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Draft Tasmanian Planning Policies consultation

Thank you for the opportunity to comment on the draft Tasmanian Planning Policies (TPPs), their inclusion in the planning laws provide much needed direction to help bring all transport modes onto a more level playing field.

Bicycle Network made a submission to the Scoping Paper and it's pleasing to see that the issues raised in that have been accommodated in the draft TPPs.

The policies are clearly written in plain English and well-structured for easy reference.

Having said that, it would be useful to have some indication of whether particular words being used in the policies have a legal meaning, separate from their ordinary meanings.

I make comments on the policy detail based on the ordinary meaning of such words and am concerned that some elements which I consider essential are being "encouraged" and "promoted" rather than "required".

Settlement and Physical Infrastructure policies

The overall intent of these policies is a much-needed change, requiring more active transport infrastructure in new and retrofitted developments.

The Climate Change statement in the Physical Infrastructure Policy is particularly welcomed:

"The Physical Infrastructure TPP supports the provision of well-planned and well-designed infrastructure that can reduce emissions and take advantage of emerging opportunities in a low emissions future by: better sharing of road space to support increased uptake of more sustainable transport modes."

As is the recognition in the same policy that the provision of cheap, ample car parking prevents the shifts we need to sustainable transport modes like cycling.

While most of the wording in these policies makes it clear that provision of active transport infrastructure is the outcome, a few of the sections aren't so clear.

In these sections I'd like to see a greater requirement for such infrastructure rather than just consideration or encouragement, which is where my suggested wording changes come from. It may be that my suggestions do not fit with current planning language but I'd like to see changes made so it's clear that policies are what must be followed rather than just considered or promoted.

Settlement Policy

Under 1.1 Growth:

 structure plans to consider include "movement networks, including street hierarchy and pedestrian and cycling paths for active transport modes" (1.1.3-6c).

Under 1.6 Design:

- "Encourage Ensure the design and siting of buildings to positively contribute to: ... safe access and egress for pedestrian, cyclists and vehicles." (1.6.3-1f).
- "Promote Ensure subdivision design that considers the existing and future surrounding pattern of development and provides for connection and integration of street networks, pedestrian and bicycle paths and the efficient provision of services." (1.6.3-7).
- "Promote Ensure subdivision design that provides a functional lot layout that: ... provides safe active transport" (1.6.3-8g).

Physical Infrastructure Policy

Under 5.4 Transport Modes:

 "Encourage Ensure public transport corridors are to be supported by current or planned active transport networks and bus stops that are safe, accessible and provide for better passenger amenity." (5.4.3-6)

Conclusion

Overall, the draft planning policies are a welcomed step in the right direction for encouraging the provision of cycling infrastructure.

The devil is of course in the detail. The intent of the draft Tasmanian Planning Policies is to be commended but how they are interpreted for implementation through the State Planning Provisions (SPPs) and Regional Land Use Strategies is still a concern.

I note that technical changes to the SPPs under the current legislative 5-year review will be undertaken with a view to another round of policy changes following the adoption of the Tasmanian Planning Policies. Until that happens it may be useful for councils to keep following the interim planning schemes as they have preferable bike parking requirements to the current SPPs.

Yours sincerely

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