

# Private Forests Tasmania

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## Consultation – Regional Planning Framework and Structure Plan Guidelines

Thank you for the opportunity to provide feedback on the Regional Planning Framework and draft Structure Plan Guidelines.

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

PFT attended the SPO's online presentation on 14 February and has reviewed the Discussion Paper, the draft Structure Plan Guidelines and other related documents associated with the Tasmanian planning system. Our submission provides responses to some of the questions posed in the Discussion Paper.

*Q. Do you agree that the general content and purposes of the RLUSs should be outlined in the legislation or regulations similar to the TPPs and SPPs?*

Response: Yes, to ensure consistency across regions an outline of the content and purpose for RLUS should be formalised in legislation. This would be a significant improvement on the current 3 strategies whose format and content are anything but consistent. There may still exist differences between the 3 regions, and these specific differences may not become apparent until the new RLUS are drafted. In that regard formalising their content and purpose in the LUPA regulations rather than the Act itself may be more appropriate so they can be more easily updated.

*Q. Do you agree with the suggested contents in the Discussion Paper? Are there other matters you think the RLUSs could capture?*

Response: The proposed content of RLUS outlined in the discussion paper is almost identical to that of the TPP's. As the RLUS are lower down in the hierarchy of planning instruments than the TPP's there is an opportunity for the content of RLUS to be more detailed. For example, *the sustainable use, development, protection or conservation of land* could include sections on 'resource protection'.

In the case of forestry, resource protection would mean the spatial identification of areas of land that are either dedicated for a forestry purpose (ie. Private Timber Reserves, Permanent Timber Production Zone Land, Future Potential Production Forest Land) and/or contain significant timber resources. These areas would then require local government planners, when preparing their LPS's and other sub regional or local

land use planning strategies, to give due consideration to the protection of these resources for their continued sustainable use and development.

In recent years this has not necessarily been the case. In many of the draft and now approved LPS's, PFT is continually made aware of the inconsistent application of zones and codes on land dedicated for forestry purposes. PTR's, PTPZ Land and FPPF Land have been placed in zones where forestry is discretionary or in some cases prohibited. Whilst this does not have any practical effect because forestry operations on land dedicated for a forestry purpose are generally exempt from the planning scheme under LUPAA, the zoning of land can influence public perceptions of what is an appropriate use of land. Land dedicated for forestry use that is zoned inappropriately will only cause confusion and can be used as an argument that the land should be transferred to other land uses. This is despite previous land use decisions and classifications made by the state legislature.

Private land that is not covered by a PTR has no automatic exemption from the planning scheme when a forestry use is proposed. There are many private forest blocks that have significant potential as a wood resource that are not covered by a PTR. This is highlighted in PFTs recently published [2020 Tasmanian Private Forest Resource Review](#). It showed that only 50% of private plantation forests are covered by a PTR and less than 20% of the private native forests with wood potential are covered by a PTR. This amounts to over 130,000 hectares of private forested land that is a potential wood resource that is not covered by a PTR. The potential for these forests to contribute to alleviating Tasmania and Australia's current wood shortage and meeting our emission reduction targets should be protected.

*Q. Do you agree with the suggested process for preparing RLUS's?*

One of the stated intentions of the RLUS's is to be a key instrument in the spatial implementation and further articulation of the TPPs and therefore the collection of appropriate spatial data will be required. Spatial data on PTR's, PTPZ Land and FPPF Land is available on ListMap and spatial data on private forested land that is a potential wood resource but not covered by a PTR is available from Private Forests Tasmania.

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

Yours sincerely,



**Penny Wells**  
CEO Private Forests Tasmania