
From: Ashley Thornton <athornton@warwyn.tas.gov.au>
Sent: Tuesday, 27 June 2023 8:43 AM
To: TPC Enquiry
Subject: Submission on the draft Tasmanian Planning Policies
Attachments: TPP submission.pdf

Categories:

Dear Mr Ramsay,

Please accept this email and attachment as Waratah-Wynyard Council's submission on the draft Tasmanian Planning Policies (TPPs).

The common themes that come through in our submission are that regional and rural areas are required and are attractive options to facilitate in increase in Tasmania's population. Prioritising growth to the higher tiers of the settlement hierarchy is not supported. We all have a role to play.

Secondly, the strategies are too prescriptive for the State policy level. Many of the strategies read as performance criteria of a planning scheme.

We thank you for the opportunity to comment, and look forward to interaction to finalise the TPPs.

Thanks,

Ashley

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TPP Topic	Policy area	Section	Comments
1.0 Settlement	1.0.2 Climate Change Statement	Dot points under second paragraph	The dot point referring to bushfires should be limited to the word “bushfires”. Bushfires can equally occur in grassland. And they don’t need to be near a settlement to have an impact. Overly descriptive statement for no benefit.
1.1 Growth	1.1.1 Application	Urban growth boundary	This needs to be a defined term, and it needs to be made clear if every settlement requires one, how it is to be determined, and what statutory process it is to be declared under (if applicable)?
	1.1.3 Strategies	1. Supply of land	Recommend that the minimum supply forecast be 20 years rather than 20. Consistent with RLUS, and reduces the risk of being caught short if there is another sharp spike in population increase.
		2. Plan for growth	Reword start to “Have a plan for growth that will...”. As it is currently drafted, growth will deliver a) to d), not the plan.
		2 a)	Can allocate land for growth at the same time as prioritising infill etc, when it is clear that infill etc will not be sufficient.
		2 d) i) to v)	Some of these read as performance criteria in a planning scheme. Need to lift the policy level. After iv) ‘and’ should be replaced with ‘or’
		4. Settlements	Disagree with this statement. All settlement areas have a role to play in managing growth, and will need to growth due to varying factors. No need to prioritise higher tier settlements at the detriment to regional areas.
		6. Structure plans	Second line, delete “and management”
		7. Growth boundaries	Need to define, as the terminology is already changing from 1.1.1.
		8. Outside growth	Do we need to specify that growth will be “on land”? delete.
		10. TODs	What if there are land use conflicts with residential use in the same area?
1.2 Liveability	1.2.1 Application		Rural Residential is out, but what about the village zone?
	1.2.3 Strategies	2.	Include word ‘provide’ after and in the first line.
		2 a)	Add the words ‘in urban centres’ at the end of the sentence
		3.	Delete all after the word ‘institutions. They are qualifiers that effectively cancel each other out.
		7.	How is this delivered through the planning system?

		8.	Replace 'managing' with 'avoiding'. Managing suggests Council will be actively policing amenity, whereas avoiding means we get it right in the use tables in the SPPs.
1.4 Settlement Types	1.4.3	2.	What if there are other constraints that mean the only way to grow is along the coastline? If there are no environmental constraints or hazards, why can't growth be along a coast. E.g along the North west, there is good quality ag land inland behind settlements.
2.0 Environmental values	2.0.2	Last dot point	Can this be expanded to include, or a new dot point, to enable retreat pathways for development. If a decision is made to not protect a settlement, then facilitating movement to a new area will be required.
	2.1.3 Strategies	2.	Replace 'land clearance' with 'change'. May not require removal of vegetation to have an impact.
		12.	As above, facilitate retreat for developed areas in coastal zones.
	2.2.3 Strategies	4 e)	Sometimes increase the rate of stormwater can be a good thing – rectifying a past mistake. Maybe restrict to just pollutants.
	2.4.3 Strategies	3 a & b	Some of these read as performance criteria in a planning scheme. Need to lift the policy level.
2.5 Coasts	2.5.3		Add a strategy to deal with retreat of settlements at risk from coastal processes. With planned retreat, preference for relocating to a nearby but free from risk area.
3.1 Bushfire	3.1.3	2.	'Every stage of the planning process' – most consideration of bushfire is now at building stage.
3.2 Landslip	3.2.3	3	Delete the end of the sentence from "where it does not achieve and maintain a level of tolerable risk from landslip". From an area with a lot of landslip issues, if there is a risk, stay away. Don't provide false hope.
		4.	Again, delete the qualifier at the end of the sentence. Need to be stronger to ensure safety for life of development.
4.1 Agriculture	4.1.2 Objective		First line, reword to "protecting land for agriculture and the resources..."
	4.1.3	6.	Does this include preservation of land for environmental/wildlife corridors?
		8.	The end of this strategy, from "to enable sustainable growth ..." could be its own strategy. Too long and needs to be broken up.
		10.	Allow for residential use where it will increase the agricultural use of the land. Increased intensity.

4.3 Extractive Industry	4.3.3	7.	Housing for mining (or other industries that need temporary housing) to be designed to be re-used
4.5 Renewable Energy	4.5.3	1 b)	Include environmental value. Environment not just viewed as a constraint.
4.7 Business and Commercial	4.7.3	4.	Regional centres need services too
5.1 Provision of Services	5.1.3		Should be a requirement for Infrastructure plans with the same minimum timeframe as 1.1.3 (1). With infrastructure plans comes the ability for infrastructure charges.
5.5 Ports	5.5.3	3.	Inclusion of Stanley Port