

Department of Planning
Transport & Infrastructure
Planning Reforms Team
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To DPTI - Planning Reforms Team

The Coorong Council wishes to take the opportunity to provide our response in relation to the Accredited Professional Scheme - Draft Regulations, which is in addition to the comments previously provided on 27 March 2018 (discussion paper).

The Regulations have assigned 4 different levels of accreditation required for professionals to undertake planning assessment. The Assessment Manager Level 1 accreditation is misleading and confusing. Following the *Assessment Pathways and Performance Indicators Consultation Workshop* run by DPTI, it was indicated that there can be more than one Assessment Manager (so long as the required accreditation can be met) and it is possible to split the responsibilities of the Assessment Manager to other Assessment Managers. Based on the information released to date it remains unclear as to whether other experienced and suitably qualified planners can be assessment managers without having to be appointed as the as the overseer of the Panel or act as an authority in their own right. It would seem more appropriate to have Level 1 - Assessment Manager and Level 1 - Accredited Professional. They would have the same experience, only the Assessment Manager has been appointed by the CEO of the Council to oversee the Panel and be the relevant authority. This distinction will also assist the community in understanding the difference between the roles and responsibilities. DPTI need to issue more information to planners to clearly explaining how the Assessment Manager role will work and provide examples to assist in understanding.

It is disappointing to see that where a development application requires public notification, these applications would be required to be assessed by the Commission or Panels. The levels of assessment allowed to be undertaken by Level 1, 3 and 4 planning officers has been significantly reduced when compared to the current system. While the intent is to create transparency, it is placing greater reliance on Panels. The system is supposed to streamline the application process and have more applications meet the deemed to satisfy criteria. From reviewing the information provided to date, there will be an increase in the number of applications that will be or have elements requiring performance assessed and public notification. More applications will require public notification and more applicants will have to wait for Panels meetings to be held for a decision to be made on their applications; this appears to be counterproductive to the intent of the new system.

The increased number of applications required to be assessed by Panels will result in rural Council's having to hold more meetings and find more funds to pay the members. It is challenging enough to find suitable personal to sit on the CAP let alone finding professionals

whom meet the new criteria. DPTI should as part of the e-portal have a page available to Council's where those interested in sitting on Panels place their names and how far they are willing to travel to assist Council's in finding suitability qualified professionals.

Further considerations needs to be given in relation to appeals lodged. When an applicant lodges an appeal it should not be against the person's name who is appointed as the Assessment Manager, rather is should be the title of Assessment Manager (Council Name) v's (applicants name).

The continuing professional development raises concerns that a lot of the training will continue to be based in Adelaide. It is pivotal that allowances be made for rural councils. It is also important that the ongoing training costs are not increased. AIBS has reduced its training within each state and the costs to attend their seminars has increased significantly. There should be controls in place to monitor the training that is being offered and the costs associated. It is not fair to force professionals to do mandatory training when limited courses are provided and the costs are excessive.

The audits remain unclear as to what aspects are proposed to be considered when accredited professionals are audited every 5 years. The requirement of accredited professionals having to arrange the audit seems odd. The e-portal is meant to collate all our professional development points and state what level each planner is on, surely the auditing process can be linked to the e-portal and arrange audits, rather than placing this requirement to the accredited professional.

We are looking forward to seeing a response to the questions and comments we have raised.

Kind regards

A handwritten signature in black ink, appearing to read 'K Schilling', written in a cursive style.

Kylie Schilling
Coordinator - Development