





Industry Joint Response to the Accredited Professionals Scheme – Discussion Paper

30 April 2018

The Australian Institute of Architects, the Planning Institute of Australia and the Australian Institute of Landscape Architects SA Chapters are pleased to provide this consolidated covering letter to our individual submissions regarding the Accredited Professionals Scheme Discussion Paper in the new planning system for South Australia.

We each offer individual submissions with focus on our direct areas of interest but have met and share common positions on the following primary elements:

1 – Support for accreditation including recognition of existing schemes run by our Institutes We support the principle of a system of accreditation of skills and ongoing development for those with roles in assessment and/or determination in the planning system.

We have already discussed with DPTI that our organisations offer their own registration and accreditation systems which should be interlinked with the DPTI accreditation for planning to minimise work for both DPTI in the administration of the system and our members in application for DPTI accreditation.

2 – Roles for Professional Expertise in the assessment process

We support the upskilling of accredited professionals involved in the planning assessment process. We also note the ongoing roles for relevant professionals in the provision of subject matter expertise relating to the assessment of applications. These roles currently exist for items such as heritage or traffic engineering assessment.

With the planning system now having a key focus on design excellence in outcomes we assert that roles for design professionals to provide expert review of design matters will also be required within the planning system. We look forward to working further with DPTI on the selection and application of these professionals and on the triggers within the system for referral.

3 - Accredited professionals and Insurances

We understand that DPTI are seeking confirmation that Accredited Professionals who take roles either within assessment authorities or on panels will be covered by a mutual liability insurance scheme. We note that our Institutes view this clarification as having great importance because the need for personal liability insurances will preclude many suitable members from seeking participation through panel roles.

Yours Sincerely,

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Australian Institute of Architects

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April 2018

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PURPOSE

■ This submission is made by the Australian Institute of Architects — SA Chapter (the Institute) to the Department of Planning, Transport and Infrastructure on the subject of the Accredited Professionals Scheme Discussion Paper

INFORMATION

Who is making this submission?

- The Australian Institute of Architects (the Institute) is an independent voluntary subscription-based member organization with approximately 11,000 members nationally and over 800 within South Australia. Members are bound by a Code of Conduct and Disciplinary Procedures.
- The Institute, incorporated in 1929, is one of the 96 member associations of the International Union of Architects (UIA) and is represented on the International Practice Commission.

Where does the Institute rank as a professional association?

At approximately 11,000 members, the Institute represents the largest group of non-engineer design professionals in Australia.

Thank you for the opportunity to review and provide comment on the Accredited Professionals Scheme Discussion Paper.

The SA Chapter of the Australian Institute of Architects (the Institute) welcomes measures that focus on good design outcomes and engagement. It is our belief that design is a complex multifaceted undertaking and that the use of educated and skilled design professionals should be included in the Act to achieve the desired outcomes.

We note that, as Architects, our members already operate under a high level of regulation and compliance as outlined by the Architectural Practice Board of SA and government legislation. Our comments on specific items are below.

Design Assessment

We note that under the Objections and Principles of the *Planning Development and Infrastructure Act* (PDI) the fourth principle in particular:

Promote high standards for the built environment through an emphasis on design quality in policies, **processes and practices**, including by providing for policies and principles that support or promote universal design for the benefit of people with differing needs and capabilities.

A greater emphasis on design quality, focussing on performance-based rather than compliance-based assessment criteria is welcomed. For this to be a respected and trusted facet of the Act assessment needs to be undertaken by a design specialist – in recognition of the fact that the success of the scheme will only be as good as the accredited professional. The inclusion of design quality as an assessable component of the planning system adds a new and highly complex aspect to assessment. In the same way that various specialist referrals in our current system require qualified professionals such as engineers to review, the assessment of design elements in built form projects require qualified professionals such as architects.

We recommend that clear triggers should exist for projects that require specialist design assessment by an architect. It is proposed that these triggers are:

- Development that exceeds 4 floors
- Development that directly affects a local or state heritage place or materially affects the context of a listed place or development in a State Heritage/ Historic Conservation Policy Area.
- Projects that require public notification

We recognise that there is perception that this will result in an undue impact on regional Councils however there is an established program that allows for detailed advice to be provided by an architect similar to operation under the Heritage Advisors scheme. This operates successfully in many regional Councils with architects engaged in response to demand.

As the scheme is implemented and more data becomes available that we wish to suggest:

 Documentation of low level projects and the development of rules/guidelines to improve design quality of small scale development which may be assessed under deemed to satisfy criteria Implementation of pre-lodgement agreement (Paid Design Review) – a fee for service for
project proponents who volunteer to go down design review process prior to assessment
(the review then given weight in the assessment). This is an important alternate pathway
for projects which may not be significant in scale but are seeking design solutions to complex
influences.

Accreditation

Our membership of architects is unique in the industry as qualified design professionals who operate under an Act of Parliament and maintain annual registration. To be registered architects must:

- have completed a Master of Architecture qualification (AQF level 9) from an accredited university program
- undertake a minimum of 3300 hours post graduate experience prior to sitting the Architecture Practice Examination
- observe a professional Code of Conduct
- be covered by Professional Indemnity Insurance
- maintain ongoing professional knowledge.

Mandated CPD is currently a requirement of Institute membership and is being written into the Architectural Practice Act

As already established professions who have established credentials, we recommend that formal accreditation for architects under the *Accredited Professionals Scheme* require that they have undertaken CPD activities that address the specified DPI Act competencies. The only additional reporting that these accredited professionals would then be required to do each year would be to record their PDI Act specific CPD details for DPTI audit. This would assist in managing the administrative and audit costs without reducing the robustness of the scheme.

As you are also aware the operation of the profession under the *South Australian Architectural Practice Act 2009* requires that a complaints mechanism already exists for the profession as administered by the Architectural Practice Board of SA (APBSA). Replication of this complaints procedure for architects involved in the PDI Act Process is not required in our opinion.