

8 April 2024

Mr Roger Howlett
Delegate (Chair)
Tasmanian Planning Commission
GPO Box 1619
HOBART TAS 7001

By email: tpc@planning.tas.gov.au

Dear Mr Howlett

PLANNING SCHEME AMENDMENT (AP-DEV-AM2022.02) - 1, 5 FRIEND STREET & 88, 90-102 STONY RISE ROAD, STONY RISE

As you are aware, we act on behalf of Goodstone, Mr David Yaxley and Ms Yvonne Rundle (Chianina Investments Pty Ltd)

We refer to Mr Morris and Mr Holbrook's correspondence of 22 March 2024 and the Commission's subsequent correspondence of 4 April 2023.

Mr Morris and Mr Holbrook have requested that the parties be afforded the opportunity to address the amended *Cradle Coast Regional Land Use Strategy 2010-2030* (**Strategy**) by way of expert evidence.

The request put to the Commission is very broad in nature. As identified in Mr Morris and Mr Holbrook's correspondence, the Strategy has merely been amended, it has not been entirely redrafted. It is also noted that the Strategy is a lengthy document, and it is not immediately clear what the extent of the amendments to the Strategy entail.

In our submission, before the Commission makes a determination on whether to allow additional evidence to be prepared in relation to the amended Strategy the request ought to be narrowed by Tipalea Partners by:

- (a) identifying the part/s of the Strategy that have been amended that it considers need to be addressed by way on additional evidence; and
- (b) specifying the nature of the evidence that is proposed to be prepared if the Commission allows additional evidence to be filed.

In our view, this will dictate whether the preparation and consideration of additional evidence is procedurally fair to all parties.

For example, if the request as currently framed is granted, it could result in extensive additional evidence to be prepared that addresses matters contained in the Strategy that remain the same as the previous version of the Strategy. Further, it may be used as a backdoor approach to adducing evidence.

The parties have been provided ample opportunities to present its case, and in our submission it has not been adequately demonstrated by Tipalea Partners why this is warranted in the circumstances.

If the further material is not provided we oppose the request.

Yours faithfully



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