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Consultation – Draft Tasmanian Planning Policies

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

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

PFT have reviewed the draft TPPs, the supporting report and related documents associated with the Tasmanian planning system. We note the draft TPPs make very little or no reference to forestry or the forestry industry. This is despite land dedicated to a forestry purpose in Tasmania makes up nearly 1.25 million hectares - 812,000 ha Permanent Timber Production Zone (PTPZ) on public land and 432,000 ha Private Timber Reserves (PTR) on private land. That is 18% of the State's landmass.

The forestry industry is a major employer in our regions and worth more than \$1.2 billion annually to the State's economy. Forestry will play a key role in meeting Tasmania's ambitions carbon emission reduction targets (detailed [here](#)) and providing timber to build the 10 000 new affordable homes by 2032 announced recently as part of Tasmania's Housing Strategy (detailed [here](#)).

The stated purpose of the TPPs is to establish a comprehensive, high level policy framework intended to shape strategic land use planning across Tasmania. Specifically, the TPPs set out the aims, or principles, that are to be achieved or applied by the Tasmanian Planning Scheme (TPS) and the regional land use strategies.

The TPS consists of the State Planning Provisions and the Local Provisions Schedule (LPS) for each municipality. In many of the draft (and likely 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 Future Potential Production Forest Land have been placed in zones where forestry is discretionary or in some cases prohibited.

It has been suggested to PFT that this does not have any practical effect because forestry operations on land dedicated for a forestry purpose are generally exempt from the planning scheme. Operations on public land are exempt by virtue of section 4 of LUPAA whilst operations on PTR's are exempt by virtue of section 11 of LUPAA.

Despite the exemption, dedicated forestry land is still subject to zoning by local government planners when preparing their LPS's. 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 and following detailed assessments.

Under the old planning schemes much of the rural and agricultural land, and all of the dedicated forestry land, was zoned in the Rural Resource Zone where plantation and native forestry was permissible, provided the requirements of the forest practices regulatory system were met. The new planning system has re-calibrated the Rural Resource Zone with the stated intent of providing better protection for agricultural land. Under the current roll out of the LPS's the old Rural Resource Zone appears to be increasingly re-zoned into other zones such the Agriculture Zone, the Landscape Conservation Zone or the Environmental Management Zone where forestry becomes discretionary or in some cases prohibited depending on whether it is plantation or native forestry.

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 does not seem to be taken into consideration by local planners when zoning this land.


Recent draft LPS's from both the Derwent and Huon Valley LGA's are examples of where local town planners have effectively engaged in land use re-classification through zoning. It has highlighted the limited capacity of 29 separate planning sections within 29 councils to interpret and implement the complex statewide planning system and ensure the Government's broader policy objectives are taken into consideration.

It shows there is no meaningful or strategic consideration of forestry, or the protection and enhancement of the existing and future timber resource, built into the planning system. This situation contrasts with land that has agricultural potential and land that has mineral or mining potential. In these situations the draft TPP contains specific provisions that identify and protect land with these capabilities (see sections 4.1 & 4.2 of the draft TPP).

PFT recommends that similar high level provisions to identify and protect land with timber potential be included in the Sustainable Economic Development TPP. I have attached the draft of this TPP with track change comments that specifically address these issues (as discussed with Senior Project Manager TPPs Nell Nettlefold).

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

Yours sincerely,



Phillip Bishop
A/CEO Private Forests Tasmania

Tasmanian Planning Policy

4.0 Sustainable Economic Development

4.0.1 Principles and Policy Context

The Sustainable Economic Development TPP focuses on identifying and supporting our economic advantages, to deliver economic growth in a socially and environmentally responsible way.

Tasmania's natural resources underpin our economic prosperity. Our fertile soils, mild climate and reliable rainfall provide opportunities in the agricultural sector while our pristine air quality unique landscapes and ecological diversity attract visitors from around the world. Our proximity to Antarctica and the Southern Ocean provides advantages to attract research, accessing and servicing opportunities. Our world-class wind, deep hydro storages and 100% renewable-energy status provide opportunities to attract industry looking for clean energy and have been identified as a key economic and emissions reduction driver both for Tasmania and Australia.

While our geographic location has advantages, it also presents some economic challenges. Being the only island state of an island nation, Tasmania's isolation from mainland Australia and the rest of the world puts us at an economic disadvantage in an era of globalisation and globalised economies. Our physical distance from the northern hemisphere and Asian markets adds to complexities for maintaining competitive in trading commodities and accessing markets. In addition, our ageing population is likely to present future economic challenges through a decline in the skilled workforce.

While the planning system alone cannot drive the State's sustainable economic growth, it still has an important role to play. We will remain geographically isolated but we can plan for and support the provision of digital infrastructure, to ensure our businesses have access to online global markets. Planning for ports and strategic transport networks can improve efficiency in physically accessing global markets. It can also facilitate infrastructure development in areas best aligned with environmental, social and economic values, provide for strategic co-location of new infrastructure with existing infrastructure and promote circular economies.

Similarly, planning cannot prevent the declining workforce. However, it can support the creation of liveable cities that encourage migration and the retention of our young adults. It can also support the establishment of higher education institutions that are easily accessible, which also helps increase the skilled workforce.

The Sustainable Economic Development TPP supports economic activity through the planning system by embedding the following principles:

- allocating sufficient land in appropriate locations to support various economic activities;
- protecting allocated land from incompatible use and development;
- supporting the efficient use of infrastructure and coordinated delivery of new infrastructure, including digital infrastructure;
- identifying and supporting emerging and innovative industries;
- promoting diversification to strengthen the resilience of the economy; and
- protecting the resources and values that are relied on for sustainable economic development.

The Sustainable Economic Development TPP provides initiatives to guide economic growth in our agriculture, tourism, renewable energy, industry, extractive industries, business and commercial and research and innovation industries. It provides for flexibility in responding to new opportunities and changing economic conditions, supporting a diverse and more resilient economy.

It also addresses the production of timber which, although regulated by the forest practices system, there is still a role for the TPPs to consider this industry from a strategic land use planning perspective.

4.0.2 Climate change statement

Tasmania's economy is likely to face challenges as a result of the predicted effects of climate change however, we also have some significant advantages. Our greenhouse gas emissions profile is unique among Australian jurisdictions, due to a high proportion of renewable energy generation and high levels of carbon sequestration from the State's managed forest estate

Each economic sector in the Sustainable Economic Development TPP will be impacted differently by climate change and will need to respond to issues as they emerge. For example, the agricultural sector will need to reconsider traditional crops and favour those that respond better to warmer conditions. Areas that may have been ideal for low chill varieties of fruit may need to consider trials and progressive replacement of orchards. Primary production is also at risk from increased storm damage, unpredictable rainfall and more extreme high temperature events.

While it is difficult to predict the range and extent of the potential impact climate change will have across all economic sectors, land use planning can play a strategic role in facilitating economic resilience and help to address the impacts and causes of climate change.

The Sustainable Economic Development TPP addresses these issues by:

- protecting agricultural resources and promoting diversification within the industry which will help the industry respond to changing climatic and economic conditions;
- strategically considering and protecting land designated for timber production to contribute to carbon sequestration;
- promoting efficient use and consolidation of land, infrastructure and transport networks to reduce emissions;
- supporting innovation and research opportunities to diversify and contribute to a more resilient economy; and
- supporting opportunities for greater economic self-sufficiency and circular economies to help reduce the impact of unexpected, external forces on the economy.

4.1 Agriculture

4.1.1 Application

Statewide.

4.1.2 Objective

To promote a diverse and highly productive agricultural sector by protecting agriculture land and the resources on which agriculture depends, while supporting the long-term viability and growth of the agricultural sector.

4.1.3 Strategies

1. Identify agricultural land, and potential agricultural land, and apply contemporary land capability classification mapping systems, that includes access to irrigation water as a criteria of land capability, that identifies and maps the capability of land to sustain long term agricultural uses as a criteria, including under forecast climate change scenarios.

2. Protect land with agricultural capabilities by designating it specifically for agricultural use and development or for purposes that prevent the permanent loss or conversion of the land's agricultural potential.
3. Allow compatible land uses to operate on agricultural land, where they do not cause unreasonable fettering or fragmentation and minimises the sterilisation of agricultural land.
4. Protect land with significant agricultural capabilities, and agricultural land within irrigation districts, by affording them the highest level of protection from fettering, fragmentation or conversion to non-agricultural uses.
5. Prevent fettering of agricultural land by considering the impacts of agricultural uses on surrounding future use and development to prevent land use conflict and protect the productivity and viability of agricultural uses.
6. Protect the viability of agricultural uses by preventing the fragmentation of agricultural land.
7. Protect agricultural land by avoiding the permanent conversion of agricultural land to non-agricultural land uses unless:
 - a) the scale of the conversion or sterilisation is minor in terms of the overall agricultural operation of the site;
 - b) the conversion contributes to the viability of the agricultural use on the site; and
 - c) the proposed use will not cause land use conflict, fetter or impact the viability of the surrounding agricultural uses.
8. Support diversification and value-adding of the primary industries sector by supporting effective agricultural production and processing, innovation in rural industries and farm-related retailing and agritourism that is ancillary to the principal use, to enable sustainable growth of the sector and strengthen its ability to adapt to climate change, natural disasters and market challenges.
- 8.9. 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.
- 9.10. Allow residential use where it is part of, or supports, an agricultural use, such as workers' accommodation, where it does not unreasonably fetter, fragment or convert agricultural land uses.
- 10.11. Support the retention of small farms close to urban areas and acknowledge the contribution, or potential contribution, that they make in supplying local produce to farm gate market, agrifood economy and tourism.
- 11.12. Facilitate the provision and protection of infrastructure that supports the diversification and improved productivity of the primary industries sector.
- 12.13. Protect the viability of upstream dam infrastructure when strategically planning land use and development.

4.1.4 Implementation Guidelines

None Specified.

4.2 Timber Resources

4.2.1 Application

Statewide.

4.2.2 Objective

To identify and protect existing and potential timber resources, and supporting infrastructure, to facilitate economic growth and support emissions reduction. ~~To contribute to the protection of Tasmania's timber resources (on private timber reserves).~~

4.2.3 Strategies

1. ~~Protect timber resources~~production areas including plantation and native forests by identifying land ~~declared as private timber reserves~~dedicated for timber production and ~~consider~~ designating/zoning that land for purposes that are compatible with timber production.
2. ~~Encourage surrounding land, that is likely to be impacted by activities associated with timber production on dedicated timber production land~~ private timber reserves, to:
 - 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.~~
3. ~~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:~~
 - o ~~the nature and scale of the existing and potential wood resource;~~
 - o ~~the viability of extracting the wood resource; and~~
 - o ~~the social, economic and environmental benefits of the wood resource compared to that of the alternative land use.~~
4. ~~Enable the provision and protection of supporting infrastructure for timber resources so access can be facilitated and maintained.~~

4.2.4 Implementation Guidelines

None Specified.

4.3 Extractive Industry

4.3.1 Application

Statewide.

4.3.2 Objective

To identify and protect existing and potential extractive industry resources, and supporting infrastructure, to facilitate economic growth and support efficient infrastructure and urban development.

4.3.3 Strategies

1. Identify and protect key resource areas and deposits, including areas of known mineral resources and strategically important construction materials, such as sand.
2. Protect existing extractive industries from encroachment by residential and other incompatible use.
3. Support the long-term viability of existing operations and access to future mineral resources.
4. Enable the provision and protection of supporting infrastructure for extractive and related resource industries so that access can be facilitated and maintained.
- 4.5. Support future mineral extraction on land available for mineral exploration by, prior to designating the land for a purpose that removes the ability of that land to be used and developed for mineral extraction, consideration of the following:
 - the nature and scale of the mineral resource;
 - the viability of extracting the mineral resource; and
 - the social, economic and environmental benefits of the mineral resource compared to that of the alternative land use.
5. Plan for and encourage the use of suitable mineral resources that can provide for a viable resource supply to be extracted consistent with relevant planning policies, considering:
 - a) the benefits to the community;
 - b) the provision of energy and infrastructure;
 - c) access to a skilled workforce;
 - d) risks to public health and safety are managed to within acceptable levels; and
 - e) environmental impacts are minimal.
6. Facilitate the provision of housing and services to support mining employees and their families in remote settlements.

4.3.4 Implementation Guidelines

	State Planning Provisions	Local Provisions Schedule

4.4 Tourism

4.4.1 Application

Statewide.

4.4.2 Objective

To promote the sustainable development of the State’s tourism industry.

4.4.3 Strategies

1. Identify existing and potential key tourism sites or destinations and investigate the role of these sites or destinations from a State, regional and local perspective to help plan where they are best located and how they can be sustainably developed, taking into consideration:

- a) visitor demand and forecast trends of visitation across the State;
 - b) existing supply of tourism product, services and infrastructure;
 - c) appropriateness of the scale and nature of the tourism use;
 - d) the impact on the environmental, landscape, intrinsic and local character values of the place;
 - e) the use and development being displaced;
 - f) alignment with and promotion of the Tasmanian brand;
 - g) alignment with regional destination plans supporting the visitor economy;
 - h) the contribution to the local, regional and State economy; and
 - i) integration with the local community.
2. Promote tourism use and development that protects, is compatible with and builds on the assets and qualities of the events, activities and attractions underpinning them.
 3. Ensure visitor accommodation does not significantly impact the supply of housing for the local community.
 4. Support unique, diverse and innovative tourism experiences that support the Tasmanian brand.
 5. Facilitate the provision of infrastructure, housing and services, where appropriate, to support tourism and hospitality employees, to meet the demand for, and support the growth of, sustainable tourism use and development.
 6. Identify and protect attributes that attract and enhance tourism experience.
 7. Prevent the cumulative impacts of tourism use and development from unreasonably detracting from how the local community engages and identifies with their local surrounds.
 8. Promote growth and investment in recreational, art and cultural activities that attracts tourism growth and supports the local community's access to these facilities.
 9. Promote the integration of tourism infrastructure into activity centres to support and reinforce the economic function of activity centres.

4.4.4 Implementation Guidelines

None specified.

4.5 Renewable Energy

4.5.1 Application

Statewide

4.5.2 Objective

To promote renewable energy use and development to support economic and employment opportunities and strengthen the State's economy, while also supporting emissions reduction.

4.5.3 Strategies

1. Identify renewable resource areas to prioritise the location of renewable energy use and development within areas that have been strategically identified for future renewable energy use and development taking into consideration:
 - a) the quality of the energy resource;
 - b) economic and social value;
 - c) investor interest; and
 - d) environmental, cultural heritage and land-use constraints.
2. Identify and plan for supporting transmission infrastructure required to connect renewable resource areas to the existing network, taking into consideration the ancillary infrastructure that may be required to provide for a reliable and secure network.
3. Recognise the quality and diversity of Tasmania's renewable energy resources and the role it can play in limiting greenhouse gas emissions and supporting the transition to national low carbon economy through existing and future interconnection to Tasmania.
4. Facilitate local, neighbourhood and specific site renewable energy generation, including the potential use of green hydrogen and bioenergy, to help diversify the local economy, improve sustainability outcomes and build resilience and diversification around energy supply.
5. Support infrastructure enabling distributed energy resources.
6. Facilitate the provision of housing, including temporary housing, required to accommodate workers, particularly during the construction phase, to support the development of renewable generation sources within regional areas.

4.6 Industry

4.6.1 Application

Statewide.

4.6.2 Objective

To protect industrial land, facilitate sustainable industrial use and development and ensure there is sufficient availability of suitable industrial land to meet the existing and future needs of Tasmania.

4.6.3 Strategies

1. Identify and allocate land within urban growth boundaries that is suitable for industrial use and development, considering:
 - a) analysis of industrial activities and land supply at a regional or metropolitan level, including existing available land, potential for growth within, or adjacent to, existing centres, and the nature of current and future industrial activities;
 - b) topography and physical site constraints;
 - c) compatibility of surrounding land use;
 - d) provision of adequate buffer areas to separate incompatible uses;
 - e) access to workforce;
 - f) supply chain relationships, including freight patterns, and proximity to existing freight networks, including high productivity and key local freight roads;
 - g) the ability to and cost of, servicing with physical infrastructure; and

- h) avoidance of environmental hazards and environmental values.
2. Provide for at least a 15 year supply of industrial land, that is located within urban growth boundaries, that is based on projected demand to meet the economic needs of Tasmania.
 3. Enable industrial types of use and development, outside urban growth boundaries, where:
 - a) the use is resource dependent, including, but not limited to, abattoir, onshore marine farm or sawmill, and required to be located with the resource to provide for more sustainable outcomes;
 - b) high impact industrial use warrants separation from settlements;
 - c) the land has formerly been developed and is no longer being used to its full capacity, such as a brownfield site, and is proposed to be re-purposed for industrial use and development; or
 - d) the land is identified as being strategically located, such as having access to supporting infrastructure or freight routes and has State or regional industrial importance; and

environmental hazards and the impact on environmental values are avoided or can be appropriately managed.
 4. Protect existing and future industrial land from encroachment by incompatible use and development.
 5. Where appropriate, protect land surrounding industrial estates by designating it for a compatible land use that does not prejudice the future availability of that land for industrial use and development.
 6. Encourage the co-location of similar industrial uses within existing or future strategic industrial precincts.

4.6.4 Implementation Guidelines

None specified

4.7 Business and Commercial

4.7.1 Application

Statewide.

4.7.2 Objective

To promote business and commercial activities at a scale and intensity suited to the location to support diverse economic and employment opportunities and strengthen the State's economy.

4.7.3 Strategies

1. Identify and allocate a sufficient supply of land within existing settlements or areas identified for future growth of settlements, to provide for commercial and business use and development based on existing and projected demands, considering:
 - a) the nature and scale of the catchment being serviced;
 - b) consumer demand and demographic forecast;
 - c) efficient use of existing infrastructure;
 - d) accessibility to existing transport networks and services;

- e) access to employees;
- f) activity centre hierarchy; and
- g) regional settlement hierarchy.

2. Identify an activity centre hierarchy that is based on the scale, role, function and accessibility of activity centres.
3. Support the activity centre hierarchy by promoting complimentary use and development to strengthen efficiencies within activity centres and avoid unnecessary competition between activity centres.
4. Encourage the intensification and growth in, and around, higher order activity centres that are highly accessible and which promote the efficient use of infrastructure and services.
5. Support the redevelopment of commercial and business use and development in existing activity centres prior to considering the establishment of new activity centres, unless it is a natural progression of the existing activity centre and is highly accessible to its catchment of users.
6. Avoid locating activity centres outside urban or settlement growth boundaries.
7. Support home-based businesses where the impact does not cause an unreasonable loss of residential amenity to the surrounding area.
8. 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, does not cause an unreasonable loss of residential amenity.
9. Support mixed use, including residential uses, in activity centres that are highly accessible and where the potential for land use conflict can be managed.

4.7.4 Implementation Guidelines

None specified

4.8 Innovation and Research

4.8.1 Application

Statewide.

4.8.2 Objective

To promote innovation and research, and the institutions and infrastructure that drives learning and prepares a skilled workforce, that will support existing and emerging opportunities and contribute to a diverse and resilient economy.

4.8.3 Strategies

1. Support the provision and expansion of logistics and digital infrastructure to promote the information and communications technologies (ICT) industry that provides opportunities to drive learning, productivity, innovation and access to online global markets.

2. Support accessible and well-connected tertiary education and training institutions that fosters innovation and career diversity while supporting the existing and emerging needs of the State's employment sectors.
3. Promote existing and emerging innovation and research opportunities, especially those that promote Tasmania's assets, facilitates diversification of our economy, makes use of our geographical location and furthers our brand values, by providing planning mechanisms that are adaptive and flexible to respond competitively to opportunities as they arise.
4. Provide for precinct planning that allows for collaborations between industry, science, research and education institutions to be co-located to facilitate and promote learning, on the job training, collaboration and shared access to resources.
5. Support opportunities for greater economic self-sufficiency, diversification and circular economies to help reduce the impacts of external forces on the State economy.

4.8.4 Implementation Guidelines

Regional Land Use Strategies	State Planning Provisions	Local Provisions Schedule