

Tasmanian Planning Policies - Draft for Consultation in accordance with section 12C(2) of the *Land Use Planning and Approvals Act 1993*

Summary of issues raised and responses to submissions

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
General			
GLOSSARY	The Glossary to the submission contains definition of the terms and suggested amendments. The terminologies defined in the glossary include Adaptive reuse, Assisted housing, Circular economy, Conservation, Cultural significance, and Curtilage. Suggest Environmental Equity warrants a definition to avoid confusion	19	These terms are widely used and known in land use planning. No modification required.
No comments	No comment on the policy content or scope of the matters of the TPPs	8, 11	Noted
Homogenising Tasmania's land use planning	Suggested that the conventional approach to land use is past and notes that land use decisions should be based on social and environmental wellness rather than on economic growth	9	The draft TPPs balance environmental, social and economic interests. No modification required.
Northern and Southern Land use policies	Concern land use outcomes are often stifled by the Northern and Southern Land use policies that constrain development at all levels Suggest putting time limits on decision cycle, example 30 days for any TPC referral, Recommend increasing the cost for planning authorities that vote against planning applications which have been recommended for approval by statutory planning staff to \$20,000 Concern a \$5,000 fee is charged for a standard residential home and recommended a planning directive should be provided to remove the fees. Support the TPPs process having a strategically consistent whole of Government approaches to infrastructure, the environment, and liveability, plus sensible development policies, that are not over-focussed on green political objectives. Concern Part 5 agreements are used to force compliance to green policies, that are not acceptable to the landowner. Suggest planning directive be issued to direct that Part 5 agreements are not to be used for any residential allotment planning in the future	2	These matters are outside the scope of the TPPs -
Draft TPPs Consultation commencement date	Questions why Flinders Council released the draft TPPs for comments only on 6 October 2022 instead of the supposed released date on 19 September 2022 Notes Council abrogated its Strategic Growth Plan on pages 4- 7 to make professional and transparent decisions communicated and implemented in the interest of the Community by a) not calling a public meeting and, or b) ensuring that the public were made aware that this consultation period to respond to the Planning Policies was open	7	Although it is acknowledged that community involvement in planning processes is vital in improving understanding and increase confidence in the planning systems, the issue being raised appears to sit outside the scope of the TPPs. However, consultation policy 7.1 - include strategies to help improve community understanding of planning systems and promote an ongoing community conversation that is fair, inclusive, respectful and genuine to allow people to express their views on land use planning.
Consistency in Terminology	TasWater supports implementation of the TPPs and recommends that there should be consistency in terminology relating to infrastructure. Nots terms such as services, community assets, and utilities are used interchangeably and suggests that the terms social and physical infrastructure, as defined in the glossary, be used throughout the TPPs	10	Agreed and modifications made to support the use of consistent terminology. As above, agreed and modifications made.
Draft TPPs	Acknowledged that the issues raised to the Scoping Paper have been accommodated in the draft TPPs But concern that some essential elements are being “encouraged” and “promoted” rather than “required”	14	Noted. Refer to section 4.2 of body of report for response –.
TPPs, SPPs and RLUS	Concern that the SPPs review currently underway will be ‘extended’ until the TPPs are ‘made’, and will setback the updating of the RLUS Note the TPPs will further extend the roll-out of the Tasmanian Planning Scheme which will prolong the time for addressing the current and imminent challenges	26	Outside the scope of the TPPs and this consultation process. No modification required.
General - comments	Pleased to see the inclusion of additional policy issues particularly housing affordability, good urban design and infrastructure contributions Good to see climate change recognised at the State level. Note that some policies are too prescriptive and suggest the level of prescription should be reduced and include principles that are based on a more aspirational and clearer framework	18	Noted Noted Refer to section 4.2 of body of report.
Length and effectiveness of policy	Note a good policy should be principles-based, easily understood and sufficiently succinct Recommend a number of ‘strategies’ which should be rationalised or deleted (identified in the attached draft TPPs)	18	Noted. Each strategy serves a particular purpose and are best expressed individually.
Application - state-wide	Notes that the policies intended to apply state-wide is inconsistent with Section 11(3) of LUPAA Questions how the intent of these policies will be implemented consistently with Section 11(3) of LUPAA	18	The TPPs sit below the Act and therefore cannot override the provisions of the Act. While section 11(3) removes certain land uses from the effect of the TPS, the TPPs can still consider those land uses from a strategic point of view.

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Implementation and review	Concern the policies will be difficult to implement and review if there are no benchmarks to measure the success of a policy	18, 19	It is difficult to measure the success of planning policy as there are no adequate benchmarks. Noted and discussed in section 4.6 of the body of the report.
Climate change	Suggest climate change should be framed in a current context throughout the TPPs rather than future Note unique and flexible responses will be required for settlements to adapt, including retreat, and develop resilience to climate change and that legitimate considerations should be applied more forensically across the TPPs in their entirety to ensure that TPPs maximises the climate resilience and mitigates vulnerability	19	The TPPs are expressed in the future tense similarly to other planning instruments. Noted and the TPPs provide for such climate change responses.
General	Concern about the application of the TPPs and the possibility of unintended consequences. Suggest much greater engagement is required, to provide Councils and other stakeholders with confidence in the draft TPPs Suggest the need for guidance documents or practice notes to accompany the TPPs	28	Noted. The approval process for the TPPs and the instruments that are required to be reviewed once the TPPs are made all involve further consultation and assessment processes. It is anticipated that unforeseen consequences will be picked up during those processes. It is also anticipated that guidance documents will be provided as needed.
General	Recommended the following: The draft TPPs should be significantly clarified and strengthened An overarching climate change TPP be created that links to statutory GHG emissions reduction targets, climate risk assessments, and sectorial plans, and provides clear implementation guidance. All the TPPs need to explicitly incorporate clear and mandatory strategies around climate change adaptation and GHG mitigation and provide express implementation guidelines in line with legislated targets, climate risk assessments, and sectoral plans. Replace the proposed “Sustainable Economic Development” TPP with a “Sustainable Development” TPP. Ensure the issues covered by the Sustainable Development TPP align with the UN Sustainable Development Goals	29	The draft TPPs have been strengthened and clarified where there has been a demonstrated need. Climate change is discussed in section 4.1 of the body of the report. The planning system is only one of the many responses required to address the issues raised in this submission. The TPPs contain strategies that support climate change adaptation and mitigation measures that can be delivered through the planning system. The entire set of TPPs promote “Sustainable Development”. The “Sustainable Economic Development TPP” is concerned with supporting the State’s economic drivers in a sustainable way through the planning system. The UNSDG are discussed in section 4.7 of the body of the report
General	Support the draft TPPs, note it will provide a sound basis for the integration of environmental, social and economic issues and policy through the Regional Land Use Strategies	30	Noted
General	Note the legislative framework continues to create confusion, not because of red tape but because of a lack of clarity and clear implementation guidelines. Note the TPPs read well and have good intent however, concern there is no clear articulation between the TPPs and the SPPs. Concern the SPPs have already been developed and partially implemented through the TPS without the strategic direction of the TPPs Concern the TPPs have no clear implementation pathway or rigorous evaluation mechanisms because there is not sufficient baseline data on environmental matters Note the inclusion of climate change throughout the policies is commendable Note any independent operation of the SPPs without due consideration to the TPPs will not be supported	32	The legislative framework is outside the scope of this consultation process. The TPPs provide the policy setting for the SPPs, LPS and RLUSs. Additional work is required to review the SPPs to give effect to the TPPs. The Act requires that the SPPs will be reviewed once the TPPs are made. Implementation issues are discussed in section 4.5 and monitoring and review are discussed in section 4.6 of the body of the report. Noted Noted however there are already SPPs in operation through the TPS in certain municipalities that don't consider the TPPs because they have not been made yet.
General	Note the statement that ‘the TPPs should be considered in their entirety with all relevant strategies applying equally’ is not realistic and not supported. Suggest the need to clarify how the TPPs are to be implemented. Recommended that there be three new sections added to the TPPs including: <ul style="list-style-type: none"> Overarching principles of the planning system that should be considered in the development of the RLUS, SPP or LPS A section on managing competing state interests to assist in understanding the application of the TPPs in a way that is strategic, practical and suitable for various locations across the state – note the Queensland SPPs is a good example. A section on how the RLUS, SPP or LPS (or an amendment) will demonstrate that it satisfies the TPPs, 	33	The statement has been modified for clarification purposes and is now included in a list of other application principles in the General Application section of the TPPs. Implementation is discussed in section 4.5 of the body of the report. The structure of the TPPs is discussed in section 4.1 of the body of the report and provide the following comments specifically in response to the issues raised: <ul style="list-style-type: none"> The overarching principles of the planning system are the Schedule 1 Objectives of the Act which the TPPs are assessed against. Competing interests have been discussed in section 4.4 of the body of the report. It is up to the relevant decision maker to determine if the RLUS, SPP or LPS satisfies the TPPs.

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Format of the TPPs	<p>Note there are significant issues with the general structure, the level of detail provided in the strategies do not align with the hierarchy of planning instruments and are not consistent with the wording in the Act – ‘objectives and strategies’ vs ‘aims or principles’</p> <p>There are instances where the TPPs include requirements that are not planning matters;</p> <p>Strategies are too specific and detailed to apply reasonably across the state and the drafting approach of using verbs at the start of each strategy makes the intent and application of the strategies complex and unclear;</p> <p>Notes that elevating the TPPs to a high-level state interest policy will give scope to support the TPPs through non-statutory guidance materials to assist regions and local government to integrate the TPPs into the relevant planning instruments</p> <p>Suggest the climate change statement could be succinctly incorporated into the policy context section rather than included in a separate section</p>	33	<p>Refer to section 4.1 in the body of the report for discussions on structure including reference to the use of ‘objectives and strategies’ vs ‘aims or principles’</p> <p>All matters referred to in the TPPs relate to a matters listed in section 12B(2) of the Act.</p> <p>The level of detail contained in the strategies and the use of verbs at the beginning of each strategy are discussed in section 4.2 (‘Drafting style’) of the body of the report.</p> <p>The high-level State interest is reflected in the Objective of each policy. The strategies outline how that objective is to be achieved and applied through planning instruments.</p> <p>A separate Climate Change statement supports the explicit response to climate change and helps draw out the proceeding strategies.</p>
Regulatory impact	<p>Concern that the interpretation and application of the TPPs as drafted may hinder growth, particularly in locations outside of the main metropolitan areas</p> <p>Recommended that the TPPs should be reviewed in consultation with local government practitioners, planning consultants and the TPC to clarify how it should be interpreted</p> <p>Note the statement that the principles and policy context are not statutory appears to be inconsistent with section 12B(1) of the Act</p> <p>Recommend that a reference group should be formed to test the application of the TPPs to: determine if they are drafted at the right level; addresses matter’s that can be dealt with in the planning system; provide the right level of guidance and align with government aspirations</p>	33	<p>The TPPs seek to promote growth in appropriate locations which may hinder growth in other locations. The allocation of where growth occurs will be developed through applying the TPPs at regional and local levels.</p> <p>The TPPs have been prepared in consultation with local government practitioners, planning consultants and the TPC.</p> <p>It is not uncommon for a statutory planning instrument to exclude certain parts of the instrument from statutory application, especially when that information is for information or explanatory purposes only. This is supported by legal advice.</p> <p>The TPC, as part of its review and assessment, is required to turn its attention to whether there ‘are matters of a technical nature, or that may be relevant, in relation to the application of the TPPs to – (1) the Tasmanian Planning Scheme; or (2) each regional land use strategy...’ (section 12F(1) (b) of the Act). By preparing, approving and providing a copy of the draft TPPs to the TPC, the Minister has confirmed that the draft TPPs provide the right level of guidance and align with government aspirations.</p>
General	<p>Concern initial comment to identify the polices that underpin the current Tasmanian Planning Scheme has been ignored</p> <p>Suggest the TPPs are vague with no implementation pathway and lack purpose. Suggest the statement that “the strategies contain sufficient detail to guide implementation” is arrogant and designed to deter the community from making comment on implementation</p> <p>Concern the language used in drafting the objectives and strategies is passive and vague</p> <p>Concern there is no overarching vision and set of goals in the TPPs</p>	34	<p>It is not the purpose of the TPPs to identify the policies that underpin the current TPS.</p> <p>The purpose of the TPPs are considered clear. Implementation issues are discussed in section 4.5 of the body of the report.</p> <p>Refer to section 4.2 of the body of the report for discussion on the drafting style.</p> <p>The overarching goals of the TPPs comprise the Schedule 1 Objectives of the Act. The structure of the TPPs are discussed in section 4.1 of the body of the report.</p>
General	<p>Concerned that the draft TPPs have little or no reference to forestry or the forestry industry.</p> <p>Note that the planning system does not take forestry, as well as the preservation and enhancement of the current and future timber resource, into meaningful or strategic consideration.</p> <p>Suggests that a high-level provision be included in the TPP to identify and safeguard land that has timber resource value</p>	35	<p>Submission supported and modifications made.</p> <p>Refer to section 4.3 of the body of the report.</p>
General	Referenced suggestions made within the Department’s previous submission. Note that the TPPs recognise and support the Department’s key areas of interest and stated that the Department has no additional comments to make on this version of the draft TPPs.	36	Noted

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Effectiveness of TPPs	<p>Concern the draft TPPs do not provide adequate overall guidance on how they can be applied by a planning authority at a municipal level</p> <p>Concern the draft TPPs do not specify the methodology to determine the priority for each region or municipal area</p> <p>Note that requiring the TPPs to apply in their entirety with all relevant strategies applying equally is difficult to achieve</p> <p>Concern the TPPs are complex and may constrain local level planning</p> <p>Recommend that the TPPs should include implementation guidelines that incorporate:</p> <ul style="list-style-type: none"> Measures to align local and State planning policy requirements in Implementation Guidelines; Methodologies and explanatory diagrams to inform the planning authority decisions including when there are conflicting objectives; <p>Recommend more engagement with planning authorities to achieve effective outcomes</p> <p>Suggest the TPPs should include provisions to guide monitoring and evaluation of the TPPs</p>	37	<p>Refer to section 4.5 of the body of the report.</p> <p>The TPPs provide the matters for consideration. It is the role of the region or planning authority to determine the methodology based on the circumstances that are relevant to the region or municipality.</p> <p>This statement has been modified to articulate the intent and is supported by the principles for application outlined in the modified Implementation section, now renamed 'General Application' more clearly.</p> <p>The TPPs provide ample opportunities for local planning.</p> <p>See section 4.5 of the body of the report for a discussion on implementation.</p> <p>Planning authorities have been consulted and are also encouraged to participate in the TPC hearing process.</p> <p>Refer to section 4.6 of the body of the report.</p>
General	<p>Questions why the draft TPPs were released for public comment on the 19th September, but were made available on Flinders island only on the 16th of October</p> <p>Concern that sale of crown land on Flinders Island is supported when private land has been rezoned and not able to subdivide</p>	38	Not a relevant consideration for section 12C(2) consultation.
General	<p>Question whether the State Government will be investing in the state-wide mapping required</p> <p>The policies lack control or direction over design outcome of private development or for developers to consider</p>	39	<p>It is likely that the State Government will support the delivery of mapping required by the strategies.</p> <p>This matter is considered too detailed for inclusion in a TPP.</p>
General	<p>Support the draft TPPs but suggest that they should be streamlined and make the policy statement clearer. The TPPs must focus on improving land use planning in terms of the outcomes delivered, the responsiveness to change and the certainty to users</p> <p>Suggest a comprehensive review of the STRLUS to address increasing demand for residential land</p> <p>Concern funding may not be available to the future application of the TPPs</p> <p>Suggest the TPPs should include implementation guidelines including specific statements as to how competing policy interests are resolved and how implementation of TPPs will vary due to different regional and local context</p> <p>Suggest there should be a description of what the TPPs are attempting to provide when read as a whole</p> <p>Note some overlapping and similar policy positions creates potential uncertainty and confusion and recommended that the policy statements should be discrete, standalone and be precise</p>	40	<p>The TPPs try to achieve these matters and have been drafted consistent with section 12B of the Act.</p> <p>The Act requires a comprehensive review of the STRLUS once the TPPs are made.</p> <p>Not a matter for consideration under this process.</p> <p>Refer to section 4.5 of the body of the report.</p> <p>The TPPs provide policy setting across a wide range of planning issues. The Foreword and (now) General Application provides overall context.</p> <p>Every attempt has been made to deliver a concise set of TPPs, given the range and complexity of matters addressed, some overlap is inevitable.</p>
Non-land use planning outcomes	<p>Suggest the TPPs address outcomes that can only be delivered by non-land use programs and investments. Social infrastructure, for instance, is planned for and provided by other government frameworks.</p> <p>Note land use planning has no role to “facilitate the co-location of suitable and compatible social infrastructure” beyond the normal provision of a wide range of uses in the zoning of activity centres</p>	40	<p>Planning still has a role to direct where social infrastructure is located to support well serviced communities. Example, planning land use and infrastructure together will ensure development is encouraged in places that can accommodate growth with access to required infrastructure and services when needed.</p> <p>There may be regulatory and strategic land use responses that can support this policy. The TPPs apply more broadly than the range of allowable uses in the zones.</p>

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General	<p>Support the draft TPPs and commends the State Planning Office for drafting very good Environmental Values TPPs</p> <p>Note the requirement for bushfire hazard management is increasing the cumulative impacts on the environment of developments across the state, both existing and new. Suggest there should be a process articulated that allows for assessment of cumulative impacts.</p>	41	<p>Noted.</p> <p>Supported. Strategy 8 of 3.1.3 has been modified (as shown below) to strengthen the policy intent consistent with this submission.</p> <p>8. When designating land for particular purposes and considering use and development in areas subject to bushfire hazards:</p> <p>a) <i>priority should be given to minimising consider the impacts, associated with implementing future bushfire protection measures, on environmental values and on the cost to the community as a result of defending properties from bushfire; and</i></p> <p>b) <i>avoid locations that require bushfire hazard management to be undertaken on land external to the site where that land is publicly owned and managed for conservation purposes.</i></p>
General	<p>Recommend using standard definition of Affordable housing (the 30/40 rule) in the Glossary</p> <p>Concern there is not enough specificity in the Draft TPP to be able to monitor or evaluate its impacts</p>	42	<p>Supported and modifications made to include additional definitions in the glossary.</p> <p>Noted, refer to 4.6 of the body of the report for discussion.</p>
General	Suggest the TPPs are very generic and would appear to be adding another layer to an already complex system	44	Noted, however the Act provides for their making.
Consistency and Prescriptiveness	Suggest the TPPs are prescriptive and instructional rather than as high-level guiding policies to inform the preparation of the Regional Land Use Strategies and the TPS	46	Discussed in section 4.3 of the body of the report
General	<p>Suggest the strategies need to be clear to achieve the objectives of the TPPs</p> <p>Suggest the TPPs should progress recommendation 6 of PESRAC report</p>	43	<p>The strategies are considered to be clear and relate to their relevant objectives.</p> <p>The TPPs support the relevant outcomes from the PESRAC report as discussed in the supporting report.</p>
General	Note has no additional comments	48	Noted
General	<p>Concerns the Policies do not adequately provide for the established and future needs of the Furneaux Islands and other such remote communities, such as;</p> <ul style="list-style-type: none"> the Policies must provide framework to recognise exceptions to the generalised policies through RLUS, as exists under the Northern Tasmania Regional Land Use Strategies detailed wording of the policies forces compliance with listed criteria and does not provide for the strategic consideration of issues against listed outcomes; TPPs do not clearly establish their aims and principles - must provide a framework that is focused on aims and principles the lack of any framework or process to balance contradictions within and between policy areas derogates a significant and expected component of the Policies to all future assessments before the Tasmanian Planning Commission; the Policies do not comply with the Schedule 1 objectives of the Act and therefore, could not be approved in their current form Concern about the lack of implementation guidelines – unclear how the TPPs can inform the SPPs and RLUS without implementation guidelines 	49 64 65	<ul style="list-style-type: none"> The needs of remote communities should be delivered through a combination of TPPs, regional and local planning policies. The TPPs provide for the consideration of local issues. If there is a need for exceptions from the generalised policies through the RLUS then they should be delivered through that planning instrument. Refer to section 4.1 in the body of the report regarding the structure of the TPPs. Refer to section 4.4 (competing policy interests) for discussion. The supporting report demonstrates how the draft TPPs comply with the Schedule 1 objectives of the Act. Refer to section 4.5 of the body of the report for comments regarding implementation.
Public Open Space, Food Security and Urban Greening	<p>Recommends the TPPs include policies specific to the provision of Public Open Space and littoral and riparian reserves</p> <p>Supports the Heart Foundation’s food security recommendations and suggests these principles are applicable to the TPPs</p> <p>Note currently the TPS does not encourage urban greening as there is no requirement for landscaping to be provided in developments or subdivision in the residential zones</p>	50	<p>The draft TPPs have been modified to include criteria for open space in the subdivision design strategy at 1.6.3.</p> <p>The draft TPPs support food security indirectly through the protection of agricultural land in section 4.1 of the Sustainable Economic Development TPP.</p>
State Rail Network	<p>Concern about the lack of clarity and understanding about the status of State Rail Network and/or TasRail’s obligations under RSNL and its rail safety accreditation which often create an unnecessarily adversarial environment</p> <p>Recommend the TPPs should recognise:</p> <ul style="list-style-type: none"> That State Rail Network land is for the exclusive purpose of supporting safe and efficient rail operations and activities (current and future) and is not available for third party developments except where such developments are directly related to the core business interests of the Rail Infrastructure Manager and are pre-agreed by the Rail Infrastructure Manager; and The State Rail Network is Open Access, meaning that the rail corridors for which TasRail is responsible for as the Below Rail Manager can be accessed by eligible third-party Above Rail operators (subject to a Network Access Agreement). This is consistent with the Tasmanian Rail Access Framework Policy and noting that the principles of the National Access Regime and Competition Principles Agreement apply in Tasmania regardless of the form of the access framework 	51	<p>Submission partially supported.</p> <p>Refer to section 4.3 of the body of the report. The higher-level policies of the submission have been included in strategies within the Ports and Strategic Transport Networks of the Physical Infrastructure TPP.</p>

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General	<p>Suggest the TPPs should better align with UNSDGs and the Commonwealth position on how the environment will be protected and restored</p> <p>Concern the use of terms such as “avoid”, “encourage”, “support” is vague with little indication of how they will be achieved, and are open to interpretation and dispute</p> <p>Concern there is no clear position that coastal development at risk from sea level rise or storm surges should not be permitted.</p> <p>Concern some terms are subjective and suggest the following terms should be defined: “high environmental or landscape value”, “incompatible use”, “consider the biodiversity values” and “viable ecological process”.</p> <p>Concern there are no targets or goals in the TPPs to measure their success and whether modifications are required to achieve the objectives</p>	52	<p>Refer to section 4.7 of the body of the report.</p> <p>Refer to section 4.2 of the body of the report.</p> <p>The TPPs adopt a range of responses to risk of coastal inundation based on existing development, new development and development reliant on a coastal location. For a variety of reasons a prohibition of all development at risk of inundation from sea level rise is not a desirable policy response and required qualification and risk assessment based on the strategies provided.</p> <p>Refer to section 4.2 of the body of the report.</p> <p>Refer to section 4.6 of the body of the report.</p>
Exemptions	<p>Concern about increasing range of land uses and activities with full or partial exemptions from LUPA</p> <p>Concern population and economic growth are prioritised above and beyond any other considerations</p> <p>Concern no substantive evidence is provided to support the assertions that the TPPs consistent with Schedule 1 objectives and the State Policies</p>	53	<p>Outside the scope of the TPPs.</p> <p>The TPP strategies respond and plan for population growth based on existing trends. The Sustainable Economic Development TPP supports the state's economic interests in a similar way that it protects the State's environmental values through the Environmental Values TPP.</p> <p>The TPC is required to assess the draft TPPs against the TPP criteria that includes the Schedule 1 Objectives and State Policies.</p>
General - Agritourism	<p>Recommended the following:</p> <ul style="list-style-type: none"> Promotion of the inclusion of agritourism specific policies in the TPPs Requesting that the State Planning provisions be amended to emphasise the role of agritourism in the Agricultural and Rural zones, including creating new exemptions and permitted pathways for small scale agritourism activities <p>Concern agritourism is not considered in the Tourism and the Innovation and Research section – suggest it represents a range of sectors in the commercial market and should be considered within the Tourism Innovation and Research section.</p>	54	<p>Sufficient planning policy weight is given to agritourism which, when the relevant strategies are implemented through the SPPs, may result in amendments to the SPPs. This is part of a separate process.</p>
General – implementation Guidelines, Climate change, Language	<p>Concern that without clear implementation pathways it is difficult to see how these will translate into positive outcomes.</p> <p>The assertion that all TPPs are to carry equal weight will create conflict and confusion in application</p> <p>Concerned that the importance of climate change to all aspects of the TPS will not be properly reflected by simply including a separate Climate Change Statement in each TPP. Suggest that the enormity and importance of climate change requires the creation of a specific climate change TPP with overarching application, linked into all other relevant TPPs</p> <p>Suggest the language should be reviewed to plain English for easy interpretation.</p> <p>Concern the TPPs do not contain evaluation and performance measures determine whether the TPP has effectively achieved its objectives</p>	55	<p>Refer to section 4.5 of the body of the report.</p> <p>This approach is common in planning and is the way that the existing State Policies apply to planning instruments.</p> <p>Refer to section 4.1 in the body of the report</p> <p>Modifications have been made to include additional definitions, consistent use of terminology and use of plain English to aid interpretation.</p> <p>Refer to section 4.6 in the body of the report</p>
General	<p>Suggest there should be a background document which supported this Draft TPPs. Note the structure of the TPPs is unclear confusing and ambiguous</p> <p>The TPPs are both insufficient and inadequate in furthering of the Part 1 and Part 2 Objectives, as set out in Schedule 1 of The Act</p> <p>Suggest restricting growth in rural areas is discriminatory against people who are resident in the rural parts of Tasmania</p> <p>Suggest TPPs should have implementation guidelines</p> <p>Concern the policy position for Land Clearance in the TPPs is inadequate. Note Land Clearance is a Nationally Listed Threatening Process under EPBC law</p> <p>Recommend the principles and policy context should have statutory application</p> <p>Concern there is no standalone Climate Change Policy – note the current climate change statement included in the draft TPPs is inadequate and does not support the approach and there should be a proper policy position over the land clearance.</p> <p>Concern environmental protection is not adequately dealt with in the draft TPPs - suggest Environmental Conservation and Protection should be added as a specific TPP Policy and recommended a host of matters to be covered in a TPP on the subject of Environmental Conservation and Protection.</p>	56	<p>There was a supporting report that accompanied the draft TPPs.</p> <p>The supporting report demonstrated how the TPPs further the Schedule 1 Objectives.</p> <p>Rural residential strategies are discussed in section 4.3 of the body of the report.</p> <p>Implementation issues are addressed in section 4.5 of the body of the report.</p> <p>Land clearance is typically dealt with through the forest practices system. The TPPs address land clearance through a variety of strategies including those contained in the Biodiversity section of the Environmental Values TPP.</p> <p>The Principles and Policy context sections (now Policy Context) are explanatory and for information only. They are not drafted to have statutory weight.</p> <p>Climate change is discussed in section 4.2 of the body of the report.</p> <p>The Environmental Values TPP is considered to provide the policy guidance to adequately protect environmental values through the planning system.</p>

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General	<p>Concern about the lack of implementation guidelines – note it may lead to unintended consequences</p> <p>Proposed that State Agencies and infrastructure providers that are pivotal to the implementation of particular strategy statements be named under the relevant implementation guideline.</p> <p>Suggest strategy statements should be revised to be clear and implementable</p> <p>Suggest that Practice Note 5 drafting conventions should be adopted to ensure language and format is clear, unambiguous and consistently applied.</p>	<p>57</p> <p>61</p>	<p>Implementation issues are addressed in section 4.5 of the body of the report.</p>
Climate change, Implementation guidelines	<p>Concern about the way the draft TPPs are structured, note it is difficult to find which of the Strategies of the TPPs are specifically addressing/ furthering the Climate change Statements - in some cases, there is a gap between the goals of the Statements and the corresponding strategies within some of the TPPs</p> <p>Recommend that there should either be specific climate change policies for each TPP, or that there should be a standalone climate change TPP</p> <p>Further explanation is required on why the ‘implementation guidelines’ currently only apply to one (1) of the TPP’s</p> <p>It is not clear how the TPPs will be interpreted when the TPC is assessing planning scheme amendments</p> <p>Recommended that a practice note or a section in an updated implementation guideline is produced that sets out how an LPS is to satisfy the relevant criteria in relation to the TPPs</p> <p>Recommended that there should be a mechanism for evaluating the performance of the TPPs</p>	<p>58</p>	<p>The TPP structure is discussed in section 4.1 of the body of the report.</p> <p>Climate change is discussed in section 4.1 of the body of the report.</p> <p>Implementation is dealt with in section 4.5 of the report.</p> <p>The SPO can not speculate on how the TPC will interpret the TPPs. The TPC is guided by the provisions in the Act when applying the TPPs to planning instruments.</p> <p>Supported, however, this will be determined after the TPPs are made.</p> <p>Refer to discussion in section 4.6 of the body of the report.</p>
General	<p>Concern about lack of implementation guidelines and how the TPPs will practically be implemented through the RLUS and the TPS - Suggest the TPPs should include implementation guidelines for transparency and effectiveness</p> <p>Note the TPPs are too generic – recommended that the policies should include a preamble to give context to the strategies.</p> <p>Suggest some policies conflict with each other and it is unclear how conflicting policies are to be dealt with – recommend they are reviewed to ensure a balanced decision rather than the need to meet all relevant strategies</p> <p>Questions whether the strategies are a prescriptive list of matters that must be complied with, or they can be read as an objective with strategies that must have regard to.</p> <p>Concern a lot of the strategies are outside the planning framework and are not enforceable by a PA – suggest the intended audience should be stated.</p> <p>Suggest the use of the term Rural Residential to describe residential land within rural setting is outdated and has the potential to confuse interpretations</p> <p>The policies lack a framework for inter-Council or inter-regional cooperation or consideration</p>	<p>59</p>	<p>Refer to section 4.5 of the body of the report for a discussion on implementation.</p> <p>The Principles and Policy Context section (now Policy Context) of each TPP provides the preamble and context for the proceeding strategies.</p> <p>Refer to section 4.4 of the body of the report for a discussion on managing competing interests.</p> <p>Each strategy has a different level of prescription to deliver the policy intent. The strategies detail how the objective is to be achieved through the relevant planning instrument and is to be applied consistent with the provisions of the Act.</p> <p>The TPPs can be delivered through the planning frameworks established through the TPS and RLUSs. The TPPs are a statutory planning instrument made under the Act so it is envisaged that the audience will be professional planners.</p> <p>Rural Living refers to a specific zone in the SPPs. Rural Residential is defined in the TPPs to make it clear what it is referring to.</p> <p>Inter-Council cooperation and consideration is intended to be delivered through the RLUS process. The Regional Planning Framework discussion paper prepared by the SPO discusses options to improve how this is achieved. Inter-regional cooperation and consideration can be established independently of the TPPs.</p>
General - form and content of the draft TPPs	<p>Include implementation guidelines in the draft TPPs to provide clear expectations to State and Local Government</p> <p>Suggest there is a disconnect between the content of the TPPs and the SPPs – Note that issues with the non-application of the Local Historic Heritage Code to places registered on the Tasmanian Heritage Register do not align with part 6.2.3 (5) of the TPPs</p> <p>Climate change should be considered in the RLUS, SPPs and LPs</p> <p>Concern about the lack of regulation and ability to consider stormwater issues through the development process under the current planning instruments – Notes the draft TPP’s contain insufficient detail to provide clear policy direction on stormwater</p>	<p>60</p>	<p>Implementation is discussed in section 4.5 of the body of the report.</p> <p>The Act requires that the SPPs are reviewed once the TPPs are made. The TPPs do not influence the Tasmanian Heritage Register.</p> <p>The strategies responding to climate change will be implemented through the SPP and RLUS once they are reviewed following the making of the TPPs.</p> <p>Modifications have been made to the draft TPPs to strengthen water quality outcomes. Stormwater is discussed in section 4.3 of the body of the report.</p>

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Language and content	<p>Suggest the following matters should be considered:</p> <ul style="list-style-type: none"> Strategies within each policy vary from prescriptive to very broad, possibly because the lack of implementation guidelines require them to be a catch-all Prescriptiveness within the policies risks them being inappropriately applied, particularly where there are competing interests across difference policies The use of the term 'avoid' appears to have different rigour between policies, varying from the prescriptive 'must not' to 'refrain' The prescriptive nature of some policies impact on their ability to be sufficiently flexible to promote unique investment opportunities, allow for diversity in communities and the environment and respond to sudden changes, such as in housing supply/demand. The policies in some instances regulate matters that are outside the scope of the planning instruments, and it is unclear how they may be complied with. The policies are quite generic in nature, with little consideration of the local social, environmental, economic and geographical context of Tasmania. 	60	<ul style="list-style-type: none"> The level of prescription used is relative to the complexity of the issue the strategy is trying to address and the policy response to the issue. Refer to sections 4.2 and 4.4 of the body of the report for more detail on the level of prescription and competing interest, respectively. Submission supported and modification made to clarify the intent where 'avoid' is used. Refer to section 4.2 of the body of the report. The strategies provide for all these matters which can be further articulated through regional and local planning policies. All matters are considered consistent and in accordance with section 12B(2) of the Act. The Tasmanian context is described in the Principles and Policy Context (now Policy Context) sections and where possible, strategies have been drawn from that information.
General Purpose of the TPPs – policy vs strategy	<p>Suggest the TPP does not clearly establish the aims or principles that are to be achieved or applied through RLUS and the TPS</p> <p>Suggest the TPPs require clarification to enable assessment compliance with the requirements of section 12B of the Act</p> <p>Concern that the way many of the provisions drafted under each of the TPPs are not in itself policies</p> <p>Recommended that there must be overarching policy statements within each TPP, preferably listed under the 'strategies' of each TPP to provide certainty and expectations for developers (and their consultants) of their responsibilities</p>	63	<p>Refer to section 4.1 of the body of the report.</p> <p>Compliance with section 12B of the Act is discussed in the Supporting Report.</p> <p>A review of policy statements across jurisdictions has demonstrated that policies can be expressed in various forms.</p> <p>This is not considered a role for the TPPs. However, the TPC is required to turn it's mind to 'matters of a technical nature, or that may be relevant, in relation to the application of the TPPs to (i) the Tasmanian Planning Scheme; or (ii) each regional land use strategy'. The appropriateness of this issue to be addressed through the TPPs will be resolved through the TPC process.</p>
Implementation of the TPPs	<p>Suggest lack of clarity on implementation guidelines directly conflicts with the RMPS objectives and must be addressed to avoid conflicts within and between policy areas</p> <p>Recommended the following:</p> <ul style="list-style-type: none"> The high level aims and principles that are to be achieved or implemented are identified for each policy area are clearly established; Some guidance is provided on interpretation and resolution of conflict within and between policy areas; Strategies are worded to require consideration of specified matters to achieve an identified outcome, rather than mandated compliance with all strategies; The policy settings and statements reflect a high growth environment, rather than the traditional low growth Tasmania has experienced. <p>Concern many of the statements are highly prescriptive and it is not clear how they relate to implementation through RLUS and the TPS</p> <p>Recommended that the policies should be reviewed to ensure that wording does not create blockages to development, are relevant to application through the RLUS and planning schemes, where relevant are committed to and supported by the relevant State agencies and that consideration is required of listed issues rather than mandated compliance with all criteria, regardless of context</p> <p>Recommended that implementation Guidelines are established to inform development and assessment of RLUS, the TPS and LPS; and Section 8A Guidelines are also used to provide non-binding guidance for implementation of the Policies and inform the ongoing maintenance and periodic review under Section 12I of the Act.</p>	63	<p>The lack of implementation guidelines do not cause the TPPs to conflict with the RMPS objectives. The development of implementation guidelines will not necessarily avoid conflicts between competing interests.</p> <ul style="list-style-type: none"> The high-level aims are stated in the objective. The way in which those aims are achieved and applied are expressed through the proceeding strategies. Refer to section 4.4 of the body of the report for a discussion on competing interests. The strategies are worded to require specified matters to be considered. The policy setting requires consideration and determination of the actual growth scenario and to plan accordingly. <p>Refer to section 4.2 and 4.5 of the body of the report, respectively, for discussions on the level of prescription used in the drafting and implementation.</p> <p>The TPPs do contain certain restraints on use and development that is both deliberate and reflects the State's interests regarding planning issues associated with the use and development.</p> <p>Refer to section 4.5 of the body of the report for a discussion on implementation.</p>
General	<p>Considers the current policy content to be overly prescriptive, where policy settings seem too rigid and inflexible and with outcomes already implied.</p> <p>Suggest the TPPs should focus on high level strategic policy direction to afford the RLUS, TPS and local strategic planning initiatives a level of flexibility to evolve, respond and adapt to changing circumstances</p>	66	<p>The level of prescription is considered necessary to express the state's interest in the matter and to provide certainty of the desired policy intent. Where appropriate, the strategies have been reviewed to remove unnecessary rigidity and inflexibility.</p> <p>The strategies provide clear policy guidance on land use planning matters and gives scope for these matters to be furthered through RLUSs and local planning initiatives.</p>

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Structure of the TPPs	<p>Submits that the structure of the draft TPPs does not align with the prescribed structure set out in the LUPAA - suggest that will prevent practical and appropriate implementation through the legislated planning instruments</p> <p>The TPPs are statutory document and must state how each of the instruments that have a legislated role interact and how these flow to the lowest level of regulation of land use and development (implementation guidelines)</p> <p>Questions whether the RLUS's and LPS decisions are to expressly prohibit settlement growth that are not in the higher tiers of the hierarchy - What are the higher tiers of the hierarchy?</p> <p>Suggest majority of the TPPs are prescriptive and would lead to confusion – recommend this should be addressed by providing clear definition for the various parts of the TPP's and how these parts relate to the actual jurisdiction conferred by section 12B</p> <p>Suggest 'Implementation Guidelines' should be changed to 'Implementation Requirements', because terminology used are not 'guidelines' but a mandatory, statutory component to be complied with</p> <p>Supports recognition of climate change – suggest if specific actions are intended, these should be clearly expressed as policies that are to have effect through the RLUS's, SPP's and LPS's</p> <p>Suggest that the Draft TPP's are often prohibitive and prevents appropriate consideration, and the rights conferred, for local strategic planning under section 32(4) and the Schedule 1 Objectives of the LUPAA</p>	<p>67</p> <p>68</p> <p>69</p>	<p>Legal advice obtained confirms that the draft TPPs are consistent with the requirements of the Act. Refer to section 4.5 of the body of the report for further detail.</p> <p>Legal advice obtained confirms that the draft TPPs are consistent with the requirements of the Act.</p> <p>The draft TPPs require the identification of a regional settlement hierarchy. Growth is promoted in the settlements within the higher tiers of that hierarchy.</p> <p>Legal advice obtained confirms that the draft TPPs are consistent with the requirements of the Act. Refer to section 4.5 of the body of the report for further detail.</p> <p>Specific policy 'Implementation Guidelines' have been removed. Refer to section 4.5 of the body of the report for further detail.</p> <p>As discussed in the supporting report, many of the climate change strategies also support other planning outcomes, such as consolidation of settlements also supporting reduced carbon emissions. The way these are implemented will depend on the planning instrument that the policy is being applied to and other considerations.</p> <p>The intent of the TPPs are to reflect the state's interest in land use planning and this is done through consideration of the social, economic and environmental issues to provide a planning policy response.</p>
Statutory Application of the TPP's Through Section 34(2) of the LUPAA	<p>Concern about the impact of statutory requirements on the assessment of future LPS amendments under section 34(2)(da) requiring LPS amendments to demonstrate consistency with every individual strategy – suggest clarification is required on how the obligations outlined in section 34(2)(da) manifests in process for all parts of the document – noting that in the draft LPS's and the interpretation of statutory documents, the TPC errs on the side of caution to ensure that all statutory obligations are fulfilled</p> <p>Many of the matters addressed in the TPP's are not able to be applied in a statutory capacity</p> <p>Concern there is no mechanism, or guidance in the draft TPP's, to address conflicts between the strategies and no implied hierarchy as stated in the supporting report.</p> <p>Concern the mandatory expression of section 34(2)(da) together with the absolute and highly prescriptive construction of the text in the TPP 'Strategies' means that the TPC will have no choice but to refuse any amendment that does not comply absolutely.</p>	<p>67</p> <p>68</p> <p>69</p>	<p>The draft TPPs have been modified to addresses the application of the TPPs to LPSs in the General Application section. Refer to section 4.5 of the report for further detail.</p> <p>The matters in the draft TPPs can be applied in a statutory capacity through either an LPS, RLUS or SPPs, or a combination of any or all of these instruments.</p> <p>Refer to section 4.4 of the body of the report for discussions on competing interests.</p> <p>The drafting has been reviewed to mostly remove mandatory directions expressed in the strategies unless it is the intent of the policy.</p>
Impacts on Strategic Planning	<p>Concern the draft TPP's as written, will undermine the more recent 'repairs' to the three RLUS's as a result of overly strict interpretations in the assessment of planning scheme amendments that were never intended at the time of drafting</p> <p>Concern that the TPP's as drafted will eliminate many opportunities, particularly in relating to growth being effectively prohibited for settlements in the middle to lower orders in the settlement hierarchy</p> <p>Concern that the Draft TPP's imports content from the existing RLUS's, particularly associated with settlement growth, that does not currently exist in some of the existing RLUS's</p> <p>The State should be transparent on fundamental policy positions that affect key local issues. Suggest the provision of evidence to demonstrate the stated 'issues' that the TPP's purport to address</p> <p>Municipal allocation of growth opportunity is an unreasonable and inequitable impost</p> <p>Recommend that Legal advice should be sought from the Solicitor General in regard to structure of the TPP's and the consequences of the application of the TPP's under the obligations set down in section 34(2)(da) of the LUPAA.</p>	<p>67</p> <p>68</p> <p>69</p>	<p>The RLUSs will be reviewed once the TPPs are made.</p> <p>The draft TPPs promote growth in the higher tiers of the regional settlement hierarchy they do not prohibit growth in the lower tiers. If there is a strategic argument for growth in a lower order settlement then the RLUS and local strategic planning can make that case.</p> <p>The TPPs express a statewide approach to land use planning and there is no requirement for them to reflect existing RLUSs.</p> <p>The State has undergone consultation to determine the fundamental policy positions and tested those against the Schedule 1 objectives of the Act and State Policies.</p> <p>The premise for the RLUS is to plan for growth to occur in an efficient and coordinated manner taking into consideration the characteristics of the region and allocate land accordingly. The TPPs set out some of the considerations by which to achieve this.</p> <p>Legal advice has been obtained and the TPPs have been drafted in accordance with that advice.</p>

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General - Drafting	<p>Acknowledge it is complex to reconcile numerous competing interests to achieve economic, social and environmental benefit on a State-wide basis</p> <p>Suggest substantive review of the draft TPP's is required in collaboration with the expertise in the Regional Planning Groups, including Council planners, government and private consultants to ensure the policies are fit for purpose and likely to achieve the intended outcomes, prior to commencing public notification.</p> <p>Suggest the statement in the TPPs that the TPPs should be <i>considered in their entirety with all relevant strategies applying equally</i> is a statutory requirement which is not realistic or practical</p> <p>Concern the TPP's will undermine the recent work to 'repair' the Northern RLUS, which was undertaken to provide flexibility to demonstrate variable local circumstances and strategic appropriateness</p> <p>Concern that the proposed structure and content of the TPP's are too prescriptive and would be difficult to interpret and implement</p> <p>Recommended that the structure and content of the Draft TPP's be substantially reviewed to:</p> <ul style="list-style-type: none"> Reflect the terminology in the LUPAA Simplify the expression of policy at an appropriate State level by removing the prescriptive and prohibitive elements and enabling the more detailed expression under regional and local strategic planning, appropriate to the circumstances; Provide clear direction as to the manner in which the TPP's will be implemented in the RLUS's, SPP's and LPS's while enabling flexibility as to how that will be expressed in strategic planning; and Ensure the revised policies are legally functional within the framework of assessment criteria under the LUPAA 	70	<p>Noted.</p> <p>Consultation has been undertaken with a wide range of stakeholders, many of which show considerable support for the policy intent expressed in the draft TPPs. The TPC will ensure that the TPPs are fit for purpose as part of their independent review.</p> <p>The statement has been modified to clarify the intent. Refer to section 4.5 of the report for further details.</p> <p>It is not the intention of the TPPs to reflect existing RLUSs.</p> <p>The level of prescription is considered necessary to express the state's interest in the matter and to provide certainty of the desired policy intent. The strategies provide clear policy guidance on land use planning matters and gives scope for these matters to be furthered through RLUSs and local planning initiatives.</p> <ul style="list-style-type: none"> The terminology and structure used is based on outcomes from consultation process and legal advice suggests that it is appropriate The level of prescription reflects the nature of the matters being addressed through the strategies and the state's interest in that matter. The TPPs have been modified to relax many of the prohibitive statements. There are still ample opportunities that enable more detailed expression through regional and local level planning. Refer to section 4.5 of the report regarding the inclusion of application principles. Flexibility is delivered through the drafting of the strategies. Legal advice obtained supports that the TPPs are legally functional and within the framework of the Act.
Glossary	<p>Suggest the following terms should be defined and added in the Glossary:</p> <p>•Biodiversity • Water sensitive urban design • Flow regime • Soil and erosion control</p>	72	A definition has been included for Water sensitive urban design. Not considered necessary to define the other terms.
1.0 Settlement			
General - Developer contributions	Recommend that developer contribution should be included under the settlement policy to allow Councils to facilitate a wide range of public benefits	19	Developer contributions are discussed 4.3 of the body of the report. -
Principles and Policy context	Questions whether paragraph 3 of the Principles and Policy context incorporate formal precinct planning for new greenfield development	24	The Principles and Policy Context (now Policy Context) section does not have operational effect and is there for information only so has no bearing on the planning outcomes expressed through the strategies.
Principles and Policy context	<p>Suggest the text 'and in doing so support health and wellbeing' be added to paragraph 5 after cultural identity, to better define what is required to meet the policy.</p> <p>Suggest the following strategy should be added to the climate change statement</p> <p><i>Erosion of valued landscape qualities with changes in rainfall and temperature stressing vegetation, diminishing some habitat ranges and extending those of some pests</i></p>	25	<p>Preference is to maintain existing text,</p> <p>These matters are more appropriately addressed through the climate change statement in the Environmental Values TPP.</p>
Clarification	<p>Promoting a 15-year supply of land appears overambitious and concern many of the settlement strategies are open to wide interpretation which is not an element of good planning</p> <p>Suggest community gardens should be part of the strategies</p> <p>Note the social infrastructure strategy if implemented will improve the well-being of the whole community</p>	32	<p>The planning horizon adopted by the TPPs is consistent with infrastructure and other planning timeframes. The TPC will review the clarity of the strategies to ensure the intent is expressed clearly.</p> <p>Support. The TPPs have been modified to reference community gardens in strategy 7 of the Liveability section of the Settlement TPP.</p> <p>Noted</p>
General	The TPPs should allow some flexibility in the planning system for communities to have a say in population growth	55	Population strategies are outside the scope of planning. Planning only responds to population change and has very little influence over it.
Demand for housing	Proposed that the stated aim of a 15-year supply of zoned land should be extended to 30 years	57 61	The planning horizon adopted by the TPPs is consistent with infrastructure and other planning timeframes.

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General	Largely agree to the topics identified under this TPP, but suggest the TPP should refer to both the terrestrial environment as well as aquatic/coastal environments, as settlements near coastal area will require consideration and future planning with climate change scenarios Recommended the policies should establish consistent timeframes across areas to reflect short, medium and long term aims and outcomes at intervals such as 10, 25 and 50 years	63	This statement is unclear. The policies within the Settlement TPP clearly articulates where they are to apply. The TPPs adopt a consistent timeframe requiring 'at least a 15 year supply of land'. The strategies do not prevent local and regional planning from determining short, medium and long term aims and outcomes at intervals of 10, 25 and 50 years.
General	Supports the direction of Settlement TPP and commend the innovative and progressive nature of this policy	71	Noted.
1.1 Growth			
Climate change	Suggest growth should include concepts around gentrification, adaptation pathways, justice and the vulnerability of future land release to novel and emerging climates	19	These matters are considered too detailed for inclusion in the TPPs.
Strategy 1.1	Recommended the following 1.1.1 – 'existing settlements' requires definition or mapping for clarification 1.1.3(2b) – specify services and required commitment from agencies, or this should be part of implementation plan 1.1.3(2d) – include the text 'don't allow greater density where it is adjacent to or within 150m or distance recommended by TFS of a bush reserve 1.1.3(2e) – this should include planned and upgraded transport systems, not just existing 1.1.3(3) – suggest this strategy should include identifying potential to designate settlements that could grow fit for purpose, such as creating a future satellite cities. 1.1.3(6) – Agreed with the proposal to create structural plans at local level and suggest resources and training should be provided. 1.1.3(7) – revise to include the said growth boundaries need to be monitored and updated 1.1.3(9) – revise to replace provide with encourage . 1.1.3(11) – include a mechanism in the scheme to control the size of land considered for consolidation in relation to adjoining land.	39	Comments noted. Many of the suggested changes refer to matters that are outside the scope of the TPPs or have little or no bearing on the policy intent being delivered.
Objective and strategies	Suggest the text 'and provides a degree of flexibility to accommodate changing circumstances' should be added to the objective to emphasize the importance of flexibility Suggest the text prioritizing active transport should be added to strategy 1.1.3.2 e) to assist in interpreting how we plan for growth Suggest the following text should be added to strategy 6 to emphasize on wellbeing "h) <i>the likely lived experience of the inhabitants of the proposed developments and whether or not it facilitates them to meet their needs</i> " suggest addition of 7 f) <i>site analysis</i> to ensure any planning response is appropriately place based	25	The additional text is not supported on the basis that the proceeding strategies do not support flexible approaches. The additional text is not supported on the basis that policies promoting active transport are delivered through other strategies so there is no need to refer to prioritising it in this strategy. As above, liveability or wellbeing policies are delivered through other strategies. Intent of submission supported and modification made by including: <i>"site suitability, such as having regard to identified values, agricultural capabilities, physical constraints and environmental hazards."</i>
1.1.2 Objective	Suggest that the objective should be revised to: <i>To plan for settlement growth that allocates land to meet the existing and future needs of the community and to deliver a sustainable form of development that is responsive to both local historical settlement patterns and natural assets within the locality.</i>	46	The proposed modification is not supported because these matters are typically addressed through other policies.
Settlement growth	Support the inclusion of settlement Growth strategy. Note it supports appropriate urban growth and expansion, including into 'greenfield' areas where possible. Strategy 1.1.3.8 under Growth should include provisions to encourage voluntary developer contribution to 'new' infrastructure networks and services and encourage innovation	5	Noted Noted Developer contributions are discussed in section 4.3 of the body of the report.
Settlement growth	Recommended that the TPPs should include policy options to provide for regions and communities that wish to maintain or reduce their populations Concern there is no justification to the proposed 15-year supply of land in strategy	34	Strategies to increase or decrease population is outside the scope of planning and the TPPs. 15-20 year planning horizon is a standard timeframe used in land use and infrastructure planning.
Mining and renewable energy	Note measuring growth by market demand is short sighted, disconnect communities from future jobs, increases non-residential workforce and put undue strain on transport infrastructure. Recommend a new strategy to prioritise growth in areas proximate to current and future jobs. Recommend growth areas should be identified based on modelling of where future jobs would be over the next 10-20 years. Suggest growth areas must be managed at state level to avoid areas seeking growth where jobs will not be available to support the growth	12	Noted. Strategies in the 'Liveability' policy align residential use and development to employment opportunities. Strategy 1.1.3(2)(b) has provisions to ensure growth is prioritised in areas appropriate to maximise the use of available capacity within existing physical and social infrastructure networks and services.

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Change - wording	Suggest the wording of 1.1.3 2. (d) be change to "... <i>natural or man-made hazards, that ...</i> " to ensure all hazards are considered Suggest clause 1.1.3 8. (c) should replicate 6 (f) for consistency and to ensure logical and efficient provision of infrastructure is fully considered when identifying growth areas	10	The TPPs have been modified to refer to 'Environmental hazards' and includes a definition in the glossary which refers to both natural and man-made hazards. The two strategies are pitched at different levels and the use of the language reflects this.
Rural residential settlements	Concern the application of the policy excludes rural residential settlements. Suggest prescriptive elements should be removed. Note the exclusion of this residential land suite within the 'Growth' policy, has potential to affect the Break O'Day community Suggest that consideration should be given surrounding the terminology 'Rural Residential Settlements' and its intention and relationship to zones	62	Noted, however the level of prescription to constrain growth in rural residential settlements is a deliberate policy outcome. (refer to section 4.3 of the body of the report for further information) The TPPs have been modified to define 'Rural Residential Settlements'. The TPPs talk in broad terms and avoids referencing zoning which is only used in regulatory planning instruments.
Rural residential	Suggest rural residential is a valid housing choice and should be recognised for its contribution towards residential growth. Note that limiting or prohibiting potential for intensification of rural residential areas, or the establishment of new rural residential development in appropriate locations are unreasonable Recommend demand for growth analysis should consider State, Regional and Local policy settings that promote aspirational population growth targets and the potential to change the role of existing settlements to support a prosperous future Concern many strategies appears to be the same and recommended that the strategies should be reviewed to take a high-level policy approach Concern the strategies do not provide for future investment or changes in the role or function of settlements	33	Refer to section 4.3 of the body of the report. The 'Growth' strategies support these types of considerations. Each strategy is different and serves a particular purpose. The supporting report discussed the need for similar matters to be addressed across planning topics. The role or function of settlements is a regional or local planning outcome that is to be planned for at those levels.
Under 1.1 Growth - Wording	Recommend the wording of clause 1.1.3-6c be revised to delete 'consider' and replace with 'include'.	14	Not supported. The list of matters that follow are for consideration, not mandatory inclusion.
1.1.3 Strategy 2 & 8	Support the intent of strategy 2, note it align with high level policy positions which will form the backbone of the Housing Strategy. Suggest strategy 8 needs consistent sources of information for strategic justification	24	Noted. Strategies 2 and 8 apply to different situations and the information requirements differ. However, the strategies have been modified for clarification purposes and to include a 'site suitability' test for strategy 8.
1.1.3 Strategies	Suggest strategy 2b&d should include overland flow paths as a component of existing physical infrastructure Suggest revise strategy 6g to add 'stormwater,' after 'transport services, Suggest refining strategy 8c to ensure the 'existing' infrastructure can provide for best practice use Suggest strategy 12 be revised to remove the cost-effective and replace with best practice to allow for other considerations other than just cost	43	Not supported on the basis that the requirement is too detailed for the particular strategy Supported, modification made. Not supported on the basis that the requirement is implied to apply retrospectively. The strategy is providing for coordinated and cost-effective delivery of infrastructure. The requirement for 'best practice' is addressed through modifications made to other strategies.
1.1.3 strategies	Recommend an amendment to strategy 6a) to include (including environmental hazards) after constraints. Suggest there should be implementation guidelines to inform a review of the RLUS	45	Supported and modification made. Refer to section 4.5 of body of report for discussion regarding implementation guidelines.
1.1.3 strategies	Suggest strategy 7 presents as an instruction for the preparation of a Regional Land Use Strategy, rather than a policy position. There appears to be a lack of apparent direct links from the TPPs to the use and development of regulatory controls The Climate Change Statement would be more effective if included holistically and part of the individual policy statements	46	Noted, the policy is to achieve the objective through the creation of urban growth boundaries. The policy statements require additional analysis, review and consultation to determine how the TPPs might influence regulatory controls expressed through the SPPs. The scoping consultation expressed greater support for explicit reference to climate change.
1.1.3 strategies -drafting	Concern about the lack of application to rural residential settlements and strategies 2, 7 (in contrast to the requirements of 2), 10; Note the strategies will effectively prohibit future rezoning and development in remote areas such as Flinders and Glamorgan Spring Bay.	49 65	Refer to section 4.3 of body of report
Strategy 1.1.3	Include an additional strategy to strategy 5 highlighting quality of design in denser areas to optimize health and wellbeing outcomes	50	Design 'quality' is difficult to regulate and is considered too detailed for inclusion in the TPPs.
1.1.3 - strategies	Does not support the use of Structure Plans to guide land use planning at a municipality level in strategy 6 unless the Structure Plans are independently assessed by the TPC	53	The assessment of structure plans by the TPC is being considered through the Regional Planning Framework project. Comment referred to Regional Planning Framework project.

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
1.1.3 Strategies	<p>Concern that Strategy 4 will have the effect of not permitting expansion of smaller towns.</p> <p>Concern the statement in strategy 5 that <i>actively address impediments to infill development...</i> is problematic as there are fundamental issues that the planning system cannot address</p> <p>Note that the requirement of strategy 6 should not be the role of TPPs and must be deleted</p> <p>Suggest strategy 7 and 8 are unnecessary and assumes that a growth boundary is the only way to manage growth</p>	33	<p>Growth is encouraged in the higher tiers of the settlement hierarchy. Smaller towns with growth potential should be identified through that hierarchy and strategically justified for that purpose.</p> <p>Agreed, the TPPs can only operate within the planning system and will not influence matters outside of it.</p> <p>Structure planning is considered an appropriate method to spatially identify and plan for settlement growth.</p> <p>Growth boundaries are commonly used to manage growth.</p>
Growth	Concern there is no clear rationale provided for the 15 year land supply goal and it is uncertain how existing subdivision approvals will be prioritised for development before attempting to allocate new land	55	The 15-20 year land supply is consistent with other planning horizons used across jurisdictions. The allocation of land and subdivision approvals will be determined through other planning processes.
Urban Growth Boundaries	Suggest the policy positions expressed under 1.1.3 clause 8 (a) to (e) represent a substantial handicap to the undefined Rural Residential citizens of Tasmania. Recommend that Clause 8 represents a discrimination and should be discarded.	56	Refer to section 4.3 of body of report
Strategies	<p>Suggest the aim in strategy 1 should be to maintain a 20-year supply of zoned land for development</p> <p>Strategy 2(d) should be rephrased to “ ... or could have the potential to be used for significant agricultural ...uses”</p> <p>Strategy 3 should explicitly recognise that the growth of rural towns located beyond the gravitational pull of the major cities is driven mostly by local factors</p> <p>Note Strategy 8 is attempting to provide a mechanism for rare, different, one-off proposals, in which case requiring compliance with the policy sub-clauses would be impossible - suggested that Strategy 8 be removed and a different external mechanism developed to enable the consideration of potentially desirable ‘black swan’ proposals</p>	57 61	<p>The 15-20 year land supply is consistent with other planning horizons used across jurisdictions.</p> <p>This strategy has been modified to assist clarification the intent regarding agricultural land.</p> <p>The strategy allows those types of considerations to be taken into account.</p> <p>Strategy 8 lists broad considerations for growth to occur outside urban growth boundaries and is considered reasonable to demonstrate compliance in such situations.</p>
Strategies - drafting	<p>Concern some statements in the policy seek to limit rural residential land use – suggest there should be a clear policy position on provision of rural residential use</p> <p>Concern strategy 1.1.3(1) does not identify tourism as a use that requires available land for growth – recommended that tourism and any other relevant land uses be included within the strategy.</p> <p>Suggest the term “will” used in strategy 1.1.3(2) makes the implementation definite, with little room for further consideration</p> <p>Concern strategy 1.1.3(2a) only appears to relate to urban areas and not relevant to all municipalities – suggest the strategy should allow for growth to occur in identified areas outside of it as well.</p> <p>Concern strategy 1.1.3(2d) is too specific in that plans for growth will avoid the development of land subject to risk of natural hazards - recommended that the strategy should be amended to ensure that the risk is managed appropriately, rather than avoided.</p> <p>Have the following queries regarding the implementation guidelines:</p> <ul style="list-style-type: none"> What occurs if new areas are identified between the RLUS 5-year review – recommend the implementation guideline should be revised to ensure new areas of land that are identified are able to be developed. The provision of 15 years appears to be low in terms of timeframes – suggest the need to allow for flexibility to respond to unknown hurdles and avoid amendments to the RLUS. There is a need to separate and monitor visitor accommodation – revise the policies to allow the separation between these uses 	59	<p>Refer to section 4.3 of the supporting report.</p> <p>Tourism is included collectively in ‘commercial’ land use</p> <p>The use of ‘will’ is intentional in the strategy to require the consideration of the proceeding matters.</p> <p>Strategy 1.1.3 (2a) prioritises infill, consolidation, redevelopment, re-use and intensification of under-utilised land within existing settlements prior to allocating land outside those settlements.</p> <p>Submission supported and modification made.</p> <p>The Implementation Guidelines has been removed for reasons detailed in the body of the report</p> <ul style="list-style-type: none"> New areas can be developed through strategy 8 The strategy provides the 15 year supply as a minimum which aligns with other planning horizons. The 5 yearly review cycle of the RLUSs should also help maintain adequate land supply to address unknown hurdles etc Strategies responding to visitor accommodation and the impacts on housing the local community are addressed in the Tourism policy of the Sustainable Economic Development TPP.

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Policy Application/ Strategies	<p>Suggest there is no need for the ‘application’ statement in any of the policies as they are generally all state-wide</p> <p>1.1.3 (2a) - Note that most major existing settlements in Brighton municipality are within the Rural Living Zone – recommended that a strategy should be included in the growth policy to allow rural residential land to be used for a better and more sustainable use.</p> <p>Suggest the use of the word ‘avoid in strategies 1.1.3 (2c&d) require further explanation as to how an LPS is to satisfy the relevant criteria in relation to the TPPs.</p> <p>Suggest the impediments to infill development should be named in strategy 1.1.3(5) including development contributions and land banking</p> <p>Note that it is unclear when a structure plan would be required as noted in strategy 1.1.3(6). Raised the following queries:</p> <ul style="list-style-type: none"> • Will RLUS name up areas that require structure plans? • If a structure plan hasn’t been prepared for an area does that mean it can’t be considered for planning scheme amendment? • Softened the wording and replace required with encourage • Structure plan should be defined <p>The growth section in strategy 1.1.3(12) should comment on development contribution for infrastructure upgrades</p>	58	<p>Not all the policies apply statewide so the ‘application’ section specifies where the policy is to apply.</p> <p>The application statement at 1.1.1 has been modified to allow for land within rural residential settlements to be included within an urban growth boundary.</p> <p>Submission supported and use of ‘avoid’ has been reviewed and modified where necessary.</p> <p>The impediments to infill can be identified and addressed through regional or local planning strategies.</p> <ul style="list-style-type: none"> • It is anticipated that the RLUSs will require structure plans for areas identified for growth and this will be used to justify amendments to LPSs. • Not necessarily as it depends on the nature, scale and context of the amendment being proposed. • Intent supported and modification made to ‘promote’. • Submission supported and ‘Structure plan’ has been defined. <p>Development contributions can be addressed at a local level on a case by case basis in accordance with the relevant strategy under section 5.1.3.</p>
Policy content	Policy content needs to find balance between the established planning principle of utilising available infill within urban growth boundaries before further rezoning can occur and achieving adequate housing supply when infill land is not made available to meet housing demands	60	The strategy seeks to find that balance which can be further developed and applied through the RLUSs.
1.1.3 Strategy - drafting	<p>Supports the 15 to 20-year planning for growth timeframe – questions if this take the form of a rolling reserve or 5-year RLUS review periods</p> <p>Questions how the prior experience of inertia will be prevented if infill is not feasible or commercially viable – note the TPP’s need to be expressed in a way that does not unnecessarily impede reasonable expansion while waiting for infill and densification that may never come</p> <p>Concern the term ‘avoid’ used in strategy 2 has legal meaning and legal precedent, it is absolute, meaning that any interaction cannot be considered.</p> <p>Concern draft amendments relating to development of land in RLZ or GRZ at the periphery of a settlement will be refused because bushfire risk cannot be ‘avoided’</p> <p>Concerns about the potential interpretation of terms used such as ‘promote’, ‘plan and provide for’, ‘integrate’, ‘protect’, ‘support’ well located’ and ‘well-serviced’ as they are considered as mandatory directions.</p> <p>Suggest if the State is going to mandate a settlement hierarchy, it should set the framework and characteristics as the three existing RLUS frameworks are not the same.</p> <p>Strategy 6 - Preparing structure plans for every amendment to an LPS is not a reasonable requirement. Suggest requirement for setting spatial boundaries of everything that will happen in the next 15-20 years is a theoretical, utopian view that is not supported in reality.</p> <p>Strategy 10 is not feasible as many settlements that have an activity centre and can support minor adjustments for suitable commercial or cultural uses</p> <p>Suggest the TPP’s should consider how to address issues relating to land banking.</p>	67 68 69	<p>The Implementation Guidelines has been removed for reasons detailed in the body of the report.</p> <p>Noted. There are strategies that seek to remove impediments to infill and there are strategies that provide for growth to occur that is not infill.</p> <p>Submission supported and modifications made to relax the use of the term ‘avoid’.</p> <p>Supported and modification made to refine language used to allow consideration of land subject to environmental hazards.</p> <p>The use of these terms have been reviewed. Further discussion regarding how they will be interpreted and therefore implementation, will be discussed at the TPC hearings.</p> <p>The considerations for the settlement hierarchy are contained in strategy 1.1.3.3. The State’s position is reflected in the considerations within that strategy. If the regions require greater prescription on how to determine the regional settlement hierarchy, further consultation and advice can follow.</p> <p>Structure plans are a useful way to spatially demonstrate how land use planning factors have been taken into consideration and makes it easier for the community to engage in planning processes and for decision makers to justify and demonstrate compliance with planning instruments.</p> <p>Strategy 10 ‘encourages’ the concentration of commercial use and development in activity centres.</p> <p>Land banking can be addressed at a local level.</p>
1.2 Liveability			

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Strategic Growth Plan - Liveability	<p>Questions how Strategic Growth Plan point on liveability could be achieved in relation to building and sustaining of a 'viable' population when planning scheme does not allow for the subdivision of land into smaller acreages on the outskirts of the population areas</p> <p>Suggest more land have be released for subdivision on the main outskirts of communities on Flinders Island</p> <p>Suggest caveat to Airbnb's should be restricted</p> <p>Note incentives could be offered to ensure buildings are completed within a maximum timeframe and mobile trailers and caravans actively discouraged.</p> <p>Considers a decision to knocked back an application to subdivide 25 acres of land (into four or five 4.5-acre blocks) on a land zoned rural, deemed unsuitable for agriculture by a certified agronomist as discriminatory with serious financial consequences.</p> <p>Questions why Flinders Council's support the sale of Crown land at Lady Baron when there are private landowners on the outskirts of that township who wish to subdivide areas of 50 acres that have now been zoned agriculture. Considers decision to be arbitrary and unjust.</p> <p>Recommend Council needs to be more proactive and open in its dealings and its approach to community consultation as the decisions they make affect many individuals on the island</p>	<p>7</p> <p>6</p>	<p>The planning systems are there to ensure land use avoid the development of land that is not well serviced by existing or planned physical and social infrastructure, or that are difficult or costly to service.</p> <p>This issue is too specific for the TPPs.</p> <p>The TPPs address visitor accommodation in section 4.4.3.3.</p> <p>These matters are too specific for the TPPs and relate more to regulatory planning instruments.</p> <p>The remaining matters are not relevant to the assessment of the TPPs.</p>
Strategy 1 - wording	Suggest the wording secure and reliable employment sources should be amended to 'established opportunities for employment'.	19	Noted however preference is to maintain existing text.
1.2.3. Strategies	<p>Add the text 'capitalize on local qualities' to recognise the region's intrinsic qualities</p> <p>Add the text 'interlink' after accessible and 'support habitat value and hydrological health' after 'with nature' (strategy 4) to ensure new development contributes to making open space more ecologically valuable and more supportive of active transport</p> <p>Add the text and where possible to strategy 5 after 'connectivity within'</p>	25	<p>Preference is to retain existing text. The regions' intrinsic qualities can be identified and furthered through the implementation of this strategy through the RLUS.</p> <p>Habitat and hydrological values are addressed through the Environmental Values TPP</p> <p>Preference is to retain existing text.</p>
1.2 Strategies	<p>1.2.3(3) – Questions why primary and secondary school mentioned. Note many urban and outer urban growth areas have public schools at capacity which have to be addressed.</p> <p>Suggest some implementation guidelines to be included in section 1.2.4</p>	39	<p>The strategy is explicitly about growth in the skilled workforce by promoting access to tertiary education and vocational training. Strategies regarding the location of primary and secondary education are addressed in the Social Infrastructure policy and are less related to strategic considerations around employment.</p> <p>There are multiple ways that the strategies in 1.2.3 can be implemented through various planning instruments.</p>
Strategy 2(a) - wording	<p>Notes that the provision of public transport is not within the remit of land use planning</p> <p>Suggest the wording should be amended to 'promote the provision of public transport infrastructure, enabling access to safe, efficient and frequent public transport'</p>	19	Noted and intent supported. Modification made to 'promote the provision of'.
Strategy 4 - drafting	<p>Suggested the following additions:</p> <ul style="list-style-type: none"> Support measures to equally prioritise and co-locate urban forest and green space in the public realm with transport and infrastructure for improved social and health outcomes Ensure there is sufficient space for greening in private developments including apartment/medium density housing developments Provide guidelines to ensure that built structures allow setbacks for street tree growth – for example, balconies, signage and fixed awnings provide for a network of accessible and inviting open and green spaces that cater for a diversity of needs and age groups 	19	<ul style="list-style-type: none"> These measures are already supported through strategies 4 and 5. Intent supported. An additional criterion has been added to 1.5.3.4 to include solar access and open space but qualified on the basis of location and density. This is too specific for the TPPs. Refer comment to SPP review. This is addressed through 1.2.3.4
1.2.3–7 – wording	Recommend the clause 1.2.3–7 include " <i>while not compromising any physical infrastructure.</i> " at end of paragraph, to protect physical infrastructure where relevant	10	Inclusion not considered necessary.
Remote Communities	<p>Note remote communities support much of Tasmania's future economic growth including mining, renewable energy, aquaculture and tourism, and without sustainable populations these industries will be impacted.</p> <p>Concern about the difficulties remote communities have in accessing services making the community unliveable.</p> <p>Recommend a new strategy to increase the population in smaller remote communities</p>	12	<p>Noted</p> <p>The TPPs support the provision of social infrastructure where residential growth is to occur.</p> <p>Not all remote settlements are appropriate for population growth. This is considered to be a local issue that can be addressed through other mechanisms.</p>
1.2.3 Exclusion– rural residential settlement	<p>Concern the application of the policy excludes rural residential settlements. Suggest recognition of rural residential settlements within proximity to the District Service Centre be given the opportunity to provide housing for family members.</p> <p>A recognition of expansion of roles within District Service Centres, Rural Towns and Rural Villages and localities, within the Strategies in relation to education, infrastructure, community facilities will further the Liveability objective</p>	62	<p>The Liveability policy does not apply to rural residential settlements because it is pitched at the urban environment.</p> <p>These matters can be addressed through the RLUSs.</p>
Affordable Housing	Concern about the lack of affordable housing solutions for youth particularly young people with disabilities in the Planning Policies Note young people with disabilities and behavioural issues often find themselves homeless as they have limited housing options	16	Noted. The TPPs are considered to do as much as they can to support affordable housing within the planning system.

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
1.2.3 – strategies - Employment	Concern strategies 1.1.3 do not apply to rural residential areas and settlements and developments occurring outside defined settlements Concern Liveability and social infrastructure strategies do not reflect the real employment and activity of the rural towns and sectors	49 64 65	The Liveability policy does not apply to rural residential settlements because it is pitched at the urban environment. The TPPs do not provide a policy setting for every situation and do not replace the need for local planning to continue. If the needs of rural towns are not reflected in the TPPs, there are opportunities through the RLUS process and local planning strategies to address these matters.
1.2.3(3)	Suggest the proposition of strategy 3 is unrealistic and an aspiration that undermines regional tertiary and vocational education establishments	46	The intent of strategy 3 is to promote the location of tertiary education and vocational training institutions in close proximity to populated areas. An additional consideration has been added to acknowledge that some training relies on regional or remote places for learning.
Strategies - drafting	Commented that: Strategy 3 cannot apply to rural towns Strategy 11 is a vague statement which would be difficult to prove compliance – suggest that a new strategy statement should be added recognising the role of rural residential land in the suite of liveability options	57 61	The intent of strategy 3 is to promote the location of tertiary education and vocational training institutions in close proximity to populated areas. An additional consideration has been added to acknowledge that some training relies on regional or remote places for learning. The intent of strategy 11 is to provide an opportunity for local characteristics of a place to be acknowledged and protected through planning instruments. Rural residential is acknowledged as a legitimate housing choice through 1.4.3.5 (h)
Strategies 1.2.3	Suggest the following: Add “develop a network of high-quality integrated settlements” Add “promote green infrastructure in private developments” The strategies should encourage mixed uses within residential areas to reduce reliance on motor vehicles and to increase diversity and liveability The liveability precinct policy should consider the draft precinct planning guidelines for Tasmania and encourage such approach for precinct planning in RLUS.	58	Integration between and within settlements is delivered through strategy 6. Sustainable design practices in private developments are promoted through the Design policy of the Settlement TPP. This is delivered through strategy 9 of section 4.7.3. The precinct planning guidelines can be adopted through the RLUSs
Future settlement	It is unclear why rural residential land has been omitted from future settlement It is unclear why on tertiary education and vocational training institutions are identified in strategy 1.2.3(3) – recommend the wording be revised to state “in conjunction with service providers, provide for the expansion of tertiary education in appropriate location	59	Refer to section 4.3 of body of report The intent of strategy 3 is to promote the location of tertiary education and vocational training institutions in close proximity to populated areas. An additional consideration has been added to acknowledge that some training relies on regional or remote places for learning.
Access & availability of health facilities	Suggest emphasis is required on the access and availability of health facilities and promotion of safe and stable (low crime) communities – note there is a large gap between the liveability policy aspirations and the outcomes achieved by SPPs	60	Noted. The SPP will be reviewed to align with the TPPs once they are made.
Drafting	Strategies include matters that are outside the purview of the planning system such as public transport and location of telecommunications infrastructure, cultural and recreational facilities Strategy 10 to ‘ protect and enhance settlements ’ is in conflict with strategies for growth as it precludes middle to lower order settlements Facilitating place making conflicts with strategies that limit the ability to add cultural and commercial uses to settlements that do not have public transport	67 68 69	The TPPs can influence these matters strategically through considerations in the RLUSs. Strategy 10 does not consider the settlement hierarchy. Not sure of the issue being raised - Strategy 11 is about facilitating place-making and not sure how it could be seen to be in conflict with lack of public transport.
1.3 Social Infrastructure			
Drafting	Note there is repetition between the liveability and social infrastructure sections and consideration should be given to merging these sections. Note this section appears to address government investment or operational matters rather than the planning systems role in the process of delivering social infrastructure.	33	Noted and it is accepted that there are clear linkages between the two subheadings with access to social infrastructure being a key component of liveability however, social infrastructure is addressed a discreet issue because it represents significant State interest.
1.3.3.1 - Wording	Recommend the wording of 1.3.3.1 should be changed to "supply of land and physical infrastructure" to ensure land is serviceable	10	Strategies requiring consideration of appropriately serviced land by physical infrastructure is addressed through other parts of the TPPs
1.3.2 Objective	Questions why social infrastructure and physical infrastructure are separated. Suggest they should be a combined TPP with individual infrastructure networks defined	19	Social and physical infrastructure have been separated because they require different land use planning considerations.
1.3.3 Strategy 1	Suggest the addition of 'community centres, recreation facilities, ' after or before 'libraries'	19	The list is not definitive and Social infrastructure is defined.

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
1.3.3 Strategies 9	Added strategy 9 to 1.3.3 9) Design streets to support their values as settings for incidental social interactions	25	Not supported on the basis that it is too detailed for the TPPs
1.3 – strategies – open space	Concern social and physical infrastructure development is not mutually exclusive but is individually addressed in separate policies Suggest further attention and clarification of Open Space should be provided to define sound Open Space planning principles and define what open space characteristics should be sought Greater emphasis on human-scale urban design principles for public open space and associated social and environmental benefits is required Open space is inadequately mentioned throughout the policies	46	Social and physical infrastructure have been separated because they require different land use planning considerations. Open space strategies are provided in the ‘Liveability’ and ‘Design’ policies. These strategies can be further developed through RLUS and local planning outcomes. Strategy 1 of the ‘Design’ policy includes encourage the use of principles for urban design. Supported. Open space requirements have been strengthened in the ‘Design’ policy in the strategies relating to subdivision and building design.
Future Technology - Smart Cities Initiative (Digital Twins)	The policy should provide a high-level overview to assist all levels of government in partnership with the private sector to develop the technology required to function as a development industry within real-world terms The omission of greater urban design principles throughout the policies is arguably the most significant oversight of the draft policies. It is strongly encouraged that urban design strategies that reference building form and design, street layouts and streetscapes, place-making, and networked open spaces are considered and further developed	46	This is considered outside the scope of the TPPs. Urban design guidelines were not identified through the scoping consultation as a matter that should be addressed through the TPPs. While the TPPs have some modest statements regarding design, the inclusion of Urban Design Guidelines for the State is a larger body of work that requires significant analysis and consultation to develop.
Strategies	Note the strategies may require engaging state agencies and infrastructure providers for implementation – suggest the inclusion of implementation guidelines with the names of relevant State Agencies and infrastructure providers	57 61	It is anticipated that State Agencies will be actively involved in the review of RLUSs to implement the TPPs.
Strategy 1.3.3	Suggested the following: Require consideration of the impacts of development on the provision/demand for social infrastructure. Encourage master planning to consider social infrastructure provision when planning growth areas Consider measures to retrieve costs /seek developer contributions for providing social infrastructure needed for residential development Add “ensure social infrastructure is delivered in the development process and in the right location”.	58	These matters are provided for in the ‘Social Infrastructure’ and ‘Growth’ policies. Not supported. The application of the TPPs should deliver this outcome.
Rural Residential settlements	Concern about omitting rural residential settlements from the application of social infrastructure	59	It is an unreasonable expectation that social infrastructure should be provided in rural residential settlements.
Scope of strategies	Note strategies include matters that are outside the planning system - suggest TPPs need to reflect the limited degree of intervention by the planning system	67 68 69	The strategies contain matters that could influence the RLUSs
1.4 Settlement Types			
1.4.3 Strategies	Concern the topic heading and objective do not appear to correspond well with the strategies Concern several strategies duplicate matters dealt with in other TPP topics unnecessarily Recommend Strategy 6 should be reconsidered. Not the restriction on rural residential development within an urban growth boundary is flawed and does not allow strategic responses to local constraints where large lots could accommodate development on land that is vacant and have no agricultural, urban or environmental value.	33	The policy intent is considered clear. Noted. The Supporting Report discussed the need for duplication in some instances. Refer to section 4.3 of the body of the report.
1.4.3 Strategy 6(h)	Concern this strategy is rather open to interpretation and should be revised to be more specific.	19	The intent of the strategy is to restrain the growth of rural residential use and development for reasons outlined in section 4.3 of the body of the report.
1.4.3 Strategy	Concern the use of the word “ avoid ” in strategy 1.4.3(6) instead of have regard to – it is unclear what minimal is referring to under 6a	59	The policy intent is to ‘avoid’ and restrain growth of rural residential development, unless it satisfies the criteria listed, for reasons outlined in section 4.3 of the body of the report.
1.4.3 Strategy 1	Suggest the text ‘and protect the amenity of adjoining residential.....should be added after natural hazards	25	Strategy 1 has been deleted on the basis that it sets up potential conflict with other strategies.
1.4 strategies	The policy heading is confusing and does not reflect the objectives Strategies 1.4.3(3) and (4) should include the text limiting/considering appropriateness of growth in areas at risk of climate change. 1.4.3(6) – should also consider the impacts of tourism and visitor accommodation	39	Noted but the intent is considered to be clear. These considerations are addressed through the Environmental Hazards TPP. The impacts of visitor accommodation on housing stock is addressed through the ‘Tourism’ strategy of the Sustainable Economic Development TPP.
1.4.3 Strategies	Suggest strategy 4 should be revised to include ‘adequate’ or ‘upgraded’ or ‘fit for purpose’ in front of physical infrastructure.	43	The strategy implies that the infrastructure will be adequate.

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Strategy 6f – future expansion	Concern the strategy effectively prohibits any future expansion on Flinders and Cape Barren Islands through overly restrictive wording and mandated compliance with all other parts of the strategy; Concern the wording of strategy 4 and 6 particularly 6f is overly restrictive and effectively prohibits any future expansion on King Island	49 64 65	The strategies restrict rural residential growth for reasons provided in section 4.3 of the body of the report.
1.4.3 Strategies	The TPP's need to specifically address the issue of tourism accommodation and strata in the coastal zone as density controls for residential subdivision and use are being undermined Note PD6 is a weak and inadequate planning provision to deal with the problem of uncontrolled tourism accommodation and the incremental impacts on coastal values	53	These are matters to be addressed through the SPPs
Strategies	Suggest strategy 1 should acknowledge that the peri-urban area is also where future urban expansion is most likely to be best located, and should be protected from development that would render it economically unfeasible for that future development Strategy 4 should also mention inland areas with recreational fishing holiday homes ('shacks') and seasonal agricultural workers accommodation. Strategy 6 should include a proactive statement encouraging the zoning of existing de facto rural residential areas to the Rural Living Zone Sub-strategy 6(f) should refer to 'significant agricultural land', not just 'agricultural land'	57 61	Supported and the strategy has been deleted as it sets up the potential for conflicting strategies and the issues are addressed through other policies. The strategy refers to 'coastal or other settlements that are characterised by holiday homes' which would apply to inland areas used for recreational fishing 'shacks'. This is included in part a) which states 'or the existing pattern of development reflects rural residential type settlement'. 'Rural residential settlement' is also now defined. Intent supported and modification to qualify 'agricultural land' has been made.
Policy application and Strategy	The policy should state whether it applies to existing rural residential areas both within and outside the UGB Note it is unclear what 1.4.3(2) is trying to achieve and where it would be applied. Suggest 1.4.3 should consider rural residential settlements in strategically beneficial areas for future growth Suggest 1.4.3(6) should require that addition RLZ land is justified based on supply and demand projections Suggest the text "Or on edge of UGB for future greenfield development if required" should be added to 1.4.3 (6b)	58	The policy applies to all settlements, including rural residential settlements, 'and land that is proposed, allocated or identified for future settlement growth'. The strategy is acknowledging inner city living and drawing attention to certain planning considerations. The intent of the strategy is to limit growth of rural residential settlements for reasons provided in section 4.3 of the body of the report.
Drafting	Concern the wording of strategy 1.4.3 (6) particularly 6f is overly restrictive and does not consider allocation of land for housing in rural residential areas Recommended that the wording should be amended to allow the strategy to be considered rather than enforced	59	The intent of the strategy is to limit growth of rural residential settlements for reasons provided in section 4.3 of the body of the report.
	Suggest the term peri-urban in strategy 1 development encroachment does not relate to the topic Suggest the topic Settlement Type is confusing and recommend condensing into one section	67 68 69	Supported. The strategy has been deleted. The intent of the 'Settlement Type' policy is to address planning issues that are particular to different types of settlements. The intent of the strategies, when read in conjunction with the objective, is considered to be clear.
1.5 Housing			
Drafting	Note this section appears to largely duplicate the policy intent of the Growth section and suggest that it should be reviewed to consider planning matters	33	The 'Growth' policy relates to the considerations for allocating land for future growth. The 'Housing' policy is to provide for residential use and development. The objective of each policy serves very different purposes.
Infrastructure Charges and Levies	The HIA's Position statement on infrastructure charges and levies on residential development was provided recommending how infrastructure items should be funded and delivered. E.g. Note that development specific infrastructure which provides essential access and services and without which the development could not proceed are considered to be infrastructure items that should be provided by the developer as part of the cost of development. Whereas the cost of broader community, social and regional infrastructure are recommended to be borne by the whole community and funded from general rate revenue, borrowings or alternative funding mechanisms.	5	The TPPs response to infrastructure contributions are provided in section 4.3 of the body of the report.
Ecovillage	Concern about unnecessary planning constraints when it comes to compact, sustainable living and land sharing / ecovillages, both within and outside towns Suggest ecovillages offer viable, sustainable alternatives to sprawling suburban development Recommend the TPPs should support the use of urban and rural land for ecovillages.	1	The Settlement TPP requires that sufficient land is allocated to meet the community's needs for housing and supports the planning system to deliver future development in a coordinated, cost effective and environmentally responsible way policies relating to specific settlement types, housing diversity and availability is a pathway to encourage ecovillages

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Housing – non-residents workers	Note non-resident workers impacts negatively on communities including less services, less liveability and less investment in long-term sustainable housing. Recommend addition of a strategy to <ol style="list-style-type: none"> Reduce non-residential accommodation, and Where it exists ensure that it is well integrated into the community, enhances liveability and services, and can be reused for community or economic purposes when the need for non-resident worker accommodation ends. 	12	The TPPs support housing for non-resident workers as it is a necessary requirement for sustainable economic development
1.5.3	Add the text ‘appropriately located for the type of housing’ to strategy 2 after Which is Add the text ‘adversely’ after ‘does not’ and ‘on site or downstream’ after ‘environmental values’ to strategy 5e) to recognise appropriate development and ensure consideration of distant effects of development	25	The application of the TPPs should determine the appropriate location for housing. Intent support with inclusion of ‘do not significantly impact environmental value...’.
1.5 strategies	1.5.3(4) – suggest should include the text: encouraging sustainable design to reduce the running costs of house such as lighting/natural light, heating and cooling Suggested implementation guideline for section 1.5.4	39	These matters are considered too specific for the TPPs. Implementation is addressed in section 4.5 of the body of the report.
1.5 Red Tape Perspective	Recommended the following: Section 1.5.3.4 should reference Workers Accommodation and be given weight alongside social and affordable housing Section 1.5.3.5 should specifically deal with height and lot coverage restrictions that are imposed by local councils at their discretion and work against higher density developments	26	Worker’s accommodation is addressed in other strategies. These are matters for the SPPs
1.5.3. 5 (c) - wording	Recommend the wording of clause 1.5.3. 5 (c) be revised to replace "services" with "physical and social infrastructure"	10	Supported and modification made
Affordable Housing	Concern affordable housing has not been sufficiently addressed by the proposed TPP. Recommends that affordable and social housing be included as a separate issue Recommend that a percentage target of affordable and/or social housing should be included in the implementation guideline for all new supplies of land	27	The strategies respond to affordable housing as much as is possible through the planning system. There are other Government initiatives that work with the planning system to help deliver affordable and social housing.
1.5.3 Strategy 4(e)	Suggest the wording be amended to consider the needs of people with disability, including independent living options, and the level of support and care required for assisted living options. Suggest addition of ‘g’ - g) ensuring good residential amenity through the provision of solar access and quality private open space	19	The strategy delivers the intent of what is suggested. Supported and modification made.
Short stay accommodation	Suggest there needs to be a way to limit short stay accommodation as part of the Housing Strategies in 1.5.3 Suggest the text people with disabilities in strategy 4e) of strategy 1.5.3 should be replaced with term ‘person living with disability’	42	The impact of Visitor accommodation on the availability of housing is addressed in the Tourism policy of the Sustainable Economic Development TPP. Supported and modification made.
Housing Affordability	Suggest a policy should promote housing diversity to support the demand for housing to meet the needs of households as they move through life cycle changes	46	The intent of the comment is delivered through strategy 4.
Strategy 5 under 1.5.3	Submits the TPPs should include policies on the provision of higher density housing relating to liveability of both internal and external spaces including the relationship of the housing to the street	50	The strategies require ‘well-designed’ housing. Other design criteria that relate to solar access and private open space are provided in the ‘Design’ policy.
Strategy 1.5.3	Concern the Government is not seeking to address the causes of the “housing crisis” include aggressive population and mass tourism growth policies, Air BnB, negative gearing, foreign ownership etc Suggest housing provision should be focused in serviced settlements	53	The ‘housing crisis’ cannot be addressed solely through the planning system as there are many other factors that contribute to it. The ‘Housing’ policy applies to settlements (as defined).
Affordable Housing	Suggest the TPPs should include strategies to require new developments to contain a proportion of social and/or affordable housing	55	Social housing is delivered by the State through other mechanisms.
Strategies	Strategy 4 should include an additional subpoint referring to sustainable living on rural residential lots Strategy 5 should include an additional subpoint to explicitly recognise that change will occur within urban streetscapes, and that this is an unavoidable consequence of pursuing a more environmentally sustainable urban footprint	57 61	The acknowledgement of rural residential as a housing choice is referenced in 1.4.3 Not considered necessary to include recognition of change in streetscape as it serves no planning purpose.
1.5.3 - Drafting	Suggest the TPPs should consider planning incentives, tenure mix, impact of short stay accommodation and mandatory planning mechanisms to facilitate the provision of social and affordable housing	58	The State has other mechanisms outside the planning system to provide social and affordable housing.
Drafting	Note the strategy only appears to focus on urban housing and not all housing types	59	The ‘Housing’ Policy applies to ‘settlements’ (as defined) so not all types of housing are addressed by the strategies.

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Drafting	Suggest Strategy 5 of I.5 should be revised to replace the text; “have been identified for urban consolidation” with “are suitable for urban consolidation”	40	Intent supported. Modification made.
Private market and state government initiatives	Suggest consideration should be given to the role the private market and state government initiatives have on housing supply and the impact this has on the capacity of statutory planning to regulate – implementation guidelines required	60	These matters are outside the planning system.
I.5.3	Strategies include matters that are outside of the planning system such as facilitating social and affordable housing and aged care services Suggest densification of settlements must also be a product of local community consultation	67 68 69	There may be instances, such as through a SAP, where this strategy can be implemented. Noted.
Under I.5.3 Strategies	Suggest that the housing strategies should prioritise infill development, and the reuse of existing structures and infrastructure and minimise the development of greenfield sites (used as a last resort). Note that the TPP encourages a diverse range of housing and should be encouraged and facilitated by the Tasmanian Planning Scheme	71	Appropriate locations for infill need to be identified at a local level. The TPPs provide for a mixture of housing strategies to apply. Noted
I.6 Design			
Drafting	Suggest most strategies read as planning scheme provisions, and not a state policy outcome Note that although it is stated that the strategy applies statewide, the objective refers to urban spaces.	33	Noted Noted.
Strategy I.6.3.8	Suggest consideration should be given to including something like “ <i>Considers passive solar optimisation in grid pattern lot design</i> ”. Notes this sets higher accountability for solar access provision to all lots at the subdivision stage.	12	The strategy includes the consideration of ‘climatically responsive orientation’
I.6.3	Suggested alternative sequencing of strategies to emphasize the importance of the public realm 5, 4, 6, 2, 3, 7, 8, 1 Suggest the addition of g and h as follows: ‘g) provision of private open space that is functional, has good amenity and considers privacy’. ‘h) incorporation of areas of green space or provide access to green space to move towards greater environmental equity Recommend encourage in strategy 3 should be replaced by required.	19	Supported and modification made. Support the inclusion of private open space to be considered. Preference is to retain ‘encourage’
Strategy I.6.3-If	Recommend the wording of clause I.6.3-If be revised to delete ‘encourage’ & ‘promote’ and replace with ‘Ensure’. “ Encourage <u>Ensure</u> the design and siting of buildings to positively contribute to: ... safe access and egress for pedestrian, cyclists and vehicles.”	14	Preference is to retain existing drafting in both strategies.
I.6.3 Strategies	Suggest the addition of the text ‘usability, appeal, comfort, resilience’ of..... to 1c) to recognise the outcome; and added additional sub-strategy e) to recognise the capacity of good design to reinforce the areas image. ‘e) the identity and character of the region’ suggest amendment of strategy 3 to replace ‘encourage’ with ‘require’ recognising that public places as essential elements suggest ‘and open space’ should be added to 8c) after.... Buildings added ‘legible, convenient and direct’ To g) to denote the key determinants of whether or not people chose active transport	25	This is a matter that can be addressed through the RLUS when considering this strategy. Preference is to retain ‘encourage’ Intent supported and an additional criterion added for public open space considerations. These matters are addressed in active transport strategies in the ‘Liveability’ policy.

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Strategy 4, 5, 7 & 8	<p>Recommended the following:</p> <p>Strategy 4 – questions whether there is any mechanism to determine what is considered character of a place – suggest character statements would help implementation</p> <p>Strategy 5 – add environmental equity after interaction</p> <p>Strategy 7 - Change the word ‘street networks’ to ‘movement networks’</p> <p>Support the intent of strategy 8 but recommended the following improvements</p> <p>Reorder the sub-strategies from higher level to assist in its logical comprehension in the order of h, e, f, g, b, a, l, c, d.</p> <p>Add ‘and choice of materials, with particular emphasis on non-heat absorbing roofs;’ to sub-strategy ‘c’</p> <p>Change the wording of (i) to ‘provide diverse lot sizes for residential use, when the location, a housing market analysis and surrounding housing make it appropriate’</p> <p>Include a new j) – ‘allows for public and private street tree and green space planting to reduce the urban heat island effect’ and include a new k) – ‘maximises retention and absorption of surface drainage water on site’.</p> <p>Add a strategy that encourages the application of Designing with Country principles and approaches</p> <p>Add a strategy that encourage community participatory design</p> <p>Add a strategy that encourages the use of methodologies that promotes adaptability</p>	19	<p>This is a matter to be determined through local and regional planning when applying the strategy.</p> <p>Preference is to retain existing wording.</p> <p>Preference is to retain ‘Street network’ as it is a key factor in subdivision design. Pedestrian and bicycle pathways are explicitly called up which collectively refer to ‘movement networks’</p> <p>Supported. Modification made to rearrange order of criteria.</p> <p>This matter is too specific for the TPPs.</p> <p>Preference is to retain existing text.</p> <p>These matters are addressed through the sustainable design practices strategy (at 1.6.3 (6) of the consultation draft)</p> <p>Tasmania has not developed these principles or approaches yet.</p> <p>Community participation is encouraged through strategies in the Planning Processes TPP.</p> <p>Not clear of what the intent of such a strategy would be and how to express it clearly through the TPPs</p>
Drafting	<p>Note the heading should be revised to Design of Public Urban Spaces</p> <p>Suggest strategy 1.6.3(8e) should include ‘and pedestrian and cycling links’</p> <p>Recommend implementation guidelines should include design guidelines or requirements in the planning scheme</p>	39	<p>The policy also includes strategies that apply to subdivision and buildings.</p> <p>This matter is addressed in the preceding strategy.</p> <p>The SPPs will be reviewed following the making of the TPPs.</p>
1.6.3 Strategies	<p>Support strategy 6b) and suggest ‘Support’ should be replaced with ‘Require’</p> <p>Concern strategy 8h is missing mention of sustainable infrastructure design. Note just being ‘responsive’ gives no guidance on sustainable action or climate change mitigation</p>	43	<p>Preference is to retain existing drafting</p> <p>Being responsive allows for greater issues, including emerging issues, to be considered rather than specifying what those actions are.</p>
Subdivision, Site and Building Design	<p>Include strategies addressing issues concerning subdivision standards providing health and wellbeing outcomes</p>	50	<p>Wellbeing of occupants included in building design strategy by considering solar access and private open space. Similarly, the subdivision design includes open space, active transport to support wellbeing of future occupant.</p>
1.6.3 strategies	<p>Suggest there should be specific requirements in strategy 6 to protect scenic amenity via strict and prescriptive requirements related to height, bulk, location and colour of buildings and other structures especially in the coastal zone</p>	53	<p>These matters are too detailed for inclusion in the TPPs.</p>
Drafting	<p>Suggest 1.6.3(2&3) needs to:</p> <p>Encourage high quality medium to high density housing</p> <p>Include consideration of climate resilience in providing public places</p> <p>Incorporate best practice principles in planning for open spaces in new subdivisions and include reference to precinct planning</p>	58	<p>The consideration for higher density housing is addressed in other strategies.</p> <p>This is addressed through strategy 6 of the consultation draft.</p> <p>These matters are considered too detailed to be included in the TPPs</p>
	<ul style="list-style-type: none"> Improve provisions for active transport which provide: Permeability and connectivity of streets and paths; Limited dead-end cul-de-sacs; and Varying street widths and alignment to suit the street function. Review and adopt Bicycle Network Tasmania’s previous recommendations related to provisions for bike path access and residential and workplace bike parking and end of trip facilities 	50	<p>Active transport is addressed across a number of strategies to deliver most of these outcomes.</p> <p>These matters are addressed through the Liveability policy</p>
Design of Building	<p>It is unclear how the design of a building can be incorporated into TPS or a RLUS given that design is restricted under section 7 of the <i>Building Act 2016</i>.</p> <p>Suggest if design is to be a policy, then it should also be referring to the design of the space – recommended that developer contribution be considered to assist in making positive and effective change to the design of spaces.</p>	59	<p>There may be elements that are incorporated through master planning exercises that inform SAPs implemented through LPSs or performance criteria in the SPPs.</p> <p>Design of ‘space’ is considered through the strategies.</p>
Climate change statement	<p>Suggest it is important that there is specific reference to design incorporating passive solar opportunities in an additional strategy</p>	60	<p>The subdivision design strategy includes promoting climatically responsive orientation of buildings and a ‘solar access’ consideration has been incorporated into the strategy for building design.</p>

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Drafting	<p>Concern that:</p> <p>Many of the matters relating to building design are outside the purview of the planning system and cross into building code territory that is prohibited by section 8 of the Building Act.</p> <p>Strategy 4 relating to the character of neighbourhoods is not achievable in a planning system that seeks to homogenise the standards for General Residential zoning</p>	67 68 69	<p>Some design matters listed in the TPPs may inform modifications to the SPPs. They can also inform responses through master planning processes that can be adopted through a SAP.</p> <p>The SPPs already contain performance criteria that seek to respond to the existing character of an area. The Act also provides for SAPs, PPZ and SSQs to set aside the SPPs to deliver local planning outcomes.</p>
Under 1.6.3 Strategies	Suggests that the requirement for green space (this could be shared or individual) be included in the list of subdivision design requirements.	71	Supported and modification made.
1.6.3 – Strategies	<p>Suggest strategy 1 should include that “<i>siting and design of buildings are to positively contribute to:</i></p> <ul style="list-style-type: none"> <i>onsite and offsite environmental values</i>” <i>adaption to climate change impact such as increased heat, bushfire risk and extreme weather events</i> <p>Note that point 6 should include climate change considerations that focus on individual building siting and design.</p> <p>Suggest strategy 8 should include a strategy to ensure subdivision design incorporates appropriate water sensitive urban design features to mitigate potential impacts on water quality and runoff associated with increased impermeable areas.</p>	72	<p>Strategy 1 ‘encourages the design and siting of buildings to positively contribute to: (a) the site and surrounds;...’ From a design perspective, this is considered adequate to recognise and respond to surrounding values, including environmental values. Protection of environmental values are specifically addressed in the Environmental Values TPP.</p> <p>Strategy 1 includes ‘incorporating energy efficient measures’ as a design criterion which is a response to climate change.</p> <p>Additional consideration included to adopt best practice stormwater management approaches</p>
2.0 Environmental Values			
General	Suggest the Environmental Values TPPs should be based on sound scientific data to ensure a reliable and up to date data set and overlay-mapping tool is able to purposefully inform land use planning	62	The first strategy of each policy is to identify and map the particular environmental value for the reasons outlined in this submission.
Principles and policy context 2.0.1	Support the draft TPPs but concern no elaboration provided on ecosystem services for a healthy functioning environment	17	Noted.
Reference to State Policies	<p>Concern there is no explicit reference to relevant State and National policies</p> <p>Recommend the Environmental Values TPPs be revised to include reference to relevant State policies</p>	17	The Act requires the TPPs to be consistent with State Policies. This is demonstrated through an accompanying report. There is no need to reference the State Polices in the
Principles and policy context and strategies	<p>Suggest the statement that "A significant proportion of Tasmania’s environmental values are protected by mechanisms outside the planning system," in 2.0.1 is incorrect and misleading and must be removed</p> <p>Suggest the point 4, regarding the application of offsets "where impacts cannot be minimised" is unacceptable. Suggest the word minimised should be deleted and replace with avoid.</p>	56	<p>The statement is correct as there are mechanisms outside the Act that protect environmental values.</p> <p>The wording reflects the intent of the policy.</p>
General	<p>Suggest that the draft climate change statement is vague and non-mandatory. Recommended that a stand-alone climate change TPP is needed</p> <p>Recommend the inclusion of conservation as an issue in the TPPs to ensure that conservation efforts are not undermined or harmed by adverse development</p> <p>Recommend the rehabilitation and restoration should be included in the TPPs to provide for how historical and future adverse effects on the environment could be remedied</p>	29	<p>Refer to section 4.1 of the body of the report for discussion regarding the structure of the TPPs including the approach to addressing climate change.</p> <p>The Environmental Values TPP seeks to conserve high value environmental assets and develop strategies to manage the impact of use and development on other environmental values.</p> <p>The planning system cannot apply retrospectively to rehabilitate vegetation.</p>
Principles and policy context 2.0.1	<p>Note statements regarding climate change biodiversity, waterways, landscapes and coasts clearly identify the key issues but require implementation guidelines</p> <p>Concern that statement 3&4 of 2.0.1 are weak and would provide a loophole for developers</p> <p>recommends that at the very least offsets should be required where impacts cannot be minimised</p>	32	<p>Implementation is addressed in section 4.5 of the body of the report.</p> <p>These are principles outlined in the Policy Context section and are not intended to have statutory application.</p> <p>Offsets are provided in the strategies.</p>
General	<p>Note the language used in the objectives is vague and passive and will be virtually meaningless without defined criteria</p> <p>Concern the implementation process for the overall TPPs is not defined</p>	34	<p>The language used reflects the comments made in the Policy Context section that acknowledges that many of the impacts on environmental values are controlled by mechanisms outside of the planning system.</p> <p>Implementation is addressed in section 4.5 of the body of the report.</p>
2.0.2 Climate change statement and 2.1.3 Strategies	<p>Note the use of ‘may’ in the climate change statement is vague and should be replaced with ‘will’,</p> <p>Suggest the wording ‘substantial’ should be removed from strategy 2.</p> <p>Suggest an additional biodiversity strategy should be included to consider impacts of linear infrastructure (roads, water diversions and cut-off drains, trenching, transmissions lines etc) on biodiversity</p>	43	<p>We cannot definitively know what the future climate will be so the impacts are described in terms of ‘may’.</p> <p>‘Substantial’ qualifies the strategy and prevents it applying in every situation involving land clearance.</p> <p>These types of developments are addressed in response to the level of land clearance or their impact on biodiversity.</p>

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
General	Concerned about the potential for unnecessary duplication and discrepancy with the State Policy on Water Quality Management 1997	44	Noted. Additional comments have been made in the accompanying report in to discuss how the TPPs respond to the SPOWQM.
General	<p>Proposed the following recommendations:</p> <ul style="list-style-type: none"> Consider how the TPPs will be developed and integrated with existing relevant policies and planned policies. Develop a specific Public Open Spaces Code which includes detailed provisions on public open space within the TPS. Review the Heart Foundation’s extensive recommendations relating to food security outlined in their <i>Representation to the final draft State Planning Provisions 2016</i> (Appendix D). Review detailed housing recommendations outlined in - TALC submission - Tasmanian Housing Strategy (Appendix C). Consider how the TPPs can promote social inclusion Highlight the co-benefits of providing access to active transport modes in reducing emissions to mitigate climate change across the Environmental Values and Environmental Hazards policy areas. Develop a framework to support the State Policy on Water Quality Management 1997, including detail of how the draft TPPs are consistent with this State Policy 	50	<ul style="list-style-type: none"> The TPPs have been reviewed and signed off by each agency who considered them in the context of their existing relevant policies. Public open space is dealt with in a number of locations throughout the TPPs. Once the TPPs are made the RLUS and SPPs will be reviewed to align them with these planning instruments. That review may result in greater regulation around the provision of public open space such as a code as suggested. Food security is not explicitly addressed through the TPPs because it is outside the scope of the planning system. However, indirectly the TPPs protect agricultural land and agricultural use and development that supports food security. Many of the recommendations relate to outcomes delivered through the SPPs. Social inclusion is promoted through the Liveability and Design policies. This would create unnecessary duplication when the synergies are discussed in the Climate Change Statements Supported. Additional comments have been made in the accompanying report to discuss how the TPPs respond to the SPOWQM.
General	<p>Concern the following key issues are not adequately addressed in this policy:</p> <ul style="list-style-type: none"> Cumulative impacts and the need for coordinated regional and/or statewide planning - note that focussing on the environmental impact of individual developments and activities does not adequately protect the environment and its values Concern about the inclusion of offsets in point 4 of this Policy. Note a Commonwealth review by Professor Graham Samuel highlighted the flaws of the offset mechanism used under the EPBC Act and it is likely to this approach will be modified 	52	<p>Agree with the comment that there is a need to address the cumulative impacts of land use and development on environmental values. It is difficult for the planning system to address and respond to the cumulative impacts on environmental values. Monitoring and review of the policy setting can assist with understanding the cumulative impacts although this requires assessment against benchmarks which are lacking.</p> <p>Agreed and supported. The TPPs present offsets as a last resort.</p>
Principles and policy objectives	<p>Suggest the objectives of the TPP and strategies across the five topics fall short on establishing clear enforceable measures to protect the environment. Noted priority is given to economic over environmental values</p> <p>Suggest the wording “that stimulates our economy” in paragraph 2 of 2.0.I should be omitted</p> <p>Suggest principles 3 and 4 seem weak and that offsets should be required where impacts cannot be minimised</p>	55	<p>The TPPs are not intended to provide enforceable measures to protect environmental values. They provide the policy setting to be applied through the RLUS and TPS.</p> <p>The phrase referred to is correct in that Tasmania’s Environmental values do stimulate our economy and, along with others, is a valid reason to protect them.</p> <p>Offsets are offered through other strategies.</p>
Policy position	<p>Suggest the policy positions of this policy section are inadequate – recommended that the ‘Aichi Targets’ should be rolled into this policy section, these include:</p> <p>"Strategic Goal A: Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society."</p> <p>"Strategic Goal B: Reduce the direct pressures on biodiversity and promote sustainable use."</p> <p>"Strategic Goal C: To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity."</p> <p>"Strategic Goal D: Enhance the benefits to all from biodiversity and ecosystem services."</p>	56	<p>The Aichi Targets and very broad and do not offer ways that these goals can be achieved through the planning system. TPPs only apply to the planning system and take a balanced approach to meeting competing social, economic and environmental interests.</p>
General	Strategy statements make no distinction between well-established systems in place for protecting natural values and those for which we have very little – suggest this should be corrected	57 61	The TPPs are not intended to reflect the existing situation.
Principles and policy context and Climate change statement	<p>Queries why principles are focused only on onsite impacts of development and not on development adjacent to areas containing significant environmental values which can degrade these values</p> <p>Suggested that the list of key impacts of climate change on Environmental Values should include the following:</p> <ul style="list-style-type: none"> increased frequency and intensity of bushfires; changes in runoff and consequent erosion, water quality and flow regime; and sea level rise should also include ‘increased storm surge’. <p>Concern the mechanisms to address climate change appears to be focused on terrestrial ecosystems and should include the following:</p> <ul style="list-style-type: none"> protecting and enhancing water quality and flow regimes to build the resilience of aquatic ecosystems; and protecting and enhancing wetlands, riparian and foreshore areas including intertidal areas 	72	<p>The Principles and Policy Context (now Policy Context) section talks about protecting environmental values in general and makes no specific reference to whether or not those values are on or off site.</p> <p>Supported and modification made.</p> <p>Supported and modification made.</p>

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
General - drafting	<p>Concern many of the policy areas do not provide adequate and realistic criteria for considering the management of existing areas, as opposed to the consideration of expansions into new areas or greenfield proposals</p> <p>Policies should reflect the relatively high growth that Tasmanian has and is likely to continue to experience.</p> <p>Suggest the term 'terrestrial verges should be replaced with 'riparian zones' and terms such as 'significant landscapes', 'high-water mark', and 'catchment management' should be clearly defined to prevent inconsistent interpretation and application</p>	63	<p>Planning cannot apply retrospectively and therefore the TPPs prioritise the management of growth areas as this is where they can best achieve their intent.</p> <p>The TPPs require consideration of the community's existing and forecast demand that will reflect the growth rate at the time.</p> <p>Support the replacement of terrestrial verges with riparian zones. The remaining suggested modification are not supported as they are typically well understood or are to be determined through further analysis undertaken as part of the RLUS.</p>
2.1 Biodiversity			
Drafting	<p>Note the language used in strategy 2.1.3(2) is similar to the existing NAC and seems to suggest that only high biodiversity values or significant values should be considered which is inconsistent with RMPS objectives</p> <p>Recommend that the text '<i>promote biodiversity in urban areas and new developments</i>' should be added to the strategy</p>	58	<p>The policy intent is to triage environmental values, affording significant values the highest protection and adopting other measure to protect the lower order values.</p> <p>This submission is not supported as it sets up the potential for conflict when applying the strategies.</p>
2.1 Strategies	<p>Suggest there is no provision for actively improving degraded natural values areas.</p> <p>Note that strategy 2.1.3 should include recognition of the benefits and values in the urban areas, 2.1.3(7) is not suitable for policy, 2.1.3(8) is not planning, 2.1.3(9) is unclear, 2.1.3(10) should be clarified with examples, 2.1.3(11) would need controls and not sure 2.1.3(13) is at the right place.</p>	39	<p>The planning system cannot actively require the rehabilitation of degraded vegetation.</p> <p>The benefits of green spaces in urban areas is dealt with the Settlement TPP. Environmental weeds can be addressed through the planning system by, for example, conditions on a permit to wash down earth moving equipment and exempting vegetation clearance involving weeds. Vegetation. The other strategies mentioned can have application through RLUS or the TPS</p>
Strategy 2.1.3.10	<p>Support the draft TPPs but concern strategy 2.1.3.10 is convoluted and unclear</p> <p>Suggest that strategy should be reworded for clarity. Recommended rewording below:</p> <p><i>Promote natural resilience by avoiding use and development that will decrease the ability of species ecological communities and ecosystems to adopt to climate change</i></p>	17	<p>Intent supported and modification made to clarify strategy, although slightly different wording.</p>
2.1.3 Strategies	<p>Recommend that "high biodiversity values" should be defined and included in the Glossary</p> <p>Recommend that strategy 7 should be revised to read: 'Promote use and development of land that prevents or minimises the spread of environmental weeds and disease'</p> <p>Recommend that 'native habitat' ... in strategy 9 be replaced with 'biodiversity'.</p> <p>Recommend that strategy 13 should be revised to: 'Support Managing Authorities responsible for land within the Tasmanian Reserve Estate through alignment of land use planning strategies and approved management plans and Reserve objectives'</p>	30	<p>'High Biodiversity values' will be a product of the methodology established to identify and rank biodiversity values required through strategy I which is anticipated to be developed in conjunction with NRE, regions and councils.</p> <p>Supported and modification made.</p> <p>Supported and modification made.</p> <p>The wording of that strategy was on the advice of the governing agency so preference is to maintain existing text.</p>
Drafting	<p>Recommend reconsidering the level of detail included in the strategies and the intended variation to the current level of regulation. Suggest care should be taken with the level of detail, the more detail, the higher the risk of omissions and the intended intent/objective of the 'strategy or principle' can be lost or misinterpreted</p> <p>Note the intent of strategy I is not clear and requires that the significance of values should be ranked</p>	33	<p>The level of prescription is considered necessary to deliver the desired policy intent.</p> <p>The ranking of biodiversity values will be a product of the methodology established to apply strategy I.</p>
Strategies	<p>Recommend that strategy 5 be strengthened to require offsets and minimise impacts</p>	32	<p>Strategy 5 requires the impacts on biodiversity values to be minimised or offset, there is no need to require both.</p>
Strategies	<p>Concern there is no explanation on how fragmentation or connectivity is to be assessed and managed in strategy 6.</p> <p>Recommend include an additional strategy to ensure that the information systems are updated and corrected when necessary and that this triggers appropriate reviews and amendments to zones and codes</p> <p>Note the language used in strategy 4 and 5 is soft and have no effect</p> <p>Note the approach to biodiversity and wetlands shows a distinct defensive or reactionary strategy where a more proactive and assertive approach is needed</p>	34	<p>An example of how this strategy might be applied is through the application of the Environmental Management zone between two isolated fragments of native vegetation to allow regeneration.</p> <p>This will be achieved through the review cycles of planning instruments established in the Act.</p> <p>These strategies can be applied in different circumstances to direct outcomes delivered through planning instruments.</p> <p>Noted, however there was no example provided on what changes are required to deliver a more 'proactive and assertive approach' so it is difficult to determine if it is a more appropriate approach.</p>

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Overlapping and similar statements	<p>Concern the term 'high biodiversity' is used without guidance on what is a high biodiversity value or what characteristics distinguish high from low value</p> <p>Suggest Strategies 2.1.3(2) and (3) addresses the same issues requiring the same considerations, creating uncertainty and confusion</p> <p>Suggest strategy 9 appears similar to strategy 11 which is much clearer in meaning</p>	40	'High Biodiversity values' will be a product of the methodology established to identify and rank biodiversity values required through strategy 1 which is anticipated to be developed in consultation with NRE, regions and councils.
Strategies 2.1.3	<p>Suggest some modification of the wording of the Biodiversity Strategies (2.1.3), to be more consistent with the wording of the Agriculture Strategies (4.1.3).</p> <p>Note that the wording of strategy 10 is confusing and suggest it should be revised to delete 'will increase'....and replace with 'thereby increasing'... so the meaning is clear</p>	41	<p>The two policies operate differently. Without an explicit example it is difficult to determine what is meant by the submission.</p> <p>Supported and modification made.</p>
2.1.3 strategies - Progressing growth	Note strategy statements appears to force compliance that does not recognise the varied nature of existing areas that may have compromised values	49 64 65	Areas with compromised values should be identified through the ranking of the biodiversity values required through strategy 1.
soil health	Suggest Biodiversity needs to recognise values beyond flora and fauna, as soil contains a very high biodiversity which is critical to soil health	52	Noted, however, micro-organisms in soils is at a level of detail that is typically not addressed through the planning system.
Drafting	<p>Concern the statement "A significant proportion of Tasmania's environmental values are protected by mechanisms outside the planning system", is a mechanism design to release certain uses and development from proper oversight, community input and proper regulatory controls.</p> <p>Suggest All land uses in Tasmania should be subject to LUPA to ensure that the requirements of Schedule 1 and the relevant State Policies can be enforced'.</p> <p>Note the use of words such as "important" "high" or "significant" values in biodiversity management is problematic and does not allow most native vegetation to be protected</p> <p>Recommend the statement below should be included in the strategy.</p> <ul style="list-style-type: none"> 'Net gain in the condition and extent of native vegetation and habitat across the State' <p>Suggest that the definition of 'Habitat Corridor' should be inserted into the Policy – 'means an area or network of areas, not necessarily continuous, which enables migration, colonisation or interbreeding of flora or fauna species between two or more areas of habitat'</p> <p>Recommend that the following statement should be added to strategy 13.</p> <p>'and provide resources for management plans to be undertaken so that Tasmania's reserve estate can be effectively protected, maintained and where necessary restored'</p>	53	<p>The statements reflects the nature of the RMPS.</p> <p>This is outside the scope of the TPPs.</p> <p>The policy intent is to triage environmental values, affording significant values the highest protection and adopting other measure to protect the lower order values.</p> <p>The planning system can deliver the strategy as suggested.</p> <p>Intent supported. Modification made to include a definition for Habitat Corridor.</p> <p>The provision of resources for management plans is outside the scope of what the TPPs can deliver.</p>
Strategy 5	Strategy 5 should be strengthened so that development which impacts on biodiversity values should only occur under exceptional circumstances where it has been demonstrated that there is a strong public interest in proceeding and suitable offsets are available	55	The strategies adequately guide strategic and regulatory responses to managing impacts on biodiversity without the requirement of a 'public benefit' test.
Strategies - Drafting	<p>Note the 5 categories of environmental values in the draft TPPs is inadequate and the list represent a severe contraction of the biological diversity which is present in Tasmania</p> <p>Recommend the following:</p> <p>In 2.1.2 Objectives add the word "increased" before "protection"</p> <p>In 2.1.3 (1) Strategies replace the word "appropriately" with "accurately".</p> <p>In 2.1.3 (4) Assumes the biodiversity values will be subject to development and thus is unacceptable.</p> <p>In 2.1.3 (6) Delete the word "promote" and add the words "and restore" after "maintain" and before "connectivity".</p> <p>In 2.1.3 (7) How? Why not stop nurseries from selling invasive plants like Foxgloves</p>	56	<p>Noted.</p> <p>Preference is to maintain existing text.</p> <p>Preference is to maintain existing text.</p> <p>This strategy applies to those situations where development is proposed that will impact environmental values which is considered unavoidable in certain circumstances.</p> <p>Preference is to maintain existing text.</p> <p>Outside the scope of the TPPs.</p>
Strategies	<p>Suggested the following:</p> <p>A new strategy statement should recognise that infill development within urban areas is a key strategy to protect biodiversity outside urban areas.</p> <p>A new strategy statement should set out a system for biodiversity offsets - this policy approach will require spatial strategic planning for implementation</p> <p>A new strategy statement should concurrently recognise that the most environmentally sustainable outcome might be the destruction of some biodiversity values in some key urban expansion locations.</p>	57 61	<p>This matter is addressed through the policies in the Settlement TPP.</p> <p>Biodiversity offsets are used as a last resort in the application of the strategies. There is considered sufficient guidance that is generally available to deliver an approach to biodiversity offsets.</p> <p>This concept is implied through numerous strategies in various policies throughout the TPPs.</p>

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Wording	Suggest inclusion of additional wording to provide for the enhancement of biodiversity with the promotion of new habitat and wildlife corridors	60	Connectivity between isolated and fragmented vegetation communities to support habitat corridors is addressed in strategy 6.
Strategies	Concern that it is not feasible to 'rank' biodiversity values for mapping within the planning system	67 68 69	The methodology used to develop the existing priority vegetation overlay already applies a ranking system for biodiversity values
Strategies	Suggest the offsite impacts should be considered under strategy 2.1.3(3a) Suggest that 2.1.3 (12) should explicitly consider management of alpine areas, given the fragility of alpine ecosystems	72	This strategy relates to designating land for particular purposes so it is difficult to require the offsite impacts to be considered when the actual use and development is not confirmed. Alpine areas are not under as much pressure from development and loss of habitat as a result of coastal erosion and inundation caused by climate change.
2.2 Waterways, Wetlands and Estuaries			
Implement the objective and strategies	further consideration should be given to including storm water management within the Tasmanian Planning Scheme that adequately addresses storm water quality and quantity	62	The strategies regarding stormwater and water quality have been strengthened which may flow through to modifications made to the SPPs.
Future strategic direction	Notes the TPPs appears to be generic and concern this will create duplication and discrepancy with the principles and objectives in the State Policy on Water Quality Management 1997, should the intention of the Environmental Values TPP be for local councils to replicate	13	The relationship between the TPPs and the SPOWQM has been demonstrated in greater detail and described in the Background report to the TPC.
Drafting	Note that the intent of strategy 2 requiring the designation of areas in and around waterways to be avoided if it has the potential to cause point source pollution is not practical in existing urban areas	33	There are criteria to be considered to allow land to be designated for purposes that may cause point source pollution.
2.2.3 strategies	Recommend strategy 2a be strengthened to read 'relies specifically on being located within close proximity to aquatic environments and has stringent controls on pollution and disturbance' Recommend strategy 4e is weak and should be strengthened	32	Preference is to maintain existing text as when it is read with the other points the matters raised in the submission is addressed.
Strategy 2.2.3.4(e)	Support the strategy but concern that the word 'increase' is not replaced with 'change' as suggested in previous comment	17	The strategy has been modified as follows " <i>not significantly change the rate and quantity of stormwater or increase pollutants entering the water</i> ".
2.2.3 Strategies	Recommend that strategy 1 should be revised to replace 'terrestrial verges' with the text 'riparian zones' Revise strategy 5 to replace 'Support'.... with 'promote' and 'Implement'... with 'implementation'	30	Supported. Modification made. Modification made to "'support" the collaboration..'
2.2 – strategies	Suggest 2.2.3(1) should be identified by codes and associated mapping Suggest 2.2.3(3) should include water harvesting or recycling be considered in new subdivisions over a certain size	39	Likely that the mapping required by strategy 1 will inform the code and associated overlay of the TPS. This can be done on a case by case basis. Not an issue that requires direction through the TPPs.
Drafting – Consistency with SPWQM 1997	Suggest the statement that the <i>draft TPPs are considered consistent with the State Policy on Water Quality Management 1997</i> ... is alarming and confusing. Note the EPA has started the process of implementing this policy and needs to be acknowledged in the TPPs Suggest it will be useful to include implementation guidelines for stormwater management and flooding at the outset to build confidence in, and provide direction on, the purpose and efficacy of these policies	43	Noted and agreed. A more detailed assessment of the TPPs against the SPOWQM has been provided in the report accompanying the draft TPPs. Implementation issues are discussed in section 4.5 of the body of the report.
2.2.3 Strategies - stormwater	Note the phrase 'significantly increase' in strategy 4e is problematic. Suggest the strategy should be revised to: 'Manage with best practice any new rates and quantities of stormwater entering waterways, wetlands and estuaries to ensure stormwater output will not negatively impact the receiving waters and environments. Prevent any pollutants from entering these systems.' Strategy 1: Suggest the phrase 'areas that support' is unclear and needs clarification and recommend that the word 'verges' should be replaced by 'Riparian zones', with explanation. Note the introduction sentence in strategy 2 is confusing and suggest the word 'considerable' should be removed. Suggest strategy c) and the final phrase - can demonstrate that the risk of environmental harm can be managed is vague and should be removed. Suggest replacing 'minimise' in strategy 3 with 'prevent'.	43	Preference is to maintain existing text as it sets the policy intent without being overly prescriptive.. The intent of the strategy is clear. Support for the change to 'riparian zones'. The level of disturbance needs to be qualified to allow for some disturbance to occur. Support the retention as it is a condition on allowing use and development around waterways, wetlands and estuaries. Preference is to maintain existing text because it is unreasonable to prevent erosion of streambanks.

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Drafting SPWQM 1997	Seeks clarification on the statement regarding the <i>State Policy on Water Quality Management 1997</i> Note there is a technical Guidance for Water Quality Objectives (WQOs) published by the EPA Board in 2020 and a Default Guideline Values (DGVs) for Aquatic Ecosystem of Tasmania Inland Waters in 2021 consistent with National Water Quality Management Strategy. Suggest that the SPWQM 1997 be given the same treatment as other state policies	47	Noted and agreed. A more detailed assessment of the TPPs against the SPOWQM has been provided in the report accompanying the draft TPPs.
Consistency with SPWQM 1997	Submits that strategy 4e of 2.2.3 does not align with the objective statement of 2.2.2. Suggest that the word 'significantly' should be omitted and consider rewording the statement to clearly emphasise on minimising the rate and quantity of stormwater and pollutants entering waterways.	47	The strategy has been modified as follows “ <i>not significantly change the rate and quantity of stormwater or increase pollutants entering the water</i> ”.
Erosion and sediment control	Recommend the integration of erosion and sediment control into the draft TPPs. Concern the draft TPPs do not make provisions for managing pollution that occurs during the construction phase of development	47	Supported. Modification made to 1.6.3.1 to include the following text shown by underline: “Encourage the design, siting <u>and construction</u> of buildings to positively contribute to: f) <u>maintaining water quality by adopting best practice stormwater management approaches</u>
Strategies	Concern section 2.2 does not explicitly consider factors including urban runoff which affect the biodiversity on the quality of waterways, wetlands, and estuaries. Recommended the inclusion of the following strategies: 'Promote the use of water sensitive urban design and soil and erosion control during construction to protect and improve water quality, and offset impacts of changes in permeability on runoff and flow regimes' Include implementation guidelines, State Stormwater Strategy and Stormwater Management Plans. Suggest the Waterways and Wetlands Works Manual and Tasmanian Coastal Works Manual and Protected Environmental Values and the Water Quality Guideline Values by EPA should be acknowledged.	72	The intent of the issues raised is supported and various modifications have been made to strengthen the consideration of water quality in the TPPs. Refer to section 4.5 of the body of the report for a discussion on implementation.
Climate change – vague language	Note the language associated with the impact of climate change and sustainable development is vague. Suggest the word 'may' in 1.0.2 and 2.0.2 should be replaced with 'will'. Note scientific evidence suggests that climate extremes are increasing in frequency and severity with evidence being observed. Suggest the term 'sustainable' should be define in the Glossary.	47	We cannot definitively know what the future climate will be so the impacts are described in terms of 'may'. The meaning of 'sustainable development' is provided in Schedule 1 Part 1 section 2 of the Act
PESRAC - report	TPPs should include strategies to progress PESRAC recommendations towards effective stormwater management for the purpose of maintaining and improving the of receiving waterways	47	The TPPs response to PESRAC has been provided in the Support Report.
2.2.3 strategies	Concern the wording of strategies 2 and 4; will effectively prohibit future rezoning and development in Flinders and Glamorgan Spring Bay Concern the wording of the strategies is outcome focused rather than allowing a balanced consideration of the specified matters as part of the strategic process. – note the strategies are silent on impacts of agriculture and farming on waterways and wetlands.	49 64 65	Unclear how this conclusion has been drawn based on the strategies referred to. The intent of the strategies is to be outcome focussed. The strategies apply to all use a development.
Water Quality	Suggest greater emphasis on measures to protect water quality should be included	52	Agreed. Modifications have been made to strengthen water quality strategies.
Drafting	Recommended the following strategies to be included: a. 'Align water extraction either off site or in stream with genuinely scientifically credible targets which maintain and restore aquatic ecosystem health' b. 'Focus urban development in serviced settlements to limit urban sprawl and ribbon development and improve stormwater management in urban settlements'	53	Water extraction is dealt with through other legislation. These matters are addressed in other strategies within the TPPs.
2.2.3 strategies	Strategy 2a) should be strengthened to read 'relies specifically on being located within close proximity to aquatic environments and has stringent controls on pollution and disturbance.' Suggest the Strategy 4(e provision for 'not significantly' increasing the rate and quantity of stormwater or pollutants entering the water does not provide sufficient protection. Suggest an alternative requirement should be included to demonstrate no degradation of water quality as a result of the development	55	The strategy already includes the proviso that 'and can demonstrate that the risk of environmental harm can be managed' which address the matters in the submission. Preference is to maintain existing text because it is unrealistic that new use and development around waterways, wetlands and estuaries can minimise the rate and quantity of stormwater and pollutants entering the waterways.
Water catchments	Concern Waterways, Wetlands and Estuaries does not deal with Water catchments, another subject of great importance. Propose that this draft TP policies be expanded to include both Water Catchments and Water Quantity and thence on to water allocation priorities In 2.2.3 Strategies, do not support (2) (c) and in the following line replace the word "managed" with "avoided". In 2.2.3 Strategies at (4) (a) replace the word "minimise" with the words "avoid wherever possible". In (b) replace the word "promote" with "ensure".	56	Strategy 5 supports the integrated catchment management consistent with the intent of this submission. Water allocation is dealt with through other legislation. The existing text sets are more realistic policy setting for considering land uses and the associated impacts around waterways, wetlands and Estuaries.
General	Note there is established system to recognise and protect waterways, wetlands and estuaries within planning schemes - statements should recognise this and articulate what more should be done.	57 61	Noted. The Act requires that the existing systems will be reviewed and modified to align with the TPPs. I

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
Drafting	Suggest strategies for avoiding land within proximity to waterways does not appropriately consider the implications for urban waterways Concern the strategies are unnecessarily prescriptive given the range of regulatory instruments available to manage impacts on waterways and wetlands	67 68 69	The strategies provide options to demonstrate that the risk of environmental harm can be managed. The level of prescription is considered necessary to make the policy intention clear.
2.3 Geodiversity			
2.3.3 Strategies	Recommend that “high conservation geodiversity” should be defined and included in the Glossary	30	Not considered necessary to define.
2.3.3	Recommend Strategy I make reference to the Tasmanian Geoconservation database Note the use of the term ‘not practicable’ gives too much leeway to developers and would not ensure the promotion of high conservation value geodiversity. Recommend that ‘not practicable’ be replaced by ‘demonstrably unavoidable’	32 55	This may be used as a resource to identify geological features but it is not considered necessary to specify that in the TPPs. Preference is to retain the existing text because it reflects the policy intent.
Drafting	Note all the strategies quite similar – suggest the strategies should be reviewed and refined	33	Each strategy is considering different matters.
Drafting	Note there is no established system to grade geodiversity values and the policy is unclear Suggest “High conservation value and geodiversity’ should be defined	57 61	High conservation value geodiversity can be determined through regional or local processes when considering the strategy.
Definition - geodiversity	Recommended that the term “geodiversity” should be clearly defined to ensure that implementation of the policy is transparent – suggest karst systems should be included in the strategy.	59	Karst system might be an example of high conservation value geodiversity. Geodiversity is defined in the Glossary.
Drafting	Have the following questions: Who will resource the mapping of high conservation value geodiversity which could be an extensive exercise? What is the definition of high conservation value geodiversity? Noted that it is not possible to ‘avoid’ designating land within some areas with karst systems for development, but could be managed to prevent or mitigate adverse impacts	67 68 69	Mapping is likely to be undertaken in collaboration between State agencies, regions and local government. High conservation value geodiversity can be determined through the methodology established for the mapping exercise based on regional or local priorities. Noted and supported. Modification made
2.4 Landscape Values			
Landscape Values - definition	Landscape Values should be defined better within the planning instruments. Suggest guideline should be developed to help local governments further identify and map the extent of landscape values in their jurisdiction.	62	Noted. The intent of the TPPs are to help provide that guidance but its acknowledged further work is required.
2.4.3	Concern the word ‘considerable’ in 3(b) makes the description of strategy too broad subject to different interpretation. Recommend that the word ‘considerable’ should be replaced with ‘overriding’.	32 55	The word ‘considerable’ helps qualify the proceeding statement to the level of consideration required to deliver the strategy
	Suggest strategies duplicate previous strategies and are low level, too specific and unnecessarily restrictive without allowing for regional or local responses to the values to be developed	33	The local and regional response is to identify landscape values and determine their specific features
Strategy 2.4.3(3)	Suggest should include notable skylines	39	Skylines are part of the landscape so are included in the policy.
Scenic Protection	Recommend the following implementation guidelines <ul style="list-style-type: none">• ‘All Local Council Planning Schemes are to include a Scenic Protection overlay• The Scenic Protection Overlay and associated Code must include prescriptive provisions related to location, height, bulk and colour of buildings and other structures which provide clear guidance on what is permissible or not in scenically sensitive areas’	53	These are TPS considerations and not policy considerations.
Drafting	In the Objective add the term "cultural heritage landscape" and before identity add "sense of"	56	Cultural heritage landscapes are included in the objective of the Historic Cultural Heritage policy of the Cultural Heritage TPP.
Drafting	‘Significant landscapes’ and ‘significant cultural, ecological, geological and aesthetic landscapes and scenic areas’ should be defined Suggest the reintroduction of landscape protection provisions similar to those in the previous Rural Resource Zone should be considered	57 61	It is a consideration of local and regional planning to determine what landscapes are ‘significant’. Not considered necessary to prescribe what that might be as it will vary between locations. This is a regulatory suggestion and outside the scope of the TPPs. However, the SPPs will be reviewed once the TPPs are made which may result in regulatory modifications to landscape provisions.
Protection of scenic values	Suggest that it is unclear how strategy 2.4.3(1) would interact with the RLUS and TPS, and how Council can identify, map and protect scenic value when zone application guidelines do not support it.	59	The TPPs apply independently to the current form of the TPS.

Policy/Strategy	Summary of submission / Issues Raised	Submission No.	Response to submission
2.4.3 (3) strategies	Recommended strategy d) 'to require that all available options to not impact on significant landscapes, scenic areas and scenic corridors be investigated and prioritised first' should be added to strategy 2.4.3 (3). Note the policy direction is unclear on whether projects would need to demonstrate social, economic AND environmental benefits, or just one of them (and vs. or).	60	The suggested inclusion of this text in the strategy is too prescriptive for the TPPs. The strategy is drafted with an 'and'.
Mapping scenic/landscape areas	Questions whether all municipalities must include mapped scenic/landscape areas in their LPS's and on what basis Suggest the expectation of strategy 3 needs to be clarified	67 68 69	The TPPs provide the policy setting. How that policy setting will be implemented through the RLUS and TPS will be based on subsequent reviews and is therefore yet to be determined. The intent of strategy 3 protect landscape values which it is anticipated will be delivered through regulatory controls.
2.5 Coast			
2.5.3	Concern with the term 'identification of coastal areas.....' in strategy 3 as it seems to indicate government promotion of the activities beyond current facilities and that is not needed Suggest there should be clear mapping of all environmental matters in the state so there is reliable data available to planning authorities	32	The strategy is to be read in the context of all the other strategies relating to coastal values. The intent of the strategy is to acknowledge that there are some uses that require a coastal location and these locations should be strategically identified. The TPPs adopt the approach of identifying environmental values that can then be used to inform strategic and regulatory land use planning decisions.
	Note that defining the coastal zone as 1km inland from high water mark is not appropriate in most circumstances Suggest the TPPs should provide a mechanism for regional or local planning to define an area of coastal influence suitable for the particular locations	33	The application of the Coastal Zone as 1km inland from the high-water mark is consistent with the <i>State Coastal Policy 1996</i> . The strategies allow for coastal influences to be identified based on regional and local planning considerations.
Strategies	Questions why is a TPP being applied to all state marine waters when the planning schemes do not extend beyond the low tide mark (strategy 2.5). Suggest there should be strategies that require important coastal values to be identified and that impacts are avoided, mitigated or off set. Suggest strategy 3 does not belong in the environment policies section as it relates to industrial, recreational and boating development	34	The application of the Coastal Zone as 1km inland from the high-water mark is consistent with the <i>State Coastal Policy 1996</i> . These matters are addressed through the strategies with the exception of offsetting impacts which is difficult to achieve for coastal values. Strategy 3 relates to those types of uses because they are often reliant on a coastal location and therefore potential impact coastal values.
Strategy 2.5.3	Recommend include another strategy about avoid development on coastal areas that are vulnerable to climate changing impacts	39	These matters are addressed under the Environmental Hazards TPP.
2.5.3 strategies	Suggest the strategies just repeats the requirements in the State Coastal Policy. Recommend the following strategies: <ul style="list-style-type: none"> 'Limit multiple dwelling tourism development outside of serviced settlements that constitute ribbon development or unrelated cluster developments' 'Stabilise rather than grow Tasmania's population and tourism numbers to reduce development pressure on the coastal zone' Attached documents from Simon Roberts highlighting the link between urban development and degradation of wetlands and waterways in the coastal zone	53	The strategies further the outcomes specified in the <i>State Coastal Policy 1997</i> . Strategies to guide the location of tourism use and development are provided in the Tourism policy of the Sustainable Economic Development TPP. Population growth and tourism numbers are not matters that are addressed under the Act. Noted.
strategies	Suggest the intertidal areas should be acknowledged as one of the environments that will be protected and have reduced threats under strategy 2.5.3(2)	72	Supported and modification made.
Drafting	Suggest Objective 2.5.2 should refer to natural coastal values Suggest strategy 3 will add to the degradation of the coastal zone and encourage undesirable ribbon development – recommend it should be deleted	55	Supported. Modification made. Strategy 3 relates to those types of uses because they are often reliant on a coastal location and therefore potential impact coastal values.
Drafting	In the 2.5.2 Objective delete the word "promote" replacing it with "achieve".	56	Preference to retain existing text.
Drafting	Questions whether it is the intention that the coast-related policy statements in the Tasmanian Planning Policies will replace the existing State Coastal Policy.	57 61	The TPPs sit under the State Policies and will not replace them.
Climate change	Recommend the need to consider whether or not to continue the use of a 1km coastal zone, considering the predicted changes in climate	59	The application of the Coastal Zone as 1km inland from the high-water mark is consistent with the <i>State Coastal Policy 1996</i> .
Definition	Suggest the legal definition of the coast under the State Coastal Policy should be adopted rather than adopting the scientific and hazard-based data definitions in the Codes under the SPPs	64	The legal definition of Coastal Zone has been adopted consistent with the <i>State Coastal Policy 1996</i> .

3.0 Environmental Hazards			
General	<p>Suggest Environmental Hazards should include ‘heat and extended heat waves’ and ‘drought.</p> <p>Suggest climate change impact and hazard should include consideration of compounding, coincidental and cascading events and limitations of viability of locations</p> <p>Glossary should include terms: adaptation, adaptation pathway, retreat, sequestration, net zero</p>	19	<p>Planning responses to these matters are addressed through the Liveability section of the Settlement TPP.</p> <p>It is considered too early to determine or predict what these ‘compounding, coincidental and cascading events’ will be and their impact on limiting the viability of locations and what can be done in the planning system to address them. Regular reviews of the TPPs will provide a response to emerging trends.</p> <p>These terms are considered well understood for the purpose of the policy intent.</p>
General	<p>Recommended that a further objective should be to ensure environmental hazards are investigated thoroughly at the subdivision stage and not be duplicated at the development stage</p> <p>Sections 3.1.3 bushfire, Section 3.2.3 landslide; Section 3.3.3 flooding, 3.4.3 coastal hazard, 3.3.5 air contamination all suggest mapping of the hazards. Contends that mapping exercises should occur at a State level not by local council to ensure consistency and reliability</p>	26	<p>Noted, however this is a specific outcome for the SPPs to deliver.</p> <p>It is anticipated that the State will work with the Regions and local government to undertake the mapping exercises required by the TPPs.</p>
General	Support the contextual statements and key principles of the Environmental Management TPPs	27	Noted.
	<p>Recommend that the draft TPP should include “extreme heat and heatwaves” as an issue –</p> <p>Recommend that clearer hazard planning requirements be included in the strategies to deal with the anticipated impacts of climate change, and appropriately manage adverse impacts of environmental hazard reduction</p>	29	<p>This is an emerging issue that requires further investigation of the impacts and possible planning responses.</p> <p>The TPPs provide clear hazard planning policies and consider the impacts environmental hazard reduction.</p>
General	Supports the draft TPPs consider hazard early in the planning system but concern about the lack of implementation guidelines for community, planning authorities and developers	32	Refer to section 4.5 of the body of the report for discussion on implementation.
General	<p>Recommended that the name of the policy should be Natural Hazards consistent with contemporary terminology used in Tasmania.</p> <p>Note many of the strategies for different types of hazards are similar – there is no need to duplicate them</p>	33	<p>‘Environmental Hazards’ is preferred over ‘Natural Hazards’ because it covers all the matters in the particular TPP, including ‘Contaminated Air and Land’ which is not a natural hazard.</p> <p>The policy for each hazard is different and cannot be consolidated into a single response as suggested.</p>
General	<p>Recommend that the TPPs should include resilience in each section to strengthen the ‘elements of resilient systems</p> <p>Recommend that the TPPs should include strategies that promotes the ‘smart cities’ initiative</p>	37	<p>An appropriate level of resilience is incorporated into the Environmental Hazards TPP</p> <p>The ‘Smart Cities Initiative’ includes factors that are outside the planning system and is therefore not appropriate for the TPPs to adopt.</p>
General	Suggest some clearer intent for strategic planning for environmental hazards as distinct from statutory planning be included to guide these two processes, in the Principles and Policy Context	45	The Principles and Policy Context (now Policy Context) provides general background information that is relevant to both regulatory and strategic planning.
Drafting	Suggest TPPs should acknowledge that all of society pays for inappropriate development in high-risk areas and include development guidelines	46	This is implied through the objective statements of the policies which refer to reducing the impacts on life and property and also through the strategies that seek to avoid high risk areas.
Drafting	<p>Suggest the text just ‘considering’ in dot point 7 (p25) should be replaced with ‘seeking to minimise’</p> <p>Note the opening paragraph of climate change statement lists potential climate change hazards but appears to omit storms/wind.</p>	55	The existing text is preferred as it is providing the background context for the proceeding policies that respond to all Environmental Hazards where ‘seeking to minimise’ might not be appropriate. The strategy that requires the impact of implementing bushfire protection measures to ‘consider’ environmental values has been modified to ‘priority should be given to minimising’
3.1 Bushfire			
Objectives and strategies	<p>Support the Bushfire objectives, note it is consistent with national and state policies for natural hazard risk reduction</p> <p>Note that strategy 6 has some overlaps with 5. Recommend strategy 6 should be amended as follows:</p> <p>‘Support emergency services and the community to prevent, prepare, respond and recover from bushfire events.</p> <p>Recommended strategy 7 be revised for clarity to read: ‘Consider the cumulative effects of planning decisions and avoid future use and development that will result in unacceptable increase to bushfire risks for existing use and development.’</p> <p>Note that providing bushfire mitigation for the benefit of neighbouring developments becomes an issue where adjoining lands are managed for conflicting purposes such as for conservation forestry.</p> <p>Recommended that strategy 8b be amended to read: ‘avoid locations that require hazard management to be undertaken on land external to the site where that land is designated or used for conflicting purposes.’</p>	52	<p>Noted.</p> <p>Supported and modification made.</p> <p>Supported and modification made.</p> <p>Noted.</p> <p>Not supported on the basis that it may sterilise land that would otherwise be suitable for development. Noting that Part 5 Agreements are a statutory mechanism to manage requirements for bushfire protection measures on land external to the site.</p>

	<p>Suggest Bushfire should be considered in a broader sense than just protecting human life, it needs to be considered in respect of loss of biodiversity values, water quality, erosion etc</p> <p>Concern this policy is silent on cultural burning to manage land – notes in the era of climate change, backburning may no longer be feasible in some landscapes – suggest management measures need to be science-informed</p>	52	<p>The policy prioritises the protection of human life consistent with national guidelines. The strategies require the consideration of environmental values. Environmental values are also protected through other policies.</p> <p>This is not a planning matter.</p>
3.1.3.6 – Wording/terminology	<p>Note “<i>Firefighting infrastructure</i>” cannot include TasWater in the context of bushfires.</p> <p>Suggest clarification is required as TasWater’s network is designed to fight structure fires only and not bushfires under <i>Water and Sewerage Industry Act 2008</i>.</p>	10	<p>Confirmed with the TFS that the drafting of the particular strategy remain correct.</p> <p>Clause 3.1.3 6 reads: <i>Facilitate the provision of firefighting infrastructure and support emergency services and the community to prevent, respond and recover from bushfire events</i>. It does not reference who owns the infrastructure</p>
3.1.3 Strategies	<p>Recommend ‘bushfire’ should be defined and included in the Glossary</p> <p>‘significant risk’ should be defined and included in the Glossary</p>	30	<p>The meaning of bushfire is considered well understood and does not need to be defined.</p> <p>Supported and modification made.</p>
3.1.3 strategies	<p>Suggest strategy 8a requires stronger terminology to achieve its goal.</p> <p>Recommend replacing ‘consider’ with ‘seek to minimise’</p>	32	Supported and modification made.
Strategy 3.1	<p>Suggest there is a disconnect between planning controls and the Building Act and regulations that needs to be addressed to achieve this policy.</p> <p>Note 3.1.3(1) already exists, 3.1.3(2) should include visitor accommodation, 3.1.3(6) is controlled by planning and 3.1.3(7) there should be requirements for visitor accommodation in bushfire prone areas</p>	39	<p>The TPPs have no bearing on the Building Act and regulations.</p> <p>The TPPs are not intended to retrospectively apply the policy setting to the SPPs.</p>
Drafting	Suggest strategy 8b should be more broadly worded, to ensure that any required bushfire hazard management must be undertaken within the development site, not required to be undertaken on land external to the site, whether public or private	41	The Act provides for Part 5 Agreements to be entered into to allow for hazard management measures to be undertaken on land external to the site.
Strategy	<p>Recommend that the following strategy should be included in the TPPs</p> <ul style="list-style-type: none"> • ‘Residential and tourism accommodation uses should in future be required to be located away from high fire risk areas to avoid risk to inhabitants and firefighters as well as impacts on the environment (ie clearing native vegetation for hazard reduction or increasing pressure for fuel reduction burns to protect new subdivisions from fire)’ 	53	Not supported on the basis that the policy speaks in broad terms and avoids referencing particular use classes
3.1.3 strategies	Suggest Strategy 8a) should be reworded to “priority should be given to minimising the impact of future bushfire protection measures on the environment and the cost to the community of defending properties from bushfire.”	55	Supported and modification made.
Drafting	The policy statements should acknowledge what exists and articulate what more needs to be done	57 61	Disagree. The TPPs articulate the policy outcomes for certain matters. It is not the intent of the TPPs to articulate what information gaps exist in achieving the outcomes.
Drafting	Suggest the TPPs should consider the socio-economic vulnerability in assessing bushfire risks – recommended the precautionary approach should be considered when rezoning additional land for rural residential areas	58	The strategies are considered to provide a balanced and realistic approach to managing bushfire risks.
General – Drafting, Bushfire - consideration	<p>Suggest the strategies appear more like an implementation measure rather than a strategy – recommend that strategies within policy 3 be reviewed to remove reference to identifying mapping, and build upon their implementation measures</p> <p>Suggest the statement of strategy 3.1.3(2) that bushfire will be considered and prioritised at every stage of the planning process is misleading – Note bushfire is not required to be addressed unless it is for a subdivision, or a vulnerable or hazardous use.</p>	59	<p>They are drafted to direct how bushfire hazards should be addressed through strategic and regulatory planning instruments.</p> <p>As above, the strategies apply to RLUS and TPS. How they are to be applied to the SPPs is a matter for consideration through another process.</p>
Visitor accommodation	Suggest visitor accommodation of all forms requires consideration at the planning application stage - to integrate appropriate protection measures to manage and reduce risk as per the draft policy and create alignment between the SPPs and the TPPs	60	The TPPs typically talk in broad land use planning terms and avoid referencing particular land use classes which are a product of the SPPs
Bushfire - Certification	<p>Suggest strategy 2 is incorrect as many aspects of bushfire protection for singular buildings have been appropriately removed from the planning system</p> <p>Questions whether it is it the State’s intention to bring certification for individual developments back into the planning system per the requirement of strategy 4, given most of the state is mapped as bushfire prone</p>	67 68 69	<p>Noted and accepted that the strategy can only apply to the matters that the Act provides for.</p> <p>Outside the scope of this process.</p>
3.2 Landslip			
Drafting	Suggest the Policy Context statements in relation to landslip should be refined to accurately represent the regulatory framework for landslip	33	It is not the purpose of the Principles and Policy Context section to articulate the current regulatory framework. Both the regulatory and strategic framework for the landslip will be reviewed once the TPPs are made.
3.2.3 strategies	<p>Recommended the following strategy</p> <p>‘No development should be permitted in areas with high risk of Landslip such as the area between St Helens Point road and Treloggen Track at St Helens’</p>	53	This is too specific for inclusion in the TPPs

Drafting	The policy statements should acknowledge what exist and articulate what more needs to be done	57 61	Disagree. The TPPs articulate the policy outcomes for certain matters. It is not the intent of the TPPs to articulate what information gaps exist in achieving the outcomes. These matters can be determined when applying the policies to the RLUS and SPPs.
Drafting	Note majority of land mapped as landslide hazard in the State Natural Hazard Framework is manageable for a tolerable risk and suggest prescribing avoidance confuses the intent of the policy Suggest the TPP should just reflect the management approach and tolerable risk.	67 68 69	The TPPs adopt 'tolerable risk' as the threshold for avoidance.
3.3 Flooding			
3.3.3 Strategies	Recommend that strategy 9 should be revised to add the text "the viability of the dam infrastructure" after protect and	30	Supported, modification made.
3.3.3 .9 - wording	remove " <i>strategically</i> " so to read as "... where planning or undertaking land use ..." for clarity and consideration during different stages of development	10	Not supported as it is a strategic land use consideration.
3.3.2 Objective & 3.3.3 strategies - drafting	Concern the objective is missing reference to harm to environment. Suggest inclusion of 'natural environment' after 'property.	43	The priority for the Environmental Hazards TPP is to protect human life and property.
3.3.3 Strategies	Suggest the addition of the text 'by applying Water Sensitive Urban Design principles in development' and....to strategy 4 to demonstrate the significance of minimising the hydrological impacts of development Additional text 'or other water retention/detention techniques' is to strategy 9 afterinfrastructure.... to recognise other techniques may be appropriate Recommended the additional strategy below to encourage the adoption of water sensitive urban design techniques. '10) Apply water sensitive urban design techniques that achieves co benefits in terms of irrigation and supporting the resilience and long term viability of local landscapes'	25	These matters have been addressed by including an additional strategy that states: 'Support the use of Water Sensitive Urban Design systems to mitigate flooding and manage peak flows in urban catchments'.
3.3 strategies	Suggest strategy 3.3.3(3) is unclear and ambiguous; and strategy 3.3.3(7) is a responsibility of government more than planning Recommend the inclusion of stormwater code into the planning scheme.	39	Strategy 3 is intended to require the consideration of the cumulative impacts, such as additional housing on a floodplain, and the impacts that that development will have on subsequent flood behaviour. Agreed, however planning can support this function through, for example, planning for evacuation centres that are well away from the flood path or exempting use and development required for temporary structures associated with a flood response. This matter is outside the scope of the current process, however, the SPPs will be reviewed following the making of the TPPs which may change some of the provisions regarding stormwater.
3.3.3 - Strategy	Strategy 4 - suggest maintaining tolerable risk will not be static over time and will require land use planning interventions like avoiding intensification for existing use and development Strategy 8 - does not support part d) and the intensification of use and development in flood-prone areas located behind flood protection infrastructure, such as a levee. Note that all flood levees are at risk of failure. This means that while levees provide a protection service, the flood risk remains present Recommend strategy 8d should be removed	45	Agreed and that is what strategy 4 is providing for. Strategy 8 d) is requiring the consideration of intensifying use and development where there is flood mitigation infrastructure in place consistent with the suggestion within the submission.
3.3 strategy - flooding	Suggest there is conflict between the use of terms such as consider and avoid	49 65	The use of terms such as 'avoid' has been reviewed and modified accordingly.
Flooding impacts	Suggest removing vegetation and development in riparian areas and flood plains will exacerbate flood impacts, and should be prevented	52	These matters are promoted through the Waterways, Wetlands and Estuaries section of the Environmental Values TPP.
Catchment management	Suggest catchment management needs to become more regulated and more mandatory to protect those lower in the catchment. Recommend that in 3.3.3 in (3) Add after "use" the words ", intensification of use" before "development"	56	A strategy promoting catchment management is provided in the Waterways, Wetlands and Estuaries section of the Environmental Values TPP. The impacts of 'use and development' include the consideration of intensification of use.
Drafting	The policy statements should acknowledge what exist and articulate what more needs to be done	57 61	Disagree. The TPPs articulate the policy outcomes for certain matters. It is not the intent of the TPPs to articulate what information gaps exist in achieving the outcomes. These matters can be determined when applying the policies to the RLUS and SPPs.

Overland path flood mapping	<p>Concern no strategy discusses overland path flood mapping and its potential impact – recommended that a new strategy should be included for such mapping</p> <p>Suggest the use of I%AEP is incorrect methodology – note it is outdated and suggest a more contemporary and modern risk backed methodology is required</p> <p>Concern about the use of the word “avoid” in strategy 3.3.3(2) and 3.3.3(5) and suggest it should be replaced with the text “appropriately managed.”</p>	59	<p>The requirement for overland flow paths to be mapped is considered too finer detail for what the flooding policy is trying to achieve.</p> <p>The I%AEP is the minimum and is supported as the benchmark position with the strategy referring to an alternative as determined by the Government in response to climate change</p> <p>The use of ‘avoid’ in these circumstances is qualified by meeting a tolerable risk level consistent with the intent of the policy.</p>
Policy direction	<p>Suggest clear policy direction on climate change is vital to guide land use planning decisions, particularly with regard to flooding.</p> <p>Consideration should be given to the appropriateness of dam failures within this section, given this is outside of the scope of planning scheme regulation and relates to strategic planning decisions around settlement locations</p>	60	<p>Noted.</p> <p>Agreed, however, as suggested in the strategy, planning can also play a strategic role when considering use and development downstream of dam infrastructure.</p>
Drafting	<p>Suggest the policy needs to reflect the State position on where the extreme flood event threshold now lies given the 2011, 2016 and 2022 events. Queried the meaning of “incompatible use and development”</p> <p>Note many of Tasmania’s settlements are located downstream of a dam, both public and privately owned. Suggest it is not tenable for every amendment to an LPS for settlement growth to do a dam safety assessment</p>	67 68 69	<p>The I%AEP is the minimum threshold and considered an appropriate benchmark. The strategy allows for an alternate position in response to climate change.</p> <p>The strategy requires consideration of upstream dam infrastructure when strategically planning land use and does not specify the requirement of a dam safety assessment.</p>
Flooding - water sensitive urban design	Suggest the strategies should include implementation of water sensitive urban design and design of green space to improve permeability to reduce the risk of flash flooding – note the importance of integrated floodplain management should be acknowledged as a core principle for managing floodplains	72	<p>An additional strategy has been included that states;</p> <p><i>‘Support the use of Water Sensitive Urban Design systems to mitigate flooding and manage peak flows in urban catchments’.</i></p>
Strategies	Suggest a supporting statement should be added in the 3.3 flooding section to advocate for the use of WSUD as a means to manage peak flows ad flooding in urban catchments		<p>Supported. Modification made to add a new strategy to 3.3.3.</p> <p><i>‘Support the use of Water Sensitive Urban Design systems to mitigate flooding and manage peak flows in urban catchments’.</i></p>
3.4 Coastal Hazards			
3.4.3 Strategies Clause 5	Suggest a state-wide discussion on strategic responses for existing settlements that are at risk of being impacted by coastal erosion or coastal inundation. Notes this will enable Council’s to develop a meaningful and relevant response drawing on best available current knowledge.	62	This is outside the scope of the current development of the TPPs however could be a response coordinated through a review of the RLUSs
3.4.3 8 – wording/terminology	Change “community assets” to “physical and social infrastructure”	10	<p>Clause 3.4.3.8 reads: <i>Facilitate the provision of engineered coastal defences to protect community assets from coastal inundation and coastal erosion, where the social, environmental and economic considerations are included in the planning and decision-making process.</i></p> <p>To provide for consistency between the terminology used in all the Environmental Hazards policies, ‘community assets’ has been deleted in favour of ‘human life, property and infrastructure’.</p>
3.4.3 - strategies	Recommend adding a phrase to strategy 3a so that it becomes ‘dependent on a coastal location and the risk can be managed’	32	This particular strategy is for use and development that cannot achieve or maintain a tolerable level of risk.
strategy 3.4.3 – I	Recommend that strategy I should be revised to include ‘as a minimum’ after that considers and before the effects....	45	The strategy refers to a sea level rise of not less than 0.8m by 2100 or the latest sea level rise projection adopted by the government. The strategy already expresses the intent of the comment.
Strategy	<p>Suggest strategy 3.4.3 should include the concept of avoiding intensification of development in those areas</p> <p>Suggest strategy 3.4.3(7) should include that such treatments must not make it worse elsewhere.</p>	39	<p>The intent of the comment is delivered through the existing drafting of strategy 2.</p> <p>Preference is to maintain the existing drafting as it may be a response to divert coastal erosion to an alternate location to protect lives and properties.</p>
Drafting	Concern about Coast strategies mandating application of the legal definition of the coast established under the State Coastal Policy, rather than adopting the scientific and hazard-based data definitions that were established through the relevant Codes under the TPS	49 65	Generally applies to the Coastal Zone as defined by the State Coastal Policy 1997 to make it clear that the strategies do not apply outside of it.
Drafting	Strategy 3a) Should read ‘dependent on a coastal location and the risk can be managed’	55	This particular strategy is for use and development that cannot achieve or maintain a tolerable level of risk.
	Suggest coastal encroachment across the State is alarming and deserves closer investigation and mapping	56	The outcomes of the strategies will help achieve this statement.
Definition	Suggest the legal definition of the coast under the State Coastal Policy should be adopted considering the predicted changes in climate	59	The TPPs refer to the Coastal Zone as defined in the State Coastal Policy 1996.

Strategies	Suggest the TPPs should recognise that there is an existing system that does most of this, and we continue to rely on that system Strategy 5 should be expanded and include clearer protocols and policy direction to enable decisions to be made regarding which settlements will be the subject of planned retreat and which will be provided with protective works	57 61	Noted. The SPPs and RLUSs will be reviewed once the TPPs are made to give effect to the TPPs. Where they already align, little change will be required. Those settlements that require planned retreat will be identified through local and regional planning. The protocols and clear policy direction on how that will be achieved will vary on the locational characteristics of the settlement and will be developed in collaboration between the Region and State and local governments.
Drafting	Suggest retreat may be an appropriate solution for economic development for tourism that capitalises on a coastal location. Strategy 6 – Avoidance is not appropriate – tolerable risk is the appropriate concept.	67 68 69	Noted.
Climate Change	Suggest the TPP should appropriately reflect climate change scenarios rather than defaulting to the clunky 1km definition in the State Coastal Policy Note the planning system will not be able to reduce threats, only respond to them in an appropriate way to mitigate impact on coastal processes Suggest policies may be more efficient if separated into coastal development as part of settlement and hazard/risk addressed through Environmental Hazards.	67 68 69	The policy is addressing coastal values generally and, similarly to the State Coastal Policy 1996, has adopted the application to land 1km inland from the high-water mark. Noted and agreed. Preference is to maintain the agreed structure.
Strategy 3.4.3	Suggest strategy 7 should also consider the potential offsite impacts – note coastal defences can exacerbate erosion in other areas of the coastline	72	The intent of the submission is addressed in the preceding strategy
3.5 Contaminated Air and Land			
Drafting / structure	Recommend that this should be included in the Settlement section given it relates mostly to land use conflict. Note the requirement to identify and map contaminated land is unrealistic and impractical.	33	Preference is to maintain the topic and issue framework. There is a lot of existing spatial information relating to contaminated land which can inform mapping.
Drafting	The policy statements should acknowledge what exist and articulate what more needs to be done	57 61	Noted. The TPPs articulate the policy outcomes for certain matters. It is not the intent of the TPPs to articulate what information gaps exist in achieving the outcomes. These matters can be determined when applying the policies to the RLUS and SPPs
Sub-policy Location	Unclear if this sub-policy should be located within the Environmental Hazards Policy – review policy location	59	The Environmental Hazards TPP is considered the most appropriate location for potentially contaminate land and air.
Drafting	Suggest add the text ‘provide measures that prevent the contamination of land in the planning system’ to the strategy	58	Measures to prevent the contamination of land is addressed in the Environmental Values TPP.
Drafting	Concerns: It is not tenable to map all land that may have historically been exposed to potentially contaminating activities Strategy 3 confuses contamination with attenuation in regard to land use conflict The TPP’s should recognise the processes that are in place for attenuating uses and clearly state expectations	67 68 69	Noted however there is a lot of spatial information that is available and can be consolidated to guide planning decisions. Applying and maintaining attenuation distances between incompatible uses is one approach for managing land use conflict. The existing attenuation provisions will be reviewed once the TPPs are made to align them with the policy intent. It is not the place of the TPPs to articulate what the existing processes are in relation to attenuation areas.
4.0 Sustainable Economic Development			
General			
Principles and Policy Context	Concern there is no meaningful or strategic consideration of forestry, or the protection and enhancement of the existing and future timber resource in the planning system Recommended that the TPPs should include high level provisions to identify and protect land with timber potential. Recommended that the sentence below should be added to the climate change section: ‘strategically considering and protecting land designated for timber production to contribute to carbon sequestration’	22	Agreed and modification to include strategies. Refer to section 4.3 of body of report for detailed response.

General	<p>Note that the sustainable economic development TPP fails to reflect the RMPS objectives to ensure that economic, social, and environmental considerations are appropriately balanced</p> <p>Recommended that the heading of “Sustainable Economic Development” TPP should be changed to “Sustainable Development” and link the issues to be addressed to relevant UN Sustainable Development Goals</p> <p>Recommend that the TPPs should include performance measures to provide a clear mechanism to measure the achievement of the TPP objectives</p>	29	<p>Disagree. The TPPs are to be considered in their entirety to ensure that the economic objectives of the Sustainable Economic Development TPP are balanced against the social and environmental interests outlined through other TPPs such as the Settlement and Environmental Values TPPs.</p> <p>All the TPPs work together to deliver Sustainable Development. The Sustainable Economic Development focusses on Tasmania’s principle economic drivers to provide for their sustainable economic development.</p> <p>Refer to section 4.6 of the body of the report for further information.</p>
Principles and Policy Context	Recommended additional statement ‘Our landscape values and lifestyle are attractive to many of the talented and creative people whom are essential drivers for growth in many emerging sectors of the economy’ to the end of paragraph two to recognise that human innovation and creativity drives economic growth	25	Preference to maintain existing text as the suggested addition is not reflected in the proceeding policies.
General	<p>support the acknowledgement of workers accommodation including in agriculture 4.1, extractive industries 4.2 and tourism 4.3.</p> <p>Recommend workers accommodation is needed in other strategies including Industry 4.5, Business and Commercial 4.6 and Innovation and Research 4.7</p>	26	<p>Noted.</p> <p>The TPPs now include strategies that support housing to accommodate employees in various occupations in remote locations across various TPPs for eg, agricultural, mining, healthcare workers.</p>
General	<p>Suggest a review to ensure it deals with planning matters and that the strategies are at a level that allows for regional and local responses to outcomes sought</p> <p>Suggest it is not appropriate for a planning instrument to give direction about the viability of a project</p>	33	<p>The strategies can only deal with planning matters. The strategies allow for regional and local responses.</p> <p>The strategy in question refers to protecting the productivity and viability of agricultural uses which can be a strategic planning consideration.</p>
Workplace health	Recommends further consideration of how to support a happy and healthy workforce through design features and infrastructure in and around workplaces	50	These matters are addressed through the Design policy of the Settlement TPP.
Drafting	Suggest the word ‘economic’ in the heading ‘Sustainable Economic Development’ should be deleted to better aligned with the LUPAA objectives	55	All the TPPs work together to deliver Sustainable Development. The Sustainable Economic Development focusses on Tasmania’s principle economic drivers to provide for their sustainable economic development.
4.1 Agriculture			
Relevant environmental issues	Concern the Agriculture section does not recognise relevant environmental issues such as biodiversity, waterways, etc, - note this is where a lot of the protection and careful management is required - suggest it should include a mechanism to recognise or encourage development that conserves natural capital	52	The impacts of land use and development on the environment are addressed through the Environmental Values TPP.
General – Agricultural Land	<p>Considers the draft TPPs fail to differentiate between agricultural land that is ‘prime or highly productive’ and otherwise.</p> <p>The definition of agricultural land should be reviewed to clarify that non-productive agricultural/farmland that may be appropriate for a change in land use including urbanisation is not quarantined from development.</p>	5	<p>Agreed and modifications made to reflect the intent of strategy I in applying a contemporary land classification system to identify agricultural land.</p> <p>The outcomes of the strategies will help determine agricultural land that might be suitable for urban development.</p>
workers accommodation	Supportive of Strategy 9 that supports Residential use where it is part of or supports an agricultural use. Note this should be extended to resource processing uses that are related to Agricultural Uses e.g. Abattoirs and Wineries/Vineyards	62	Noted. The suggestion relates to specific SPPs outcomes. The SPPs will be reviewed once the TPPs are made to give effect to them through the TPS.
4.1.3 Strategies	<p>Recommend the strategy below should be added:</p> <p>Encourage the integration of trees on farms through shelterbelt and small woodlot plantings to increase primary production outcomes while simultaneously improving the carbon balance and growing timber products</p>	22	It is unclear how planning can achieve this outcome.
4.1.3.8	Support Section 4.1.3.8 as it recognises the importance of value adding to primary industries through farm related retailing and agritourism	26	Noted.

Timber Resources	<p>Recommend the inclusion of Timber Resources TPPs and provided the draft below.</p> <p>Objective: To identify and protect existing and potential timber resources, and supporting infrastructure, to facilitate economic growth and support emissions reduction</p> <p>Strategies:</p> <p>Protect timber production areas including plantation and native forests by identifying land dedicated for timber production and designating/zoning that land for purposes that are compatible with timber production</p> <p>Encourage surrounding land, that is likely to be impacted by activities associated with timber production on dedicated timber production land, to;</p> <ul style="list-style-type: none"> a) be designated for purposes that are compatible with timber production; or b) consider incorporating measures to mitigate, manage or avoid environmental hazards and social and environmental impacts associated with timber production <p>Support the development of future timber production on suitable land by, prior to designating/zoning the land for a purpose that removes the ability of that land to be used for timber production, consideration of the following:</p> <ul style="list-style-type: none"> • the nature and scale of the existing and potential wood resource; • the viability of extracting the wood resource; and • the social, economic and environmental benefits of the wood resource compared to that of the alternative land use. <p>Enable the provision and protection of supporting infrastructure for timber resources so access can be facilitated and maintained</p>	22	Intent supported and modification made. Refer to section 4.3 of the body of the report for further discussion.
Drafting	<p>Note the PAL policy addresses many of the issues covered in the proposed strategy statements.</p> <p>Suggests there are many other economic development activities that occur in rural areas besides agriculture and our planning system should encourage and facilitate their location of lesser quality agricultural land</p> <p>Note there is a fundamental mis-match between the spatial allocation of the Agriculture Zone and the written provisions in the TPS. Suggest the strategies are drafted along the same lines and would not be supported</p>	57 61	<p>Noted</p> <p>Noted and the TPPs provide for these activities.</p> <p>The intention of the TPPs is to get the policy setting right. Once the TPPs are made the SPPs will be reviewed to align the policy intent with SPPs.</p>
Strategy 4.1.3	Suggest should include the text: a) don't conflict with the biodiversity objectives/policy and b) should consider the road networks and potential centralised regional distribution centre for more efficient use of resources and associated transport	39	These matters are addressed through other strategies.
Overlapping and similar statements	Suggest the wording of strategy 4.1.3 (I) is not clear	40	The intent of the strategy is to sets out the considerations for an agricultural mapping methodology.
Strategy 4.1.3	<p>Concern strategies 2 and 4 appear to be in conflict with strategies 3, 7, 8 and 10 which tends to encourage the conversion of agricultural land to support for diversification and agritourism to enable sustainable growth.</p> <p>Recommend the TPPs should include strategies to support exemption pathway in the SPPs for small scale agritourism operations, reducing regulation and enables diversification of agricultural enterprises improving their viability without introducing a conflicting land use.</p> <p>Suggest the draft TPPs should clearly articulate that bond stores do represent a broader agricultural use in the form of resource processing.</p> <p>Suggest implementation guidelines should be included in the TPPs to help address some of the inconsistencies.</p>	54	<p>Strategy 2 has been modified to 'Protect land that is within the higher classes of agricultural capability'. Both strategies 2 and 4 prioritise the protection of higher quality agricultural land. Strategies 3, 7 and 8 refer generally to agricultural land or agricultural uses and seeks to protect these through various responses, all of which are qualified to consider competing interests on the land.</p> <p>The strategies relating to agritourism are pitched at an appropriate level. Once the TPPs are made the SPP will be reviewed which may result in a review of the requirements for how the SPPs address agritourism.</p> <p>This is too specific for the TPPs and is a matter for clarification through the review of the SPPs.</p> <p>Refer to section 4.5 in the body of the report.</p>
PAL policy	<p>Unclear how this policy will work with PAL - note policy is relatively consistent with PAL</p> <p>Unclear how the strategies will align with the environmental protection and housing supply policy – suggest there will be conflict when applying to the RLUS or TPS if not aligned.</p>	59	<p>State Policies sit above the TPPs. The Act requires that the TPPs are consistent with PAL.</p> <p>Refer to section 4.4 of the body of the report for further information regarding competing or conflicting policies.</p>
Economic development in the agricultural space	Concern there is little direction through the strategies on supporting the growth of the vast range of industries that directly assist the operation of the agricultural industry.	60	The TPPs do not provide a policy setting for all uses or industries in the State. Those industries that have local or regional importance can be strategically addressed through local planning or the RLUS.

PAL Policy	<p>Concern the TPP strategies largely import the principles of the State PAL Policy, however does not carry over the nuances of the PAL Policy in allowing for agricultural land to be converted if a higher order benefit can be demonstrated, such as the need to expand settlements.</p> <p>How can a planning system 'acknowledge' small farm contribution? What are small farms?</p>	<p>67</p> <p>68</p> <p>69</p>	<p>The PAL Policy will still apply to the TPS and RLUSs.</p> <p>Strategy 7 has been modified, with modifications shown by underline, as follows:</p> <p><i>“Protect agricultural land by avoiding the permanent conversion of agricultural land to non-agricultural land uses unless:</i></p> <p style="padding-left: 40px;">a) <u>the land is strategically identified for growth;</u></p> <p style="padding-left: 40px;">b) <u>the scale of the conversion or sterilisation is minor in terms of the overall agriculture operation of the site, local area or region; or</u></p> <p style="padding-left: 40px;">c) <u>the conversion contributes to the viability of the agricultural use of the site, local area or region;</u></p> <p><i>and the intended use will not cause land use conflict, fetter or impact the viability of the surrounding agricultural uses.”</i></p> <p>The strategy’s main purpose is to retain small farms close to urban areas. Reference to acknowledging the contribution that they make to farm gate markets, agrifood and tourism is to help add context to the reason why the strategy has been included.</p>
Strategy 4.1.3	<p>Concern the strategy does not mention the environmental sustainability or the importance of sustainable development of agriculture</p> <p>Concern the list of exceptions where conversion of agricultural land may be converted to non-agricultural uses in strategy 7 does not consider circumstances where conversion to native vegetation would occur</p>	72	<p>It is difficult for the planning system to influence specific agricultural practices.</p> <p>Land can still be used for agricultural purposes if it is converted to native vegetation.</p>
4.2 Extractive Industry			
Growth of extractive Industry	<p>The growth of the extractive industry must be managed to promote local communities social and economic benefits.</p> <p>Concern that the growth of non-residential workforce reduces the economic link between mines and local communities and needs to be managed. Recommend the following:</p> <ul style="list-style-type: none"> a. A stated policy to minimise non-residential workforces b. A policy requirement for major industry to invest in housing to support workers and family to live in local communities c. A requirement for community impact assessment for extractive industry projects and a need for industry to implement the recommendations to address those impacts d. Priority be given to increasing residential growth and services in mining communities to support future growth e. Growth in the extractive industry require consideration of maintaining diverse economies in the local community. 	12	<p>These strategies are not supported as they do not reflect the State’s interest for the extractive industry sector.</p>
4.2.3 strategy 7	Suggest the inclusion of requirement for companies to consider the social / economic impacts of housing workers	24	<p>This is not a matter for inclusion in the TPPs as it is unclear how it could be applied to a planning instrument.</p>
General	<p>Supports the urgent introduction of TPPs to sustainably develop, secure and protect critical extractive industry resources to build Tasmania</p> <p>Support the change of title to ‘Extractive Industry’</p> <p>Recommends that the word ‘key’ be changed to ‘strategic’ resource areas and deposits</p> <p>Suggest the practical application of the policy will be enhanced with an ‘Implementation Guideline’ that makes specific reference to the Strategic Resource Mapping and how this can be used to identify and protect strategic resource areas</p>	31	<p>Noted.</p> <p>Noted.</p> <p>Supported. Modification made.</p> <p>Refer to section 4.5 of the body of the report that discusses implementation options. Implementation guidelines have been removed.</p>
4.2.3 - strategies	<p>Suggest strategy 3 should be conditional on the social and environmental objectives of the TPPs</p> <p>Recommends that Strategy 6e should be expanded so that ‘environmental impacts are minimal, and planning provides for future rehabilitation and alternatives uses of the mine site’</p>	<p>32</p> <p>55</p>	<p>This strategy is more about planning approaches to protect existing operations so cannot be conditional on retrospective social and environmental objectives.</p> <p>Agree with the intention to require rehabilitation of the site. Modification made.</p>
Strategy 4.2.3(1)	Suggest that Strategy 4.2.3(1) should focus Statewide and not just local government.	39	<p>There are Statewide maps available to indicate where these deposits are located.</p>
Overlapping and similar statements	<p>It is unclear what practical benefit policy 3 provides above and beyond policies 1 and 2</p> <p>Note that Policies 1 and 2 already require existing operations, be it the resource or a processing operation, to be identified and protected</p>	40	<p>Agreed that there is an element of overlap however strategy 3 also protects access to future mineral resources.</p>
Environmental Impacts	Suggest the references to environmental impacts by extractive industry is minimal – recommend a clear plan for remediation, or limiting impact to associated natural or cultural values, is required.	52	<p>Support the policy intent to provide for the rehabilitation of extractive industries sites.</p>
Drafting	<p>Comments include:</p> <p>Who will resource the identification of key resource areas and deposits in order to map them?</p> <p>Strategy 5 – what if identified resources occur in a rural residential area?</p>	<p>67</p> <p>68</p> <p>69</p>	<p>The State is working on mapping key resource areas.</p> <p>Strategy 5 requires, on land available for mineral exploration, consideration ‘prior to designating the land for purposes that removes the ability of that land to be used and developed for mineral extraction’. The strategy would have no impact on existing rural living zoned land.</p>
4.3 Tourism			

Real benefits to the Tourism sector and economic diversity	There needs to be improved coordination of land use and infrastructure decision making to ensure benefits are maximised and shared There should be a provision of affordable long-term housing to ensure the hospitality and tourism sector is able to source employees	62	Noted An additional strategy has been included to support housing for tourism and hospitality workers in remote locations.
4.3.3 -strategies	Concern about lack of implementation guidelines. Recommend Strategy 4 should be revised to ‘Support unique, diverse and innovative tourism experiences that support the Tasmanian brand in a way that does not risk long term harm to the brand and the tourism industry’ Suggest the word ‘unreasonable’ in strategy 7 should be removed	32 55	Preference to retain the existing text and let the policy respond to local and regional circumstances. Preference is to retain existing text as it provides a qualified response.
4.3.3 strategy (3)	Suggest ‘significant impact’ should be defined and recommend that the local tourism market needs recognition	39	‘Significant impact’ needs to be considered in the context of the strategy and situation it is being applied to.
Drafting	Suggest the requirement in strategy 1 that future and potential projects are known and identified as part of the RLUS and/or TPS does not allow for the unexpected or unique and highlights the current uncertainties around the ongoing maintenance of the existing RLUS	49 64 65	Strategy 1 allows for the identification of key tourism sites to allow for strategic planning to be undertaken. Unexpected or unique tourism opportunities can still be considered.
Tourism - risk	Concern the key risks to the natural and cultural values of the state through overuse have not been captured Include a requirement for application of a sustainable model that strives for well-considered, sensitive, and sustainable developments that recognises and protect the natural and cultural values, while not impacting on the amenity for other users.	52	Noted however there has been no evidence presented that identifies where this ‘overuse’ has occurred and how the TPPs can address it. Many of these matters are broadly addressed through various strategies in the TPPs.
Drafting	Suggest strategy 1(g) should be deleted and replaced by the strategy below: <ul style="list-style-type: none">‘Visitor numbers should be capped at a level which is ecologically sustainable’	53	Not supported. This matter is broader than the planning system and requires a sophisticated and agreed approach to determine which has not been developed.
Agritourism	Include agritourism requirements in the policy to support agritourism in an agricultural or rural setting	54	This matter is addressed in the Agriculture policy of the Sustainable Development TPP.
Drafting	Recommended the following: Add Aboriginal heritage to strategy 4.3.3 (1d) Add that tourism in protected areas should be undertaken in an ecologically sustainable manner and be based on best practice principles of carrying capacity	58	Aboriginal heritage is addressed through the Cultural Heritage TPP. Management of land in the Tasmanian Reserve Estate is addressed in the Biodiversity section of the Environmental Values TPP.
Consistency with growth policies	Unclear how the strategies are aligned with the growth policies as tourism is not identified as a land growth area - suggest there will be conflict when applying to the RLUS or TPS if not aligned.	59	Tourism use and development can occur outside urban growth boundaries
Visitor accommodation	Strategy 3 - Question whether the State altered its position on visitor accommodation levels in settlements	67 68 69	The strategy reflects the State’s interest.
General	Notes that environmental values underpin tourist numbers and growth in Tasmania’s, therefore a strategy that ‘protects and enhances environmental values that attract tourist growth’ would align with the other strategies and would improve the environmental sustainability of tourism	72	The TPPs deliver that intent through the relevant strategies.
4.4 Renewable Energy			
Growth of renewable energy	Manage the growth of renewable energy to ensure projects do not negatively impacts local housing markets Recommend that: <ul style="list-style-type: none">a. Renewable energy projects be required to conduct community impact assessment including impact on housing and be required to implement the mitigation measures identified in the assessmentb. Renewable energy projects be required to prioritise family housing over temporary housing or be limited to a certain percentage of workforce in non-resident worker accommodation.c. Any temporary housing be design to integrate into local communities and designed with a post project use from the beginning e.g. be transition to social housing, aged care tourism accommodation at the end of the project	12	Strategy 4.4.3.6 facilitates the provision of housing, including temporary housing, in regional areas to accommodate workers during the construction phase of renewables. It is not the intention of the TPPs to specify exactly how that will occur as this will be based on local characteristics, the nature and scale of the project and local and regional planning objectives.
4.4.3 Strategies	Recommends that Strategy 1b should include ‘the impact on communities’ so that it reads ‘economic and social value and impact on communities’;	32 55	Agreed and modification made.
	Support the renewable energy strategy but concern whether they are appropriate for planning instruments	33	The strategies reflect the State’s interest and are intended to guide regional and local planning strategies and potential modifications to the SPPs.

4.4.3	<p>4.4.3(1a) - Suggest clarification of the word quality is needed.</p> <p>Strategy 4.4.3(3) should highlight that it could be public or private/ownership and should include the text: 'protect private installations such as solar panels when considering impacts of neighbouring development'</p>	39	<p>The quality of the renewable energy resource, in the case of wind, simply relates to the reliability and quantity of the resource.</p> <p>Not considered necessary to specify ownership. The suggestion to protect private installations when considering the impacts of neighbouring development is a matter for the SPPs.</p>
Exemptions	Suggest the renewable energy industry should not be given any exemptions which allow fast tracking of scenically and environmentally destructive developments such as the Robbins Island Industrial Wind Turbine development	53	Noted. No exemptions are proposed or implied through the TPPs.
4.5.3 Strategies 4	Suggest 'and bioenergy' should be added after green hydrogen	22	Agreed and modification made.
Localised renewable energy	<p>Concern there is little direction of localised renewable energy, such as promoting the use of solar panels.</p> <p>Concern strategy 4.4.3(1c) does not indicate how investor interest can be implemented</p> <p>Suggest strategy 4.4.3(6) appears to be too specific and only relates to regional policy</p>	59	<p>Strategy 5 provides for supporting infrastructure enabling distributed energy resources that includes solar panels.</p> <p>Investor interest is a consideration in identifying renewable resource areas.</p> <p>Strategy 6 facilitates the provision of housing for workers during the construction phase.</p>
Location of infrastructure	<p>Who will responsible for the identification of renewable resource areas?</p> <p>Suggest it is not possible to predict the market and where future investment decisions will be directed.</p> <p>Suggest the TPPs should clarify preference for infrastructure and the local aspirations of community in the location of infrastructure.</p>	<p>67</p> <p>68</p> <p>69</p>	<p>It is anticipated that this will be a collaboration between ReCFIT (Renewables, Climate and Future Industries Tasmania).</p> <p>Noted. However, planning can play a role in identifying appropriate locations for where renewables cause the least impact and guide future investment decisions to those areas.</p> <p>These matters are considered in strategy 1.</p>
4.5 Industry			
Social benefit and economic development	<p>There needs to be greater emphasis on ensuring the social benefits from economic development.</p> <p>Recommend that there should specific strategies added to the TPPs to maximise the local economic benefit from industry growth, promote diversification of industry in remote regions and to mitigate the impact of cyclical industries on local economies.</p> <p>Suggest all industries must be given some form of prioritisation and the TPPs must introduce mechanisms for deconfliction and allow community input. Example, there should be a mechanism to assess the economic benefit where a renewable energy project is proposed in a mining area.</p>	12	<p>The Industry policy includes the strategies to guide where industrial growth will occur and the protection of existing industrial land. The social benefits are not explicitly addressed but they are implied through the creation of jobs, quality of life through greater access to goods and services and separation of incompatible land uses.</p> <p>These are matters that can be addressed by applying the TPPs locally and addressing and responding to local issues.</p> <p>Refer to section 4.4 regarding competing interests.</p>
4.5.2	Support Section 4.5.2 to protect and facilitate land for industrial use as OCG believes the supply of industrial land is the next big land shortage crisis after affordable housing	26	Noted.
Strategy 4.5.3	Suggest 4.5.3(1) should include access to fast/suitable communication and technology access and strategy 3 should include: should consider the presentation of the built form and design response.	39	Refer to the first strategy of the Innovation and Research policy.
	Suggest the wording of strategy 2 is not clear and recommend it should be revised to 'maintain a 15-year supply of zoned land'	40	The strategy states 'provide for at least a 15 year supply of industrial land'. The suggested modification is implied through the wording of strategy 1.1.3.1.
Drafting	Suggest the TPPs should acknowledge the need to maintain up to date data on industrial land supply demand and include reference to placemaking for industrial areas	58	This is outside the scope of the TPPs.
Strategy Application	Concern strategies 4.5.3(3(a) and (c provides for specific land uses, meaning anything outside of that would not be able to be supported.	59	The strategy refers to uses that are 'resource dependent, including, but not limited to,
Urban growth boundaries'	Suggest consideration should be given to the use of the term 'urban growth boundaries', given the lack of reference to the term in both the RLUS or SPPs	60	Strategy 7 of the Growth policy introduces urban growth boundaries, stating; 'Create urban or settlement growth boundaries that clearly identifies the spatial extent of growth, including the allocation of a sufficient land to meet projected growth'
Industrial land outside of urban growth boundaries	Suggest the TPP is too prescriptive in the requirements for locating industrial land beyond the urban growth boundary	<p>67</p> <p>68</p> <p>69</p>	The strategy provides for a list of situations where industrial land can be located outside the urban growth boundary and are expressed as 'or' meaning only one must be satisfied. This is not considered overly prescriptive.
4.6 Business and Commercial			
4.6.3 Strategies	Recommend strategy 9 should be revised to include the text 'support multi-purpose trips'..... highly accessible to recognise that mixed use activity centres support multi-purpose trips including active transport	25	Preference is to maintain the existing text. The intent of the suggestion is still delivered through the strategies.

4.6.3 strategies	Note Strategy 7 and 8 outline planning strategies but fails to protect the needs of local residents. Note these policies are not specific enough to prevent an unreasonable effect on local communities. Questions what is considered: 'reasonable' or 'unreasonable' and what constitutes 'small scale commercial activity'	32	Both of these strategies make explicit reference to not causing an unreasonable loss of residential amenity. The TPP strategies talk in broad terms. These matters will be considered in greater detail when they are required to be implemented through the SPPs.
4.6.3 - strategies	Recommended that: Strategy 1. e) might be better worded as 'access to workforce'. Strategy 7 be amended to: 'Support home-based businesses where it is demonstrated that the impact causes no loss of residential amenity to the surrounding area.' Strategy 8 be amended to: 'Provide for small scale commercial or business opportunities in residential and industrial areas that meets the needs of local residents or workers, is conveniently located and, in the case of residential land, causes no loss of residential amenity and is supported by evidence that residents agree with such development.'	55	Supported, modification made. This suggestion is more appropriate for inclusion in the SPPs. This suggestion is outside the scope of the TPPs as they cannot require evidence that residents agree with a particular use and development.
Areas outside urban growth boundaries	Unclear how new identified areas outside of the requirements of 4.6.3(6) would be able to occur	59	Strategy 6 states 'avoid locating activity centres outside urban growth boundaries'. This has been modified to 'discourage activities from being located...'. When the strategy is read in the context of all the other strategies, it provides guidance on the location of new activity centres.
	Concern that strategy 8 promotes a potential loss of residential amenity – Suggest the need to demonstrate what is an 'unreasonable' loss of amenity is unnecessary at policy level	60	Strategy 8 is qualified by 'small scale', 'meets the needs of the local residents or workers' and, in the case of residential land, does not cause an 'unreasonable loss of residential amenity'. Given this strategy will apply in different contexts with different levels of ambient residential amenity, to try to prescribe what an unreasonable loss of amenity is would require a level of prescription that is not appropriate for the TPPs.
Commercial use	The TPP's must recognise that there is role for the market as a demonstration of demand for commercial use, whether this is for local service or the tourism economy The Strategy 1 criteria for assessment for small activity centre amendments is not reasonable or practical and too prescriptive Strategy 5 - Concern new local activity centres may be required and appropriate for larger, new greenfield sites.	67 68 69	The TPPs consider consumer demand and demographic forecast which is also demonstration of market demand as referred to in this submission. Strategy 1 includes a list of matters to consider, one of which is the nature and scale of the catchment being serviced, thereby catering for smaller scale activity centres. Agreed. Modification made
4.7 Innovation and Research			
Objective & strategy 4.7.3	Suggest the addition of the following text.... 'capitalize on our landscape values and enviable lifestyle'....., before will support Suggest the addition of strategy 6 below. Support high amenity working and living environments that are critical to attracting key people in many emerging industries	25	Landscape values and liveability objectives are addressed in other TPPs. As above, these matter are addressed in the liveability and design strategies of the Settlement TPP.
Drafting	Questions if it is the role of the planning system to promote innovation and research	33	It is identified as a key economic driver as discussed in the Principles and Policy Context section of the Sustainable Economic Development TPP.
strategy 4.7.3	Suggest strategy 2 should include reference to secondary schools as well	39	The strategy is about developing a highly skilled workforce thereby supporting tertiary and vocational training institutions.
Drafting	Suggest the TPPs should give recognition of the importance of innovation within the tourism and agritourism industry to support the industry more broadly	54	Innovation is supported in general terms without specifying a particular industry.
Drafting	Suggest many of the strategies relate more to investment matters that are outside the jurisdiction of the planning system. Policies for precinct planning are better located with policies for settlement and industry.	67 68 69	The strategies are within the Sustainable Economic Development TPP to support some of the key economic interests of the State. The strategies may help guide investment opportunities in the sector but only so far as what the TPPs can provide for in the planning system.
5.0 Physical Infrastructure			
General			
General	Recommends that the topic be titled "Sustainable Physical Infrastructure". Suggest that the content of the TPPs should be updated to reflect the critical need for infrastructure to be sustainable; and better align the TPP to the RMPS objectives considering PESRAC's recommendations and the UNSDG.	29	Preference is to retain the existing title of the TPP as it adequately reflects its purpose.
Climate Change	Include the new dot point below to recognize the importance of green infrastructure 'adopting 'green infrastructure' based on harnessing natural processes wherever possible as opposed to the traditional grey infrastructure that relied primarily on engineered solutions to deal with stormwater'	25	Preference is to retain existing text as it aligns with the proceeding strategies that don't reference 'green infrastructure'.
Climate Change	Support the climate change statement in the Physical Infrastructure Policy	14	Noted.

Principles and Policy Context	Suggest the second last paragraph should include “where there is available capacity” to promote development that utilises spare capacity	10	Supported. Modification made.
Principles and Policy Context	<p>Questions why social infrastructure and physical infrastructure are separated, suggest the two should be combined with individual infrastructure networks defined.</p> <p>Recommend the inclusion of the strategy below once the policies are combined</p> <p>'Identify the local government's plans for trunk infrastructure that are necessary to service urban development at the desired standard in a coordinated, efficient, and financially sustainable manner.'</p> <p>Suggest there should be a legislation to ensure local governments are resourced to undertake proper infrastructure planning</p>	19	<p>There are different planning implications for physical and social infrastructure and addressing them in the manner drafted seems a logical way to group similar planning responses.</p> <p>The proposed addition is more appropriate to be included as a RLUS or local planning outcome.</p> <p>This matter is outside the scope of the TPPs.</p>
General	<p>Support the development of the TPPs and hoped it will encourage investment and also provide protections for the electricity industry to support economic growth</p> <p>Acknowledged the changes made to the TPPs to include the reticulation of electricity supply, the protection of existing and future electricity infrastructure assets and corridors from sensitive and incompatible use and developments that may encroach.</p>	21	<p>Noted.</p> <p>Noted.</p>
General	<p>Note the interaction between infrastructure provision and the planning system is complex given the different legislation involved</p> <p>Suggest there should be clarity around what is required at each level of planning instrument, the responsible entities and the data required</p> <p>Note repetition should be reduced</p>	33	<p>Agreed.</p> <p>It is not the role of the TPPs to interpret the legislation around infrastructure provision and specify the roles and responsibilities of responsible entities.</p> <p>Noted, however, as discussed in the supporting report, certain degrees of 'perceived' repetition is required because of the complex and interrelated nature of the matters being addressed. In the case of the provision of physical infrastructure, there are planning responses that are similar but also nuances in relation to the impacts and considerations of particular infrastructure or service.</p>
Strategic planning processes	<p>The TPPs need to set the requirement for a comprehensive framework of infrastructure delivery and infrastructure contributions to ensure delivery through regional and local planning instruments.</p> <p>The submission raised the following questions:</p> <ul style="list-style-type: none"> • In what way can the TPPs better integrate Regional Development Australia – Tasmania into the planning system and planning outcomes; • Further investigation into coordinated state-wide planning data collection, reporting framework and accessibility; • How do the TPPs ensure Infrastructure entities such as DSG, TasNetworks and TasWater are better integrated into strategic planning and development assessment (statutory referral agencies); 	62	<p>The Physical Infrastructure sets the policy considerations to achieve this.</p> <ul style="list-style-type: none"> • The TPPs provide the planning response, there are other Government initiatives that promote integration with Regional Development Australia; • The TPPs are not considered to be the platform to co-ordinate these matters. • From a land use planning policy perspective, all statutory referral agencies are bound by the TPPs. Other Acts regulate certain processes and it is outside the scope of the TPPs to address these matters.
Stormwater, Flood and Flooding	<p>Suggest the definition of physical infrastructure should be revised to replace <i>and survive</i> with 'flourish'</p> <p>The TPPs should provide planning pathways for best practice management of, and mitigation measures for runoff from impervious surfaces</p> <p>Stormwater warrants specific mention in the introductory list</p> <p>Suggest including Overland Flow Paths to the list in this point</p> <p>Concerned the brief statement under heading 5.0.2 may be used in a misguided way to 'protect' settlements and infrastructure that would otherwise be better relocated</p>	43	<p>Preference to maintain existing definition.</p> <p>Strategies relating to this matter have been strengthened to deliver the intent of this comment.</p> <p>Supported, modification made.</p> <p>Preference to not include on the basis that Overland Flow Paths do not constitute physical infrastructure.</p> <p>The Policy Context sections of the TPPs, including Climate Change Statements, are non-statutory and are for information only.</p>
5.1 Provision of Services			
5.1.3 3 – wording	Suggest the wording of clause 5.1.3.3 should be redrafted to read “ <i>Where there is no infrastructure, no available infrastructure capacity or no non-infrastructure solution, promote the most logical and cost-effective solution to deliver services to growth areas</i> ” for clarity.	10	Supported, modification made.
Strategy 5.1.3	Recommends that Strategy 5.1.3 number 3 should be amended to ‘..... the most logical and cost-effective solution to deliver services to growth areas while minimising environmental impacts’	32	Supported, modification made.
5.1.3 13 – wording	Change to “... <i>physical infrastructure, including roads</i> ...” to promote service corridors and co-location of assets	10	Support, modification made.

Strategy 5.1.3	<p>Suggest the wording of strategy 5.1.3(1) should be revised to change 'infrastructure to 'best practice infrastructure provision'</p> <p>Suggest strategy 5.1.3(2) should be revised to ensure future capacity scenarios are required to be considered, not just existing</p> <p>Suggest strategy 5.1.3(3) is not clear and note 'cost-effective' should be 'effective' as the most effective solution to protect environmental values such as water quality might not be the cheapest solution in monetary terms at the outset</p> <p>Suggest adding '... and the environment that the community relies upon to strategy 4.</p> <p>Suggest strategy 6 require an implementation guideline</p> <p>Questions why only domestic wastewater was considered in strategy 7</p> <p>Suggest adding 'stormwater' to strategy 9 for consistency throughout policies</p> <p>Suggest strategy 10 should be revised to replace 'Encourage' with 'Require' and recommend that strategy should be reviewed for intent and clarity.</p>	43	<p>Preference to maintain existing text.</p> <p>The strategy in question is in response to existing infrastructure.</p> <p>Supported. Modification made.</p> <p>Support the addition of 'and the environment'. Modification made.</p> <p>Refer to section 4.5 of the body of the report.</p> <p>The strategy is providing an option for lots that can't connect to reticulated sewerage. Other matters are addressed through other strategies.</p> <p>Modification made.</p> <p>Preference to maintain existing text.</p>
Strategy 5.1.3.5	<p>Concern mandatory development contributions would lead to the erosion of housing affordability and act like a 'tax' on new home buyers</p> <p>Reference the National Housing Finance and Investment Corporation (NHFIC) 2021 report on Development Contributions: How should we pay for new local infrastructure that <i>developer contributions increasingly act like a tax on new housing, which can impede new housing supply and reduce housing affordability for buyers and renters.</i></p> <p>Recommend the costs of broader community, social and regional infrastructure should be borne by the whole community and funded from general rate revenue, borrowings, or alternative funding mechanisms</p>	5	<p>Strategy 5.1.3(5) provides for facilitating developer contributions to service new use and development to be transparent, fair and reasonable, providing for equity between users.</p> <p>Strategy 5.1.3(6) encourage an integrated approach to the planning and engineering design of new subdivision and subsequent use and development, promoting the coordinated and efficient provision of infrastructure.</p> <p>The above strategies do not necessarily demand mandatory development contributions but provide an avenue to generate funds in support of providing servicing infrastructure. There are alternate ways, outside of land use planning, to generate funds for other types of infrastructure.</p>
Section 5.1.3.5	<p>Supports the strategy to facilitate developer contributions to service new use and development</p> <p>Suggest that the strategy should name up the "first mover disadvantage" and provide a strategy to ensure the first developer only pays for the infrastructure they need to avoid any unfair contribution</p>	26	<p>Noted.</p> <p>The strategy refers to facilitating developer contributions that are 'transparent, fair and reasonable, providing for equity between users'.</p>
Broadband network infrastructure	Suggest that the TPPs be amended to include mandatory conditions requiring confirmation that fibre-ready facilities have been built to the relevant carrier's technical specifications and that broadband services.	23	An additional strategy has been added stating "Encourage the connection of new lots, or provide for potential future connection to, telecommunication services at the time of subdivision, where the land is in a serviceable area and there is a reasonable expectation that the future use of the lot will require telecommunications services".
5.1.3	Questions the essence of specifying outcomes for one type of industrial facility over others in strategy 10 of 5.1.3	40	Strategy 10 provides for recycling and waste management services which is referenced in the objective.
5.1	Concern the TPP does not clarify why development contribution relates solely to physical infrastructure and excludes social infrastructure needs	46	There are alternate ways, outside of land use planning, to generate funds for social infrastructure.
Drafting – strategies	<p>Suggested the following strategies for provision of services.</p> <ul style="list-style-type: none"> Focus service maintenance and consolidation on existing serviced settlements Avoid provision of services in unserved settlements in ecologically sensitive areas and instead limit development to the carrying capacity of the unserved settlement using planning controls such as appropriate lot sizes and site coverage (including limiting multiple dwellings) Ensure stormwater is managed to decrease the amount exiting each lot and increasing the quality of stormwater that leaves each lot and enters local waterways and wetlands All service construction should be subject to environmental assessment. No exemptions 	53	Preference is to maintain the existing drafting as the proposed drafting is considered to restrictive and impractical to deliver.
Drafting	Suggest Strategy 3 should be amended to '..... <i>the most logical and cost-effective solution to deliver services to growth areas while minimising cultural and environmental impacts,</i> ' to ensure environmental impacts are properly considered	55	Support the modification from 'cost-effective' to 'effective' to consider other issues that are outside the scope of cost.
Drafting	<p>Suggest strategy 5.1.3(5) should be expanded to include the following:</p> <p>Provide a framework for development and infrastructure contributions through new legislation that facilitates and coordinates the delivery of all necessary infrastructure from the relevant authorities and prepare development and infrastructure plans for key areas through new legislation to manage contributions towards infrastructure</p>	58	Outside the scope of the TPPs.
Objective	It is unclear how the objective could be implemented through the RLUS or TPS. – recommend that the strategies should reviewed to ensure the strategies are not over-stepping.	59	The policy expressed through the objective and strategies can be implemented in numerous ways through the RLUS and TPS including SPP standards for subdivision, and strategic identification of existing servicing infrastructure capacity to guide where growth occurs.
Sewer AND stormwater	Concern there is lack of provisions to promote and regulate reticulated services (sewer AND stormwater)	60	Regulation of reticulated water and sewerage is managed through the <i>Water and Sewerage Industry Act 2008</i> and is therefore outside the scope of the TPPS.

Drafting	<p>The TPP should reconcile expectations in the provision of infrastructure that serves multiple parties e.g 'facilitate developer contributions</p> <p>The strategies are too prescriptive and should simply express expectations for levels of service, taking into account the variabilities across localities and different types of settlements. As drafted, they stray into areas that are outside of the planning system jurisdiction</p>	<p>67</p> <p>68</p> <p>69</p>	<p>The relevant strategy states “facilitate developer contribution to service new use and development to be transparent, fair and reasonable, providing for equity between users” which reflects the State’s interest. Reconciliation of expectations in the provision of infrastructure can be coordinated on a case by case basis between the various parties.</p> <p>Refer to section 4.2 of the body of the report for discussion on the level of prescription used in the drafting. The TPPs can only operate within the planning jurisdiction however, the strategies can promote the co-ordination between planning and other jurisdictions.</p>
5.2 Energy Infrastructure			
Change of strategy name	Recommend that “energy infrastructure” should be changed to “sustainable energy infrastructure”	29	Preference to maintain existing terminology
Strategy 5.2.3	Recommends an additional Strategy 5.2.3 number 5 ‘Encourage local self-contained energy solutions that reduce network dependence and load’.	<p>32</p> <p>55</p>	The intent of this submission is delivered through section 4.4 Renewable Energy, where the relevant strategy states: ‘Facilitate local, neighbourhood and specific site renewable energy generation, including the potential use of green hydrogen, to help diversify the local economy, improve sustainability outcomes and build resilience and diversification around energy supply.
Strategy 5.2.3	Should consider if any are currently ill-placed	39	The TPPs cannot retrospectively apply.
Future energy facilities	<p>Future energy facilities are unknown and are usually a response to the market.</p> <p>The strategies relate to matters that are outside the jurisdiction of the planning system and needs to be clear in its expectations</p>	<p>67</p> <p>68</p> <p>69</p>	<p>Noted.</p> <p>The intent of the policy is clear and can be delivered within the planning system.</p>
5.3 Roads			
	Recommend a specific strategy to protect the West Coast to Burnie road, and rail network given its importance to State exports	12	Although the TPP does not specifically provide for protection of West Coast to Burnie road, strategy 5.3 provides for the identification and protection of key corridors from incompatible land use and development including Burnie to Hobart transport corridor, Tasmania’s premier passenger and freight corridor, facilitating the movement of high volumes of people and heavy freight between major ports, intermodal hubs, population and industrial centres and other key urban passenger transport corridors and freight routes.
5.3.3 Strategy 10	<p>Recommend additional strategy (10) below to adequately acknowledge the important social function of roads</p> <p>‘Design local roads to support incidental social interaction, sustainable drainage and irrigation of street landscape and active transport.’</p>	25	The inclusion of this strategy may introduce a conflict with other strategies that seek to support transport efficiency. Other strategies promote social interaction in more appropriate locations.
5.3.3	<p>Suggest stricter controls for the roll out of major road “upgrades” to ensure they do not destroy the scenic and natural values in sensitive areas</p> <p>Recommended the following strategy</p> <p>‘Any new road upgrades need to be constructed in such a way that scenic and natural values are not degraded or destroyed but rather maintained or preferably enhanced through ecological restoration works’</p>	53	The suggested modification to the policy position for maintenance of existing roads is not supported.
5.3.4 strategies	<p>Recommend Strategy number 4 should be amended to ‘Support heavy vehicle access that is responsive to industry needs and appropriate to the condition, current use and function of a road.’</p> <p>Concern Strategy 6 appears to make road investment the driver of planning decisions.</p>	32	<p>Preference is to retain existing drafting.</p> <p>The strategy must be read and applied in the context of other relevant strategies that apply to the particular situation.</p>
Strategy 9	<p>Note this strategy implies that Environmental, Heritage and social impacts only must be considered at the construction stage.</p> <p>Suggest it should include measures to ensure these values are considered to minimise roadkill through design.</p>	17	<p>The issues identified represent broad planning considerations.</p> <p>This issue is considered too detailed to be effectively delivered through the TPPs.</p>
Drafting	<p>Suggested the following:</p> <p>Strategy 4 should be amended to read ‘Support heavy vehicle access that is responsive to industry needs and appropriate to the condition, current use and function of a road, and that allows impact on existing residential amenity and the environment to be minimised.’</p> <p>Strategy 6 should be reworded to make clear the primacy of the planning system in determining land use</p> <p>Consider creating a new topic ‘5.4 Streets’. Notes that the street connects us all both within suburbs and between suburbs and should be included in the planning system</p>	55	<p>Preference is to retain existing drafting. Many of the additional matters are addressed in other strategies.</p> <p>The strategy must be read and applied in the context of other relevant strategies that apply to the particular situation.</p> <p>Street networks and connectivity are addressed in the Design Policy of the Settlement TPP.</p>
Drafting	<p>Note strategy 5.3.3(1) is too specific and suggested that the wording should be revised to ensure that all corridors are identified</p> <p>Concern regarding what constitutes a ‘future road corridor’</p>	59	The intent of the strategy is to focus the protection on the higher category roads.

Drafting	<p>Many of the strategies relate to matters that are outside the jurisdiction of the planning system</p> <p>There are no definitions of the key road corridors. What is the last mile urban freight route?</p> <p>Road investment programs should align with strategic planning, not the other way around.</p>	<p>67</p> <p>68</p> <p>69</p>	<p>The strategies can still inform planning instruments.</p> <p>The TPPs call up 3 key road corridors under strategy 1 of 5.3.3.3. It is anticipated that the review of the RLUSs will identify the key urban passenger routes and last mile freight routes which is defined in the Tasmanian Freight Strategy</p> <p>Strategic planning should consider road investment programs and vice versa. The TPPs provide an approach to deliver a more cost effective and efficient provision of roads through a review of the RLUS.</p>
5.4 Transport Modes			
Active transport	<p>Support the TPPs' emphasis on active transport</p> <p>Note modern and sustainable transportation systems provide benefits such as low or zero car urban developments and creating more opportunities for social interaction between the many demographics of our society.</p> <p>Recommend a resource for learning about modern and sustainable transportation system and how to apply it in urban and regional areas is the channel Not Just Bikes on YouTube: https://m.youtube.com/c/NotJustBikes</p>	3	The Transport mode TPPs include strategies that encourage public transport corridors supported by active transport networks that recognise opportunities for reduced car usage in areas serviced by quality public and active transport.
	<ul style="list-style-type: none"> Incorporate existing and future ferry services under the Transport Modes policy area. 	50	The policy supports increased passenger modal support, which includes ferry transportation.
Active transport	<p>Support the TPPs drafts considering and incorporating active transport</p> <p>Note it is important to create infrastructure that keeps up with this shift in transport options</p>	4	As above
Strategy 5.4 - wording	<p>Revise the wording of clause 5.4.3-6 to replace 'Encourage' with 'ensure' to read as follows:</p> <p>"Ensure public transport corridors are supported by current or planned active transport networks and bus stops that are safe, accessible and provide for better passenger amenity</p>	14	Preference is to retain the existing drafting as 'ensure' is a conclusive verb and the strategy may not always be able to be achieved.
Active transport	<p>Suggest Active travel should stop being considered as separate, but additional part to transport policy concerned with 'practical' cars</p> <p>Note walking and cycling are essentially side-effects to good holistic transport policy</p>	15	Noted and this is what the policy seeks to achieve.
5.4.3 Strategies	<p>Strategy 2 – suggest 'corridors' should be replaced with 'stops'</p> <p>Strategy 5 – add the text 'direct, convenient, safe, offering high amenity' before integrated</p> <p>Strategy 7b – amended to add 'appropriate, safe and legible' to support broad take up of active transport</p>	25	<p>Preference is to retain the existing drafting.</p> <p>These matters are addressed through other strategies.</p> <p>Preference is to retain the existing drafting.</p>
Change of name	Recommend "transport modes" should be changed to "sustainable transport modes"	29	Preference is to retain the existing title.
5.4.3 Strategies	<p>Request heading should be changed to Passenger Transport Mode for clarity</p> <p>Suggest the strategy should consider the possibility of passenger trains from Hobart to Launceston</p>	39	<p>Supported. Modification made.</p> <p>Too specific for the inclusion in the TPPs. Rail transport addressed generally through the inclusion of an additional strategy in the Ports and Strategic Transport Networks policy.</p>
Drafting	<p>Suggest strategy 5.4.3 (7) should be more ambitious e.g. has public transport within a 400m radius of 80% of all new lots</p> <p>Suggest the text "encourage transport providers to be involved in subdivision design" should be added to the strategy.</p>	58	<p>Modification not supported as the intent of the strategy is to be site responsive.</p> <p>Unclear what is meant by 'transport providers'. The Design policy includes a strategy for subdivision design that includes supporting efficient and effective public transport access.</p>
	<p>Many of the strategies relate to matters involving the provision of service by organisations that are not incorporated into the planning system.</p> <p>The effect of the strategy is to prohibit uses that may have a high economic benefit to a settlement or locality, because it is not urban or within proximity to public transport</p>	<p>67</p> <p>68</p> <p>69</p>	<p>The strategies can still inform planning instruments.</p> <p>Clarification made to the strategy to address concern that the subdivision is not prohibited if it is not in a location serviceable by public transport.</p>

5.5 Ports and Strategic Transport Networks			
TasRail - Standalone Policy	<p>Suggest Rail warrants its own standalone policy and recommended the following policy should be included:</p> <p>5.6 Rail, 5.6.1 Application: Statewide.,</p> <p>5.6.2 Objective: To support the safety, efficiency and operability of current and future rail transport operations and activities.</p> <p>5.6.3 Strategies</p> <ol style="list-style-type: none"> 1. Recognise the State Rail Network is a strategic infrastructure asset that includes railway lines that are declared National Land Transport Network Corridors 2. Recognise that freight rail is an integral transport mode for Tasmania's Heavy Industries and Freight Forwarders which supports economic development and growth, employment and export supply chains for Tasmania. 3. Recognise that the State Rail Network is Open Access, with the rail corridors able to be accessed by eligible third party Above Rail operators which may include other freight or passenger rail service providers including Tourist and Heritage Rail. 4. Protect Rail Corridors, Rail Infrastructure, Terminals, Hubs and other rail assets by applying appropriate buffers that prevent the encroachment of incompatible use and development. 5. Protect the current and future use of State Rail Network land by not permitting third party developments above ground on State Rail Network land except where such developments are directly related to the core business interests of the Rail Infrastructure Manager. 6. Promote the installation of appropriate physical barriers to separate State Rail Network land from incompatible land use adjacent to/adjoining State Rail Network land boundaries. 7. Implement a moratorium on the construction of new level crossings. 8. Require all rail crossings on private roads/land to be subject to Safety Interface Agreement (Licence) issued by the Rail Infrastructure Manager. 9. Require formal risk assessment processes where there is a proposed, perceived or action change in conditions associated with a railway crossing or other rail interface to identify and eliminate or control safety and operational risks SFAIRP. 10. Provide appropriate zoning for State Rail Network land to protect and support current and future permitted (and exclusive) use. 	51	Refer to section 4.3 of the body of the report for discussion on the inclusion of a rail network strategy.
Biosecurity	Concern the policy is silent on biosecurity risks to Tasmania, - note this is a key risk to both the environment and agriculture	52	Planning has little influence on Biosecurity matters. Refer to Report on Scoping Consultation for further information.
6.0 Cultural Heritage			
Principles and policy context	<p>Supports the reframing of cultural heritage in the planning system</p> <p>Recommended that the description of non-indigenous cultural heritage articulates a more holistic understanding of the uniqueness of Tasmania's heritage to recognise the strong connections between local cultural heritage and its broader setting and surrounds.</p>	20	<p>Noted.</p> <p>Agreed and modification made.</p>
6.0.1 Climate Change Statement	The Heritage Council agrees that the TPP's should address the emerging trend of the impacts from climate change on Tasmania's cultural heritage assets	20	Noted.
European and Aboriginal Heritage	Include mandatory requirement in the TPPs for important European and Aboriginal Heritage to be listed in the LPS	56	The TPPs promote the protection of cultural heritage values through a range of planning instruments.
6.1 Aboriginal Cultural Heritage			
SPPs	Note it is encouraging to see policy on Aboriginal Cultural Heritage but questions whether this will result in deletion of C6.1.2. Note this code does not apply to the Aboriginal heritage values from C6.0 Local Historic Heritage Code, or will require clarification or other legislative changes to implement	18	It is yet to be determined what modifications will be made to the SPPs as a result of the TPPs being made.
Local cultural heritage values	<p>Opposed to the blanket use of the term 'local cultural heritage values'. Considers it to be too restrictive as places listed on the THR are not reflected in or bound by the policy. Note this is at odds with the <i>Historic Cultural Heritage Act 1995</i>.</p> <p>Note the above approach results in significant gaps in the protection of heritage values.</p> <p>Recommend that the TPPs should include other heritage places and precincts and not exclude anything more than having local heritage value.</p>	19	The TPPs are bound by what can be achieved and applied through the TPS and RLUS and therefore cannot influence State heritage matters delivered through the <i>Historic Cultural Heritage Act 1995</i> .

6.1.3 Strategies	<p>Concern Strategy 2 refers to the investigation of land for the presence of Aboriginal Cultural Heritage places and objects but fails to refer to landscapes as is referenced in the “Non-indigenous cultural heritage” policy</p> <p>Suggest the use wording: avoid designating... Is vague and should be replaced with a more forceful and clear term</p> <p>Note strategy 4 is seeking the agreement of the Tasmanian Aboriginal people but omits any reference to who is to be consulted and how</p> <p>Recommend include a policy relates to “retention of appropriate surrounding settings and site contex’t in the Aboriginal cultural heritage policy</p>	34	<p>Noted however the inclusion of Aboriginal cultural landscapes was not supported by the relevant agency.</p> <p>This is consistent with the drafting style used throughout the TPPs.</p> <p>Strategy 4 has been deleted on the advice of Aboriginal Heritage Tasmania.</p> <p>The strategies promote the protection of Aboriginal Cultural Heritage values. If the protection of those values relies on protecting the surrounding area, presumably this will be picked and delivered through the assessment of the values.</p>
Strategy 6.1.3	Suggest 6.1.3(1a) is not tangible in planning, 6.1.3(5) is more the field of social planning, and made some recommendation to be included in the implementation guidelines	39	Noted however, preference is to retain existing drafting.
Aboriginal Heritage Assessment	Note Aboriginal Heritage Tasmania is not a suitable organisation to assess Aboriginal Heritage at risk of damage in DAs. Suggest a number of DAs assessed by AHT as low probability tends out to contain Aboriginal heritage values	53	Outside the scope of the TPPs.
Aboriginal cultural heritage	Support the inclusion of Aboriginal cultural heritage and suggest that the content should be determined by the Aboriginal community.	55	Noted and supported.
Drafting	Questions whether there should be a statement to recognise the pending new Aboriginal Cultural Heritage Act	57 61	The policy is intended to complement the new Act and provide for the strategic consideration of Aboriginal Cultural Heritage..
Drafting	<p>Suggest the following text should be added to the strategy.</p> <p>‘Ensure aboriginal heritage is considered early in the planning and development process’</p> <p>‘Adequately resource and put in proper processes for assessing aboriginal heritage’</p>	58	<p>The strategies provide for the early consideration of Aboriginal Cultural Heritage in the planning process.</p> <p>This matter will be resolved at a later stage when the TPPs are implemented in the SPPs and the Aboriginal Cultural Heritage Act is legislated.</p>
Drafting	Suggest that strategies 6.1 and 6.2 should be reviewed to ensure that they relate a regional and a local level respectively and not at a state level	59	Both strategies can relate or be applied at a local or regional level.
Drafting	Strategy 3 could effectively prohibit use and development that is acceptable to the Aboriginal community in regard to its degree of impact and is in conflict with Strategy 4.	67 68 69	<p>Unclear how this conclusion is drawn from the interpretation of the strategies 3 and 4.</p> <p>Notwithstanding the issues raised in the submission, strategy 4 have been deleted on advice from Aboriginal Heritage Tasmania.</p>
General	<p>Concern there is too much focus on Aboriginal Cultural Heritage places and objects in the strategies</p> <p>Suggest the strategies should acknowledge the cultural values associated with Land, Sea and Sky Country and their significance to the Tasmanian Aboriginal community</p>	72	Preference is to retain the existing drafting and to incorporate reference Aboriginal Cultural Heritage values.
6.2 Non-Indigenous Cultural Heritage			
Objective	Recommend that the objective should be revised to read ‘promote design responses that preserve cultural heritage’, rather than just ‘consider’	32	Intent supported. Modification made.
Non-indigenous	<p>Notes the term non-Indigenous is not consistent with current meanings set out in both historic heritage and Aboriginal legislation and non-binding. Recommend ‘non-Indigenous’ is replaced with ‘historic’,</p> <p>Suggest the wording of the objectives should be revised to delete ‘non-indigenous’ and replace ‘preserves’ with ‘support conservation’.</p> <p>Strategy 2 - delete ‘non-indigenous’ from the strategy and replace ‘considered’ with ‘understood and addressed’.</p> <p>Strategy 3 - delete ‘non-indigenous’ from the strategy and replace ‘restoration’ with ‘understood and addressed’</p> <p>Strategy 4 - delete ‘non-indigenous’ from the strategy and replace ‘encourage’ with ‘promote’ and replace ‘by promoting innovative and complimentary’ with ‘through’.</p> <p>Strategy 5 - delete ‘non-indigenous’ from the strategy and replace ‘support’ with ‘allow for’ and replace ‘surrounding settings’ with ‘curtilage’.</p> <p>Recommend the addition of a sixth strategy below</p> <p>‘Adopt and implement best practice governance structures (namely The Burra Charter 2013) to provide guidance on appropriate heritage design responses that are sympathetic to their setting.’</p>	19	<p>Supported and modification made.</p> <p>Support the deletion of ‘non-indigenous’ but preference to retain all other existing text.</p> <p>The proposed addition is not supported.</p>

6.2.3 Strategies	Supports the general intent of the strategies that supports the identification, investigation and protection of local cultural heritage Concern that some municipalities do not adequately protect e local heritage places and acknowledged that this issue cannot be addressed directly by the TPP's Recommended that consideration be given to how the increased protection of local heritage places through the development of the 'Implementation guidelines' section of the TPP's and through the development of Regional Land Use Strategies	20	Noted Noted. Intent of submission supported. The proposed implementation statements have been modified to be strategies to deliver the same intent.
Non-indigenous	Addendum to original submission suggested that the Cultural Heritage TPP be modified to change 'non-indigenous cultural heritage' to 'historic cultural heritage', greater explanation of the interaction and role of other heritage protection mechanisms and inclusion of implementation guidelines.	36	Supported and modification made. Refer to section 4.3 of the body of the report.
Drafting	Suggest the wording of the objective should be reworded to 'landscapes and promote design responses that preserve cultural heritage values while allowing adaptive reuse wherever possible'	55	Intent supported and modification made to include 'promote'.
Drafting	Suggest the heading 'Non-Indigenous Cultural Heritage' should be changed to 'Historic Cultural Heritage'. Suggest the <i>Historic Cultural Heritage Act 1995</i> should be referenced.	57 61	Supported. Modification made.
	Suggest the policy should provide sufficient direction on implementation of the strategies – implementation guidelines Concern that the non-application of the Local Historic Heritage Code to places registered on the Tasmanian Heritage Register in the SPPs do not align with part 6.2.3 (5) of the TPPs	60	Sufficient direction has been given in the strategies to guide how they should be implemented. This will be addressed as part of a review of the SPPs once the TPPs have been made.
Definition	How is significant to be interpreted? Is the expectation of the State that there will be a local heritage list of places and/or heritage precincts in LPS's?	67 68 69	Local and regional strategic planning can determine what they consider to be 'significant'. The TPPs set the policy for what ought to be included in a local heritage list of an LPS. The TPPs can not enforce that an LPS includes a local heritage list.
7.0 Planning Process			
7.1 Consultation			
Planning process	Suggest section 7 is inappropriate in a planning policy document and should be omitted from the policy section of the document.	46 33	The intent of section 7 is to provide some strategies that relate to planning processes where the Act is silent. It is noted that while some submissions did not support the inclusion of this TPP, many others supported it.
Strategies	Suggest the following strategy: <ul style="list-style-type: none">• 'On critical planning issues such as a Tasmanian Population Strategy the Government should hold community referendums/plebicides to ensure that their strategies have a genuine social licence.'	53	The Tasmanian Population Strategy is a project that is outside of the TPPs.
Drafting	Suggest the TPPs should have had a background report	56	There was a Supporting Report published with the draft of the TPPs that went out on exhibition.
General	Does not support the change from the TPP scoping document for a "Public Engagement" TPP to "Consultation" in the draft TPPs. Note "consultation" denotes a lower level of active involvement. Recommends that the "Consultation" TPP should be changed to "Public Engagement" and provide implementation guidelines on how it should be implemented recommends that an issue of civil enforcement and appeal rights should be included in the TPP	29	Supported. Modification made.
Implementation	It is unclear how the strategies could be implemented through the RLUS	59	The strategies are intended to support regional and local planning processes that don't have minimum standards for consultation.
	Strategies for consultation relate to matters that are outside the jurisdiction of the planning scheme Ideally the TPP should elevate the role of local consultation in determining the balance of competing interests expressed in the suite of TPP's.	67 68 69	While the Act provides the statutory consultation processes for discretionary development applications there are no public engagement requirements for strategic planning. The strategies within this policy can be applied through local and regional planning exercises.
General	Suggest the planning process TPP is unnecessary as the matters are already addressed under the Act and adds complexity and conflict	63	The Act only provides for consultation processes for statutory planning. The intent of the policy is to provide for public engagement processes that are not specified in the Act.

7.2 Strategic Planning			
Drafting	Suggest some concepts could be reframed as overarching principles of the TPPs Noted that even though this section promotes balancing of competing interests, it conflicts with the implementation statement Unclear how this section would be used in determining how a planning instrument has implemented the strategies	33	This is outside the already agreed and supported structure of the TPPs. Submission intent is unclear. No response. Can demonstrate compliance through documenting strategic planning processes.
7.2.3 Strategies	Note that apart from scientific evidence, there are other experts who may provide valuable input to the planning process Recommend adding a phrase 'and other expert' to strategy 3 after the word 'scientific'.	32	Preference to retain existing text.
7.2.2 Objective & 7.3.3 strategies	Objective - Add the text'To encourage an equitable distribution of amenity and environmental opportunities amongst all in the community' to the last paragraph. Strategy 2 – add the text 'geographical' inter-generational equity, 'all sections of the community'	25	Preference to retain existing text. Preference to retain existing text.
7.2.3 strategy	Questions how strategy 7.2.3(1) can be measured and suggest that the wording of 7.2.3(1) and (2) should be revised to replace 'scientific based' with 'evidenced based'.	39	Preference to retain existing text.
LUPAA needs urgent reform	Suggest the current strategic planning is untransparent and poorly regulated with little public rights of consultation	56	Noted.
	Recommend reframing this section as the 'principles and aims to be achieved by the TPP's'.	67 68 69	This section is not considered to represent the 'aims and principles to be achieved by the TPPs'.
7.3 Regulation			
Conflict between policy	Concern there appears to be some conflict between the intent of some policy provisions. Note strategy 7.3 could pre-empt the inclusion of exemptions or controls which do not need to be advertised in planning schemes as they would be 'consistent' with the policy while 7.1 promotes meaningful and genuine consultation in the planning process	18	These strategies are qualified by the relative impact of the use and development.
7.3.3 Strategies	Note it is not immediately clear what the following strategies mean in effect: <ul style="list-style-type: none">7.3.3 (2) the intent to avoid over regulation by aligning regulations with the scale and impact of development and that planning regulation should reflect the level of impact.7.3.3 (4) planning regulations to adjust to pandemics, climate change etc.7.3.3 (5) facilitate coordination and regulation where there is consistency between planning and other jurisdiction	32	<ul style="list-style-type: none">To allow use and development that has minimal or no impact to proceed with minimal regulation eg exemptions in the TPSSupporting regulation that is responsive to emergency situations.Supporting the coordination of regulation between jurisdiction to avoid red tape, such as between planning and building approvals
7.3.3 strategies	Suggest the whole strategy is confusing and misleading Suggest strategies 7.3.3(1) & (2) are too broad and has little or no impact	39	These strategies can be used to guide outcomes expressed through the SPPs
7.3.3 strategies	Support strategy 4	45	Noted
Drafting	Note the guidelines make no reference to any obligation to regulate in accordance with the required legislation Suggest the following strategies be included: <ul style="list-style-type: none">'Ensure all regulation is consistent with Schedule 1 and State Policies''Strengthen planning laws to reflect the urgent need to protect biodiversity from further decline'	53	The TPPs are subordinate to the Act and do not need to make reference to the obligations contained within it. The Act requires that planning instruments, and therefore all planning regulation, are consistent with the Schedule 1 objectives and State Policies. The TPPs have no bearing over other legislation.
Drafting	Suggest that: In 7.3.2 the term "over regulation" has not been articulated or defined in the glossary. In 7.3.3 where in (1) there to ostensibly be "no impact" claimed: how would that be standardised, defined or determined? In 7.3.3 in (2) this appears to be a statement about an open slather in defiance of the Schedule 1 Objectives	56	The term 'over regulation' is well understood and does not need to be defined. Use and development that has little or no impact are typically exempt under the planning scheme so this is not a new concept for planners to determine. The strategy is qualified on the basis of the level of impact which is similar to how permitted and discretionary pathways in planning schemes operate.
Regulation	Note that the treatment of No Permit Required use and development is inconsistent between Planning Authorities. Suggest the State should set the process across the State, and standardised any fees (including no fee) that may be considered appropriate	57 61	This is outside the scope of the TPPs.
Drafting	Unclear why the policies include a regulation section when the majority of the proposed strategies are all facilitated through LUPAA	59	The strategies try to establish policy thresholds that can be applied when reviewing the SPPs.

Regulation	<p>Concern clarification is required around use and development that has 'little or no impact', as the impact of development is highly subjective with differing views within the community</p> <p>Argued that 7.3.3 (1) of the TPPs is unnecessarily detailed; has the potential for misuse/misinterpretation and is otherwise adequately covered by 7.3.3 (2).</p>	60	<p>Use and development that has little or no impact are typically exempt under the planning scheme so this is not a new concept for planners to consider and will be tested through the review of the SPPs once the TPPs are made.</p> <p>Strategy I is intended to provide the policy setting for exemptions in the SPPs</p>
Regulation	regulation must also be able to reflect local aspiration, as enshrined in the LUPAA.	67 68 69	Agreed and the TPPs support local aspirations being delivered through the LPSs.