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**From:** DPTI:PD Building Branch  
**Sent:** Wednesday, 18 December 2019 2:27 PM  
**To:** Powell, Chris (DPTI)  
**Subject:** FW: Draft Building Inspection Policies Practice Direction feedback

**Follow Up Flag:** Follow up  
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**From:** Tim Pride [mailto: [REDACTED]]  
**Sent:** Wednesday, 18 December 2019 2:20 PM  
**To:** DPTI:PD Building Branch <DPTI.PDBuildingBranch@sa.gov.au>  
**Subject:** Draft Building Inspection Policies Practice Direction feedback

To whom it may concern

Council staff have reviewed the draft building inspection policies practice direction and its operation with the Act and Regulations. We have the following feedback to provide:

- 1) The focus on safety is supported, however elements of building work that are high risk, should be mandated inspections, such as framing and trusses, with clear mandates improving consistency across councils. While it is acknowledged that this may create difficulties for regional councils, it could be considered for Metropolitan Adelaide councils;
- 2) If there is a genuine interest in public safety, and the Practice Direct allows councils to set their own inspection policies through the flexible inspections of key points of the building process, that fees should be set at a price point that allows for resources above that of the minimum inspection requirements. More than one inspection should occur on high risk building work, with high risk building elements existing at multiple stages of building work, and as such, resourcing should deliver this level of oversight, with the building industry assisting in funding to a reasonable level;
- 3) There is ambiguity between the Practice Direction and the requirements of Regulation 93, with Table 3 and 4 specifying in a 'note' that inspection of stages in building work is to be determined by council when setting mandatory notification stages. Regulation 93(1)(d) allows a 'relevant authority', to set mandatory notification of stages of building work, with the Practice Direction not clear on who is responsible for the inspection of these mandated stages that Council may not agree with or be resourced to inspect. This may open councils to risk that is transferred from a relevant authority other than councils. Consideration should be given to a relevant authority undertaking inspections of their own mandated notification stages, where agreement is not reached with the relevant council. Relevant authorities should have regard to individual council inspection policies.
- 4) Table 2 – the inspection of small commercial or public buildings, this should be reduced from 100% to a percentage, as many small commercial developments is for low risk building work, such as existing shop fit out. These particularly are low risk where they are located within larger shopping centres, where most of the essential fire safety provisions are provided by the larger commercial centre. As such, it is not considered that 100% level of inspections should be mandated.
- 5) Notifications should be through the E-Portal only, to ensure timely notification, accurate reporting and ease of process management.
- 6) The issuing of certificates of occupancy for residential development by private certifiers, is considered to have issues given that final inspections may not have occurred. It is considered particularly problematic where

development involves elements of fire safety features and other items that are encouraged by the inspection police to form part of preferred final inspections. So where there are high risk aspects to a development, the policy encourages that at least a final inspection be undertaken. This is contrary to the potential for a Certifier to issue a certificate of occupancy without a final inspection being undertaken. At present Council's will use the CO process to leverage the installation of things such as bushfire protection measures.

If you have any questions, please feel free to contact me on the number below or by return e-mail.

Kind Regards



**Tim Pride – Acting Manager Development Services**

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