

From: Peter Coney [REDACTED]

Sent: Wednesday, 3 February 2021 5:24 PM

To: Have Your Say <HaveYourSay@justice.tas.gov.au>

Subject: Regarding licensing for No Permit Required Certificates

Thank you for the opportunity to provide feedback on this issue.

It has been a recurring matter for planning authorities and the industry that where certain developments do not require a planning permit, some planning authorities have still required applications for planning permits to then assess and determine themselves (for a fee), that the work does not require a planning permit. This is contrary to the point of the NPR status, and contrary to the legislation in those planning authorities requiring an application for development which a planning scheme does not require an application for. Notwithstanding this, it seems industry have required these 'proofs' of not requiring a planning permit, and so there is inconsistency on how to provide these proofs, and what weight they are given. To that end, though it is certainly not "red tape reduction", it is welcome to have a pathway which offers some consistency.

What I am concerned with is the elevation of status to which the Planning Institute of Australia is being given by the assertion that they will offer the benchmark for who may be accredited or licensed. I have never been a member of the Planning Institute of Australia, I do not want to be a member of the Planning Institute of Australia. I have been a statutory planner for near seven years, I am yet to see a person with or without PIA membership status perform better, or worse or with more or less decency, than another. Planning in this state is bound by the objectives of the RMPS and law, not PIA policy, conferences, logos or stale cucumber sandwiches.

For the most part PIA offer nothing but 'points' to their members for their own aggrandisement, and the exaction of fees. I am equally concerned this will be a lead in to Private Planners (PIA accredited) being able to issue Permitted Permits (s58) and one day Discretionary assessments (for issue of permit by the

planning authority). these will be lapped up by resource stretched Planning authorities.

I know for a fact these reforms have been drafted by people with a financial interest in becoming a quasi planning authority. I expect too that consultation with the PIA will no doubt return positive feedback, as well as consultation with UTas. For the most part not many ordinary people will care (until they need a planner), but I suggest there is a simpler way to make it fair to more people without this elevation of PIA as a "Licensing body". for decisions under law. I put it to you also that the cost to industry for these certificates would be a lot cheaper if a licensed planner did not have to be a member of PIA (annual cost for no material gain).

I would ask that the weight of the decision making for who has the competence to determine whether a development is No Permit Requirement is not deferred to the Planning Institute (by virtue of their accreditation of the course they are involved) solely, but includes at the very least, some discretion by the licensing board where relevant experience and education may still allow for a person to be licensed, albeit not a member of PIA and not currently a PIA accredited course. The alternative (as you propose) is a monopoly by a non government body with no material ability to determine wrongful action by their members which amounts to thuggery.

Of note, a Graduate Diploma formally PIA accredited (when I graduated) now is not PIA accredited. Teh threshold has become a Masters degree in order to make accreditation. Under the proposal my option should I wish to be a private planner would be to join PIA or go back to Uni to do a job I have done successfully for 7 years. The only benefiter of this would be to UTas and PIA. This would be for no material gain, except for the benefit of the Planning Institute in increasing their membership and UTas in their student numbers. I do not see that the public would receive any benefit, because presently Planners at Councils who are not PIA accredited are determining NPRs daily with no ill effect.

Sincerely Peter Coney
Town Planner

Appendix I.

Draft Concept for amendment to Assessable Items Determination

Certificate Type	Given by	Qualifications	Specialty Area
Planning Assessment – No Planning Approval Required	Private Planning Consultant	<ol style="list-style-type: none">1. Membership with the Planning Institute of Australia; or2. Completion of a degree recognised as an Accredited Course by the Planning Institute of Australia. Professional Indemnity Insurance	Land Use Planning matters.