

25th January, 2023

John Stimson
Chair, Expert Panel Review of the Planning System

By email: DTI.PlanningReview@sa.gov.au

Dear Mr Stimson,

Submission on the Expert Panel's Review of the Planning System

Thank you for the opportunity to lodge a submission on the review of the planning system. Council is encouraged by this comprehensive review as, whilst there are many sound and innovative elements in the system, there are also several problems, as yet unresolved.

A detailed response is attached, but, in summary, outstanding concerns affecting the District Council of Yankalilla's staff and community are as follows:

1. Difficulties working with and navigating the ePlanning system, particularly for occasional users in the community.
2. Difficulties managing certain elements of development assessment, particularly variations and staged consents.
3. Fees do not adequately reflect the time and resources required to ensure sound planning outcomes.
4. Timeframes are unrealistic particularly as they relate to requests for further information and "deemed consents"
5. The public notification is not achieving its goals. There needs to be more discretion for staff in notifying, and whilst there is wider notification in the community, there are fewer appeal rights. This is misleading the community.
6. A general vagueness of policy in the Code, and lack of policy relating to design in rural areas, boundary realignments in rural areas and climate-responsive siting and design.
7. Serious concerns regarding Private Proponent-led Code Amendments, including their adverse impact on orderly strategic planning, limited opportunity for review/verification of content, and their unpredictable impact on staff resources.

On a positive note, Council commends the intention of the Planning Commission to provide more support for Councils preparing/amending Character and Historic Area Overlays, and the upgrading of Character Areas to Historic Areas.

Should you wish to discuss Council's submission further, please do not hesitate to contact Kylie Weymouth, Acting Manager Strategic Development, Alexandrina Council on [REDACTED] or email [REDACTED]

Yours sincerely

A handwritten signature in black ink, appearing to be 'Darryl Houston', with a long horizontal flourish extending to the right.

Darryl Houston
Mayor, District Council of Yankalilla

Item No 14.2
To: Council
Date: 17 January 2023
Author: Judith Urquhart, Strategic Development and Policy Planner,
Alexandrina Council
Kirsty Tapp, Senior Planner
Nathan Cunningham, Chief Executive Officer
Subject: SUBMISSION TO THE EXPERT PANEL REVIEW OF THE
PLANNING SYSTEM
Attachments: A – Detailed DC Yankalilla submission
B – LGA Submission
C – Covering letter
Prev. Resolution: Nil

Officer's Recommendation

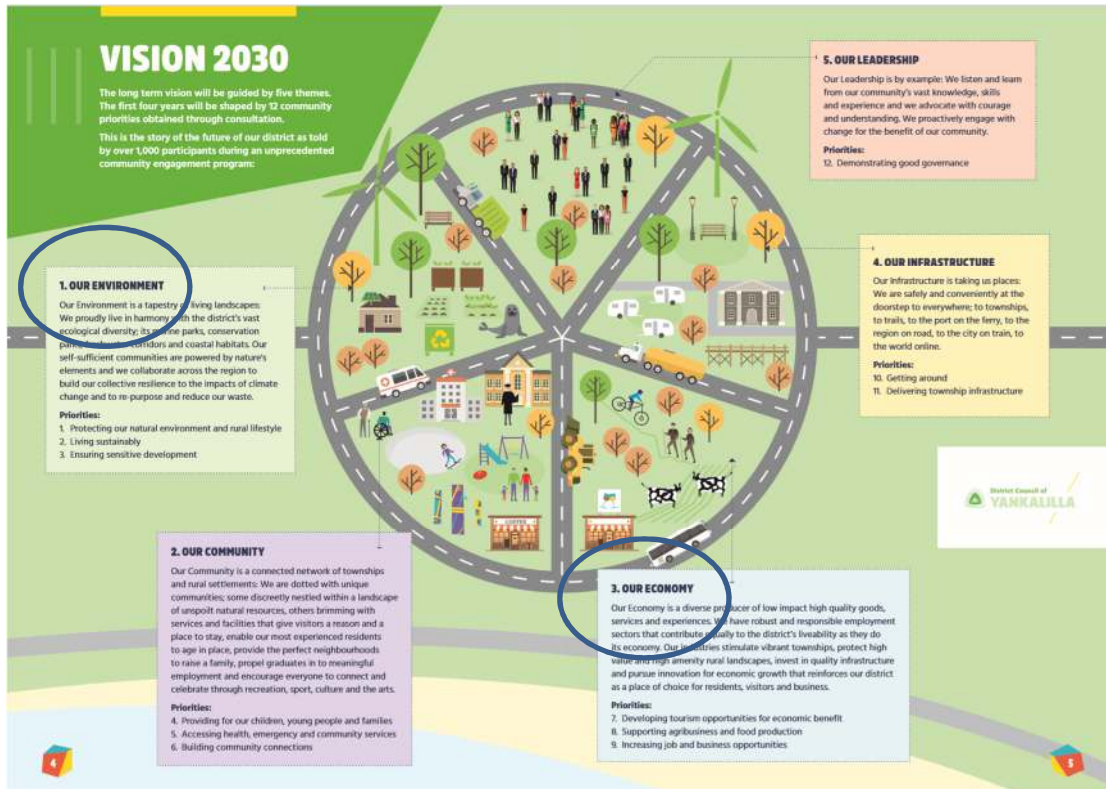
1. That the Report be received.
 2. That Council endorse the submission prepared in Attachment A on the Expert Panel Review of the Planning System, and submit to the Expert Panel, together with a full copy of this Council report which in some areas provides greater context, and forms part of the overall submission.
 3. That Council delegate to the Chief Executive Officer any required amendments to the proposed submission of an administrative nature only.
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Purpose

1. To inform Council of the background to the Expert Panel's Review of the Planning System being undertaken under the auspices of the Minister for Planning by an 'Expert Panel' established for the purpose of the review.
2. Seek Council endorsement of the proposed submission in order for it (together with the full Council Report) to be submitted to the Expert Panel as part of the consultation.

Strategic Plan

3. The following Strategic Plan provisions are relevant:



4. The following Strategic Plan Four Year Focus Items are relevant:

OUR ENVIRONMENT FOUR YEAR FOCUS

COMMUNITY PRIORITIES

1. Protecting our natural environment and rural lifestyle
2. Living sustainably
3. Ensuring sensitive development

OUR ECONOMY FOUR YEAR FOCUS

COMMUNITY PRIORITIES

7. Developing tourism opportunities for economic benefit
8. Supporting agribusiness and food production
9. Increasing job and business opportunities

Proposal Impacts

Asset Management		Legislation/Statutory/Policies	✓
Budget/Annual Business Plan		Long Term Financial Management Plan	
Community Engagement		Risk Assessment	
Economic Growth	✓	Service Standards	
Environment	✓	Social	
Legal Advice		Staff Resources	

Report Preparation

5. This report was prepared by:

Author	Time
Chief Executive Officer	5 hrs
Strategic Development and Policy Planner, Alexandrina Council	3 hrs
Senior Planner	1.5 hrs
Governance & Communications Coordinator	0.5 hrs
Total	10.0 hrs

Discussion

6. In March 2021 a new planning system was introduced across South Australia.
7. The key elements of the new system are:
- 7.1 an electronic system - the SA Planning Portal
 - 7.2 Planning and Design Code applicable to the whole state, replacing individual Council Development Plans
 - 7.3 a suite of Zones, Sub-zones, Overlays and General planning policies (issue-based) which replaced individual Council zones and Policy Areas
 - 7.4 a new approach to development assessment
 - 7.5 a new approach to the public notification of certain Development Applications
 - 7.6 a Community Engagement Charter guiding community consultation relating to Code Amendments
 - 7.7 a new Code Amendment process replacing the previous Development Plan Amendment process including the ability for private proponents to submit Code Amendments
 - 7.8 greater opportunity for Private Certifiers to approve certain developments
8. This new system was intended to simplify the development process, speed up assessments and make the system more accessible to the community.
9. However, one single state-wide system is necessarily complex, and in response to concerns raised by the community and industry groups since the system inception, the new Minister for Planning, the Hon. Nick Champion commissioned a review and appointed an Expert Panel to undertake the work. The Panel has invited submissions on any aspects of the new planning system.
10. The Review is currently undergoing a period of public engagement, with submissions required by **Monday 30 January 2023**. This submission period was extended given

the Local Government Elections and the impact this had on Councils abilities to prepare submissions.

11. A submission by the Local Government Association has been prepared (Attachment B) and considers the changes at a higher level as it reflects the collective response of many member Councils gathered over time through various forums and input mechanisms.
12. The submission from the LGA has been reviewed by key staff and is wholly supported.
13. Council's submission (Attachment A plus this full Report) developed in collaboration with Alexandrina Council under the shared services model relates more to the day-to-day workings of the e-Planning Portal and the content of the Planning and Design Code, used on a daily basis by Planning and Building staff as well as known views of members of the community lodging Development Applications. It also addresses the ability for private proponents to submit Code Amendments.
14. The two submissions differ in their focus however it allows for a greater variety of issues to be addressed.
15. In summary, the position put forward by DC Yankalilla and Alexandrina Council staff note the following aspects of the new planning system as being problematic, or not satisfying the original stated intent:

16. Development Assessment

- 16.1. Difficulties working with and navigating the ePlanning system
- 16.2. Document management
- 16.3. Complexity and difficulties for members of the public to understand and navigating the system as occasional users
- 16.4. Fees do not reflect the complexity and time needed for quality, effective assessment
- 16.5. Overlays - Problems with various aspects of the application of Overlays

17. Timeframes

- 17.1. Timeframes are unrealistic and do not allow for quality decisions given existing resources in smaller Councils which are highly susceptible to peak lodgement periods which they can not control.
- 17.2. Requests for further information - the allocated 10 day period in which to request further information is unreasonable and quite inadequate, particularly for those applications on public consultation where representations received draw attention to issues needing negotiation.
- 17.3. Deemed Consents - should a Council fail to issue a decision within the prescribed timeframe, the application is automatically approved and this is not seen as a suitable outcome which protects the public interest.

18. Public Notification

- 18.1. Wider opportunities for public representations but reduced appeal rights for third parties (none exists for appeals against a Planning Approval on the planning merits of a Development Application) - creates a false sense of influence for the community.

- 18.2. System has resulted in too much domestic (such as residential sheds) notification (previously considered minor) and lack of notification of proposals with potential for significant impacts. Essentially, the balance is wrong and later in this report, the DCY CEO picks up on this point.

19. Wastewater

- 19.1. Lack of consideration of interface with Council's wastewater management system in unsewered areas and lack of understanding on the part of Private Certifiers of the implications of building on a site without access to the sewer.

20. Policy and Strategy

- 20.1. Lack of policy to guide and inform:
 - 20.1.1. boundary realignments, especially in rural areas
 - 20.1.2. design in visually sensitive rural areas
 - 20.1.3. climate-responsive siting and design
- 20.2. This highlights a need for clarification around "value-adding" and tourist accommodation in rural areas.

21. Private Proponent-led Code Amendments

- 21.1. Concerns regarding staff resourcing - these Code Amendments are lodged for Council comments with no warning and lack a systematic or strategic approach.
- 21.2. Concerns about the impartiality of a community consultation process run by a person with a commercial interest in the outcome.
- 21.3. Limited ability of Council to review or verify information/ data provided in these types of Code Amendments.
- 21.4. These Code Amendments have the potential to undermine Council's long-established strategic planning processes.

22. Character and Heritage

- 22.1. As part of the Expert Panel's review, the State Planning Commission has put forward a proposal to better preserve South Australia's valuable character streetscapes. Their recommendations are:
 - 22.1.1. Elevate Character Areas to Historic Areas (where appropriate justification is provided) and,
 - 22.1.2. Update Character Area Statements.
- 22.2. In both of these initiatives the Department of Planning will update heritage and character guidance material and support Councils in undertaking character and heritage Code Amendments. Both of these recommendations are welcomed and supported.

23. Chief Executive Officer Input

- 23.1. In recognition of the background, experience, broader network and ability to interface with the planning system, the Chief Executive Officer has also

summarised some key matters worthy of being raised through the submission. The recommendation suggest the full Council Report be provided as part of an overall submission so as to ensure these additional comments are captured.

23.2 Through a forum held with invited Local Government Mayors and CEOs, DC Yankalilla was represented by the CEO and a summary of key themes which arose through that forum (which are relevant to DC Yankalilla) are as follows:

23.2.1 Accredited Professionals:

- o Skilling, attraction and retention issues being experienced widely;
- o Role of professionals (and particularly Assessment Managers) as assessors/ advisors and their interface with community should be re-considered;
- o Lack of university pathways to become a planning professional is an increasing concern for resourcing the new system, noting there is already a recognised skill shortage.

23.2.2 Public notices and consultation:

- o Suggested increase the role of public consultation for significant development and increase the size of notification zone (beyond 60m – especially in regional areas).
- o Also increase the opportunity for comment from neighbours and those directly impacted by development;
- o Perception to residents that their voice is not being heard when they have no ability to appeal to the court is an evident issue. This is resulting in more adversarial representation occurring in the CAP (and RAP) environment as representors have nowhere else to go.

23.2.3 Local heritage:

- o Requiring heritage process to be managed by heritage experts is causing concerns in the regions with skill shortages;
- o Local heritage listing process is over convoluted and expensive for the level of protection that it provides.

23.2.4 Verification:

- o Increase timeframes for adequate assessment by councils and other professionals as rushed decisions do not lead to better or balanced decisions.

23.2.5 Deemed Consents:

- o Timeframes need to be reviewed or the whole notion of a deemed consent needs to be withdrawn as it sits as a threat for planning authorirites who may simply be being thorough;
- o System has become more about timeframes and this creates risks of poor outcomes;

23.2.6 Character and Heritage Policy

- o There should be a requirement to maintain heritage buildings to eradicate deliberate neglect.

- o Tougher demolition controls should apply in heritage and character areas such as under the previous system where the replacement building needed approval prior to demolition.

- o Collaboration with communities has been lost in relation to character preservation. Need to pursue options to listen to what the community value in their area and bring them into the process.

23.2.7 Infill Policy

- o Infill policy is leading to more driveways and less on street parking availability.

- o Design guidelines need to consider impact of ageing population, small block implications (storage, number of vehicles, street design) and prioritise sustainability/ environmental benefits.

- o Need to be looking at opportunities for co-housing to support ageing in place.

23.2.8 Carparking Policy

- o Street design in land divisions often leads to inadequate visitor carparking and inadequate manoeuvrability for service and emergency vehicles.

- o Developments with small garages are not suitable for people's preferences for larger vehicles and number of cars per dwelling, but small garages also result in people using garages for storage rather than parking.

- o Need to consider the emergence and projections for electric vehicles to be charged on street and off-street.

23.2.9 E-Planning and PlanSA Discussion Paper

- 23.2.9.1 PlanSA is good from a practitioner perspective, but work needs to be done to improve the User Experience for novice users of PlanSA website who may not have the technical knowledge or digital skills to navigate the complex pages.

- 23.2.9.2 Fees are not reflective of effort and do not consider abandoned applications; they should be paid at lodgement to lock in the version of the Code to be used for assessment; and referral fees need to be looked at as there are occasions where this costs more than the development itself.

24. Through other forums and discussion groups (Planning Institute of Australia, Urban Development Institute of Australia as well as through the role as Presiding Member of multiple Council Assessment Panels, the CEO has compiled a number of other elements which relate to DC Yankalilla which are included below and therefore form part of the overall submission.

24.1 The SAPPA (South Australian Property and Planning Atlas) and the e-planning system has streamlined processes, however simple fixes could yield further improvements.

24.3 Policies specific to local areas lacking and could be improved.

24.4 Prioritising system fixes needs to occur in collaboration with Councils and practitioners.

24.5 Reduce 'all code assessed' development for simple applications.

- 24.6 Deemed consents should not be issued outside of the Development Portal and Crown developments should also be assessed with the portal and not have a separate process.
- 24.7 Reporting needs to be improved as different reports provide varying data and at launch, the sector was advised that 'real time' reporting was a likely feature of the system.
- 24.8 The Development Portal should withdraw proposals when not passed verification after a certain time.
- 24.9 Assessment clocks are not always functioning properly which is a significant problem given the over-focus on timeframes in the system.
- 24.10 Searchability of Code could be improved.
- 24.11 The Expert Panel appears to be strongly focused on planning and should consider the challenges of building assessment, compliance and enforcement and essential safety provisions.
- 24.12 Historic Area statements need updating, the status of heritage listings and heritage policy requires strengthening, including education, communication and compliance.
- 24.13 Local heritage assessment is a particularly difficult process.
- 24.15 Public notification is occurring to the broad 60m radius from developments which arguably only impact on one neighbour. This needs consideration.
- 24.16 Design matters such as energy efficiency, solar orientation, eaves, roof colours, allotment layouts and landscaping all appear lacking in a system assessed under a Planning AND Design Code.

Conclusion

- 25. Given the complexity of the new planning system, and current problems being experienced by planning practitioners and the public in using and navigating the Planning Portal and achieving sound planning decisions, it is important that Council make known its concerns to the Expert Panel.
- 26. There are concerns about both the policy content of the Planning and Design Code that guides development, and the mechanics of the online portal.
- 27. On a positive note, the Commission's intentions to assist in strengthening the protection of character and historic areas is welcome and fully supported.
- 28. In addition, Council can fully support the submission prepared by the Local Government Association in consultation with Local Councils.

DEVELOPMENT ASSESSMENT

1.	Difficulties working with and navigating the ePlanning system	
	Document management	Much communication with clients is by email but emails cannot be uploaded into the portal. Instead emails have to be printed, saved as a PDF and then uploaded. This creates an unnecessary administrative workload.
	Complexity navigating the system	Whilst planning practitioners and associated admin staff using the system every day have become familiar with the complexities and mechanics of the portal, this is not the case for members of the public seeking to lodge an occasional development application. For the lay person the system is daunting and invariably leads to lengthy discussions with staff guiding clients through the process.
	Variations and staged consents	The system makes managing variations to applications and staged consents very difficult and confusing. It is noted that some changes have been made to the SA Planning Portal and this may improve the processing of variations.
	Verification process	The verification necessary at the start of the process, before any fees are paid, is very onerous and demanding, and is in effect a quasi-planning assessment. The fee structure should reflect this, with a fee being charged before verification is commenced. Some applications remain awaiting mandatory documentation with no way of moving them on or cancelling them.
	Referrals to Government Agencies	To determine if an application requires a referral to a State government Agency, a Council Planner needs to check the Planning and Design Code as well as the <i>Planning, Development and Infrastructure (General) Regulations 2017</i> . This can be onerous when there is no assessment pathway for a development and the Planner needs to check multiple locations to determine if a referral is necessary. In this scenario it is highly likely that a referral will be missed.

2.	Fees	Changes to the fee system whereby Councils no longer receive a lodgement fee has led to a significant negative impact for Councils. In addition, fees coming to Council in no way reflect the resources required to assess an application in the planning portal.
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3.	Overlays	
	Overlays and assessment pathways	<ul style="list-style-type: none"> ▪ In situations where a particular overlay only applies to part of a title (common in rural areas) a development application will trigger the calling up of all overlays applicable somewhere on the site even if the actual site of the development is not affected by the overlay. This has the potential to determine the incorrect assessment pathway. ▪ There are in places no assessment pathways for developments described as “envisaged” within the zone. This necessitates scrolling through numerous policies that have no relevance, a frustrating and time-consuming process.

	Flood Overlays	Needs to be more highly developed policy to address the possible impacts of flooding – building a certain height above identified flood levels may not be the best solution given local characteristics and impacts.
	Tree Canopy Overlay	Council proposes that the Tree Canopy Overlay apply to Yankalilla's townships. It is puzzling that it does not – issues of reducing heat and creating shade and habitat apply equally outside the metropolitan area. This Overlay should also apply to the Master Planned Township and Neighbourhood suite of Zones and should be relevant to non-residential such as Industry and Commercial Zones where there are often swathes of barren land. It seems a big opportunity missed to not require urban greening on private land at the outset of a new development area or in areas with often large barren sites.
	Native Vegetation and Bushfire Risk Overlays	An effort should be made to resolve contradictory advice received from the Native Vegetation Council and the CFS. It is acknowledged that they have different agendas and seek different outcomes, but conflicting advice makes resolution of issues difficult for Council planners and applicants. For example, the application has been referred to the CFS who outline in their advice to the Planning Authority that they can only support a certain Bushfire Attack Level (BAL) rating if native vegetation is removed. The applicant and Council Planners are then left to navigate this advice/direction.

4. Timeframes		
	Requests for further information	The 10 day period for requesting further information is quite unreasonable and results in poor outcomes. It works for the most basic structures only. It is inflexible and takes no account of resources available in the Development Assessment team. Council is not averse to timeframes applying but suggests that the 10 day period apply to Accepted Development and Deemed to Satisfy Development only and that more reasonable time frames apply to other categories, particularly those on public notification. Applications on public notification often require additional information and/or clarification arising from representations; the inability to do this leads to possible conflict, poor planning outcomes and potentially more refusals.
	Deemed Consents	This aspect of the system is one of the most perplexing. It creates unreasonable pressures on DA staff, creating the potential to result in less than rigorous assessment and poor planning outcomes. Its inflexibility does not consider and respond to changing and often challenging staff resources. At very least it should apply only to Accepted and Deemed to Satisfy categories of development.

5. Public notification		
	Lack of discretion	The opportunity for staff to deem a proposal minor and therefore not subject to notification is welcome.
	Wider notification/fewer appeal rights	Whilst the extent of notification has been increased, and the notice on the subject site has given greater exposure to notifications, this has created a false sense of influence in the community as third party appeal rights have been significantly reduced.
	System has targeted domestic proposals	There appear to be many more domestic applications undergoing public notification than previously whilst more substantial proposals are not being notified. 80% of items decided by the Fleurieu Regional Assessment Panel are dwellings. Is the intent to have greater scrutiny of residential development than, for example, commercial development which often does not require public notification?

6.	Wastewater	The current system has not adequately addressed issues which arise with proposals in unsewered areas. The interface with Council's wastewater management system has not been adequately considered, and many Private Certifiers have little awareness of the implications of development on an unsewered site.
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POLICY AND STRATEGY

7.	Lack of Policy	
	Boundary realignments	This is a concern in rural areas where realignments have the potential for adverse outcomes for primary production and landscape quality. Excellent policy to guide proponents to the best outcomes was not carried over from Development Plans; current policy is simply too shallow to result in sound outcomes. Council is happy to provide this policy to the Expert Panel and/or PLUS for further consideration.
	Design in Rural Areas	<p>There is currently very little guidance for design in rural area and this is a critical issue in areas of high scenic quality. Existing policy focuses on minimising cut and fill, and “maintaining a pleasant rural character and amenity”. This policy is vague and provides little sound guidance to proponents. Nowhere is “Character” articulated – this could be done in Character Statements, providing guidance to applicants.</p> <p>The need for non-reflective materials and finishes, substantial setbacks and siting below ridgelines applies only to large buildings but there is just as much potential for substantial dwellings to create a blot on the landscape.</p> <p>Nowhere does policy address local natural features such topography, creek lines and existing vegetation, nor design elements such as shading, articulation and roof lines, but rather relies on blunt instruments such as substantial setbacks. Large setbacks are not always possible on historically small allotments and take no account of local geographic features.</p> <p>Previously developed policy has not been carried over but Council is happy to provide this policy to the Expert Panel and/or PLUS for further consideration</p>
	Lack of local policy	A great deal of local policy was lost in the transition to the new system. A relatively easy solution to this would be the re-introduction of Concept Plans to address local issues of importance in specific locations/critical sites which cannot be adequately addressed by the application of state-wide policy.
	Climate responsiveness	There is a lack of policy addressing the siting and design of habitable buildings so as to minimise heating in summer and cooling in winter, and take advantage of local climatic conditions such as cooling breezes. Whilst this issue is addressed in the Building Code (National Construction Code) in a different way, it could also be addressed at the planning stage by way of policies dealing with siting, articulation, shading, depth of covered verandahs on northern and western sides, fenestration and materials, remedies which may in the long run be less expensive than building rules solutions.
	Vagueness of policy	Throughout the Code policy lacks definition and provides little guidance. Examples are references to “small-scale” in the <i>Local Activity Centre Zone</i> , with no reference to what constitutes “small-scale”, and references in rural zones to “pleasant rural character” with no descriptions of what constitutes that character.

8.	“Value-adding” and Tourist Accommodation in rural areas	There is a lack of clarity around “value-adding” enterprises and tourist accommodation in rural areas, due in part to the rapidly changing tourism and visitor offerings in the hills and Fleurieu Peninsula. Language around these developments needs to be more rigorous as it is currently ambiguous and this leads to confusion and potentially poor planning outcomes. The policy wording is also unclear with the PO referring to value-adding as being “associated”, while the corresponding DTS/DPF comments on its being “ancillary”.
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9. Private Proponent Code Amendments		
	Resourcing	This is currently a serious issue for Council in terms of resourcing, and in terms of Council’s long-standing strategic approach to planning policy. Private Proponents can lodge a Code Amendment with PlanSA at any time, and this action has immediate implications (unplanned) for Council staff who have to formulate an initial response. This is time-consuming, with frequently short deadlines to meet Council meeting dates, and removes resources from other on-going planning policy work identified by Council as having priority.
	Consultation	<ul style="list-style-type: none"> ▪ Concerns about the impartiality of a community consultation process run by a person with a commercial interest in the outcome. ▪ Concerns that the community will be disengaged/apathetic regarding lodging submissions to a private proponent, who may be a local identity, rather than Council, with perceptions that as it is not being undertaken by Council, it is of no consequence. ▪ Council has no opportunity to gauge the community’s view on a Code Amendment until the consultation period has closed. This means that Council (elected to represent the community) does not have the benefit of the community’s view in forming its stance on the appropriateness of the Code Amendment
	Review/verification of content of documentation	There is very limited, if any, opportunity for Council staff to review and verify the content of a private code amendment. A good example of this is the Retail Study forming part of the Lot 5 Hampden Way Strathalbyn Code Amendment; there has been no opportunity to have this independently verified.
	Lack of grace period	Private Code Amendments can be lodged at any time. This is despite the fact that Council may have made a recent decision which contradicts the objective of the proposed Code Amendment as in the case of the current Lot 50 Hampden Way, Strathalbyn Code Amendment.
	Relationship to Council’s long-standing strategic planning process	The long-standing process of strategic planning has been undermined by the ability of private proponents to undertake code amendments. Under the previous Planning & Development Act 1990, Council, the Minister for Planning and private proponents (under very limited circumstances and with Council undertaking the amendment) had the ability to amend strategic planning policy. For the most part Council was in control of the process and could determine, according to demand and available resources, which policy should be changed, and how and when it should be changed. A good example is the re-zoning of Deferred Urban lands to a residential zone. Under current arrangements a private proponent can step in at any time and seek to change the zoning regardless of whether or not the proposal meets any local strategic documents or whether Council considers the time is right. A good example is the current proposal to rezone Rural land at Normanville to Caravan and Tourist Park, associated with the existing caravan park adjacent to the north-west. A preferred approach is one more akin to the previous, where it is possible for private proponents to instigate a Code Amendment, but with Council’s agreement, and with Council undertaking the process.

10	Heritage and Character	
	Elevate Character Areas to Historic Overlays	Council supports this initiative to upgrade Character Areas to Historic Areas where there is adequate justification, and in fact is currently doing this for the township of Milang. The development by the Department of guidelines for this work is very welcome. It is worth noting that some Character Areas are not historic in nature; the distinctive character is due to other design, siting or streetscape elements.
	Character Area Statements' upgrades	This initiative, and the support for Councils undertaking upgrades is strongly supported