Geospatial Council of Australia

Spatial Information and Cartography · Land Surveying · Engineering and Mining Surveying · Remote Sensing and Photogrammetry · Hydrography

16 December 2022

Submission via: DTI.PlanningReview@sa.gov.au

Attention: Expert Panel

Dear Panel Members,

On behalf of the Geospatial Council of Australia (currently trading as Surveying & Spatial Sciences Institute) we congratulate the Minister for Planning, the Hon. Nick Champion, for commissioning a review of key aspects of South Australia's planning system. We commend the Minister for championing planning decisions which facilitate sustainable, affordable and liveable long-term growth strategies for Greater Adelaide and the region.

The Geospatial Council of Australia (Geospatial Council) is the new peak industry body for the geospatial sector. The Geospatial Council is in the process of forming as a result of a recent decision to merge the Surveying & Spatial Sciences Institute (SSSI) and the Geospatial Industry Business Association (SIBA|GITA) with its official launch planned for March 2023.

The Geospatial Council represents both individuals and organisations working in or aligned to the geospatial sector. We are representative of all the disciplines that encompass geospatial such as surveying, hydrography, remote sensing, photogrammetry, geographic information system (GIS) just to name a few. Our priority is workforce development with a focus on building industry capability and capacity to ensure long term sustainable growth of our sector.

The Geospatial Council welcomes the opportunity to provide feedback on this important review. We have requested feedback from our members, and are pleased to submit the following feedback. We have provided a summary of comments received in relation to each of the relevant discussion papers.

Planning, Development and Infrastructure Act 2016 reform options.

- **Accredited Professionals:** The Geospatial Council supports only planning certifiers assess applications for planning consent and only building certifiers assess application for building consent.
- **Deemed Consents:** Overall the process for actioning Deemed Consent is onerous and confusing to applicants. We recommend this process be simplified. The Geospatial Council supports the prescribed deemed consent provisions as being effective as it provides a mechanism for the 'customer' to keep the relevant authority accountable in order to finalise their assessment.

  We also support the possibility to apply for Deemed Development Approval following a prescribed period and for the review into the current assessment timeframes, particularly for land division applications (at present the wait time is too lengthy). The assessment for Land Division consent should be contained within the Planning Consent Assessment and should not exceed it.

27 – 29 Napier Close
National Surveyors House
DEAKIN ACT 2600

T: +61 2 6282 2282
E: info@sssi.org.au
W: www.sssi.org.au

- **Verification of Development Applications:** A major issues is where Councils are delaying application from moving past the verification stage by requesting architectural and engineering designs up front prior to giving the application any planning consideration. (E.g., retaining walls, partial house demolition). These structural and building alterations are generally a technical matter that in most cases have a logical solution, but the planning staff of certain councils seem to use the verification as a holding point, without the compulsion to deliver planning feedback or comments, which would give customers some certainty and direction, especially when asked to spend significant money on design and engineering works.

  We would like to leave the verification process to the key planning matters for land division only and have any structural demands as part of the planning assessment itself. It will provide further certainty and clarity for customers and Council can still uses other tools to pause any 'countdown clock' if the developer needs to work through additional engineering and architectural designs.

  The Geospatial Council believes there would be advantages in amending the scope of Schedule 8 of the PDI Regulations. The information required to be provided for a land division application is beyond what is required for assessment by a Council. We suggest the following be altered:
  - Part 7 (2)
    - (a) (ii) - omit the requirement for the widths of existing roads, streets and thoroughfares.
    - (a) (iv) - omit the requirement for the names of each owner of land and agent
    - (a) (ix) - include the option for an "indicative" driveway to be shown on a plan of division, without the need to commit to construction of a proposed driveway (which may change location once a building plan is approved on the same site).
  - Part 7 (3)
    - (a) (i) - clarify/discuss the requirement for certificates of titles of all adjoining land, and of the land on the opposite side of any abutting road. This is often quite a substantial amount of information to be shown on a plan of division for assessment.
- **Single Point of Verification of land division applications for the State:** Surveying firms have long used the electronic application lodgment of land division applications through the EDALA system. It was a single point of initial assessment/verification and the single point of enquiry for the status of all divisions. It was working very well, apart from the need to upgrade the online portal. Now with the new Planning System, we have in the order of 68 Councils acting as a point of verification and potentially 68 different views.

  The Geospatial Council recommend the State Planning Commission delegate the verification process for land division applications to a centralized function. Returning to the central point of truth for all division applications will provide greater clarity and consistency for all users and referral agencies.

Infill Policy

- **Strategic Planning:** The system currently in place for ensuring good strategic alignment between regional plans and how policies of the Code are applied spatially is effective in terms of providing a guide on the desired size of an allotment, but also allowing for a deviation from that if the locality allows.

An application can be assessed on its performance provisions, it does not need to meet all quantitative data. This approach to assessment however should be better described to relevant authorities.

Car Parking Policy

- **Code Policy:** it is not necessary for the Code to seek the provision of at least one covered carpark when two on-site car parks are required.

Tree policy

- **Native Vegetation:** Native Vegetation is an important resource to conserve and there is always tension between development of land and maintaining Native Vegetation. Management and the method of working through this tension applies well in a rural/semi-rural environments where there is scope to modify applications and achieve the goals of the Native Vegetation Overlay. But in urban areas (and with experience in the Mitcham Council area in particular, where this overlay applies) when the size of allotments are under $2000m^2$ (which is in most cases) , it discourages the developer from preserving pockets of native vegetation by:
  a. not providing the option of having enforceable building envelopes (when blocks are under $2000m^2$) to minimise the impact of the development on native vegetation. and
  b. the SEB offset payment reflects this as the developer then needs to pay the SEB amount as though the entire site is to be cleared, even when the developer does not intend to do this.

  The Geospatial Council requests that consideration be given to modifying the criteria for the assessment of native vegetation management / protection in the urban areas where it currently applies.

e-Planning and PlanSA Reform Options

- **Website Re-design**: The Geospatial Council believes the PlanSA website is easy to use, however, suggests the following changes to be considered to improve usability:
  - Under **"Policies that Apply to this property",** hover text or a pop up link to show data from Tables such as **"Design in Urban Areas Table 1 – Private Open Space"** or **"Transport, Access and Parking Table 1 - General Off-Street Car Parking Requirements".** Use similar design principles as used for **"Definitions"** in the same section.
  - When searching for an application in PlanSA the results screen doesn't show the assessment clock. Assessment clock is only shown on the **"Under Assessment"** tab on the **"Your applications"** dashboard. We suggest the assessment clock shown on the individual search result, and within the application itself for clarity.
- **Online Submission Forms:** The Geospatial Council believes a PlanSA login would be beneficial as this would enable applicants to login and review existing and past lodgments.
- **Increase Relevant Authority Data Management:** There needs to be the ability to replace old versions of a plan, rather than needing to submit updated plans. This was a capability in EDALA. We also request that old plans remain available. It is essential that the system in place can keep track of version numbers
- **Collection of lodgment fee at submission:** The Geospatial Council is supportive of a lodgment fee being paid on application.

We do not see any major consequences to locking in Code provisions at lodgement – once an application has been submitted, it should be locked into the Code at that time.

- **Combined verification and assessment processes:** Implementing a streamlined assessment process will ensure faster assessment times and result in less backlog on relevant authorities. A current obstacle that may prevent decisions on Accepted or Code Assessed applications being made quickly are delays in referral response times from referral agencies. This is particularly relevant to land division applications.
- **Automatic Issues of Decision Notification Form:** the automatic issue of an e-Planning system being able to issue an automatic decision notification form will allow for better file and time management by relevant authorities. A key challenge of implementing an automatic system is that developers may also take advantage of delayed payment of fees. Therefore a deadline for payment of fees should be introduced.

General Comments

Consideration should be given to the implementation of digital twins, in particular Spatial Digital Twins (SDTs) as a requirement for the planning of any significant structure and the visualisation of more complex strata developments. SDTs are an advanced spatially accurate digital representation of the real world with 3D and 4D (time) dimensions that are emerging globally as a powerful tool to improve understanding of the physical environment and enable better-informed decisions.

SDTs develop predictive capability through artificial intelligence and machine learning and offer just-in-time analytics, products and services. They vastly improve the value of data through aggregation from multiple sources and shared access, leading to better information for decision-making and lower service life costs for many forms of infrastructure. With their rich information suite, analytics and services, SDTs are rapidly becoming an essential component of global critical cyber infrastructure. SDTs are becoming a critical information and decision-making tool to address South Australia's key challenges.

Thank you once again for the opportunity to provide feedback. If you have any questions please do not hesitate to contact us at ceo@sssi.org.au. The Geospatial Council of Australia looks forward to receiving feedback on the outcomes of this review.

Tony Wheeler
Chief Executive Officer

Graham Walker
SA Region Chair