

Submission on the Draft Inspection Policy on behalf of the District Council of Coober Pedy

The Policy requires Councils to comply with the requirements set out in Appendix 2 of the Practice Direction.

An authorized officer is to be appointed by Council/CEO and Council/CEO must ensure the authorized officer has the appropriate qualifications, skills, knowledge and experience relevant to the nature of development to be inspected.

It is highly unlikely a person with the appropriate qualifications, skills and experience resides in Coober Pedy let alone be willing to undertake the necessary functions.

Table 1 of the Appendix refers to mandatory inspections of Class 1a dwellings.

On reading the Policy Appendix 2 prescribes the necessary mandatory inspections however it is unclear when or even if such inspections are required!

Clause (a) states an inspection “must” be carried out at time during construction other than clause (b). Clause (b) states Council “may” inspect on completion in certain situations.

Also, an inspection on completion must be carried out within 1 business day of receipt of a Statement of Compliance.

The reference to 66% of developments to be inspected creates further uncertainty – developments includes planning, building, land division etc! This contradicts the preamble which refers to a class 1a building under the building rules. The 2nd column relates to at least one inspection of a relevant building.

The Policy wording is very poor for example is an inspection is to be carried out at completion, any time during construction, a development which may be other than a class 1a building.

The Table 1 heading relates to Domestic dwelling – maybe there needs to be a definition of what a “domestic dwelling” and a “non-domestic dwelling” is!

The other tables have similar confusing terminology however it is clearer that an inspection must be carried out of all buildings/developments within 1 business day of receiving a Statement of Compliance.

This would be impossible to comply with in Coober Pedy and extremely unlikely other Councils with greater resources could meet such an obligation.

Interestingly it is not a requirement of the Government to have the same responsibility for development out of Council areas.

One would question what purpose an inspection on completion would serve as all structural elements, waterproofing etc would not be visible.

Tables 3 and 4 states an inspection at completion but also says must be carried out during construction or on completion?? These requirements contradict each other!

On behalf of the District Council of Coober Pedy you are requested to review and rewrite the Policy as it is confusing and onerous. There is no benefit in undertaking inspections on completion. Inspections if mandatory should be carried out during construction.

If this provision is not reviewed to make it a workable document it is requested Coober Pedy be exempted from this Policy.

As mentioned in the Policy the requirements have taken into account resources. Obviously that is not correct. I invite you to provide evidence how Council could meet this obligation and at what cost.

With regard to the requirement for class 1a buildings to have a Certificate of Occupancy I remind you this was a requirement 25 years ago but rescinded because it was impossible to administer.

You are reminded that the following additional fee, currently \$75.50, was introduced as a pseudo inspection fee for Councils when Councils were required to adopt an inspection policy:

Schedule 6 1 (1)(c) if the development involves building work that is, under the provisions of the Act, subject to the requirement to obtain building rules consent and the development cost exceeds \$5000 (including a case where the relevant assessment is undertaken by a private certifier) other than development consisting solely of a swimming pool, spa pool, or a safety fence or barrier for a swimming pool or spa pool.

Although never called an inspection fee it was introduced to compensate Councils for inspections. It was not called an inspection fee because people paying for an inspection would demand an inspection be undertaken. Also there was concern about extra liability to Councils.

From memory the original calculation of determining this fee was based on atleast 3 inspections of 20% applications:-

Eg: 10 applications = \$755 income

6 inspections = \$125.83 per inspection

Based on new policy requirements 66% (6.6 inspections) = \$114.40 per inspection

This Council agrees with the objective of having a safe built environment however this Policy fails to achieve such a condition.

Should you wish to discuss any aspect of this submission please contact Council's Planning and building Surveying Consultant on 83742211.