
Submission to the Expert Panel for the Planning System Implementation Review

**Planning Institute of
Australia (SA Division)**

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The following submission has been prepared by the
**South Australian Division of the
Planning Institute of Australia (PIA)**

1. Overview

The Planning Institute of Australia (PIA) is the peak national body representing planning and the planning profession. We engage with over 10,000 practitioners each year through events, education and training and represent over 5,600 members nationally. PIA is responsible for serving and guiding thousands of planning professionals, 500 of whom are located in South Australia.

Unlike other industry representative bodies that advocate for either sectors, industries or interest groups which typically have broad cross sector professional representation, the South Australian Division Committee of PIA represents urban and regional planners from across the State who provide planning expertise for both public and private sectors, non-government organisations and universities. We also represent student and retiree members.

Consequently, there is often no single position on issues amongst the PIA membership. Our planners are professionals who specialise in developing strategies and designing the communities in which we live, work and play. Balancing the built and natural environment, community needs, cultural significance, and economic sustainability, planners aim to improve our quality of life and create vibrant communities.

As well as assessing development proposals and devising policies to guide future development, our planners work in areas as diverse as housing, energy, health, education, communications, leisure, tourism and transport. They create and revitalise public open spaces, conserve places of heritage and enhance community value.

We are pleased to provide the following submission to the expert panel as part of the Planning System Implementation Review.

2. Planning, Development and Infrastructure Act 2016

Public Notification and Appeal Rights

- The manner in which public notification occurs, through the placement of signs on sites, the use of the QR code and online access to application documents and representation submission is considered to be working well. It is the experience of a significant number of relevant authorities that the number of representations in

support of developments has increased due to the reforms. This has occurred through the sharing of the QR code and link to representation links on the PlanSA portal through social media.

- PIA notes the discussion concerning alternative appeal pathways and does not consider appeal pathways to a Tribunal provide a simpler, quicker and more cost-efficient form of appeal than appeals in the ERD Court (the Court).
 - Unless legal representation is prohibited from such a process, there will be no savings in legal fees for litigants.
 - The Court through the *Environment, Resources and Development Court Act 1993*, Rules and Practice Directions encourage conciliation, a practical and pragmatic approach to appeals, settlements wherever possible and allow self-represented litigants to participate in appeals in a manner which is more similar to a Tribunal than a Court.
 - The filing fees for matters in the Court are already very low - \$263 is the current filing fee for a planning appeal. Whilst this is higher than Level 1 SACAT Fees (\$79.50 or \$60 for a concession holder), it is considerably lower than Level 2 SACAT Fees (\$607 for an individual, \$853 for a prescribed corporation – acknowledging that the fee for concession holders is \$152).
 - Further and as mentioned above, self-represented litigants are able to appear in the Court and considerable assistance is provided through materials provided by the Courts Administration Authority and the Court's ability to dispense with its Rules as it sees fit.
 - The Court was established together with the *Development Act 1993*, the *Heritage Places Act 1993*, the *Environment Protection Act 1993* and other legislation within its jurisdiction with the specific purpose of creating a specialist Court to hear all manner of matters, civil and criminal, within its statutory jurisdiction.
 - It is the experience of many members working at Councils that criminal and/or compliance matters are often related to planning appeals and that the ability to have all related matters concerning a property in the same Court is advantageous in terms of reducing costs and ensuring that all matters are efficiently determined.
 - The Court is a Court of Record which ensures published judgements that can be used to provide guidance to relevant authorities and applicants in

interpreting and applying the PDI Act and other legislation, with specialist knowledge and expertise.

- Replacing the Court with a Tribunal is not the solution to ensuring that increasing third party appeal rights will not delay developments. Member experience with SACAT for instance is that the resolution of matters in this jurisdiction is not any more expeditious than in the ERD Court, with matters taking similar, if not longer, times to reach a conclusion.

We address the Expert Panel's specific questions on this topic, below:

1. **What type of applications are currently not notified that you think should be notified?**
 - 1.1 Tree-damaging activity applications where lodged by an applicant who is not the owner of the site upon which the tree is located.
 - 1.2 Partial demolition of buildings which comprise:
 - 1.2.1 dwellings which share a wall with another dwelling (i.e. partial demolition of semi-detached dwellings, row dwellings, duplexes, townhouses, etc);
 - 1.2.2 commercial buildings with shared walls, roof and/or footings.
 - 1.3 Variations to development authorisations where the original application was publicly notified and the variations relate to matters raised in representations.
2. **What type of applications are currently notified that you think should not be notified?**
 - 2.1 Certain forms of development located in Historic Area Overlay Areas including:
 - 2.1.1 demolition of paving and hard surfaces;
 - 2.1.2 demolition of fencing and other small structures;
 - 2.1.3 restoration works to historic plaques and other similar objects located on private land.
 - 2.2 Variations to existing development authorisations where the variation intends to reduce the size and/or impacts of an approved development.

Accredited Professionals

We address the specific questions posed by the Expert Panel, below.

- 3. Is there an expectation that only planning certifiers assess applications for planning consent and only building certifiers assess applications for building consent?**

This expectation does exist in the community given the accreditation classes and distinction between accredited professional – planning and accredited professional – building forms of accreditation under the Accredited Professionals Scheme (APS).

- 4. What would be the implications of only planning certifiers issuing planning consent?**

It is PIA's submission that only 'planning certifiers' should be permitted to issue a planning consent.

The Deemed To Satisfy (DTS) assessment pathways under the Planning and Design Code are considerably more complex than those that existed for 'Residential Code' developments under the former *Development Act 1993* and *Development Regulations 2008*. Such assessments, particularly where minor variations to DTS criteria are contemplated, require expert planning input and should only be undertaken by qualified planners.

- 5. Would there be any adverse effects to Building Accredited Professionals if they were no longer permitted to assess applications for planning consent?**

It is PIA's submission that there would be little to no adverse impacts for Building Accredited Professionals (BAPs) arising from this proposal. The national shortage of accredited building surveyors in Australia has, in many members' experience, meant that BAPs are not accepting instructions to assess planning applications. Further, many BAPs do not have Professional Indemnity insurance to cover these activities. In reality, so few planning applications are being determined by BAPs that the impacts of preventing them from doing so in future are marginal at best.

Impact Assessed Development

We address the Expert Panel's question below.

- 1. What are the implications of the determination of an Impact Assessed (Declared) Development being subject to a whole-of-Government process?**

PIA submits that there are both positive and negative impacts which could arise

from this proposal.

On the positive side, the proposal, if implemented, could improve public perceptions of decisions made in respect to Impact Assessed (Declared) Development by adding significant transparency and debate to this process.

On the negative side, the proposal could politicise developments which are of State significance, and which could cause delay and/or frustration such that these developments cannot proceed in a timely and necessary fashion.

Infrastructure Schemes

We address the specific questions raised by the Expert Panel below, noting that the infrastructure schemes referred to are those under Part 13 of the PDI Act.

1. **What do you see as barriers in establishing an infrastructure scheme under the PDI Act?**

1.1 Cost, time and complexity.

1.2 The experience of those PIA members involved in the pilot schemes were that they are very complex and that the costs of developing the required documentation, processes and systems, including those which involve State Government Agencies, were prohibitive.

1.3 More infrastructure schemes might be developed if the relevant State Government Agencies provided support through the preparation of required documentation, processes and procedures to facilitate their establishment.

2. **What improvements would you like to see to the infrastructure scheme provisions in the PDI Act?**

Greater documentation and support for applicants and the ability to ensure that they can be mandated across areas to ensure fair and equitable infrastructure contributions, including to the costs of establishing an infrastructure scheme from all landowners who benefit from a Code Amendment.

3. **Are there alternative mechanisms to the infrastructure schemes that facilitate growth and development with well-coordinated and efficiently delivered essential infrastructure?**

At present, individual Infrastructure Agreements with relevant Councils, some of which are supported by Land Management Agreements, are considered preferable to infrastructure schemes due to their reduced cost and efficiency in implementing.

Local Heritage

4. **What would be the implications of having the heritage process managed by heritage experts through the Heritage Places Act (rather than planners under the PDI Act)?**

This proposal is welcomed, in principal. However, for this proposal to be effective, sufficient funding of Heritage SA would need to occur to ensure that there are sufficient resources to deal with local heritage matters across the State. Further, support for this proposal is subject to current local heritage places being retained as such.

5. **What would be the implications of sections 67(4) and 67(5) of the PDI Act being commenced?**

The implications will be both positive and negative with both implications arising from the required approval from the 'prescribed percentage' of owners. On the positive side, local heritage decisions will better reflect the will of the property owners affected by them. On the negative side however:

- 5.1 achieving the 51% quota is considered to be very difficult indeed as this quota is premised upon all owners approving a proposal. Some owners may not choose to participate in this process or may not be aware of it, and
- 5.2 the heritage value in places may be of broader community interest and importance and this may not be shared by the affected owners, meaning that opportunities to preserve heritage places are lost.

Deemed consents

1. **Do you feel the deemed consent provisions under the PDI Act are effective?**

No, for the following reasons:

- 1.1 many PIA members who are consultant planners are reluctant to use the deemed consent process due to their adversarial nature. A deemed consent is not often viewed as being a positive outcome for an applicant;
- 1.2 the deemed consent provisions in section 125 of the PDI Act are problematic and this has been identified through litigation on deemed consents. Whilst there have not been any judgements from the ERD Court on deemed consents to date, the following legal issues have been raised in as-yet undetermined deemed consent litigation matters:

- 1.2.1 Deemed consents are not available on the PlanSA portal for combined planning consent and land division consent applications which is contrary to the provisions of section 125 of the PDI Act. Applicants seeking deemed consents upload same to the 'additional documents' tab and notices can be rejected by the Assessment Manager. When such applications are refused by the Assessment Manager or an Assessment Panel, the applicant appeals include deemed consent grounds.
 - 1.2.2 Section 125 of the PDI Act does not provide for any suspension of a deemed consent where the relevant authority has applied to the Court to have it quashed. This is extremely problematic for applications that only require a planning consent and a development approval and has resulted in instances where there are two litigation matters on the same development application – an application to quash the deemed consent and an appeal against a Council decision not to issue development approval pending the outcome of the deemed consent litigation.
 - 1.2.3 Section 125 is silent as to the jurisdiction of the Court in determining an application to quash a deemed consent and whether this is in the form of a merits review or judicial review. Where deemed consent matters are being litigated, judicial review grounds which assert that individual decision makers have erred are being raised, together with criticism of individual planning officers and delegates as to their work performance and diligence, which is creating resultant Work Health Safety risk for relevant authorities.
 - 1.2.4 Deemed consent litigation is costly, complex and lengthy, defeating Parliament's stated intention in providing for them.
2. **Are you supportive of any of the proposed alternative options to deemed consent provided in this Discussion Paper?**

No.

If not, why not? If yes, which alternative (s) do you consider would be most effective?

The deemed approval suggestion is not supported. Many PIA members report that delays in issuing development approval to privately granted planning and/or

building consent developments arise from fundamental errors and omissions in the relevant consents which comprise errors of law and render consents granted of no effect.

Examples include:

- 2.1.1 applications for new residential dwellings being granted planning and building consents by accredited professionals in circumstances where a building exists on the subject site and the building requires a development authorisation to be demolished;
- 2.1.2 fundamental plans being omitted from consents, including roof framing drawings, footing specifications and other documentation that is essential for builders to ensure that they build lawfully as well as to ensure that inspections can occur;
- 2.1.3 errors in assigning assessment pathways by accredited professionals
- 2.1.4 which result in planning consents being granted unlawfully to performance assessed developments, including those which require public notification;
- 2.1.5 consents being granted by accredited professionals contrary to conditions placed on their accreditation.

As the ultimate designated authorities for inspection and compliance functions under the PDI Act, councils are conscious to ensure that avoidable errors are 'caught' and addressed before developments are undertaken.

Final development approvals being issued by an accredited professional is not supported for many of the reasons raised above.

The review of timeframes is not supported as many assessment timeframes are already considered to be generous and extending them will only cause unnecessary delay to the determination of development applications.

Verification of Development Applications

We address each of the questions raised by the Expert Panel, below:

1. **What are the primary reasons for the delay in verification of an application?**

Applicants not understanding verification requirements, submitting inadequate documentation and expressing reluctance to obtain appropriate plans and

documentation.

2. **Should there be consequences on a relevant authority if it fails to verify an application within the prescribed timeframe?**

No, as current delays are primarily being caused by applicants failing to provide basic adequate plans and documentation.

3. **Is there a particular type or class of application that seems to always take longer than the prescribed timeframe to verify?**

Non-professional applicants tend to submit insufficient documentation due to lack of technical knowledge. They attempt to submit development applications without the assistance of a planning professional, which results in delays.

4. **What would or could assist in ensuring that verification occurs within the prescribed timeframe?**

PIA suggests that greater levels of information could be provided on PlanSA, for instance examples of site plans, elevations and floor plans. In addition, a more dynamic 'wizard' service with different types of development not requiring consent or the rules that apply in visual form for development which does require consent.

3. Character and Heritage in the Planning and Design Code

PIA Supports the elevation of character areas to historic areas and the updating of character area statements.

4. Tree Policy in the Planning and Design Code

PIA advocates for planning decisions to contribute to the achievement of carbon neutrality as early as practical and not later than 2050, in line with the attainment of the Paris Agreement goals (limiting global temperature rise to less than two degrees and with a target of less than 1.5 degrees).

PIA has also not yet recognised explicit targets for greenhouse gas mitigation in other sectors (e.g. agriculture), types or scales of development. However, we recognise that such goals or targets are necessary to drive methodologies to deliver low carbon precincts – and regions. The development of such targets should flow from place-based (and sectoral) objectives set out in strategic plans. Pathways to achieve these targets are necessary and should be accompanied by the means to measure, adapt and respond.

PIA supports flexible measures to increase overall tree planting and tree canopy within

our urban environments. PIA also supports opportunities for increased tree planting within the public realm where overall management of these trees can be undertaken by a range of authorities to complement the private 'on-block' tree planting measurements.

PIA acknowledges that increased planting may impact on the ability to deliver infill development and that offset planting in the public realm may be part of a holistic approach to infill development, however PIA recognises the value of vegetation cover both in reducing heat loads and carbon sequestration.

PIA supports planning for streets and green open spaces that generate cooling to reduce demand for energy use and cool internal spaces, as urban heat island effects will become more common and more intense.

5. Infill Policy in the Planning and Design Code

Based on current immigration, fertility and life expectancy trends, Australia's population is expected to double over the next 60 years which will place pressure on settlements that accommodate growth. This growth will in turn require additional land supply (infill and greenfield) to accommodate associated housing and employment needs as well as different infrastructure and services. The ability to address these pressures in a sustainable and feasible manner requires integrated land use and infrastructure planning, coordination and delivery.

Strategic planning integrated with infrastructure and service delivery funding and delivery is fundamental to the success of cities. A commitment to developing and implementing a strategic plan for a city, region and state that takes account of growth scenarios is a prerequisite for success. A successful strategic plan must be based on actionable and measurable outcomes that are specific to the place.

PIA members have considered the relative importance of different outcomes and highlighted the following as most important to drive the development of scenarios for future Australian cities (top 4 survey responses):

1. Improve urban liveability, health and quality of life;
2. Make the most sustainable use of natural resources (i.e. reduces energy, water, and resource consumption);
3. Bring jobs closer to where people live (i.e. productivity / agglomeration economies /reduced living costs) and
4. Ensure high quality natural and built environment.

PIA also surveyed our members on what factors would have the most significant impact

on the sustainable development of our cities over the next 30 years. Our members noted that different factors are important in different scale cities - major capital cities (e.g. Sydney / Melbourne), mid-sized capital cities (e.g. Perth / Adelaide) and regional cities (e.g. Townsville / Launceston). Not surprisingly the factors of greatest concern in the largest cities were:

- Congestion and accessibility and
- Availability and costs of housing

PIA supports the development of a forward-looking cities agenda focused on innovation and the integration of land use planning, infrastructure which informs key investment decisions. PIA has shaped discussion in '[A New Era for National City Planning](#)' to foster dynamic urbanisation by charting urban patterns and crafting national urban policies critical to ensure Australia's productivity, prosperity, sustainability and resilience.

Our work advocates for the Federal Government to fulfil urgent needs around city planning, including for: a national settlement strategy; national urban development policies; urban indicator systems; unified and streamlined national planning approval processes; better and more consistent metropolitan strategic planning; and rational, fair and transparent structures for capturing value from infrastructure investment and development.

It is important to ensure that any strategies to share the growth in our population do not exacerbate or worsen standards of liveability or widen social disadvantage.

6. Car Parking Policy in the Planning and Design Code

Strategic planning will need to respond to increased demand for land uses and activities that reduce carbon consumption by:

- Planning for improved urban accessibility to develop urban environments that are compact and walkable, and neighbourhoods in all communities that have a mix of land uses, to reduce transportation-associated emissions and infrastructure and reduce demand for more frequent or longer trips.
- Planning for transport choice to ensure communities have robust multi-modal transport systems in place, including infrastructure for active transportation (walking, cycling, public transit) and low emissions vehicles.
- Planning for more attractive local destinations and effectively managing parking supply. There is the potential to reduce parking supply in accessible locations where it is practical to reduce the demand for travel and reduce transport emissions.
- Planning for evolving changes in technology in zero emissions, electric and

autonomous vehicles so that their proliferation improves carbon performance rather than adding to congestion and flow on impacts.

- Planning for locations, corridors and facilities supporting renewable energy and the circular economy. This could include residential uses offering electric vehicle (EV) charging options.

7. E-Planning and PlanSA

PIA recognises the significant efforts that have been made to transition the State's planning system in to an 'online first' approach. The suite of online tools: PlanSA website, SAPPA, the Code Portal and the Development Application Processing (DAP) system have made significant steps towards that online future.

Feedback from PIA members suggests that a number of issues with the online tools are critical to be resolved.

1. Plan SA Website

Feedback from members, industry and the public alike suggests that the plan.sa.gov.au home page tries to present too much information. We would recommend that the PlanSA home page focus solely on 'core' aspects of planning in South Australia, namely: development assessment; policy reform; State Commission Assessment Panel; legislation and Ministerial information.

Helpful 'Wizards' to step through the process would greatly assist first-time users in finding the information they need. This is currently available to a limited extent with the Online 'find out if you need approval' wizard. Enhancement of this tool is desirable and would result in time-saving efficiencies for all users.

Further detail on the level of information required to be submitted with Development Applications also needs to be prominently displayed, whilst encouragement for applicants to utilise the services of an Accredited Professional (to ensure consistent, high quality applications) should be flagged conspicuously on the Plan SA website.

South Australian Planning and Property Atlas (SAPPA)

PIA and its membership considers that SAPPA is a great improvement upon previous iterations of mapping available to the South Australian community, compared to the numerous pages in former Development Plans. PIA believes that resolving Zoning and Overlays of similar colours could be helpful for practitioners and general users alike. One example of this is the Affordable Housing and Character Area Overlays (which are generally found in neighbourhood type zones), all are of mauve type colours.

One suggestion is the introduction of patterns (rather than colours) for Overlays which would assist to better define the two.

Planning & Design Code Portal

PIA considers that an online Planning Policy framework is an improvement with respect to accessibility in comparison to previous iterations under the Development Plans.

We consider the following improvements could assist:

Navigating the whole Planning & Design Code

Feedback from members is that browsing the Planning and Design Code is currently difficult even for practitioners, especially in the PDF Version. We note that the Code PDF version does not have footers that would quickly identify the page and what Zone, Overlay, or General development policies to which that page applies.

We would recommend to the Expert Panel that significant focus be applied to improving the search functions for the Code to ensure that there is a level of hierarchy to the search results.

Restricted Development Missing in Code Snapshot Online

We note that, in several cases, when selecting policies to apply to a certain development the table for Restricted Development classification (Table 4) is absent. This can cause issues for practitioners and the community alike in identifying what may or may not be restricted development.

Development Application Processing (DAP)

We consider that the use of an online, single portal for development assessment processing has proven useful in standardising approaches to processing applications, as compared to the previous system. PIA notes however that the Portal remains one of the biggest points of complaints from practitioners who use the system.

Individual instances of concern will no doubt be raised by different bodies in their submissions to the Expert Panel, however PIA considers that significant ongoing effort and review is required to ensure that the DAP is robust and fit-for-purpose.

PIA would also like to make comment on the following matters:

8. Acknowledgement and Protection of Aboriginal and Torres Strait Islander Cultures

In 2021, PIA convened the Planning with Country Knowledge Circle, an Indigenous-led group of Indigenous and non-Indigenous built and natural environment leaders from across Australia who are guiding PIA through a whole-of-organisation response to action on reconciliation. This journey has been informative and confronting, but overwhelmingly positive and compels us to find new and effective ways to acknowledge, value, protect and promote First Nations cultures, while supporting good planning and development.

We acknowledge that Aboriginal and Torres Strait Islander cultures are the oldest living cultures on Earth and have the oldest continuing land tenure, land use planning and management systems in the world. We are fortunate to have the opportunity to learn from these practices and apply these learnings in our work.

PIA strongly recommends that Aboriginal and Torres Strait Islander knowledges, cultures and traditions are acknowledged, valued, protected and promoted through the Planning, Development and Infrastructure Act 2016 (SA) (PDI Act).

One example of how this has been achieved is in Queensland. Section 5 of the Planning Act 2016 (Qld) states that ‘an entity that performs a function under this Act must perform the function in a way that advances the purpose of this Act.’ Sub-section 5(2) lists ways to advance the purposes of the Act and was amended in 2016 to include ‘valuing, protecting and promoting Aboriginal and Torres Strait Islander knowledge, culture and tradition’ (s.5(2)(d)).

PIA recommends that a similar approach could be taken in the PDI Act by establishing a new sub-clause under the ‘Objects of Act’ in section 12(2), or by establishing a new ‘Principle of Good Planning’ under section 14. These sections provide guidance on interpreting the PDI Act and must be given regard through planning instruments and by anyone operating under the PDI Act – like in Queensland.

PIA believes that this change is an important step toward reconciliation and will provide strong and clear statutory leverage for planners, engagement professionals, policy writers, decision-makers and allied professionals to perform their functions, while valuing, protecting and promoting our First Nations cultures.

Information about the Queensland example can be found here:

- Refer to pages 20 and 21 of the Planning Act 2016 (legislation.qld.gov.au)
- <https://aiatsis.gov.au/ntpd-resource/577>

This [amendment](#) was endorsed by PIA’s Qld Division.

9. Local Design Review Scheme

PIA supports the formalised Local Design Review Scheme (the Scheme) available to all local government bodies within South Australia. The Scheme is established under section 121 of the PDI Act and we commend the Office for Design and Architecture SA (ODASA) for ensuring the Scheme is consistent with principles and the intent of the Act.

PIA believes that access to design expertise is central to good planning, as it often takes specialised design skills to visualise plans and drawings to identify real-world impacts and how they might be resolved. PIA is of the view that expert design advice is as important as advice from building surveyors, engineers, ecologists and other specialists prior to finalising a development application to ensure they are assessment ready and support relevant authorities with making well-informed decisions. Engaging with design experts also helps improve the planning profession's understanding of the design process and how to support high-quality design outcomes.

To date, PIA understands that no council has opted into the Scheme. Feedback from our membership suggests that councils are reluctant to opt into the Scheme because it relies too heavily on the voluntary participation of proponents. In other words, if a council invests in establishing a Local Design Review panel, there is no certainty that it would get used.

The Panel could consider opportunities that would provide councils with greater certainty that their investment in a Local Design Review panel would result in proponent participation.

One option would be to remove section 121(2) of the PDI Act, which states 'a person who is considering the undertaking of development to which this section applies may apply to a design panel for advice'. This change would enable a legislative environment where certain classes of development could be required to engage in Local Design Review.

Specifying which classes of development should be limited to those deemed appropriate within the local context, for example, development within a heritage area or large-scale subdivisions. Formal approval from the Minister for Planning or State Planning Commission to mandate certain classes of development would be strongly encouraged and could be sought when a council opts into the Scheme. In this scenario, a council could also choose to have the voluntary process available to other classes of development within their area.

PIA recommends consultation with ODASA on how to best implement such a process.

10. Workforce Issues

With ongoing high turnover rates of planning professionals, as well as marked shortages in all areas of the planning profession now emerging, and combined with high

development activity post-COVID, stress and burnout is becoming a common place issue. Not only can this lead to poorer productivity, lower morale and mental health issues, but it ultimately leads to a drift of experienced practitioners away from the planning profession. This then leads to a vicious cycle of an inexperienced and over-burdened workforce.

Whilst no data exists in South Australia on the current age, experience levels and severance from the profession, it makes it hard to precisely identify the extent of this problem. The Expert Panel or State Planning Commission may wish to commission a study into such.

Local Government and, in particular, rural Councils, appear to be experiencing the brunt of the planner shortage. These Councils are often a long way from where most of the planning professionals live (in Metropolitan Adelaide) and, due to a low rate base, are often unable to provide attractive salary packages.

PIA is acutely aware that the planning profession is not as widely known as more common career choices, such as Accounting, Engineering, Law, Medicine, Architecture, etc.

Due to this, at both a National and a State level, PIA is very supportive in bringing in a stronger focus and awareness on planning through secondary schools. In addition, PIA believes it to be absolutely imperative that one of the State's three major Universities develop an Undergraduate Urban and Regional Planning program as soon as practically possible.

This is critical to ensure the ongoing supply of planners within not only local government, but also state government and the private sector in South Australia in coming years. PIA continues to support the Masters of Urban and Regional Planning at the University of South Australia, through both the accreditation program and sitting on the program advisory committee.

PIA looks forward to working with PLUS and the State Planning Commission, as well as the Expert Panel, in collaborating with one or more of the State's main Universities to develop a new Undergraduate planning degree.

11. Conclusion

To conclude this submission we reiterate that, as a broad church, there is very wide diversity of views amongst the profession. This submission aims to broadly summarise the majority view of the profession, as determined by surveys, previous submissions and SA Division Committee members discussing concepts and issues amongst their networks.

As practitioners, planners are often at the coal face of where the legislation and policy changes hit the ground, leading to being able to identify where the legislation and the

Planning and Design Code are causing roadblocks, unintended issues or where some improvements may lead to better outcomes.

It is hoped that our submission will provide the Expert Panel with some detailed commentary in respect to this. Further, that our commentary regarding tree policies, infill policies and car parking policies provides practical opinions from the profession for the Expert Panel to consider.

Lastly, PIA is grateful for the amount of work that the State Government has put into the new ePlanning system and the PlanSA portal. It is a vast improvement on previous archaic practices and systems however, we note there is still plenty of opportunity for the new systems to be refined. We appreciate the efforts of the State Planning Commission and Planning and Land Use Services in their pursuit of continuous improvement of the system.

One final comment, both as the planning profession and, more broadly, the planning industry, is that greater emphasis needs to be placed upon the ongoing health and wellbeing of planning practitioners, as well as that of the community at large.

As detailed earlier in this submission, there is a notable shortage in the planning workforce at present, exacerbated by a nation-wide skills shortage and the absence of a planning undergraduate degree in South Australia.

Further, it is important to note the positive impact that the planning profession has on the health and wellbeing of the general population. Good design and development will encourage walkable communities, universal access for people of all abilities, more active travel options, less reliance on private motor vehicles and, importantly, accessible and high quality open spaces for people to use.

We are more than happy to provide further information on any of the above discussion points, and we look forward to presenting to the Expert Panel shortly.



David Bills

Vice President

Planning Institute of Australia (SA Division)