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State Planning Office
Department of State Growth
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15 May 2026

By email to: haveyoursay@stateplanning.tas.gov.au

Re: Land Use Planning and Approvals Amendment (Miscellaneous Amendments) Bill 2026

To the State Planning Office,

The Australian Institute of Architects (the Institute) welcomes the opportunity to provide feedback on the proposed amendments to the *Land Use Planning and Approvals Act 1993* (LUPAA) through the Land Use Planning and Approvals Amendment (Miscellaneous Amendments) Bill 2026 (the Bill).

The Institute is the peak body for the architectural profession in Australia and represents over 13,000 members nationally, including a significant cohort practising in Tasmania. The Institute is committed to advancing the quality of the built environment for the benefit of all Tasmanians.

This submission builds on the Institute's previous contributions to planning reform in Tasmania, including submissions relating to the Southern Tasmania Regional Land Use Strategy (STRLUS)[1] , the Northern Tasmania Regional Land Use Strategy[2], the Cradle Coast Regional Land Use Strategy[3], and broader housing and planning system reforms.

1. OVERALL POSITION

The Institute broadly supports the intent of the Bill to improve the clarity, consistency, and efficiency of Tasmania's planning system.

In particular, the Institute acknowledges the value of:

- clarifying administrative processes within the Tasmanian Planning Scheme
- improving alignment between State Planning Provisions (SPPs), regional strategies, and Local Provisions Schedules (LPSs)

[1] Refer to the Institute's previous submissions relating to the STRLUS here: https://www.architecture.com.au/wp-content/uploads/20241218-AustInstArchsubmission_STRLUS-FINAL.pdf and here: https://www.architecture.com.au/wp-content/uploads/20260227-AustInstArchsubmission_STRLUS-FINAL.pdf
[2] https://www.architecture.com.au/wp-content/uploads/20260213-AustInstArchsubmission_NTRLUS-FINAL.pdf
[3] https://www.architecture.com.au/wp-content/uploads/20260428-AustInstArchsubmission_CCRLUS-FINAL.pdf

- reducing ambiguity in development assessment timeframes and procedures

However, the Institute notes that the Bill is largely procedural in nature and does not address the critical need to embed design quality and place-based outcomes within the statutory planning framework.

The Institute therefore considers the Bill to represent a positive, but incomplete, step in the ongoing evolution of Tasmania's planning system.

2. SUPPORT FOR IMPROVED SYSTEM CLARITY AND ALIGNMENT

The Institute has consistently advocated for a planning system that is clear, coordinated, and accessible to practitioners, decision-makers, and the community.

The proposed amendments to streamline and clarify processes relating to:

- the amendment of Local Provisions Schedules
- the integration of regional land use strategies
- the operation of development assessment timeframes

are supported.

Greater alignment between planning instruments is particularly important in the Tasmanian context, where inconsistencies between strategic documents and statutory controls have historically resulted in inefficiencies, delays, and uncertainty for both applicants and authorities.

These reforms are expected to improve confidence in the system and assist architects in providing clearer and more reliable advice to clients.

3. EFFICIENCY AND TIMELINESS IN DEVELOPMENT ASSESSMENT

The Institute supports measures that improve the efficiency and predictability of development assessment processes, including clearer provisions relating to information requests and the management of statutory timeframes.

A more transparent and consistent approach to "clock stopping" and requests for further information will assist in reducing unnecessary delays and disputes.

However, the Institute emphasises that efficiency must be balanced with the need to maintain robust and considered assessment processes. Streamlining administrative procedures should not result in diminished scrutiny of proposals, particularly where design quality, urban context, and long-term place outcomes are concerned.

4. GOVERNANCE AND INTERIM AMENDMENTS TO STATE PLANNING PROVISIONS

The Bill proposes to broaden the capacity for interim amendments to the State Planning Provisions.

While the Institute recognises the need for the planning system to respond in a timely manner to emerging issues, it is important that such powers are exercised within a framework that ensures transparency, accountability, and appropriate expert input.

The Institute recommends that:

- clear criteria be established to guide when interim amendments are appropriate
- processes include appropriate levels of consultation and public transparency
- mechanisms are considered to incorporate design expertise, particularly where amendments may materially affect built form outcomes

Maintaining confidence in the planning system requires that expediency does not come at the expense of good governance.

5. DESIGN QUALITY AND PLACE OUTCOMES

The Institute notes that the Bill does not introduce any measures to strengthen the consideration of design quality within the planning system.

This represents a significant gap.

The Institute has consistently advocated for planning reform in Tasmania to:

- elevate the importance of design quality
- support well-designed medium and higher-density housing
- promote place-based outcomes that respond to local context and community needs

While improvements to administrative efficiency are welcome, they do not in themselves lead to better built environment outcomes.

The Institute encourages the Tasmanian Government to consider complementary reforms that embed design quality more explicitly within planning controls and assessment processes.

6. HOUSING SUPPLY AND SYSTEM PERFORMANCE

The Institute acknowledges that the Bill forms part of a broader program of reforms aimed at improving housing supply and system responsiveness.

Reducing unnecessary barriers within the planning system can contribute positively to housing delivery. However, the Institute reiterates that the provision of housing must be accompanied by a strong focus on:

- design quality and liveability
- amenity
- sustainability
- integration with infrastructure and services

A planning system that prioritises speed without these considerations risks delivering outcomes that do not meet the long-term needs of the Tasmanian community.

7. RENEWABLE ENERGY AND INFRASTRUCTURE

The Institute supports measures that facilitate the delivery of renewable energy infrastructure, including amendments that clarify that certain long-term leases are not to be treated as subdivision.

These changes are consistent with broader objectives to support climate transition and reduce unnecessary regulatory barriers to essential infrastructure.

8. RECOMMENDATIONS

The Institute recommends that the Tasmanian Government:

1. **Proceed with the proposed amendments** to improve clarity, consistency, and efficiency within the planning system.
2. **Ensure appropriate safeguards** accompany expanded powers for interim amendments to State Planning Provisions, including:
    - clear criteria for use
    - transparency and consultation requirements
3. **Integrate design quality considerations** into future stages of planning reform, including:
    - stronger statutory recognition of design outcomes
    - mechanisms for design review where appropriate
4. **Maintain a balanced approach** to planning reform that aligns efficiency with long-term place quality, liveability, and sustainability outcomes.

9. CONCLUSION

The Institute supports the intent of the Bill as a constructive step toward improving the operation of Tasmania's planning system.

However, the Institute emphasises that administrative reform alone is insufficient to achieve the high-quality built environment outcomes that Tasmanians expect and deserve.

Future reform efforts should build on this foundation by embedding design quality, place-based thinking, and good governance at the core of the planning system.

For further information, please don't hesitate to contact us.

Kind regards,

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The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with over 13,000 members across Australia and overseas. The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design. To learn more about the Institute, log on to www.architecture.com.au.