



CLARE & GILBERT  
VALLEYS COUNCIL

13 January 2023

Ref: 3.71.7.10

Mr John Stimson – Presiding Member  
Planning System Implementation Review Panel  
DTI.PlanningReview@sa.gov.au

Dear Mr Stimson

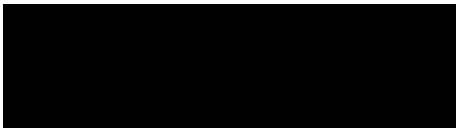
**Re. Planning System Implementation Review – Clare & Gilbert Valleys Council  
Response.**

Thank you for the opportunity to provide Council's input towards this important review. Outlined below is Councils' feedback regarding the questions asked within the discussion papers.

Some of the discussion papers questions are not relevant to our Council and therefore they have not been answered.

If you would like to speak further about our comments, please contact myself on 8842 6400.

Yours sincerely



Andrew Christiansen  
Director – Development and Community



## Planning and Design Code Reform Options

### *Character and Heritage*

1. In relation to prong two (2) pertaining to character area statements, in the current system, what is and is not working, and are there gaps and/or deficiencies?

Not applicable to our Council.

2. Noting the Panel's recommendations to the Minister on prongs one (1) and two (2) of the Commission's proposal, are there additional approaches available for enhancing character areas?

Not applicable to our Council.

3. What are your views on introducing a development assessment pathway to only allow for demolition of a building in a Character Area (and Historic Area) once a replacement building has been approved?

I think this would be a good outcome.

4. What difficulties do you think this assessment pathway may pose? How could those difficulties be overcome?

I think this pathway is a fair outcome, buildings should not be demolished within character areas if the replacement dwelling/s is not keeping with the character of the area, otherwise, what's the point? It would annoy developers but planning regulation should protect and enhance character of an area. If their development is consistent with the existing character it should not necessarily be a problem even if it is a higher density development.

### *Native Vegetation*

1. What are the issues being experienced in the interface between the removal of regulated trees and native vegetation?

N/A – CGVC Council deals exclusively with the Native Vegetation Overlay – no Reg/Sig Tree overlays are present.

2. Are there any other issues connecting native vegetation and planning policy?  
There are a number of recurring issues that Council has to negotiate when assessing development that is subject to the native vegetation overlay.

The first is determining if vegetation that is the subject of removal is in fact native. In some instances, an applicant is unable to determine whether vegetation they seek to remove is/isn't native vegetation. Council Planners also lack the expertise to make these determinations. Greater resources needs to be made available to assist both applicants and assessment bodies in determining whether subject vegetation is native and requires further consideration.



## CLARE & GILBERT VALLEYS COUNCIL

The second is in many instances applicants sign the declaration stating no vegetation will be removed, when it is clear on the plans provided that some vegetation will be removed. This puts the onus on the Council planner to either take the declaration on good faith (making some sort of judgement that the vegetation in question isn't going to be impacted, isn't native, etc.) or challenge the applicant on the declaration provided.

The third is native vegetation isn't just large trees. Some of our rarest flora are small ground covers, orchids, grasses, etc. that require a suitably qualified professional to formally observe and identify to know they are even there. The Council Planner doesn't have the expertise to undertake this. There is no doubt in my mind that vegetation of this nature would have been adversely impacted by development as it is simply missed through the assessment process, through no fault of applicants/assessment bodies. Greater input is required during the assessment process by the Native Vegetation Council through an expansion of the Native Vegetation Overlay(s) statutory referrals process.

### *Tree Canopy*

A note on this, the Urban Tree Canopy Overlay applies to phase 3/urban Council areas however it is not present in rural townships throughout the CGVC area/phase 2 Councils. The topic of tree canopy, safeguarding existing canopy and increasing overall tree canopy is just as applicable in rural townships as it is in urban areas and the implementation of the Urban Tree Canopy Overlay in rural townships would be beneficial to increasing tree canopy throughout these townships.

### *Tree Policy – generally not applicable to Clare & Gilbert Valleys Council*

1. Should the criteria within the Planning and Development Fund application assessment process give greater weighting to the provision of increased tree canopy?

Currently regional Councils have the same opportunity to apply for funding via the Open Space Grant Program but generally have less resources to invest in master planning / streetscaping that are a pre-requisite for being successful in receiving funding.

Although the focus on trees is almost exclusively urban trees, it shouldn't be. Many regional towns have minimal street trees and street tree planting would have significant benefits to the residents of these towns and the general amenity of the towns. The Open Space Grant should be extended to include street trees or as a minimum the Greener Neighbourhoods fund should not exclude regional areas. Until I read this report I was unaware of its existence which is unfortunately exclusionary to regional areas.

### *Infill Policy*

1. Do you think the existing design guidelines for infill development are sufficient? Why or why not?

One of the lines within the discussion paper on p.21 states the following: "These policies can be found in the Design and Design in Urban Areas General Development Policies in



## CLARE & GILBERT VALLEYS COUNCIL

the Code.” Unfortunately for regional Councils this is incorrect. Under the “Design” general development policies it does not reference these three design features in this policy. When Code extracts are generated for dwellings within the Neighbourhood Zone which is the majority of residential zones within our Council area and probably many regional centres, the ‘Design’, rather than the ‘Design in Urban Areas’ General Development Policies apply and the design features are not included in the ‘Design’ suite. . It would be helpful if this was incorporated into Township Zone policies as well, effectively any residential type zones would be of benefit.

To address this, CGVC would like to see Design in Urban Areas - Residential Development – Low Rise PO/DPF 20.2 carried over to the Design overlay and made applicable in the assessment of any form of dwelling application.

This is a big problem for us as in recent times, there have been multiple examples where poor house designs, essentially a standard house design which has it’s “end” facing the street with minimal if any street presence has resulted in us trying at the minimum to get a door, window and some articulation hasn’t been supported by the general development policies in “design”. We’ve had some quite frankly shocking housing designs come through and the implementation of the three design features in the “design” policies would be of great benefit and should be changed as a priority. The design features shouldn’t be just for developments in urban areas nor should it be just the focus of infill housing design policy. More specific guidance in regards to housing design would be hugely beneficial.

2. Do you think there would be benefit in exploring alternative forms of infill development? If not, why not? If yes, what types of infill development do you think would be suitable in South Australia?

As the population ages innovative housing models would be of benefit. The “co-housing” model does not look vastly dissimilar from a typical granny flat but the concept of ownership by various parties/persons is unique and worthy of exploring further. I’m not sure if ownership models is beyond the realms of this review though. Incorporating multiple homes as a group dwelling situation I don’t believe it is markedly different from the co-housing model. Overall, as the population is ageing rapidly the incorporation of more, smaller homes within close proximity to services is of benefit.

### *Strategic Planning*

1. What are the best mechanisms for ensuring good strategic alignment between regional plans and how the policies of the Code are applied spatially?

The Regional Plans haven’t been developed yet, the existing ones in regional areas are so old they’re no longer relevant. We are keenly awaiting the development and implementation of these Regional Plans to then determine what can be spatially provided. There is a challenge though as Code does not always reflect local desires/aims as it doesn’t reflect the nuances that were afforded by Development Plans. Effective consultation with Local Government is key in this area, I’m unsure of what specific mechanisms though that would assist in this area.



2. What should the different roles and responsibilities of State and local government and the private sector be in undertaking strategic planning?

Local Government, particularly in regional areas, has a much better understanding about where local residents want to see their communities grow/develop spatially. Our Council, like most regional councils, does not have a policy planner, therefore we are reliant on consultants to deliver Code amendments for us. I'm not sure what role beyond the lobbying role that private organisations currently have should influence strategic planning in the State. I view this as a largely Government role but through effective consultation.

#### *Car Parking Policy*

Car parking is a more vexed issue in metropolitan areas however it's perhaps more important in regional areas as there are no alternative transport options particularly for more rural locations. Walking is challenging given the greater distances and cycling is something that is unlikely to take hold in the foreseeable future without significant investment in infrastructure. The lack of traffic, wider spaces, land use patterns and non-existence of public transport means cars will always be king within regional areas. An "uncoupling" of car parking demand from development in regional areas is something that should be considered at best fantasy.

Of note, within regional areas, larger vehicles have increased exponentially so it should be considered that the parameters around minimum garage dimensions should reflect that. Even with higher fuel prices this transition to SUVs is unlikely to go anywhere fast. In answering whether it is still necessary for the code to seek the provision of at least 1 covered car park and two on site car parks, the answer is a resounding yes. If this is reduced it will just result in cars parking on the street and reduce amenity.

The development of a design guideline or fact sheet related to off-street car parking, particularly a rural version with large car parks would be of benefit.

Council has a car parking fund. The fund has challenges in that development is often sporadic in the CBDs where it effects and it can take a long period of time to accumulate enough funds to then be utilised for car parking in the townships. Probably not such an issue in a metro area. However, reorientating the fund to provide new bike parks or trees I don't think will address the need for car parking as this demand will always remain high in regional areas.

5. Is it still necessary for the Code to seek the provision of at least one (1) covered carpark when two (2) on-site car parks are required?

Yes – particularly in rural areas with little to no public transport. Garage dimensions should reflect the change in consumer patterns (e.g. SUVs and 4WD becoming more popular) to ensure garages are fit for purpose. It's often found that garages in many instances are wholly utilised for uses other than storage of vehicles – instead being used to store household goods, used as workshops or used as games rooms. This then pushes cars out into the driveways and onto the street. Whilst not a huge issue in the CGVC



## CLARE & GILBERT VALLEYS COUNCIL

area given the relatively low densities and size of lots, there is potential for this to become an issue in areas that envisage higher densities and is already an issue in urban council settings. Council requires greater powers to enforce that garages are used for their intended use in the event that they aren't and parking/congestion issues arise.

Another benefit of requiring at least one covered parking space as part of the dwelling development is to ensure that at least one covered space may be accommodated on the property. Otherwise, conceivably, 2 open parking spaces could be provided to the street side of the dwelling building line and the dwelling design/location may preclude any future garage or carport being constructed behind the building line.

### **Planning, Development and Infrastructure Act 2016 Reform Options**

#### *Public Notification and Appeal Rights*

1. What type of applications are currently not notified that you think should be notified? The balance is considered right. It may take some more time before other issues are unearthed though.
2. What type of applications are currently notified that you think should not be notified? The balance is considered right. It may take some more time before other issues are unearthed though.
3. What, if any, difficulties have you experienced as a consequence of the notification requirements in the Code? Please advise the Panel of your experience and provide evidence to demonstrate how you were adversely affected.

The former system mandated that an applicant's response to representors be forwarded on the representors for their perusal. This was a simple step that provided a line of communication between applicants and representors and provided representors with a direct response to their concerns raised, questions asked etc. This was lost when the new system was implemented and now the applicant has to offer their permission for responses to be forwarded on. It seems illogical that you would give an applicant the opportunity to respond to representations received and not then provide this response to those who submitted the representation.

Apart from this, I am happy with how notification operates under the new system.

4. What, if any, difficulties have you experienced as a consequence of the pathways for appeal in the Code? Please advise the Panel of your experience and provide evidence to demonstrate how you were adversely affected.

We have not yet had an appeal. We are sure if there was a Category 3 appeal rights, these would have been exercised particularly around a number of frost fan developments approved in recent times. Considering that a frost fan, subject to meeting the noise requirements, is highly consistent with the Rural Zone provisions, the lack of appeal rights has saved Council a significant sum of money needlessly having to defend something that is highly consistent with the Code.



5. Is an alternative planning review mechanism required? If so, what might that mechanism be (i.e. merit or process driven) and what principles should be considered in establishing that process (i.e. cost)?

Our position is that third party appeal rights should not be re-introduced. There should be more time for people to understand that these rights no longer exist before any changes are made. The interstate and international examples provided such showed no third party appeal rights and there's no real foundation for them. The Panel should be able to do its job and hear from affected residents before making its decision. Third party appeal rights can, in our experience, result in significant legal costs for Council to deal with an issue between two parties that often have a personal animosity to one another.

*Accredited Professionals*

1. Is there an expectation that only planning certifiers assess applications for planning consent and only building certifiers assess applications for building consent?
2. What would be the implications of only planning certifiers issuing planning consent?
3. Would there be any adverse effects to Building Accredited Professionals if they were no longer permitted to assess applications for planning consent?

Answering all the queries above, planning consent should only be issued by planning professionals as they have the requisite skill level to determine what is required correctly as evidenced by the discussion paper.

*Impact assessed development – no comment.*

*Infrastructure Schemes – no comment.*

*Local Heritage – we share the Panel's views.*

*Deemed consents*

1. Do you feel the deemed consent provisions under the PDI Act are effective?
2. Are you supportive of any of the proposed alternative options to deemed consent provided in this Discussion Paper? If not, why not? If yes, which alternative (s) do you consider would be most effective?

Our opinion is that deemed consent is good in theory, however in the context of extreme resourcing difficulties within the sector that are likely to be exacerbated in the future it is understandable that Councils are unable in many instances to meet the timeframes. Often this resourcing issue leads to delays in the verification stage as planners are focussed on getting the consents/refusals through. The bluntness of the instrument is that it doesn't take into consideration human resourcing. Providing too much pressure on a stretched sector will only have negative consequences and will likely lead to more people leaving the industry.



## CLARE & GILBERT VALLEYS COUNCIL

Although it should be removed, if it is to remain, there should be a lengthening of the assessment timeframes.

### *Verification of Development Applications*

1. What are the primary reasons for the delay in verification of an application?  
Our Council is generally ok but fundamentally, not meeting the verification timeframes is due to resourcing. The reasons outlined below highlight some of the resourcing problems we have:

- You may have enough staff but if one is unwell or on leave, it's sometimes difficult to backfill and then verification starts to slip as you have assessments to do.
- Enquiries in regional areas also needs to be addressed more urgently as we don't have duty planners on staff to answer enquires.
- There may be major applications that need assessment all at the same time, i.e. RAP reports, and this can really exacerbate the problem as this essentially takes a planner off line to undertake these reports.
- Applications can come in waves, so at times it can be overwhelming.
- Dealing with urgent compliance/complaints issues relating to planning matters. Number of applications, sick leave, enquiries, and verifications, all of these are entirely out of Council's control when they come in so penalising Council staff who are overwhelmed with work is a poor outcome and will only result in more staff stress.

Verification also needs to be understood, verification is essentially a mini-assessment and is a time consuming activity, particularly when the quality of information provided can be very poor at times.

Perhaps if the State Government is keen to keep the verification within the timeframe, they could undertake the verification for Councils who are struggling with the workload.

Perhaps if it was mandated that all applications need to be submitted by professional draftsmen/architects or design professional to significantly increase the quality of applications, any measures to punish Councils for not meeting the timeframe should not be entertained.

2. Should there be consequences on a relevant authority if it fails to verify an application within the prescribed timeframe?

Do you think it's fair to punish any organisation due to resourcing constraints?

Development has grown a lot over the last few years but resources haven't. If the Panel is of the view that Councils should just get more resources, they do not understand the difficulties in finding planners in SA let alone regional SA.

A potential outcome could be that this would only result in verifications being rushed and sub-par/missing documentation being accepted due to concerns over consequences.

3. Is there a particular type or class of application that seems to always take longer than the prescribed timeframe to verify?





## CLARE & GILBERT VALLEYS COUNCIL

Typically the applications that take the longest to verify are large complex applications that have a large volume of documentation that needs to be reviewed per Schedule 8 of the PDI (General) Regulations 2017.

All Code' Performance Assessed applications (i.e. where performance assessed by default) which typically involves assessment against an extensive suite of provisions, even if many are not relevant to the development.

4. What would or could assist in ensuring that verification occurs within the prescribed timeframe?

State Government assistance for overwhelmed Councils could be a good start.

Greater instruction for applicants – particularly mum/dad applicants who have a limited understanding of the system – is required. As they lodge through the PlanSA website, these resources should be made available through the PlanSA Website. A number of example plans (e.g. an example site plan, elevations etc.) that would give those who have limited knowledge with a visual as to what is required would also be beneficial. If applicants are able to provide the information we need upfront, verification becomes an easier task.

5. Would there be advantages in amending the scope of Schedule 8 of the PDI Regulations?

No. The system expects that the information provided is good quality. It is not unusual to get a site plan which might meet Schedule 8 requirements, but it is of very poor quality and doesn't provide the information needed to make an assessment.

To support Schedule 8 of the Regulations, a range of 'exemplar' planning application 'documents' (i.e. complete suites of plans) for a range of application types could be made available for information/guidance purposes, along with explanatory information that plans are required to include sufficient detail to allow proper assessment against all applicable provisions of the Code. Each 'suite' could include plans that set an indicative minimum standard in terms of detail. By providing concrete examples of applications that meet the minimum standards required for applicant consideration, applicants will have a clearer idea of what standards are expected. It is envisaged such resources would clarify expectations and assist in raising the standard of application documentation and improve verification and assessment timeframes.

### **e-Planning System and the PlanSA website**

#### *Website Re-Design*

1. Is the PlanSA website easy to use?  
Yes
2. What improvements to the PlanSA design would you make to enhance its usability?  
No comment.

#### *Mobile Application for Submission of Building Notifications and Inspections*



3. Would submitting building notifications and inspections via a mobile device make these processes more efficient?

Yes.

4. Where relevant, would you use a mobile submission function or are you more likely to continue to use a desktop?

Mobile would be very helpful. Currently we are implementing a system which essentially is a tick box template for building inspections which can then be pdfed and uploaded. Having this as an online tick box exercise that goes straight into the portal would get rid of the middle man.

*Online Submission Forms*

5. Is there benefit to simplifying the submission process so that a PlanSA login is not required?

Not really.

6. Does requiring the creation of a PlanSA login negatively impact user experience?

They have a reluctance to do it but overall if it's a requirement to do so it shouldn't be a massive problem for people.

7. What challenges, if any, may result from an applicant not having a login with PlanSA?

An applicant will struggle to view and manage their development application(s), respond to documentation/information requests, access decisions etc. I'm not sure how one would manage without having a log-in, given that the system is now wholly online.

*Increase Relevant Authority Data Management*

8. What would be the advantages of increasing relevant authorities' data management capabilities?

It would allow us to correct any mistakes within an application – whether it be to an applicant's details, elements of development, address/addresses etc. Ideally these mistakes wouldn't occur, but human error cannot be 100% avoided.

9. What concerns, if any, do you have about enabling relevant authorities to 'self-service' changes to development applications in the DAP?

This function could be abused by relevant authorities in order to cover up mistakes on their part. However, with the portal's tracking function, any changes should be recorded and be clearly visible in an audit process, which would uncover any abuse/manipulation of the system itself.

*Inspection Clocks*



10. What are the advantages of introducing inspection clock functionality?

Would be helpful to see timeframes for inspections and whether Council will undertake it or not.

11. What concerns, if any, would you have about clock functionality linked to inspections?

None.

12. What, if any, impact would enabling clock functionality on inspections be likely to have on relevant authorities and builders?

Could be a useful tool. It may be concerning for building officers though to have a series of red zeros considering they also have assessments to undertake as well as dealing with building complaints etc. Regional Councils often have one building officer to undertake all activities and this can be challenging to achieve coupled with more red zeros on their dashboard.

*Collection of lodgement fee at submission*

13. Would you be supportive of the lodgement fee being paid on application, with planning consent fees to follow verification?

Yes, we have numerous applications that we have spent time verifying that have ultimately gone cold as a result of fees not being paid. By charging a lodgement fee upfront, this would 'weed out' any applicant who isn't 100% invested in the DA they are lodging. If they don't pay the lodgement fee, the application never reaches verification.

14. What challenges, if any, would arise as a consequence of 'locking in' the Code provisions at lodgement? How could those challenges be overcome?

A change to the provisions that would alter how the application is accessed or processed procedurally would be the biggest challenge. The chances of this happening would be rare.

If all relevant elements are not selected at lodgement stage (e.g. retaining wall within a detached dwelling development application is missed at lodgement), it will (or may) not be possible to add the element later in the assessment process. The current arrangement provides some flexibility to allow a 'missed' element to be added during the assessment process, however, it is not currently possible to generate the relevant code backdated to the lodgement date and requires manual search for the copy of the full Code as at the date of lodgement.

*Combined Verification and Assessment Processes*

15. What are the current system obstacles that prevent relevant authorities from making decisions on DTS and Performance Assessed applications quickly?



## CLARE & GILBERT VALLEYS COUNCIL

This can be effective and many Councils had their own systems of effectively completing the assessment during lodgement for straightforward applications under the Dev Act 1993. The risk of doing this is that a relevant authority would verify and effectively assess a DA before fees are paid and there's a chance that they complete this work, invoice fees which are never paid. This effectively is time lost. If a system of allowing for assessment to be undertaken concurrently with verification were to be introduced, I would suggest this be introduced with part or all of the relevant lodgement/assessment fees being paid upfront to avoid the abovementioned scenario.

While Schedule 8 lists are comprehensive, many applicants (notably one-off clients) do not have a clear idea before preparing and lodging an application what an acceptable suite of application documents 'looks like'.

Good exemplars (available via Plan SA website) to illustrate indicative suitable minimum documentation standards could be expected to lift application standards and reduce verification delays.

16. What would be the advantages of implementing a streamlined assessment process of this nature?

Faster turnaround, allowing planners to get simple assessments off their desk faster and provide applications with quick decisions.

17. What, if any, impact would a streamlined assessment process have for non-council relevant authorities?

Increased pressure for these decisions to be completed faster, potentially resulting in errors, misclassifications, etc. due to the verification/assessment being rushed.

DTS decisions being issued on applications that aren't DTS with no opportunity for these to be vetted.

### *Automatic Issue of Decision Notification Form*

18. What are the advantages of the e-Planning system being able to automatically issue a Decision Notification Form?

Not sure to be honest, apart from the applicant having a decision faster than they normally would?

19. What do you consider would be the key challenges of implementing an automatic system of this nature?

There is a problem that Council may undertake an assessment before the payment of fees and then the payment of fees never comes. If an applicant wants to expedite assessment, they should just pay the fees as soon as they get the invoice which many applicants do. It could be risky for Councils undertaking the assessment before payment.



## CLARE & GILBERT VALLEYS COUNCIL

20. If this was to be implemented, should there be any limitations attached to the functionality (i.e., a timeframe for payment of fees or the determination will lapse)?

A timeframe for payment of fees should be put in place at a minimum.

*Building Notification through PlanSA*

21. Would you be supportive of mandating building notifications be submitted through PlanSA?

Yes, the current system of them calling in and emailing can be difficult in terms of administration. Having it in the portal means it won't be missed.

22. What challenges, if any, would arise as a consequence of removing the ability for building notifications to be received by telephone or in writing to a relevant council? How could those challenges be overcome?

There are builders that are digitally illiterate and nothing is going to change that. However, the portal has been implemented and people have gotten used to that so this is not an insurmountable challenge. If people don't notify we can always fine them.

23. Would this amendment provide efficiencies to relevant authorities?

Yes, it would remove that step of ensuring phone messages or emails are passed onto the relevant authority.

*Remove Building Consent Verification*

24. Would you be supportive of removing the requirement to verify an application for building consent?

Not at all.

25. What challenges, if any, would arise as a consequence of removing building consent verification? How could those challenges be overcome?

Verification is an important part of the assessment process, in effect, it's a mini-assessment of the development at the point of submission. It is critical that a building officer looks through the information and ensures that all the information is there before undertaking an assessment, this is done at the verification stage. If there is no longer a verification stage, how do they know they have the correct information to undertake an assessment? A planning officer does not have the requisite skill level to know what sort of information is required at the building consent stage. Also the building officer, particularly in a regional setting, identifies what fees and inspections are required at the verification stage and invoices the applicant then, how will this be determined. I cannot see this being a workable solution. One of the key delays with the assessment is the poor quality of the documentation so therefore verification is critical to the assessment process.



*Concurrent Planning and Building Assessment*

26. What would be the implications of enabling multiple consents to be assessed at the same time?

If you can't get planning consent, you can't build. Having a two-step process is important. The applicant also can get confused as once they have building consent, they often think they can start building. This has happened on multiple occasions at our Council.

There may be benefits in expediting an application in this regard however there are risks to the applicant in having to pay fees at the same time and then not getting planning consent and therefore can't build the development that would upset them I'm sure. Maybe if there was a clear clarification up front that people tick off that they understand assessment can be undertaken at the same time, but that doesn't mean they'll get approval, it's essentially at their own risk including all the costs for engineering design, etc.

Occasionally applicants seek building consent (via Portal) prior to planning consent. Not sure if this has been sorted, but this should not be an option.

**Innovation**

*Automatic Assessment Checks for DTS Applications*

1. What do you consider would be the key benefits of implementing an automatic system of this nature?

Improve timeliness of applications and provide a consistent methodology. Though we would need to better understand how an automatic checklist would work. Would this involve the applicant completing a checklist before submitting the application and the assessing officer completing a separate checklist? This could be workshopped with templates provided to Councils before something is settled to help influence the design.

2. What do you consider would be the key challenges of implementing an automatic system of this nature?

As above.

3. Would you be supportive of the Government investing in developing this technology so that it may integrate with the e-Planning system?

Yes.

*3D Modelling for Development Application Tracker and Public Notification*

4. What do you consider would be the key benefits of the e-Planning system being able to display 3D models of proposed developments?



Better understanding for the public of what the development will/could look like.

5. Do you support requiring certain development applications to provide 3D modelling in the future? If not, why not? If yes, what types of applications would you support being required to provide 3D modelling?

Yes. Where appropriate for large scale developments (notably high-rise buildings/tall buildings within urban setting). Inclusion of sun shadow modelling for such developments would also be useful.

Modelling should assist assessment and there should be clear and demonstrable benefit to the community and likely cost should not be excessive in the context of overall development cost.

As 3D modelling seems unlikely to be 'reasonably affordable' in the shorter term, it would seem unreasonable to introduce such a requirement for smaller developments.

#### Modelling

Maybe require modelling for restricted or impact assessed developments (where relevant) in the first instance and then filter down over time to other larger CAP/RAP developments.

6. Would you be supportive of the Government investing in developing this technology so that it may integrate with the e-Planning system?

Yes, but only for larger development where there are clear and demonstrable benefits to such modelling being provided.

#### *Augmented Reality Mobile Application*

7. Would you be supportive of the Government investing in developing this technology so that it may integrate with the e-Planning system?

Yes, but as above, realistically considering the cost and the need to make speedy applications, I can't see this as something being widely adopted.

#### *Accessibility through Mobile Applications*

8. Do you think there is benefit in the e-Planning system being mobile friendly, or do you think using it only on a computer is appropriate?

Yes, mobile may be difficult to get the data useful in a visible way to the operator but it's worth exploring.

9. Would you be supportive of the Government investing in developing this technology so that the PlanSA website and the e-Planning system is functional on mobile?

Yes.