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Consultation on the Draft Tasmanian Planning Policies

We welcome the opportunity to provide our views on the draft Tasmanian Planning Policies (TTPs).

The Tasmanian Forest Products Association (TFPA) is the peak body for forestry that undertakes policy development, lobbying and advocacy for members interests. TFPA represents all elements of the value chain from the sustainable harvesting of plantations and multiple use natural forest resource including forest establishment and management, harvesting, processing of timber resources and manufacture of pulp, paper and bioproducts.

The TFPA is concerned that under the draft TPPs there is little or no reference to forestry or the forestry industry. Even though 1.25 million hectares of land in Tasmania is dedicated to forestry—812,000 hectares of Permanent Timber Production Zone (PTPZ) land on public land and 432,000 hectares of Private Timber Reserves (PTRs) on private land.

The TFPA highlight several important interactions that the forest industry provides to the State, including:

- it makes a significant economic contribution and provides over 5,000 direct and indirect jobs;
- as part of Tasmania's draft Housing Strategy, it was recently announced that 10,000 new affordable homes would be built by 2032; and
- forestry is a crucial part of the state's efforts to meet our carbon emission reduction goals.

The State Planning Provisions (SPP) and the Local Provision Schedule (LPS) for each municipality are included in the Tasmanian Planning Scheme (TPS). Operations on public land are exempt by virtue of section 4 of *Land Use Planning and Approvals Act 1993*, whilst operations on private timber reserves are exempt by virtue of section 11 of this Act.

Despite the exemption, dedicated forestry land is still subject to zoning by local government planners when preparing their LPSs. The zoning of land can influence public perceptions of what is an appropriate use of land. Land designated for forestry but improperly zoned will only lead to confusion and can be used as an argument in favour of transferring the land to other uses.

Recent examples of where local town planners have changed land use re-classification through zoning include Derwent and Huon Valley local government areas. This highlights the limited capacity within some of the 29 councils to interpret and implement the complex state-wide planning system.

A lot of the rural and agricultural land, as well as all the dedicated forestry land, was zoned in the Rural Resource Zone under the old planning schemes. This zone allowed plantation and native forestry when the requirements of the forest practices regulatory system were met.

The Rural Resource Zone has been re-calibrated under the new planning system with the stated goal of improving agricultural land protection. The old Rural Resource Zone appears to be being increasingly rezoned under the current LPS implementation into other zones, such as the Agriculture Zone, the Landscape Conservation Zone, or the Environmental Management Zone, where plantation or native forestry may be discretionary or prohibited.

On the face of it 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. This doesn't seem to be the case with land that could be used for farming or mining.

Like farming and mining, TFPA suggests that similar high-level provisions be included in the TPP to identify and safeguard land that has timber resource value.

We look forward to continuing to participate in the ongoing consultations on the Tasmanian Planning Policies.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nick Steel', with a small dot at the end.

Nick Steel
Chief Executive Officer