;

o the viability of extracting the timber resource; and

o the social, economic and environmental benefits of the timber resource compared to that of the alternative land use.

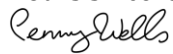
~~3.4.~~ Enable the provision and protection of supporting infrastructure for timber resources so access can be facilitated and maintained.

Rationale: PFT is continually made aware of the inappropriate application of zones and codes in LPS's on land that is already dedicated for forestry purposes. PTR's, PTPZ Land and Future Potential Production Forest (FPPF) Land have been placed in zones where forestry is discretionary or in some cases prohibited. The stronger wording recommended above will help to ensure that land dedicated for a forestry purpose is appropriately zoned. The addition of strategies 3 & 4 is modelled on similar strategies under section 4.3.3 for the extractive industry. These changes are aimed at protecting the future potential timber resource on public and private land. FPPF was established to secure a 'wood-bank' to provide for future

sustainable forestry production on public land. On private land, PFT has identified in its 2020 Tasmanian Private Forest Resource Review, 130 000 hectares of private forested land as a potential timber resource which is not currently dedicated for that purpose. The potential for this land to contribute to alleviating Tasmania and Australia's current timber shortage and meeting our emission reduction targets should be recognized by all levels of the planning system.

If you have any queries on the points we have raised, please contact myself on 03 6165 4070 or our Policy & Data Officer Murray Root on 03 6165 4072.

Yours sincerely,



**Penny Wells**

CEO Private Forests Tasmania