

# Department of Premier and Cabinet State Planning Office

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John Ramsay  
Executive Commissioner  
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Dear Mr Ramsay

## **Draft Tasmanian Planning Policies (TPPs)**

Thank you for the invitation to the State Planning Office (SPO) to provide comments in response to the Northern Tasmanian Regional Planners Group, on behalf of the Northern Region General Managers, (Northern Region) submission on the draft Tasmanian Planning Policies dated 19 March 2023. The Northern Region submission was in response to a submission made by the SPO dated 8 February 2024, in which the SPO proposed amendments to strategies 3 and 4 of clause 1.1.3 of the draft TPPs. The Northern Region submission then proposed further amendments to those strategies.

Strategies 3 and 4 of clause 1.1.3 of the draft TPPs, as proposed by the SPO and Northern Region are outlined in the table below:

SPO	Northern Region
<p>3. Identify regional settlement hierarchies and allocate growth scenarios to settlements based on:</p> <ul style="list-style-type: none"><li>a) population projections and forecast demographic change;</li><li>b) the functional characteristics of the settlement and any specific role it plays in the State or region;</li></ul>	<p>3. Identify and implement a regional settlement strategy that enables sustainable growth and liveable communities having regard to:</p> <ul style="list-style-type: none"><li>a) population projections, forecasts and demographic change, including unanticipated demand;</li><li>b) the social, environmental, economic and cultural characteristics of the settlement;</li></ul>

<ul style="list-style-type: none"> <li>c) the social, environmental and economic characteristics of the settlement;</li> <li>d) the availability of goods and services, including social infrastructure, to support the needs of the community;</li> <li>e) access to employment and training opportunities;</li> <li>f) efficient and accessible transport systems; and</li> <li>g) capacity and cost-efficient upgrading of physical infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>c) the aspirations of the community, as expressed through local strategic planning;</li> <li>d) the current and future practical ability to provide services including physical infrastructure, public and social infrastructure and the level at which those services should be provided;</li> <li>e) reasonable access to employment, education and training; and</li> <li>f) access to transport networks.</li> </ul>
<p>4. Support the growth of settlements that is in accordance with their allocated growth scenario.</p>	<p>Delete strategy 4.</p>

In the Northern Region submission, it is stated that their “proposed revisions provide a statement that clarifies the outcome to be achieved – sustainable growth and liveable communities – rather than simply the task to be completed”. The structure of the draft TPPs has been developed so each policy is framed with an ‘Objective’, setting out the aims of the policy, followed by ‘Strategies’ which set out the ways that the policy objective can be achieved.

The strategies in question are located within the Growth policy of the Settlement TPP. The Objective of the Growth policy is ‘to plan for settlement growth that allocates land to meet the existing and future needs of the community and to deliver a sustainable pattern of development’. There is no need to repeat the outcome to be achieved in the strategy because it is already stated in the policy objective. This approach is outlined in the General Application section of the draft TPPs and has been adopted to make it clear what the strategies aim to achieve and to avoid having to repeat that outcome in each subsequent strategy. It would be inconsistent with the structure of other parts of the TPPs to introduce this ‘statement of outcomes’ in the ‘Strategies’ section.

The Northern Region submission also proposes to remove the reference to a regional settlement hierarchy and allocation of growth scenarios and refer to ‘identify and implement a regional settlement strategy’.

The identification of a regional settlement hierarchy, based on the considerations listed in the SPO strategy 3a)-g), is a fundamental exercise to be undertaken that will inform the Regional Land Use Strategies (RLUS). Identifying a regional settlement hierarchy will help the regions understand the role and function of settlements, how this might influence land uses and help determine where future growth areas might be located. A regional settlement hierarchy is a useful strategic planning tool that will help future users of the RLUSs to understand broader regional strategic planning outcomes.

The statement by the Northern Region, that the requirement to identify a regional settlement hierarchy, ‘is unnecessary to mandate this approach at the State policy level’ seemingly fails to understand the purpose of the TPPs and their relationship with the RLUS and Tasmanian Planning Scheme to guide planning outcomes. The State has developed the TPPs with the clear intent that they will inform strategic land use planning and help guide future State investment in infrastructure. To suggest that it is inappropriate for the State to mandate this approach would introduce risks and impact the coordinated and efficient provision of State infrastructure and services.

The requirement to identify a regional settlement hierarchy and allocate growth scenarios to settlements based on the SPO considerations provided, still allows each region to develop a methodology tailored to the region's characteristics and planning needs.

The Northern Region submits that strategy 4 should be deleted as it is unnecessarily restrictive and, as proposed in their submission, it can be achieved through including an implementation statement in strategy 3.

The intent of the proposed Northern Region submission seems to be to change from a process of determining a preferred settlement strategy based on identifying which areas should grow and to what extent, to a situation where any settlement can grow as it sees fit based on meeting its own needs. This would suggest that there is no pre-determined strategy but a policy approach of uncoordinated or competing growth resulting in unpredictable demands on infrastructure provision.

The SPO drafting provides separate strategies for the identification of the settlement hierarchy and the allocation of growth scenarios, including the range of matters required to be considered, from the implementation of the growth scenarios. The strategies have been drafted that way as they perform two separate functions and to make the intent of each clearer.

Other points of difference are provided in the table below with a corresponding comment by the SPO:

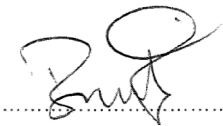
Northern Region Submission	SPO Response
Including 'unanticipated demand' as a consideration in 3(a)	<p>It is difficult to rationalise how 'unanticipated demand' can be catered for in a settlement strategy if the demand is unknown.</p> <p>The regional planning framework's review timeframes will address the best way to respond to 'unanticipated demand' through monitoring and regular statutory review and capacity for interim updates.</p> <p>Additionally, strategy 8 of clause 1.1.3 provides for a scenario to deal with 'unanticipated demand'.</p>
Removal of consideration of the functional characteristics of the settlement and any specific role it plays in the State or region	<p>The SPO considers this to be a fundamental consideration in informing the RLUS. Its proposed removal would undermine the purpose of the RLUS and the way in which the planning instruments under the <i>Land Use Planning and Approvals Act 1993</i> are intended to inform each other and the intent of the TPPs to deliver contemporary and sustainable settlement outcomes. This reference is intended to allow for setting the hierarchy based on a range of criteria not simply the size of an existing settlement, but the specific functional role it plays irrespective of its size.</p>
Including that 'the aspirations of the community, as expressed through local strategic planning', is an additional consideration	<p>The community's aspirations, as expressed through local strategic planning is a general consideration when reviewing the 'social, environmental and economic characteristics of the settlement'.</p>

	Understanding and utilising the aspirations of the community are outlined in the Planning Processes TPP and does not need to be repeated.
Other minor word changes in the list of matters to consider	Proposed rephrasing and adding or removing qualifications to the list of considerations either do not add any value or clarify the drafting and in some instances changes the strength of the policy from what is intended.

In summary, the SPO does not support any of the modifications to strategies 3 and 4 of clause 1.1.3 of the draft TPPs as proposed by the Northern Region.

If the Panel requires further information, please don't hesitate to contact Nell Nettlefold, Senior Planning Adviser: [Nell.Nettlefold@dpac.tas.gov.au](mailto:Nell.Nettlefold@dpac.tas.gov.au) or phone 6232 7163.

Yours sincerely



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