

27 September 2018

Hon. Roger Jaensch MP
Minister for Human Services,
Minister for Housing,
Minister for Planning
Suite 4C, Level 3,
33 Salamanca Place
HOBART, Tas, 7000

Attention: Mr Jaensch

Dear Minister,

RE: Draft Land Use Planning and Approvals (Miscellaneous Amendments) Bill 2018

Cement Concrete & Aggregates Australia (CCAA) is the peak body representing the heavy construction materials industry in Australia. Our members operate cement manufacturing and distribution facilities, concrete batching plants, hard rock quarries and sand and gravel extraction operations throughout the nation.

CCAA has consistently engaged with the Hodgman Liberal Government to provide our member's view point on the planning reform process. We thank you for the opportunity to comment on the proposed changes to the *Land Use Planning and Approvals Act 1993* (LUPAA) intended to expediate the planning reform process.

1. Streamlining the draft LPS approval process

(a) Considering the LPS criteria

CCAA was fully engaged in drafting the Tasmanian Planning Scheme and our members are keen for the scheme to be declared in a timely manner. We understand the need for the Tasmanian Planning Commission to apply a pragmatic approach to the assessment of the local provision schedules (LPS) otherwise the approval process is likely to stall.

CCAA **supports** the application of more flexible test criteria to enable the TPC to determine if the draft LPS is consistent with the relevant regional land use strategy or local council strategic plan.

(b) Issuing a 'LPS criteria outstanding issues notice'

Giving the Commission Assessment Panel the opportunity to issue an 'outstanding issues notice' and proceed to public consultation enables the process of providing additional information and receiving public representations to occur concurrently. This change will enable the outstanding issues and the content of representations to be considered at the same time and seems a practical way to streamline the process.

CCAA **supports** the introduction of a '*LPS criteria outstanding issues notice*' to streamline the process of assessment of the draft LPSs against the criteria.

(c) Removing an administrative step in the draft LPS exhibition process

CCAA agree that interrupting the process to seek approval of the Minister before proceeding to exhibit the draft LPS seems an unnecessary step. CCAA **supports** the removal of this requirement.

2. Aligning the SPPs with other planning reforms

It is important that any changes to the State Planning Provisions (SPP) and any Planning Directives are subjected to a comprehensive public exhibition and hearing process. Through this process CCAA was able to effect significant changes to the draft SPPs which will be of great benefit to the state. A range of views are best able to determine if a change will be in the public interest.

CCAA **supports** the change to ensure there is no duplication in the assessment process as long as all changes through planning directive and revisions to the SPPs are subjected to public scrutiny.

3. Notice to 'relevant agencies'


It is possible that amendments to the planning scheme can have unintended consequences when considering assets, infrastructure and resources with regional and state significance. These consequences are not always apparent to the planning authority.

CCAA **supports** the change to LUPAA to require a planning authority to notify 'relevant agencies' of a draft amendment to the planning scheme. To be effective this initiative will need to be supported by dedicated resourcing within the relevant agencies.

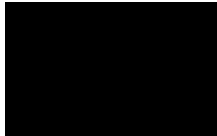
CCAA strongly encourage the Department of State Growth to be determined a relevant agency and that relevant officers within State Growth are equipped to consider potential impact on significant construction materials resources and deposits. Any amendments with such implications should be directed to Mineral Resources Tasmania for consideration.

4. Changes to the Tasmanian Planning Commission Act 1997 (TPCA)

CCAA **supports** changes to the TPCA to allow minor errors and omissions to a decision document made by the commission to be corrected prior to the decision coming into effect.

To discuss these matters further, please contact Mr Barry Williams (CCAA Industry and Policy Relations Manager, Tasmania) on mobile 

Yours sincerely



Brian Hauser
State Director, Victoria and Tasmania