



Native Vegetation Council

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Mr Aaron Witthoef
South Australian Productivity Commission
30 Wakefield St
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Dear Aaron,

The Native Vegetation Council (NVC) notes the breadth of work and analysis undertaken by the South Australian Productivity Commission in its draft report on Development Referrals.

The NVC would also like to acknowledge the work that has been contributed by the Native Vegetation Branch in providing the information to the SAPC. This has allowed for fulsome and robust consideration of the development referral process under the *Development Act 1993* and also the *Planning Development and Infrastructure Act 2016*.

Information Request 2.1 Use of native vegetation accredited consultants

Accredited consultants provide an invaluable resource in the preparation of applications but also as a conduit for interpreting requirements. The performance of consultants is something that is monitored by the NVC with a view to continuous improvement.

The NVC acknowledges, that in some instances, the quality of the consultant's work is limited by the information provided by the applicant. This impacts on the ability of the NVB officers to undertake the assessment in a timely and streamlined way.

As an alternative to the accredited consultant model, NVB officers could undertake the assessment on behalf of applicants, on a cost recovery basis. This would streamline the assessment process and potentially deliver higher quality outcomes. Before this option could be fully considered, additional analysis should be undertaken on the level of resourcing, costs to applicants, streamlining of processes and reduction in assessment timeframes in comparison to the current model of using accredited consultants.

The increased use of technology would likely improve the assessment process from the perspective of approval timeframes. With appropriate technology infrastructure and an increase in resourcing, there is the potential for real time approvals by an NVC delegate particularly for simple applications. The NVC can provide further information on this approach if it assists SAPC.

Information request 2.4: Publishing 'on request' referral body guidance materials.

As the SAPC has established in the draft report, the methodology for assessment is only broadly available on the Department for Environment and Water (DEW) website. Details such as score sheets are only available on request.

Score sheets and other similar documents contain technical details and require suitably qualified persons to interpret and use them correctly. Providing these documents as open source materials does come with risk as it may result in misinterpretation and add confusion unless interpreted correctly.

The current approach of advice on these matters by the accredited consultant or officers of the NVB ensures that the applicant understands the context to the requirements and is given appropriate advice tailored to their situation.

However, to support applicants, the NVC is currently developing guidance materials that will assist applicants and planning authorities to understand these processes, and may be more useful than providing assessment materials such as score sheets.

Recommendation 4.1 Formalising Pre-Lodgement Arrangements.

- *Producing and publishing guidance material to make clear to applicants and their consultants or agents what can be expected from the pre-lodgement process with that referral body*

The NVC supports this recommendation and is actively undertaking a body of work that includes fact sheets and guidance material to educate applicants on the process and requirements. Developing standards that guide the pre-lodgement process will be important so applicants understand what is expected of them and what they can expect through the process.

- *Ensuring suitably experienced staff are involved in pre-lodgement engagements with applicants that can identify key issues, information requirements and show-stoppers; and that remaining staff are trained and mentored in these skills*

The NVC supports this approach and reinforces the current informal practice. However depending on the extent of and input required for pre-lodgement engagements, there may be pressure on existing resources.

- *Where pre-lodgement agreements are not used, record and share the outcomes of the pre-lodgement process with the applicant to support a clear and mutual understanding between the parties, including the extent to which pre-lodgement advice can be relied upon in relation to any subsequent development application and assessment process*

The NVC advises that the NVB regularly undertakes this for all pre-lodgement enquiries. In addition, the NVB shares this type of information with planning authorities and other referral bodies as required.

- *supporting an evidence-based approach to calculating the value of pre-lodgement activity in the referrals process by capturing specific metrics*

The NVC very much supports the proposal for an evidence-based approach. Further work will be required on defining suitable systems to capture these metrics. It is anticipated that Planning and Land Use Services (PLUS) will take carriage of this element as part of the introduction of the Code. NVC is able to support PLUS in the provision of data, if required.

Yours sincerely

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

Vaughan Levitzke PSM
Presiding Member
for **NATIVE VEGETATION COUNCIL**