

Ref. CR19/74886

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18 December 2019

Chairperson Mr Michael Lennon
State Planning Commission
GPO Box 1815
ADELAIDE, SA 5001

Dear Mr Lennon

DRAFT COUNCIL INSPECTION POLICIES PRACTICE DIRECTION

City of Prospect welcomes the opportunity to comment on the draft council inspection policies practice direction for Consultation as released by the State Planning Commission (the Commission) for feedback by 18 December 2019.

Council considered the draft council inspection policies practice direction at its 17 December 2019 Council Meeting and agreed to provide a submission to the Commission. Feedback comments from City of Prospect are outlined below:

- City of Prospect recognises the critical safety aspect of what the Practice Direction is trying to achieve.
- City of Prospect is mindful that the Practice Direction is still in draft form and will be further refined by the State Planning Commission in response to consultation.
- Notwithstanding this, Council is extremely concerned that the draft practice direction, should it be endorsed in its current form, will lead to a significant increase in the building inspection function required to be undertaken by Council.
- Associated with this concern is the absence of any indication of the fees that will be associated with the building inspection function undertaken by Council. Council is of the view that fees for building inspections (mandatory and additional if this element is retained) should be set at a level that recognises the time and resources involved in undertaking these additional tasks (beyond current standard).
- The Practice Direction should be amended to clearly outline which inspections are mandatory and the specific expectations of Councils to undertake 'additional inspections'.
- Inspection timeframes should consider and reflect the many tasks that Council building officers are required to undertake as well as understanding the staffing levels within local government and the broader availability of qualified staff.
- Requiring inspections to occur within 1 business day of notice is not reasonable or practical.

Looking forward to your consideration of these (and other) comments on the draft and we await your response through an updated Practice Direction.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nathan Cunningham', written in a cursive style.

Nathan Cunningham
Director Community & Planning