

17 October 2018

RECEIVED
17 Oct 2018
DPTI

Planning Reform Team

via email: DPTI.PlanningEngagement@sa.gov.au

Dear Planning Reform Team

ACCREDITED PROFESSIONALS– RESILIENT EAST FEEDBACK

The Resilient East Project Steering Committee (the Committee) has been made aware of changes to the way planning decisions are proposed to be administered under the Planning Reforms proposals and wishes to have its comments considered as part of the Accredited Professionals Scheme (draft – August 2018).

The Resilient East Project is a partnership between the Campbelltown City Council, the Cities of Adelaide, Burnside, Norwood Payneham & St Peters, Prospect, Tea Tree Gully, Unley and the Town of Walkerville and the South Australian Government. This submission follows initial feedback provided on the *Blueprint for SA's Planning and Design Code Introductory Paper* and *South Australia's Planning and Design Code – How Will it Work? Technical Discussion Paper, draft State Planning Policies, Assessment Pathways and Performance Indicators Discussion Papers*.

This input does not reflect formal Council consideration by any of the constituent Councils, which is being made formally by individual Councils.

The Committee has a significant interest in the ways in which policy gets developed and planning and building assessment gets undertaken in South Australia, due to these being key processes of influence in delivering on the State Government's commitment to climate change, biodiversity, coastal protection, energy management, water security and natural hazard management.

The purpose of the Committee's feedback is to ensure planning and building assessment decision making processes align with the key priority actions outlined in the various South Australian Climate Change Adaptation Plans, including the Resilient East Regional Climate Change Adaptation Plan. These priority actions of relevance for the Eastern Region as defined in the Resilient East Climate Change Adaptation Plan include:

- Increase planting across urban areas.
- Increase the area of open space in strategic locations.
- Improve stormwater management to maximise amenity and water reuse.
- Make asset management plans climate ready.
- Prevent development in hazard prone areas.
- Prepare and implement climate ready guidelines for public realm, green infrastructure and urban design.

To support our increased focus and attention on climate adaptation, sustainability outcomes and biodiversity outcomes, the skill sets of those creating and administering planning policies need to include basic environment and sustainability training modules with annual updates that are specific to environment and sustainability and are mandatory, covering topics such as:



- Annual climate change projections update including changes in sea level rise.
- South Australia's Climate Adaptation framework and regional climate adaptation plans.
- How Water Sensitive Urban Design can increase canopy cover, reduce urban cooling.
- What is urban heat?
- What is sustainability?
- What is biodiversity?
- How to keep riparian ecosystems functioning.
- What makes successful urban biodiversity, - habitat, food plants, shelter and nesting.
- How nature corridors work.

It is pleasing to note, at the Assessment Manager level, that “*planning for climate change mitigation and adaptation and the assessment of natural resources*” and the “*assessment of impacts and effects of policy and development actions*” (including environmental considerations) are included within the list of technical skills. It is noted that with a need to demonstrate only three of a possible 14 technical skills, this could result in decisions makers at the highest level who do not have this skillset, incorporating environmental considerations, to draw upon. This could be addressed by ensuring relevant and ongoing environmental training and awareness raising is offered through the proposed Continuing Professional Development (CPD) topics.

The proposed accreditation of Assessment Panel Members to either fulfil three of the technical skills listed for Assessment Manager or a qualification in a planning related field (which includes environmental management) is also supported. Again, this enables optional demonstration of skill sets, therefore it is hoped that when Councils and SCAP recruit for positions on their panels, they do so with a view to forming a balanced Panel of individuals who collectively bring experience in their professional backgrounds and qualifications. This is particularly important in the lesser represented fields of environmental and social planning.

It is important that in State Government, local government and the private sector (where enabled), those responsible for drafting and applying policy and development assessment professionals are comprised of suitably qualified and experienced persons with a broad range of skill sets, including environmental management. This applies to Assessment Panels, policy makers, Development Assessment planners and building professionals. It is noted in the draft scheme the accreditation does not extend to Policy Planners or to State Commission Assessment Panel which is a shortcoming of the scope of the accreditation scheme. There is also a need that where advice is sought from and referral services such as the CFS Development Assessment Service (relating to both fire risk and native vegetation clearance) that there are adequate skill sets in relation to the advice provided and the impacts of that advice.

The draft scheme enables private entities to undertake decision making in a wider capacity than currently exists. It is noted that it is the intention for the Planning and Design Code to include new requirements for Deemed to Satisfy and performance outcomes assessment criteria requiring Water Sensitive Urban Design (WSUD) and Green Infrastructure (GI), which is strongly supported. It is not clear if this will apply to all forms of development, however it is expected that this will become a new area of planning assessment, emphasising the need for this to be enhanced in the qualifications, experience and CPD requirements of accredited professionals.

The ability for privately accredited professionals to exercise judgement-based, discretionary powers on multiple planning considerations, on the basis of paid engagement by an applicant is not supported. If this to be contemplated as part of a future, then there should be careful testing and evolution of the Accredited Professionals. In the meantime, decision making for private assessment should only be introduced for measurable Deemed to Satisfy criteria and in the case of new WSUD

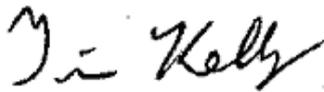
and GI measures, following training of all practitioners in the application and interpretation of these new assessment tools.

Introducing GI and WSUD into Deemed to Satisfy and Performance Outcomes pathways, will mean those administering these new provisions will need to be skilled in the technical evaluation of these matters. The training and development accompanying the introduction of these into the Planning and Design Code should ensure widespread understanding and technical competency across the planning and development sector, to all practitioners involved in submitting and evaluating development applications, not just those who hold professional accreditation.

If you wish to further discuss the comments contained in this submission, please contact me and I would be happy to arrange a meeting with representatives of our Committee.

The Committee seeks acknowledgement of this submission and feedback as to how these comments have been considered in the drafting of the scheme.

Yours sincerely



Tim Kelly
Resilient East Project Coordinator (Mon-Thurs)
City of Unley
m [REDACTED]
Email: [REDACTED]