12 October 2018

Attention: Rhiannon Hardy, Project Lead, Assessment Pathways
Department of Planning, Transport and Infrastructure
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Submission re: New Assessment System and Assessment Pathways Discussion Paper

Having read the documentation at www.saplaningportal.sa.gov.au about the new assessment system, I make the following submissions.

In a nutshell the new assessment system spells disaster for residents who want to have a say about development happening in their neighbourhood. The proposed new system would require less public notifications, provide less avenues for appeal, and worst of all would let developers choose the people who will assess their application (you may as well say it will let developers assess their own application).

It’s all very well to regulate the minimum qualifications of “accredited professionals”, but in the real world, the hand that writes the cheque expects a certain outcome and developers will engage someone they can rely on to comply. Such a system is fraught with the possibility of conflict, misconduct and corruption and should be rejected outright.

It was bad enough when private certifiers were given the power to assess and grant Building Rules consent. A private certifier approved the demolition of the historic grandstand at Cheltenham Park Racecourse which led to the grandstand being demolished while an application for state heritage listing (that I was involved in) was in progress, so you can understand my objection to extending the power of private sector professionals to include assessing development applications.
Obviously, with my stance against accredited professionals I think the enabling legislation, the draft *Planning, Development and Infrastructure (Accredited Professionals) Regulations 2018* should be ripped up. However I will make the comment that it gives too much power to the Chief Executive in being able to determine and vary the qualifications for accredited professionals. I submit that this power should lie with the Minister who can at least be held to account by the Parliament.

The following are my responses to the specific questions that submitters are asked to consider.

1. Should industry bodies be allowed to deal with complaints against Accredited Professionals on behalf of the Chief Executive of DPTI?

   My answer is absolutely not; such complaints must be dealt with by the Chief Executive.

2. Should Accredited Professionals be penalised for failing to participate in audits in accordance with the Scheme?

   My answer is they absolutely should be penalised for failing to participate in audits.

3. Should certificated of currency be submitted as proof of insurance, or is annual self-certification sufficient for this purpose?

   Absolutely they should have to submit proof of insurance; annual self-certification is not sufficient.

4. How important is design as a non-mandatory Continuing Professional Development topic compared with other non-mandatory topics?

   Design is absolutely critical and it should be a mandatory topic for Continuing Professional Development.

Yours sincerely,

Carol Faulkner, concerned citizen.