

RECEIVED

17 Oct 2018

DPTI

Level 2, 15 Leigh Street
ADELAIDE SA 5000
T +618 8402 5900
sa@architecture.com.au
architecture.com.au



Australian Institute of Architects

17 October 2018

Mr. Michael Lennon
Chair State Planning Commission
Via email: DPTI.PlanningEngagement@sa.gov.au

Dear Michael,

The Australian Institute of Architects SA Chapter appreciates the opportunity to respond to the Assessment Pathways Discussion Paper released for comment.

We have reviewed the paper and attach our detailed feedback. We look forward to working toward its further development.

Sincerely,

Mario Dreosti
President
SA Chapter Australian Institute of Architects

Assessment Pathways for South Australia
Review undertaken by the Australian Institute of Architects SA Chapter

Date: 17 October 2018

Assessment pathways	
Pg 9: Introduction	We support the inclusion of a preliminary advice process to work through a proposal prior to it being formally lodged under a defined pre- lodgement approval process with a recognised panel
Pg 10: Key Differences - Referrals	There should be clarification around whether design review is a referral or not especially if feedback from referrals is to be included as a direction
Pg 11: Outline consent	We support the inclusion of the Outline Consent process. If an Outline Consent application is made, it should automatically trigger a design review process as this is the point in the development of a design that urban-scale issues are dealt with. If issues such as height and mass are agreed without design review, they will end up as matters of conjecture later in the process.
Pg 14: ePlanning Flow Chart	There should be a step in the latter part of the process for a review to confirm that what has been lodged for full Development Approval is what was approved at the planning stage. This is especially important for projects of a more complex nature that have undergone design review Mandatory notifications should include compliance with conditions from the design review process
Pg 24: Assessment Categories chart	Design Review should be mandatory for any Impact Assessed Development, including EIS preparation and opportunity for “pre-lodgement” design review should be able to be accessed as an alternative route for Code Assessed Development – Performance assessed as for Impact Assessed Development
Pg 32: Performance Assessment	Generally all projects that are performance assessed should go through a design review process as by definition there are qualitative elements that are being considered The last paragraph notes that if it is determined that there is a serious variance with the Planning and Design Code then planning consent must not be granted. This should extend to a grading system for design performance whereby if a design review determines that the proposal is substandard, then it automatically can’t obtain planning consent. In this way, not everything needs to achieve design excellence, but if an expert design review panel determines that a proposal is below a minimum quality, it cannot proceed

Pg 34: Impact Assessed Development	Any application in this category should have to undergo design review
Pg 38-42: Public Notification	Consideration should be given as to when the public should be engaged in the process. More complex developments in the Impact Assessed category could require engagement prior to lodgement. At the moment the process appears to require engagement only <u>after</u> lodgement of an application
Pg 44: Provision of Information	Information that should be submitted for performance and impact assessed applications should follow the requirements outlined in pp12-17 of the ODASA publication <i>Preparing for Design Review</i>
Pg 46: Preliminary Advice	A significant issue raised by our members is the ability to have a discussion on design with an appropriately qualified person from the organisation making the assessment (currently local government). In the context of 5.5 Preliminary Advice, there needs to be an ability for preliminary design advice to be sought as one of those referrals pathways, and if necessary the ability to formally request it. The same agreement provisions should apply.
Pg 52: Outline consent	Refer comments re pg. 11
Pg 46: Design Review	Refer comments elsewhere in this feedback as to when design review should occur and how it should be applied, acted on and followed up for compliance
Pg 56: Crown Development	<p>Crown Development should be subject to the same notification requirements as any other development. This provision appears to put a lower limit of \$10m before public notification is necessary irrespective of the Assessment Category.</p> <p>Our comments regarding Design Review are intended to apply to Crown development as well, in particular social infrastructure (schools, hospitals, police, justice facilities etc.), transport infrastructure (especially train and tram, road systems and passenger interfaces in urban areas)</p>
Pg 58: Assessment Pathways Summary Table	The Assessment Tool for Crown Development should be the same as any other application pathway e.g. Code assessed – performance assessed should be assessed under the Planning and Design Code