Department of Justice

Office of Strategic Legislation and Policy

GPO Box 825

HOBART TAS 7001

By email: haveyoursay@justice.tas.gov.au

22 October 2021

To Whom It May Concern,

**Scope of the draft Tasmanian Planning Policies – Have your say**

The Tasmanian Independent Science Council appreciates the opportunity to comment the Tasmania’s Government’s [Tasmanian Planning Policies: Scoping Paper for draft TPPs](https://www.justice.tas.gov.au/__data/assets/pdf_file/0004/628240/TPP-Scoping-Paper-Revised-3-September-2021.PDF) which is currently open for public comment.

Strategic, statewide policies are an important component of Tasmania’s Resource Management and Planning System, and the Science Council commends the Government for taking action to address the need to identify critical issues, to canvass opinion and advance policy solutions.

The Science Council would prefer to see the development of State Policies, established by the Tasmanian Parliament, as these provide for a whole of Government approach and are more transparent. However, more narrowly focused TPPs are a step in the right direction and will influence the future of Tasmania as they help to shape the planning system and react to emerging issues.

The Science Council recommends some additional topics and issues the TPPs could cover.

We consider the best approach to addressing climate change would be to adopt a State Policy on Climate Change to help to implement the Climate Change Act, as well as integration across all relevant TPPs.

We look forward to providing input to the content of the new draft Tasmanian Planning Policies when they are released for public consultation in 2022.

Yours sincerely,

Tasmanian Independent Science Council

Contact for further advice from TISC

Dr David Campin

Queensland International Fellow

Founding Member Tasmanian Sustainable Development Advisory Council 1993-1996

[info@tassciencecouncil.org](http://www.tassciencecouncil.org/)

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**The Tasmanian Independent Science Council**

The Tasmanian Independent Science Council is dedicated to science and evidence based policy reform to ensure the long-term health of Tasmania’s critical environments. We are composed of scientists and relevant professionals who are a source of independent, non-government advice.

Our goals are to:

* Connect science to public policy;
* Drive innovation in managing the use of Tasmania’s terrestrial, freshwater and marine ecosystems; and
* Engage community, business and political leaders to find and implement solutions to the challenges of environmental stewardship in Tasmania.

We seek to achieve these goals by compiling and synthesising research, producing papers on key issues, commissioning independent research, making submissions on legislative reforms and leading public debate through the media and events on the science-policy nexus.

**State Polices vs Tasmanian Planning Polices**

Tasmania only has three State Policies: these relate to coastal development (*State Coastal Policy 1996*), the protection of agricultural land (*State Policy on the Protection of Agricultural land 2009)* and protection of water quality (*State Policy on Water Quality Management 1997*). The development of a full suite of State Policies stopped in around 2009.

The full definition of Planning Policies should not be overlooked, namely “Tasmanian sustainable development policies”, the longer name incorporates legislative aspects possibly overlooked but are essential when considering the purpose of this instrument.

The development of State Policies is a robust process that delivers a suite of long-term outcomes. It may be slow but a valued outcome is borne of rigor. The conceptual framework that sets the process and milestones to produce an SPP was strongly debated at the time of the early 1990s, those matters and drivers have not disappeared. A significant legislative review of local government administration, parliamentary governance and community input sought robust solutions but it would appear that those lofty goals have been set aside as being too hard. A review of the supporting documents behind the policy initiatives of the 1990s would help inform the current process as to reasoning for the legislative reforms.

The Science Council would prefer to see the development of a full and up to date suite of State Policies, established by the Tasmanian Parliament, as these provide for a whole of Government approach and are more transparent. State Policies create longer term strategic direction across a range of issues, as they are more likely to survive changes in Governments.

By comparison,TPPs are signed off by the Planning Minister and affect Tasmania’s land use planning system only.

Although the Science Council’s preference is for the development of State Policies, we welcome efforts to develop strategic policy direction for land use in Tasmania.

The Science Council would suggest that TPPs be designed for a finite life of, say, ten years to ensure the currency of policy initiatives in response to pressures and advantages of the Tasmanian State.

**Additional topics and issues for TPPs**

The Science Council consider there should be additional topics and issues that the TPPs could cover.

**Monitoring, Evaluation and Reporting**

We note the absence of a State of the Environment Report since 2009. In order to fully inform the government on achievements by the Tasmanian community as a whole in meeting these new TPPs and the existing SPPs, the Science Council advocates the formation of a new Office of Parliamentary Commission for the Environment to implement the requirement (SPPA s29) to produce a State of the Environment Report. It is suggested that Tasmania carefully consider the well-trodden path that New Zealand has taken to develop this role. It is noteworthy that the current (NZ) Commissioner, Mr Simon Upton, was the Minister responsible for the passing of the NZ Resource Management Act, an act that had significant influence on the transformation of land planning and environmental legislation of the early 1990s in Tasmania. The old adage “you can’t manage what you don’t measure” is profound in respect to living within tolerable bounds and to ensure the elements of sustainable development prevail.

We recommend a new Monitoring, Evaluation and Reporting TPP topic be included to drive these considerations under other instruments and authorities. Consistent with other statutory planning in Tasmania, Tasmania’s resource management and planning system should also be evaluated to ensure it is achieving its objectives.

The TPP on Monitoring, Evaluation and Reporting should be linked to State of the Environment Reporting both at the State and National levels.

Under the *State Policies and Projects Act 1993* Tasmania must release a State of Environment Report every five years and the Minister must table it in Parliament. So far, three Tasmanian State of the Environment reports have been prepared: 1997, 2003 and 2009. The SoE reports provide a strategic view to shape policy and action. However, it is noted that it is twelve years since the last SoE was released.

**Environmental Protection TPP could also include new issues:**

* Geodiversity and geoconservation
* Air-quality
* Soil quality – erosion, salinity
* Ground water
* Cumulative environmental impacts
* Land contamination
* Ecological restoration
* Animal Pests and diseases
* Weed management and diseases
* Maintenance of ecological processes and genetic diversity

**Public engagement in planning processes TPP could also include new issues:**

* Transparency, fairness and independence

**Should climate change be integrated into all relevant TPPs?**

The Science Council agrees with the authors of the Scoping Paper that climate change will have impacts on all aspects of our community, economy and environment and that the development of TPPs provides a unique opportunity to properly integrate climate change adaptation and mitigation into Tasmania’s land use planning system.

We consider a specific climate change TPP as well as integrating the issues across all relevant TPPs would be best to ensure reduction of emissions of greenhouse gases and mitigate the impacts of climate change on the Tasmanian community. Although, in accordance with our concerns above, the development of a State Policy on Climate Change would be more appropriate than a Climate Change TPP.

The climate change policy should refer to Tasmania’s legislated greenhouse gas emissions target and detail how the State Planning Provisions and the Regional Land Use Strategies will be practically required to achieve this target.