

Draft Tasmanian Planning Policies

State Planning Office online presentation transcript

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Presenters:

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Transcript

Good afternoon.

Can I get an indication if you can hear me OK? Just waiting for a few more people to come online. So if you just hang in there for us, please that would be great.

Hello everyone, I think we've got most of our people now online. Let me start by making an introduction. Welcome to this 4th presentation from the State Planning Office. I'm Brian Risby, the Director. This session is about the Tasmanian Planning Policies.

I want to start by acknowledging the traditional owners of the land upon which we're meeting today and to pay our respects to elders past, present and emerging.

Just a few housekeeping matters to start with. The presentation is being recorded and we'll be placing that on the Planning in Tasmania website in the near future. If you have some questions, you can use the chat function for that. We'll keep a record of those. When the presentation is finished, we'll see if we can work our way through questions that you've raised and answer them as best we can. We may need to take some offline and all of these we will make sure we do respond to as soon as we can.

I've just a few words about the planning policy program before I hand over to Nell, who's going to make the presentation today. The Tasmanian Planning Policies are a completely new part of the Tasmanian planning system, so I think it's important I outline a little bit of the background.

The key to this is that for many years, even decades, there's been a call for the State Government to recognize and address its policy interests in the planning system. There's been a lot of calls from different stakeholders, particularly local government, that the government step up and express its interests. That's what this project is all about. So the intention is the TPPs will fill this gap and it will express the State Government's interest into the planning system. That doesn't mean that they are not part of the planning

system. It means they must be aligned to the objectives of their legislation and be consistent with state policies.

Today's presentation is going to be delivered by senior project manager Nell Nettlefold. I'll tell you a little bit about Nell and her background. Nell has been working on this project for quite a long time with us now and has got us to this really important stage. Nell's background is in geography and plant ecology as well as planning and she's got experience in various areas, including healthy rivers and Landcare projects, as well as planning in the local councils, the Commission, consultants and with us in the State Planning Office. I think that's a background that places her very well to work on this key project for us. So, I'll hand over to Nell in a second but please use the chat function to start recording your questions. That's it for me, I'll hand you over to Nell.

Thank you.

Thanks Brian and thank you to everyone for joining us today. I can see that there's a lot of familiar names. Unfortunately, I can't see all your faces, which is a bit odd when you're giving a presentation. Please bear with me and feel free to make comments in the chat room and I'll try to make the presentation as engaging as possible. This is the first time that the SPO has presented in this format and on our own platform. If there are any technical issues being experienced from your end, please let us know through the chat room.

Today's presentation is on the draft Tasmanian Planning Policies or the TPP's that are currently out on a six week consultation period until the 1st of November.

As Brian mentioned, my name is Nell Nettlefold and I'm the senior project manager for the TPP's and I've been working on this project since January this year.

The purpose of today's presentation is to give you a better understanding of the TPPs and, by helping you to understand the TPPs in terms of what they are, how they fit into the planning system and the State Planning Office's approach to get to this point, we're hoping that will provide greater context for you and support your engagement during this consultation period.

To be clear, I will not be going through each specific policy content. If you've had a look at them already you can see for yourselves that there's a lot of ground that they cover. And when considering the information that's contained within the TPPs and in the supporting report, we hope that their intent and purpose are clear. Having said that, and as Brian also mentioned, there will be an opportunity for questions after the presentation.

So, to set the scene for the TPPs, let's just go back and remind ourselves of the basics and why we plan. Put simply, we plan to allocate land for different purposes now and into the future, separating incompatible use of land uses and avoiding land use conflict.

Now this is just to inject a bit of humour into what's a pretty dry topic, so these two images sum up the latter two points (and just to clarify that the top yellow sign is actually not a wombat, as us Tasmanians might be conditioned to think, it's actually a polar bear.) The point being made is that locating a child's playground in a polar bear habitat is probably a good example of incompatible uses.

And as planners, we're only too aware that incompatible land uses can lead to conflict and this can manifest itself in different forms from passive aggressive neighbourly disputes, shown here, to traumatised children (and polar bears) in the Arctic Circle, to disputes being battled out in the tribunal or Supreme Court.

Very broadly speaking, the premise for the TPPs is to provide a common set of planning policies that form the platform for the consideration of how we allocate land for various purposes and in doing so avoid incompatible land use and then reduce the subsequent conflicts and cost that this imposes on the community.

So now we've covered first principles, let's turn our minds to the legislative framework in which the TPP is set. The *Land Use Planning Approvals Act*, or the Act from here on in we'll call it, was amended back in 2018 to provide for the TPP. They set the high level, strategic policy direction for the planning system. The Act states that the TPPs are to set out the aims and principles that are to be achieved or applied through the Tasmanian Planning Scheme and regional land use strategies.

It's very important to understand that they do not apply to individual development applications or DAs.

The TPPs can relate to the sustainable use, development, protection or conservation of land, environmental protection, liveability, health and wellbeing of the community, and any other matter that may be included in a planning scheme or regional land use strategy. So you can see from this list, it's pretty broad, with a broad range of matters that the TPPs can address.

And as Brian mentioned in his introduction, they are required to further the Schedule 1 objectives of the Act and be consistent with State Policies, and those two things are referred to in the Act as the TPP criteria, which the TPPs must satisfy.

So as we've established the TPPs are statutory planning instruments made under the Act that are intended to inform the regional land use strategies and the Tasmanian Planning Scheme.

Currently, our strategic and regulatory planning instruments are informed by three State Policies covering the protection of agricultural land, coastal issues and water quality and supported by broad objectives of the RMPS found in the Schedule 1 objectives of the Act.

The TPPs are intended to provide that more robust policy setting, to inform a more balanced and mature planning system. This common and more thorough set of planning policies will help guide decisions that are made in those strategic and regulatory spheres of the planning system as represented in this slide.

A quick review of the process to get to here.

The scoping consultation was undertaken in October and November of last year and during that time, we received 108 submissions. It was interesting to note from those submissions that there was a significant number of issues raised and similarly a significant number of varying views on how the TPPs should address these issues.

One of these issues was climate change. The majority of submissions thought that climate change policy should be integrated throughout the TPPs and not addressed as a stand-alone topic.

The outcomes of that consultation formed the basis for a report that was published back in April of this year and included a modified structure and a refined list of topics and issues, both of which I'll discuss later. For anyone that's interested that report is still available on our website for further information.

The process then involved an initial drafting phase. That drafting phase was based on the outcomes of the scoping consultation, a review of current policies, planning policies from other jurisdictions, and some technical input from state agencies and state authorities.

A draft suite of TPPs were prepared and underwent targeted consultation with state agencies. This was done through an approach where each agency nominated a representative to act as a TPP liaison to make sure the policy being expressed through the TPPs reflected the interests of the respective state agencies.

The information received through these various processes has informed the draft that is currently undergoing consultation as part of this process.

The outcomes of this scoping consultation resulted in a modified TPP structure. One of these modifications was to include a principles and policy context section for each TPP topic. The purpose being to provide background reason and context for the proceeding policies. This section is non statutory and informative only. It's basis is to help the readers understand the intent of the planning policy being expressed through the subsequent strategies and how it also might inform planning outcomes delivered through the regional land use strategy and the Tasmanian Planning Scheme.

This section also includes a climate change statement that identifies the likely impacts that climate change will have on the particular TPP topic, and how the TPPs will respond.

The policy content of the TPPs are delivered through objectives and strategies. The objective is structured as an aspirational policy outcome or direction in response to a particular land use planning issue. The objective is followed by a number of strategies that specify how the objective is to be achieved.

The policy content is supported by an application section and implementation guidelines. These sections are included to spatially define the application of particular policies and the latter to provide greater clarity on how the policy is intended to be implemented.

There's more information about the structure and the role of the various elements of the TPPs in the supporting report, if you're interested.

The scoping consultation also resulted in a refined list of TPP topics and issues. The drafting of the TPPs has been based on the framework that you can see in this slide. It represents the range of topics and issues that were identified through the consultation as requiring the most attention in the planning system and where there's a need for a consistent policy foundation.

A lot of thought has gone into what I call or refer to as the 'pitching' of the policy content. We've tried to pitch the content in a way that achieves a policy response that is fair, balanced and relative to the nature of the issue that it's seeking to address. In doing so, our approach to the policy development takes into consideration social, economic and environmental interests and weighs up those competing demands.

The TPPs speak in broad land use planning terms and it's really important to understand that they do not provide a policy setting to guide every single outcome that can be expressed through a regional land use strategy or the Tasmanian Planning Scheme.

To illustrate what I mean, I've taken an example of an SPP standard in this case, the requirement for a 4.5 metre front set back for a dwelling in the general residential zone. What I thought we might do is work out the policy setting for that standard and how the policy might be implemented through a regulatory standard in the planning scheme.

If you work through all the TPPs you'll find that for a dwelling in a residential zone, and you're looking at what the setback criteria might be, the relevant strategy is in the Settlement TPP under the 'Design' subheading that states:

“encourage the design and sighting of buildings to positively contribute to:

(a) the site and surrounds;

(b) the well-being of the occupants;

(c) the public realm;

(d) neighbourhood amenity”

....and then there are actually some more, but they're not relevant.

The strategy is providing the policy setting for what the regulatory standards need to consider.

The policy is expressed in a way that allows those considerations to be applied under different circumstances to inform responses under different conditions. For example, the way that a dwelling responds to this strategy and to meet the objective, (which is down in the left hand corner of the slide) which is “creating functional connected and safe urban spaces that positively contribute to the amenity, sense of place and enjoyment experienced by the community”, how this strategy responds in relation to a dwelling is different to how other use and development might respond such as a shop or an office. The point I'm trying to make is, therefore, when we apply the same strategy to different circumstances, we can expect a different response. In this case, the response is likely to deliver a different set back requirement when applied in the context of different zones or different use and development.

To help clarify, the TPPs set up the design requirements for what is to be considered when determining what an appropriate setback for a dwelling in the general residential zone might be. It is not the purpose of the TPPs to prescribe the answer. And I think that's a really important point to make.

From the example provided you can see that the TPPs do speak in rather broad terms. I think it's really important to understand that there's a body of work to be done to get from the TPP policy, to that policy then being implemented either through a standard in the planning scheme (such as the front set back standard), or a spatial or strategic outcome expressed through the regional land use strategy.

The drafting of the policies have been carefully considered so that, where appropriate, they can apply to regulatory and strategic planning instruments and apply broadly to different types of use and development.

I encourage you all to really think about how the TPPs have been drafted and the level of detail that we've tried to express in the strategies. We welcome either general comments about how we've approached that or comments relating to specific strategies and whether you consider that there's too much detail or there's not enough detail or whether the strategies are delivering the stated objectives.

Any comments are welcome.

As Brian also mentioned the TPPs are a brand new planning instrument so naturally there's going to be some anxiety around how they'll be interpreted and how they'll be implemented.

As planners, we're interpreting and implementing policy on a daily basis. Whether it be through applying performance criteria to development applications or assessing a rezoning for compliance with state policies. The ability to unpack complex arguments and weigh up competing demands is a part of our core function when we're providing planning advice to decision makers. We do this within a legal framework and with guidance from what we've learned from past decisions that have been challenged.

Having said that, if you find some strategies that are not expressed as well as they could be or if you find they could be interpreted in multiple ways, please let us know so that we can redraft to improve their clarity and meaning.

Another issue that we are aware of is that because the TPPs are statutory, and typically statutory documents are not written with accessibility in mind, the language that we've used is not as friendly to the non-planner as it could be. While we've tried to draft them as accessible as possible, we've had to prioritise functionality and drafting for statutory planning purposes.

There's also an issue related to repetition or what I call 'perceived repetition'. Some planning responses appear across multiple topics. While we've tried to avoid repetition, we've come to the conclusion that it's necessary in some cases to help us get the desired outcome. Again, the supporting report goes into this issue in greater detail for anyone who's interested. And, if we've got it wrong please let us know how we can clear it up or make it better.

Also, as I've mentioned the Act allows for implementation guidelines where the TPPs may specify the manner in which they are to be implemented into the SPPs, LPS and regional land use strategies. We've

only included one implementation guideline that has been specified at this stage. There was a general view, from the input received so far, that there's sufficient information in the strategies to direct how it is intended to be implemented. And there are also complexities regarding how you implement a strategy in relation to one set of circumstances which might be different to how it is implemented under another. I draw your attention back to the previous comments and examples regarding the front set back.

As discussed in the supporting report, we have some options to help with implementation, but we would appreciate any feedback that you have in relation to implementation and to help us think through how the TPPs will be implemented. In addition, we will be reviewing the TPP's regularly and can address implementation issues when or if they become apparent once they are operational.

The TPP's are also intended to be applied in their entirety with all relevant strategies applying equally. While there's no hierarchy associated with the application of the TPPs, there are differences with how they are expressed. For example, some strategies refer to 'facilitating' or 'promoting' an outcome while others refer to 'avoiding' or 'strengthening' certain outcomes. So while they apply equally, the language used reflects the relative emphasis that is intended to be achieved through the implementation of each strategy.

The Act requires that the SPPs and regional land use strategies are reviewed once the TPPs are made. Noting that the Act only requires that amendments to LPSs need to be consistent with the TPPs.

As we've already established, there's a body of work to be done to get from the TPP policy setting to implementing that policy through the regional land use strategies and Tasmanian Planning Scheme. The process of delivering the TPPs through these instruments will require further consultation and review.

And finally, the Act requires that the TPPs are reviewed every five years and there are also opportunities to amend the TPPs to rectify potential issues as they arise.

Our six week consultation period ends on the 1st of November. That is done under section 12(c)(2) of the Act, which requires that we consult with the Commission, state agencies and planning authorities. With the approval of the Minister, we've broadened that group and welcome submissions from all our stakeholders and all those who are interested in the TPPs.

At the completion of the consultation period, we will review submissions and, depending on the extent and the complexities in resolving them, will seek to have a revised set of draft TPPs to the Tasmanian Planning Commission by early next year for independent review and assessment.

The Act requires that the Commission exhibits the TPPs for 60 days and people can make representations during that exhibition period and the Commission can decide whether or not to hold hearings in relation to those representations. The Commission has 90 days after the end of that exhibition period to prepare a report to the Minister. The Minister can make or refuse to make the TPPs after considering the report provided to him by the Commission.

We're anticipating that the Minister will make the TPPs in the third to fourth quarter of next year. As already mentioned, the making of the TPPs by the Minister triggers a review of the regional land use strategies and the State Planning Provisions.

Some key messages to take away.

The TPPs set the policy direction for the Tasmanian Planning Scheme and the regional land use strategies.

There is still a body of work to be done to implement and deliver the policy intent of the TPP to those instruments and those processes will involve collaboration between the regions, council and state government with further opportunities for consultation. In the case of the SPPs and amendments to LPSs, independent review and assessment by the Tasmanian Planning Commission.

For further information and details, please go to our website, which is up there on the screen. All information regarding the draft TPPs, supporting report, and how to make a submission are all located there.

Finally, I'd just like to say that we really appreciate that there's a lot of information to process as part of this process. I hope that this presentation has helped you to understand the scope of the TPS and will support you in making submissions to help us improve them.

Thanks for tuning in, and we'll now take some questions that have been submitted through the chat room.

As you can see we're playing a tag team here.

Thanks for the questions and comments so far through the chat. It is an opportunity for you to start putting a few more through and we'll try and monitor that as we go.

I'll try and deal with some of those that have come through.

Michael Edrich from LGAT made quite a series of supportive comments about the TPP process and we're very appreciative of those, thanks Michael. I think it does recognize the importance of this particular part of the planning system. Particularly in this growth period. Where you can get away with not having policy in a low growth environment in the state, but now as we're all aware there's increasing population and economic activity, and we do need to have some policies in place for those things.

Michael also made a comment about the importance of reviewing these and keeping them up to date. So I want to assure you that not only have we got a statutory obligation to review the TPPs and that will occur, I think our track record with the five yearly review of the state planning provisions already commencing demonstrates that we'll be doing that. We'll also be very much looking at the way these are implemented because, as Michael pointed out, if you ignore whether they're being delivered and implemented in the right way and just do a review, it's pretty much useless. So, how they're implemented is the critical point to the success of these so that will form a really important part of the review.

There was also a comment that these might be sort of self-executing and used to refuse development in an environment where we need to be supportive of appropriate development.

As Nell pointed out, these are not self-executing policies, they are delivered through other mechanisms and, in a real sense, they are a very positive statement of government intent to deliver the right outcomes as opposed to trying to close down the wrong things. They do do that on occasions, and this goes to a follow up question from Brian White, that talks about them being quite prescriptive and some of them quite prescriptive, and Brian indicated that they are a bit more prescriptive than some of the SPPs.

Now, it's quite a challenge to compare how policies are framed as opposed to planning scheme provisions. But my real response to that is that planning scheme provisions (the SPPs), are a setting out a bunch of ways that you can achieve a certain standard or a certain objective. So by their nature, they are providing an acceptable solution and a performance criteria so they're not prescriptive in a sense. Some bits of the TPPs need to be prescriptive because the point about TPPs is ensuring we get development in the right sort of development in the right locations. Now sometimes that needs to be prescriptive about ensuring we don't go into the wrong locations.

Planning scheme provisions don't need to be like that because the location for the developments already been prescribed through the policy and planning scheme process. So prescription at the development application stage is a different proposition to ensuring development goes to the right locations in the first place. So there will be some prescription in these but they are also very positive statements about what

we want planning to achieve and to set out a positive vision of the way places should progress and develop.

So I hope that answers those questions.

We got a few more questions coming through so let me let me have a look at these.

And there's lots of them.

Ian Moore - is there an opportunity for the consultation period to be extended?

We have an agreement with local councils to wait for the post-election council meetings to be convened and for responses to come through those. We will always look at case by case extensions if there are genuine reasons for those. So please contact us directly if there's a need for an extension.

Sophie Underwood has asked, can you please explain the relationship between the TPPs and the LPSs?

The current LPS are not impacted by the TPPs. The legislation was very clear that the first tranche of LPSs would go through the system without having to have reference to the TPPs. In fact that process all started before the TPPs were even legislated for, so the TPPs are designed to impact on LPSs and regional strategies, etc., from the first LPS being finalised forward.

So any amendments to the LPSs will need to be looked at in terms of the TPPs.

I hope that answers your question Sophie.

Ian - When do you think the implementation guidelines will be created and out for consultation?

No implementation guidelines at this stage are considered, so we'll wait and see what comes from the final versions and the Commission's recommendations, but there won't necessarily be implementation guidelines. I think Nell addressed the issue about the implementation statements being embodied in the policies themselves.

I think that deals with that one.

Sophie has another one. Can you please explain how the review of the SPP process and the creation of the TPPs will work?

Absolutely, it's a good question.

So we've got a number of work programs and streams running in parallel. One of the critical issues is that we start work on various bits and at a certain point we then feed, we connect the stream, so that once the TPPs are finalised towards the end of next year the SPP review process will then check against those TPPs to see what the SPP review process needs to be modified to address what the final TPPs say.

So, while we've started work on the SPP review, there will be a point next year where it stops and it looks at the TPPs and it readjusts the SPP work accordingly.

Will there be a requirement for State Government Department authorities to align their strategic plans and budgets with the TPP or as a minimum consider them?

That's a really good question Indra.

Theoretically, or legally, there's no such requirement and the way we've progressed drafting these, by seeking that state agency input and making sure that we have state agencies expressing their policies through the TPPs, means that there should be some alignment there at least in their aspirations. Now beyond that, it's a bit difficult to get a bit more integration. It's something I've been keen to pursue but technically, because these are driven through the planning scheme and the planning processes, any state agency that needs to go through those processes will need to obviously have consistency with the TPPs. But the alignment at a strategic level we hope occurs through the state agency engagement through the process in the first place.

There is an unnamed guest contributor here?

I have several concerns that I'd like to flag, namely the lack of any provisions that prevent sovereign risk and the erosions of private property rights.

I think the only response I can give to those sort of issues are that these are planning policies delivered through the planning system and planning policy and planning systems don't deal with issues around private property rights in and sovereign risk in those ways.

We may need to have a more detailed discussion with you and if you want to contact us directly about some of those concerns because I'm not quite clear how I can address those.

Mick Purves asked a question here about environmental hazard policies departing from policy, science and mapping developed since the first regional land use strategies. Such a reversion to coastal policy definition in the coastal area where there's no sign of it.

This one, I think you'll forgive me Mick if I take this one offline. I think that's quite a lengthy and complex question. I think we'll have to provide a written response to that one.

Another question to include drought, pests, pestilence, disease, environmental hazards, look at these things, go to the scope of planning as opposed to broad policy matters.

Things like Biosecurity are very difficult matters for planning policies to deal with, and, of course, there's a separate regulatory management regime around those things. So my response to some of these is, the scope of the policies is constrained by the parts of the Act that Nell talked about at the very beginning. We are only delivering these things through certain parts of the planning system. We recognise there are other matters that people may be concerned about but we are constrained by what the policies are limited in doing through the legislation.

Sophie, when will the SPP review findings on public consultation be conducted by the TPC?

Do you mean the TPPs Sophie?

I'll come back to you on that one.

And you said the SPP's I think you might mean the TPPs.

Mick - Is there a reason why the TPPs should not establish a decision framework to deal with issues at inter, intra and sub regional levels, metro areas such as city deals, natural hazards or values management policies?

Well the TPPs can't establish a decision making framework. It comes back again to what the legislation says about the TPPs, what their role is and what the instruments that they are designed to influence. The TPPs can't come up with decision making frameworks, which sit outside of its scope and have to do with other types of processes. I'm not saying we don't and may not need one, we may need those sorts of matters to be considered, but it's not for the TPPs to venture into processes and frameworks of decision making. They are policy statements about government intent into the system.

Sophie's come back as SPP's.

OK, so the question, when will the SPP review findings public consultation be conducted by the TPC? So that'll come at the end of the SPP review process. That's going to be quite a lengthy process even though we've started scoping it. And we will soon be releasing a summary of the submissions to the SPP review and then there'll be a more detailed consultation report coming out.

As I mentioned we're looking at a lengthy set of project work probably around certain bits of the SPPs to conduct some detailed review of those, we'll get to the end of next year when we have to do this sort of comparison of the SPP process against the TPPs. From there, there will be a finalization of the SPPs and any draft changes that are suggested to the SPP then they will go off to the formal process with the Commission. So my best guess at the moment is that you won't see that until the end of next year and into 2024 for a Commission process around the SPPs.

But the process itself is established in the legislation. There's a normal exhibition process and hearings and reporting by the Commission back to the Minister. But that will be quite some time away after we've worked through all the issues and come up with some draft SPP amendments dealing with those and the input of the TPP.

I hope that answers it and any other questions coming through on the chat. Please feel free to contact us directly with follow-ups if they occur to you.

We are conscious that there's a lot of information in the TPP's themselves. The consultation is still open and you've still got a couple of weeks to make a submission to those and we look forward to those.

Thank you all for attending and thank you Nell for the presentation. I think it's always very useful to talk to a stakeholders and as I said, I think this is our fourth presentation this year. We like to keep these things rolling and to keep you informed as best we can so thanks all for your input. We'll be in touch.

Thanks so much.

Bye now.

End of transcript

Information provided post-presentation:

The following question was raised during the online presentation on the Tasmanian Planning Policies held by the SPO. The SPO took the question on notice to seek further clarification and provides a response below.

“Can you please explain why the environmental hazard policies depart from the policy science and mapping developed since the first RLUS were done, such as reversion to the Coastal Policy definition of a coastal area when there is now scientific data to inform application; omission of natural disaster management and response policy frameworks; and the restrictive statements around growth outside metro areas?”

The Environmental Hazards TPP is intended to be based on the most current risk management framework, where elements of that framework relate to land use planning. The TPPs do not reference those documents.

It is anticipated that the Environmental Hazards TPP will instruct outcomes expressed through the Tasmanian Planning Scheme and Regional Land Use Strategies (RLUS) and will be based on, and potentially build on, existing hazard mapping.

Reference to the ‘Coastal zone’ (as defined by the State Coastal Policy 1996) has been adopted when making general reference to land use and development on the coast. The use of an existing definition avoids confusion and duplication. In addition, the TPPs are required to be consistent with State Policies and using the ‘Coastal zone’ to define the application of certain policies helps achieve that consistency.

The TPPs promote settlements (with the exception of rural living settlements) to accommodate a 15 year supply of land for growth based on forecast demand.

The TPPs prioritise growth in settlements that have been identified as higher order settlements through the establishment of regional settlement hierarchies in the RLUS. The TPPs promote growth in locations that make efficient use of existing services and infrastructure and encourages locating people where they have access to employment, health and education. Growth outside metropolitan areas, in smaller settlements, can occur where it is identified through the RLUS and consistent with the TPPs.

The TPPs recognise 'rural living' as a lifestyle choice and acknowledges that it contributes to housing diversity. For reasons outlined above regarding servicing, infrastructure and access to health, education and employment, and the typically dispersed and low density nature of rural living development, the TPPs don't prioritise it as a housing choices to promote.