



RECEIVED

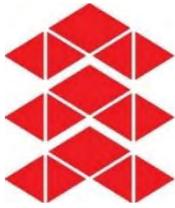
17 Sep 2018

DPTI

Submission

South Australian  
Draft State Planning Policies

17 September 2018



Australian Institute of Building Surveyors  
Ground floor  
15 Bridge Street  
Pymble NSW 2073  
P: 1300 312 427  
[www.aibs.com.au](http://www.aibs.com.au)

### **Our Mission**

AIBS is committed to ensuring a safer Australia through continuous improvement and development of the profession of Building Surveying. The overarching objective of the Institute can be best summarised as follows:

*To achieve the highest standard of professionalism through Professional Development, such as education pathways and training, and Advocacy in representing the profession and establishing standards.*

### **Who we are**

The Australian Institute of Building Surveyors (AIBS) is recognised nationally and internationally as the peak professional body representing building surveying practitioners in Australia.

### **Australian Institute of Building Surveyors – Submission Principal Contacts**

Mr Brett Mace  
Chief Executive Officer  
+61 2 [REDACTED]

Mr Jeremy Turner  
National Technical Manager  
+61 [REDACTED]

## Introduction

This submission has been prepared following release of the draft State Planning Policies as released by the Department of Planning, Transport and Infrastructure for comment by COB 21 September 2018.

Content has been provided by the AIBS South Australian Chapter Committee and the final submission coordinated by the National Technical Manager.

## Overview

AIBS supports the direction and future-conscious intent of the SPPs, noting the potential for parallel regulation. In the drafting and implementation of the new SPPs strong consideration must be given to existing standards within the ambit of the building rules and more specifically the Building Code of Australia (the BCA) to mitigate potential conflict.

### **SPP3 – ADAPTIVE REUSE – “*The adaptive reuse of existing buildings accommodates new and diverse uses.*”**

The upgrading and reuse of existing buildings has been, and will be, an ongoing challenge for the industry and particularly for Building Surveyors. Measures to mitigate the costs of adaptive re-use of existing buildings have been introduced such as the *ABCB Handbook – Upgrading Existing Buildings*, published in 2016; and *Minister’s Specification SA – Upgrading health and safety in existing buildings*, published in August 2017.

Part of the intent of the *Minister’s Specification* is to address anomalies in the interpretation of the legislation which prescribes triggers for the upgrade of parts, elements or systems in an existing building. It is therefore critically important that the introduction of SPP3 does not further convolute the interpretation and workability of the requirements.

AIBS urges consideration to existing benchmarking established within the Building Code of Australia and the greater building rules. The building rules pertain to the health, safety and amenity of buildings, and therefore these are already critical considerations in the upgrading of existing buildings. There should not be any technical requirements developed outside of the intergovernmental agreement so that all provisions related to the upgrade of existing buildings should be incorporated into the NCC BCA.

### **SPP5 – CLIMATE CHANGE – “*Our greenhouse gas emissions are reduced and development that is climate-ready is promoted so that our economy, communities and environment will be more resilient to climate change impacts.*”**

It is acknowledged and also supported that the SPP extends beyond the design of the building itself and to consider the planning of components both in the curtilage of the allotment itself, and beyond to greater Adelaide. It is however important to reiterate the existing provisions within the ambit of the building rules with regard to a building’s efficient use of energy and water.

Currently, provisions exist under the building rules for benchmarking the energy efficiency and water usage performance of buildings under both Volume One and Volume Two of the BCA. The componentry to a building’s performance examined under the building rules includes the efficiency of energy usage, building fabric, external glazing, building sealing, air movement, services and more. The BCA also incorporates components specific to water efficiency and water usage.

SPP5 appears to foreshadow new regulation and construction requirements in this area; all technical requirements should be developed and introduced in accordance with the intergovernmental agreement so that these are incorporated into the NCC BCA. To the extent that any requirement is introduced impacting planning considerations, these should be entirely consistent with the requirements in the NCC BCA.

**SPP13 – COASTAL ENVIRONMENT – *“Protect and enhance the coastal environment and ensure that development is not affected by coastal hazards.”***

The AIBS supports the design of buildings to be conscious of any natural environment and to accommodate potential coastal hazards. Provisions exist with regard to protection against corrosion in proximity to breaking surf coastal environments and flood prone areas, whilst ensuring that the development is structurally adequate to compensate for any other reasonably foreseeable coastal hazards.

SPP13 appears to indicate the potential for new regulation and construction requirements in this area; all new technical requirements should be developed and introduced in accordance with the intergovernmental agreement so that requirements are introduced via the NCA BCA. All planning controls should be consistent with any technical requirements.

**SPP15 – NATURAL HAZARDS – *“Communities and developments are protected from the adverse impacts of natural hazards.”***

The Building Code of Australia references numerous construction standards with the intent of mitigation of impairment of structures, and their occupants, from effects of a range of risks. This ranges from high wind events, flooding, snow and ice, to earthquakes, bushfires and other natural disasters which threaten the wellbeing of people and their assets.

SPP15 appears to indicate that additional objectives are to be implemented within the State Planning Policies with regard to these existing requirements. Any additions must be drafted in consultation with due consideration to the existing requirements under the building rules for building works within areas prone to natural hazards and disasters.

Conclusively, any SPPs which directly or indirectly impart change to requirements in these areas should be developed in concert with the existing building rules.

**In Closing**

AIBS welcomes and embraces any opportunity to continue to work closely with the Department of Planning, Transport and Infrastructure to ensure that the introduction of the State Planning Policies are an appropriate reflection of current industry needs and a future-conscious and pragmatic solution to the challenges that development in South Australia is faced with.