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RECEIVED

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DPTI

Sally Smith
General Manager, Planning and Development
Department for Planning Transport and Infrastructure

17th October 2018

RE: ACCREDITED PROFESSIONALS DISCUSSION PAPER

Dear Sally,

Thank you for providing the UDIA (SA) with the opportunity to comment on the Accredited Professionals discussion paper as part of the current planning reforms consultation process. The UDIA is a member-based organisation representing the urban development sector. Our members include developers, planners, surveyors, architects and many other representatives across the South Australian property industry.

Our members have very real understanding of urban development and appreciate the positive effect that having an accredited professionals' scheme could have on the efficiency of the system, provided it is implemented correctly.

The UDIA provided a submission in May 2018 on an early draft of the Accredited Professionals scheme ('the scheme'). Since then we have participated in industry workshops and held meetings with DPTI representatives to address specific and general points of clarification on the proposed scheme. We have been pleased to learn that some elements have been taken into consideration, while some doubt remains as to others. This submission will touch on those points we understand will be altered to reaffirm our views and then we will address any major concerns that the UDIA has with the scheme.

Timeframe to get accredited

The UDIA understands from a meeting with DPTI that while the timeframe of one year has not been extended in the regulations, in practice it is unlikely that this will be enforced strictly given the staged rollout process of transitioning to the Planning, Development & Infrastructure Act ('PDI'). The UDIA believes that at a minimum, professionals should be given two to three years to obtain accreditation so as to avoid unnecessary pressure and cost to the industry.

Accreditation levels

As stated in several meetings and in our earlier submission, the UDIA does not believe that an Assessment Panel Member only needs two years' experience. We believe that two years full-time experience as a planner or similarly qualified person does not constitute sufficient experience to sit on these panels. Individuals simply have not had enough time or exposure to development assessment to have an acceptable working understanding of the development assessment system or the complex intricacies of a development proposal.

Similarly, we believe that a Level 4 Land Division Accredited Professionals must require at least three years minimum experience with a greater emphasis placed upon "relevant experience considered appropriate". In stark contrast to the statement that there was "overwhelming support for removing Level 4" within the 'What we have heard report', we completely support its inclusion, and insist this level include the opportunity for licensed land surveyors with relevant experience to have the opportunity to become land division accredited professionals. The inclusion should be based on statistical evidence and not on any desire for authorities to retain control merely for the sake of it.

Accreditation process

The UDIA questions the need for accreditation renewal on an annual basis as this is an unnecessary layer of red tape and added costs to the sector. We suggest this be extended to at least three years to increase efficiency. Provided that the accrediting authority has appropriately determined the practitioner's competency, it is unlikely that this will need reviewing within 12 months, as they are most likely still going to be deemed competent.

If an accredited professional wanted to upgrade to a higher level, there should be a mechanism to re-apply as frequently as possible, however making renewal mandatory on an annual basis is totally unnecessary.

Delegation

The delegation of the accrediting authority's (DPTI) functions to another body is understandable, however the process surrounding this and how the delegation is made and to whom it is made will need to be transparent to ensure any delegation is fair and appropriate.

Further, we understand that some organisations have already engaged with the government to have this power delegated to them. The requirements of any organisation to be able to deliver an accrediting process and mechanism are quite involved, as such we remain concerned that there are only a few bodies with the capacity to actually do so. Given this, we are seeking further clarification on how the government will encourage or enable other bodies to become accrediting authorities, or at a minimum participate in providing

professional development that satisfies the DPTI accreditation requirements so there is greater choice in the market for accrediting authorities.

Review process

While the UDIA understands and agrees that SACAT is the appropriate body to review a decision relating to the accreditation of an applicant, there is not enough detail provided on what criteria will be used to assess the decision-making process. Without enough detail surrounding the benchmark for why someone is not granted accreditation, and what a review will entail, this gives any accrediting significant power to make a decision and not be able to be challenged.

We appreciate the involvement of the development sector in the consultation and look forward to further engagement on these matters.

Yours sincerely,

Pat Gerace
CHIEF EXECUTIVE