

Discussion Paper on Inspection Policies

2025



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Government of South Australia

Department for Housing
and Urban Development

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Commission Chair's Message Building inspections play an important role in identifying issues before they become problems. They help protect the wellbeing of the community and ensure the places where we live and work are safe. Inspections are essential to ensuring that our buildings are not only compliant with approvals, but are truly safe and fit for purpose.

In 2019, the State Planning Commission undertook a comprehensive review of inspection requirements and introduced a range of actions to improve building inspection practices across South Australia, ahead of introducing new mandatory inspection requirements under the *Planning, Development and Infrastructure Act 2016*. The outcomes from that work have now been operational for close to 5 years, and it is understood that inspection practices and frequency have remained largely the same.

On the national stage, there has been real progress. Building Ministers have come together to endorse a series of best practice model guidance publications from the Australian Building Codes Board, following the Building Confidence Report. These are important steps, and they show a strong commitment from Ministers to lift standards right across Australia.¹

In South Australia, the data tells us we still have a way to go and that we can do better – we need to ensure our communities are safe and we need to build confidence in the building and construction industry.

This Discussion Paper is an important step in achieving both outcomes, and your input and feedback is now invited. We want to be open about the challenges, reinforce why this review is happening, and set the expectation that meaningful change is needed. Your feedback will help us shape a system that works for everyone—one that is practical, consistent, and truly delivers on its promise.

Thank you for being part of this conversation. Together, we can make a real difference for South Australia.



Craig Holden

¹ [24 Jun 2025 - Building Ministers' Forum: Communiqué July 2019 | Department of Industry Science and Resources - Trove](#)

Role of the State Planning Commission

Under Section 144 of the *Planning Development and Infrastructure Act* (the Act), the State Planning Commission (the Commission) must issue a Practice Direction that will require councils to carry out inspections of development undertaken in their respective areas.

In preparing or varying this Practice Direction, the Commission must take into account the following matters:

- a) the financial and other resources of councils;
- b) the impact that a failure to inspect a certain number of developments over a period of time may have on local communities;
- c) the various sizes of the areas of councils and differences in population;
- d) the amount of development undertaken in the various areas of the State;
- e) the type of development that predominates in the various areas of the State;
- f) in relation to building work, building conditions in the various areas of the State;
- g) the public interest in ensuring that development is undertaken in accordance with the requirements of this Act.

[Practice Direction 9 – Council Inspections](#) (Practice Direction 9) is the current Practice Direction that exists for the purpose of Section 144 of the Act.

Further, Section 156 of the Act provides that the Commission may issue a Practice Direction that requires councils to carry out inspections of swimming pools and buildings.

[Practice Direction 8 – Inspection Policy for Swimming Pools](#) (Practice Direction 8) is the current Practice Direction that exists for the purpose of Section 156 of the Act.

These Practice Directions may make different provisions in relation to different councils and councils must comply with the requirements of the Practice Directions as they relate to their council.

These Sections apply to council-controlled areas of the State only. All 'out of council' areas fall under the ambit of an out of council inspection policy, issued separately by the Commission.

[Practice Direction 7 – Inspection Policy for Out of Council Areas](#) (Practice Direction 7) is the current Practice Direction that exists for the purpose of inspections in out of council areas.

Under the repealed *Development Act 1993*, Section 71A provided a direct obligation on Councils to prepare building inspection policies, as opposed to the Commission. There were no sanctions for a failure by a Council to prepare, adopt or adhere to any such policy.

Background

In October 2019, the Commission prepared a Background Paper on Inspection Policies² and consulted on a first-generation Practice Direction³ to support the successful functioning of the State's building system. This was to be the first Practice Direction to exist for this purpose under the *Planning, Development and Infrastructure Act 2016* with the intention it would be built on and improved into the future, in concert with other reform as necessary.

Key themes identified through the 2019 consultation process included⁴:

- That the inspection policy should direct consistent inspections of areas of risk focusing on elements which impact on occupant and public safety, leaving the overall delivery of contracted works and quality as a matter for owner/builder and other regulatory authorities.
- That mandatory inspection levels should be increased over time to reflect council capacity and industry circumstances.
- That whilst the scope of inspections is not limited to buildings and extends to 'development' generally, a focus on building safety was the recommended direction.
- That there should be a transition toward national best practice standards.

Key challenges that were identified included:

- The limited availability of qualified experienced resources to undertake inspections.
- The large geographic areas of many regional councils.
- The cost implications of resourcing the inspections regime.
- That councils would be unlikely to do more than the mandatory requirements prescribed unless appropriately resourced.
- That it would be difficult to achieve requirements without councils contracting the private sector to assist in inspections.
- That caution should be given to the level of accreditation held when allocating inspections.

The Background Paper on Inspection Policies was further supported by a report from Botten Levinson Lawyers who had been engaged to examine the issue of inspections⁵.

Amongst other things, the report provided the following immediate, transitional and ultimate recommendations:

Immediate recommendations included:

- Identifying the purpose of the policies and priority areas giving consideration to the likelihood and consequence of non-compliance when directing inspections to areas of risk.
- That there should be a focus on the elements to be inspected suggesting:
 - Mandatory inspections to 100% of Class 1a developments for primary structural elements, bushfire protection, wet areas/waterproofing and completion.
 - Mandatory inspections to 100% of Class 1b-9 developments for fire safety systems and separation (incl ESPs, bushfire protection), primary structural elements, wet areas/waterproofing and completion.

² [Background Paper \(PDF, 1024 KB\)](#)

³ [Draft Inspection Policies Practice Direction on consultation \(PDF, 256 KB\)](#)

⁴ [What We Have Heard Report \(PDF, 2616 KB\)](#)

⁵ [Botten Levinson Report to the Minister for Planning \(PDF, 1134 KB\)](#)

Transitional recommendations included:

- Streamlining and simplify the mechanisms so that builders can readily issue notifications to a central portal accessible by the Council, certifier and inspectors.
- Mandatory inspections to 100% of Class 1b-9 developments to also include performance solutions, designated building products, electrical, mechanical and hydraulic systems.

Ultimate recommendations included:

- Allowing private certifiers to have the relevant powers of an authorised officer and charge a fee for inspections (noting that the added cost to residential market may be significant), including an accreditation, regulation and auditing system.
- Allowing other suitably qualified and experienced professionals to be recruited into the inspection process.
- Including mandatory inspections of change of use or classification where the risk of building failure increases and including existing high risk / high consequence buildings in inspections.
- Development of a centralised system for inspections, notifications, compliance and record keeping.
- Using planning data to identify those most likely to comply to integrate with and inform Consumer and Business Services licensing and compliance areas.

Since their introduction, there has been minimal change to the percentage requirements listed in Practice Directions 8 and 9 for mandatory inspections of different classes of building works. There has been a large focus on the need to address the challenges raised above and allow industry and councils to become familiar with the introduction and use of the SA Planning Portal. As such, variations have been limited to changes in how inspections are recorded and reported to assist in quality of data.

The most recent updates to Practice Directions 8⁶ and 9⁷ that became operational on 1 July 2025, were to provide clarity around the following matters:

- updated definitions and readability
- consistent use of 'building work' throughout the document
- that only building works completed in a reporting year are to be counted towards inspection requirements
- the types of matters that should be inspected
- that inspection requirements also apply to buildings constructed off-site
- that building works of different building classes in the same application can be counted separately
- that additional inspections following the initial inspection of building works are not to be counted as an additional inspection
- the accreditation requirements for authorised officers
- minor updates to mandatory inspection requirements (percentages) limited to farm buildings and farm sheds and introduction of Class 10c buildings (private bushfire shelters)
- the timing of notifications and inspections as they relate to the completion of swimming pools, swimming pool safety features and temporary safety barriers where a swimming pool contains a water depth greater than 300mm.

⁶ [Practice Direction 8 – Inspection Policy for Swimming Pools 2019 | PlanSA](#)

⁷ [Practice Direction 9 – Council Inspections 2020 | PlanSA](#)

National approach

In mid-2017, the Building Ministers' Forum (BMF) commissioned an assessment of the effectiveness of compliance and enforcement systems for the building and construction industry across Australia. This culminated in the 2018 Building Confidence Report, which made 24 recommendations to Building Ministers to address systemic issues in the Australian building industry⁸.

In particular, recommendation 18 recognised that each jurisdiction requires on-site inspections of building work at identified notification stages.

Following this, a more detailed Model Guidance document⁹ was released by the Australian Building Codes Board (ABCB) in 2021 which provides more specific and practical ways to implement Recommendation 18 with a focus on national consistency and with an enhanced focus on a risk-based approach for undertaking inspections.

The model guidance provides suggested minimum requirements in relation to areas/stages to be inspected based on a building's complexity level.

It is recommended that the ABCB's proposed 'Definition of Building Complexity' be used as the risk framework that determines the extent of *mandatory inspections*.

Building complexity criteria¹⁰

Building complexity criteria are used to determine the building complexity level of all or part of a building in accordance with [Table 2](#). The criteria are as follows:

- (a) Attributes — the building is designed or constructed with any of the following sub-criteria:
 - (i) An *effective height* of more than 25 m.
 - (ii) One or more *Performance Solutions* are used to demonstrate compliance with the *Performance Requirements* relating to material and systems for structural safety.
 - (iii) One or more *Performance Solutions* are used to demonstrate compliance with the *Performance Requirements* relating to material and systems for fire safety.
 - (iv) Is located in an area prone to natural disaster or adverse environmental conditions.
- (b) Class 2 — all or part of the building is Class 2 of three or more *storeys*.
- (c) Occupant numbers — the building is to be occupied by more than 100 people determined in accordance with [D2D18](#).
- (d) Occupant characteristics — the building is to be occupied by more than 10 people who will require assistance to evacuate the building in an emergency.
- (e) Importance Level — the building is determined to be Importance Level 4 or 5.

⁸ [2018 Building Confidence Report](#)

⁹ [Model Guidance](#)

¹⁰ [Glossary | NCC](#)

Table 2 Building complexity level

Building complexity level	Criteria
Low	The building meets only one of the following building complexity criteria : (a) (Attributes), (b) (Class 2), (c) (Occupant numbers) or (d) (Occupant characteristics)
Medium	The building meets two of the following building complexity criteria : (a) (Attributes), (b) (Class 2), (c) (Occupant numbers) or (d) (Occupant characteristics)
High	The building meets three of the following building complexity criteria : (a) (Attributes), (b) (Class 2), (c) (Occupant numbers) or (d) (Occupant characteristics)
Very high	The building meets all of the following building complexity criteria : (a) (Attributes), (b) (Class 2), (c) (Occupant numbers) and (d) (Occupant characteristics); or (e) (Building Importance Level 4 or 5)

The National Construction Code (NCC) currently does not include corresponding technical requirements relating to the defined term 'building complexity criteria' and the various building complexity levels. It is intended that these terms will be integrated into future editions of the NCC.

The model guidance further recommends percentages of mandatory building works to be inspected based on classification and stage. Additional comments are provided on an alternative approach whereby inspection percentages could be set dependent on complexity level for each of the minimum suggested areas/stages to be inspected.

The suggested minimum mandatory inspection requirements in relation to areas/stages to be inspected (where a building does not fall under a building complexity level) are:

- Foundations
- Reinforcement – in situ, reinforcement in footings/slabs and other structural elements
- Framing – structural frames, including roof construction
- Waterproofing of wet areas
- Pool barriers, including in situ reinforcement for pools
- Final, post-completion of all work
- The suggested minimum mandatory inspection requirements where a building does not fall under a building complexity level are:

The recommended percentages of mandatory inspections based on classification and stage are:

- For Class 1 and 10 buildings 100 per cent of building work is inspected for all mandatory inspections
- For Class 2 – 9 buildings, a minimum 30 per cent of building work is inspected with 20 per cent per storey for each mandatory inspection, except the final inspection, post-completion of all building work
- 100 per cent of the final inspection post-completion of all building work must be inspected
- Where an inspection uncovers multiple instances of non-compliance, the issue(s) must be resolved and all remedied building work re-inspected. Where further non-compliance is found, 100 per cent of building work for the mandatory inspection stage must be inspected.

Scope of updates

In support of further significant updates to the Practice Directions, the Commission has resolved to identify the key areas for investigation that it would seek to address, being:

- introducing an enhanced risk-based approach suggested by the [Australian Building Codes Board](#) - this includes changes to percentage requirements for different classes of building works, or more substantial revision of inspection requirements
- reviewing and potentially implementing the findings of the Consumer and Business Services (CBS) [Building and Construction Industry Review](#)
- introducing inspection requirements for class 1a buildings to encourage more inspections during construction instead of at completion
- reviewing the use of Metropolitan Adelaide versus Greater Adelaide for the purpose of council timeframes for undertaking inspections
- reviewing mandatory notifications and associated processes and procedures
- introducing an alternative approach for Councils to require site inspection certification and other documentation in lieu of undertaking physical inspections which may also include guidelines for virtual inspections

Whilst the Commission has chosen to focus on the above areas for investigation, that does not limit or otherwise exclude stakeholders from raising matters that fall outside of this scope during this engagement process such as fees, resourcing initiatives or regulation changes. The Commission is interested to hear about any ideas for reform that may benefit the industry and South Australian community.

Topic 1 – CBS Building and Construction Industry Review

Discussion

CBS regulates aspects of the building and construction industry by setting licensing requirements, monitoring and enforcing compliance by building workers and establishing various protections for consumers. These powers are mostly found in the [Building Work Contractors Act 1995](#)

Private building inspectors are considered ‘building consultants’ under the *Building Work Contractors Act 1995* and CBS can take disciplinary action against private building inspectors for conduct, such as acting negligently. Under the Australian Consumer Law, private building inspectors must also provide their services with due care and skill and take all necessary steps to avoid loss and damage.

However, private building inspectors do not currently need to be licensed, hold qualifications, demonstrate industry experience or have particular insurance in South Australia. There is a risk private building inspectors could fail to identify defective building work or make incorrect findings. CBS is considering requiring building inspectors to be licensed or registered.¹¹

The recent CBS Building and Construction Industry Review¹² included a discussion paper¹³ that was released for consultation in late 2024 and concluded 31 January 2025. The engagement will be reported via the [Building and Construction Industry Review | YourSAy](#) site. Whilst the discussion paper focused mainly on building consultant inspections, there was also a section about the Council inspection regime under section 144 of the PDI Act.

Feedback was sought about whether the current inspection scheme is effective, and inspections are consistent across council areas and building types:

- many stakeholders believed that the council building inspection requirements in Practice Direction 9 do not ensure compliance with the National Construction Code (NCC), and
- that the current council inspection regimes are inconsistent across different councils, types of builds, and stages of a build.
- the following themes were also noted in responses:
 - Disparity between councils’ compliance regimes and the NCC, there appears to be stronger reliance on a council’s decision, with a more flexible application of the NCC.
 - Inconsistent inspection regimes across South Australian councils, including how and when inspections are applied, e.g. the inspection process appears ad hoc and there is some consensus that not every build receives an inspection.
 - Inspections rarely occur across the end-to-end progress of a build.

Further comments suggested that the training of inspectors is inadequate, however stakeholders’ reasons for the inadequacies differ. Building company stakeholders and industry bodies take the view that while training courses should be improved and more consistent, the power to inspect should not be limited to a statutory body e.g. a council.

¹¹ <https://yoursay.sa.gov.au/96721/widgets/448042/documents/297246>

¹² [Building and Construction Industry Review | YourSAy](#)

¹³ <https://yoursay.sa.gov.au/96721/widgets/448042/documents/296214>

By contrast, council responses support improved resources for councils, to create greater consistency with limited interference from private individuals.

The feedback received further reiterates there is room for improvement in South Australia and real change is needed to strengthen the reputation and regulation of the construction industry.

Topic 2 – Jurisdictional comparison

Discussion

For South Australia, Practice Direction 9 provides the minimum percentage of building works in a council area to be inspected based on the building classification.

For a Class 1 building: A minimum of 66% of building work completed in the relevant reporting year should be inspected.

For a farm building or a farm shed with a floor area of 500m² or greater: A minimum of 33% of farm sheds and 75% of farm buildings completed in the relevant reporting year should be inspected.

For Class 2 - 9 buildings inclusive (other than a farm building or a farm shed): A minimum of 90% of building work completed in the relevant reporting year should be inspected.

For a Class 10c building (private bushfire shelter): 100% of building work completed in the relevant reporting year should be inspected.

The inspections can be at any time during construction or on completion. Whilst particular stages at which inspections should occur are not prescribed, the practice direction provides that inspections should include particular elements present and reasonably accessible at the time of inspection.

Practice Direction 8 also provides that 100% of safety features associated with swimming pools over the course of the relevant reporting year should be inspected upon notification of the completion of the swimming pool and/or swimming pool safety features; or upon the installation of a temporary safety barrier for a swimming pool containing a water depth greater than 300mm.

In July 2025, the ABCB released an Issues Paper on the National Voluntary Certification Scheme for Manufacturers of Modern Methods of Construction¹⁴. The issues paper provided a summary of the current mandatory inspection stages for buildings in different jurisdictions based on classification as follows:

Mandatory inspection stages for house building in different jurisdictions (Class 1 buildings)

Inspection stages	NSW	VIC	QLD	WA*	SA [†]	TAS	ACT	NT [‡]
	1	2	3	4	5	6	7	8
Before pouring footing	X	X	X	X		X	X	X
Before pouring in-situ reinforced concrete element	X	X				X	X [§]	X
Before pouring concrete slab			X	X				X
After covering foundations of the work						X		
Before lining/covering framework	X	X	X [#]	X		X	X	X
Before pouring reinforced masonry or block walls								X
Before covering walls, floors, or ceilings to check fire resistance levels								X
Waterproofing in a wet area	X					X		X
Upon completion	X	X	X	X		X	X	X

¹⁴ [Issues paper Manufacturer Certification Scheme for Modern Methods of Construction.docx](#)

Note:

* WA requirements are proposed and not currently in force.

† SA requires a minimum 66% of house construction to be inspected at least once during construction or on completion.

‡ NT has a 2-tier system of building control areas. Tier 1 areas have full certification requirements for all building work. Tier 2 areas have full certification requirements for most building work and part certification requirements for some building work.

§ ACT does not specify 'in-situ'

If bracing consists of cladding or lining, then frame inspection takes place after lining/covering.

Mandatory inspection stages for apartment building in different jurisdictions (Class 2 buildings)

Inspection stages	NSW	VIC	QLD*	WA†	SA‡	TAS	ACT	NT§
	1	2	3	4	5	6	7	8
Before placing footing membrane/concrete	X	X		X			X	X
Before pouring in-situ reinforced concrete element		X					X#	X
Before pouring concrete slab						X		
After covering foundations of the work						X		
Before lining/covering framework		X				X		X
Before pouring reinforced masonry or block walls								X
Before covering walls, floors, or ceilings to check fire resistance levels								X
Reinforcing steelwork for settings and structural elements before pouring concrete				X				
Structural framework before covering				X				
Fire and smoke resisting building elements in each story		X						
Junction of internal fire-resisting construction bounding a sole-occupancy unit and another building element required to resist internal fire spread	X			X				
Lightweight construction building element required to resist fire spread in at least one sole occupancy unit in each story. Also, its components and junctions.		X						
One of each lightweight construction stair shaft, lift shaft or service shaft required to resist the spread of fire. Also, its components and junctions.		X						
fire protection methods for service penetration	X	X		X		X		
external waterproofing membranes, flashing, sarking or like materials				X				
waterproofing in wet areas	X			X		X		X
Upon completion	X	X		X		X	X	X
Fire safety system testing				X				

Note: currently only for Class 2 buildings (Apartments) and has not included all plumbing inspections.

* QLD has no mandatory requirements for Class 2-9 buildings as these are as prescribed in the building development approval by the building certifier

† WA requirements are proposed and not currently in force, except for fire safety system testing

‡ SA requires a minimum 90% of Class 2-9 buildings to be inspected at least once during construction or upon completion

§ NT has a two-tier system of building control areas. Tier 1 areas have full certification requirements for all building work. Tier 2 areas have full certification requirements for most building work and part certification requirements for some building work.

ACT does not specify 'in-situ'

In jurisdictions such as QLD, NSW and VIC private certifiers perform a large portion of inspections¹⁵.

The ability for councils to engage non-council employees and private certifiers to undertake inspections in South Australia exists through the appointment of an authorised officer under the Act and the *Planning, Development and Infrastructure (Accredited Professionals) Regulations 2019* (the Regulations). This provides councils with flexibility to assist them in meeting the prescribed requirements in the policy.

The development of an accreditation, regulation and auditing system to allow private certifiers to undertake and charge fees for inspections outside of this appointment falls outside the scope of this Discussion Paper and any associated updates to the Practice Directions.

Questions

1. Should mandatory inspections be aligned to specific stages of building work? If so, what stages should be mandatory? Should these differ based on the building classification?
2. Should mandatory inspections be based on a building's complexity level? If so, how should the building complexity be determined?
3. Should the percentage requirements for mandatory inspections be broken down by classification and stage?
4. Should the percentage requirements for mandatory inspections be based on a building's complexity level with the same percentage requirement for each stage of building work?

¹⁵ [Botten Levinson Report to the Minister for Planning \(PDF, 1134 KB\)](#)

Topic 3 – Resourcing

Discussion

Councils have now been responsible for managing their compliance with the practice directions for the past four years. During this time, the Department of Housing and Urban Development (the Department) has received feedback on suggested improvements and changes to both practice directions.

The Department has also been working with councils to develop inspection reporting tools. The reporting platform leverages inspection data from the Development Application Processing (DAP) system to assist councils in tracking their compliance with the mandatory inspection requirements identified within the practice directions. Various requests for updates to the DAP system for inspection workflow and construction notifications have been received and actioned.

The below Power BI Report provides a summary of the current Practice Direction targets (based on building work completed within the relevant reporting year) and actual inspection results for all councils as 2 September 2025 (for the 2025-2026 Financial Year) for which councils have the ability to filter specific to their respective area.

Practice Direction						
Description	Building Class	Target %	Building Works Inspected %	Building Works Target	Building Works Inspected	Inspected Within Time
Practice Direction 9	Class 1	66%	65%	1,818	1,190	1,159
	Class 2-9	90%	67%	314	209	131
	Farm Building	75%	40%	5	2	2
Practice Direction 8	Swimming Pool	100%	83%	241	199	180

- Only a building work which is completed within the relevant reporting year can be considered for contributing towards the percentage of mandatory inspection requirements for that reporting year, noting that even if the inspection for that building work occurred during a previous reporting year it can still be counted.
- The first inspection of a building work under the mandatory inspection requirements is to be counted as the one inspection required for the purposes of the percentage.

The Regulations and Practice Direction 9 both outline that councils must undertake inspections of different stages of development of certain building works. Currently, there are no inspection clocks built into the DAP to assist councils in the oversight of this area.

In 2022, the Minister for Planning, Hon. Nick Champion MP, commissioned an independent panel of planning experts to conduct a review of reforms to the planning system. In their [Final report and government response](#), the Expert Panel (the Panel) received support for introducing inspection clocks of this nature, noting it would only seek to provide a further efficiency for councils.¹⁶ As such, the Panel has also recommended inspection clocks be added to the e-Planning portal to improve the management, monitoring, and reporting on inspection compliance.

The following key concerns have been raised around resourcing issues that councils are facing in order to meet inspection requirements and timeframes:

¹⁶ [Final report and government response | Planning Review](#) Recommendation 60

- insufficient numbers of suitably qualified persons to conduct inspections
- difficulties engaging and attracting qualified building compliance personnel to undertake statutory inspections and the aging population of accredited building professionals
- feedback that inspection timeframes are unrealistic
- challenges regional councils face in regard to travel timeframes
- the high cost of funding a compliance officer and competition with private sector and other industry professions.
- that compliance fees are inadequate to cover resourcing of additional inspections

In response to these concerns the Accreditation Authority (Chief Executive of the Department) has recently undertaken a review and updated the [Qualifications, skills and experience requirements for Accredited Professionals](#) to:

- include further guidance and advice to prospective applicants about conditional accreditation
- to correct or remove outdated qualifications
- include new South Australian qualifications accepted by the Accreditation Authority for entry level building accreditation

The newly accepted SA qualifications, relate in particular to Building Level 4 accreditation which provides entry level accreditation in order to carry out inspections on behalf of council as an appointed authorised officer¹⁷ in accordance with the Practice Directions. This addition has been included in an attempt to provide a timelier and more cost-effective option for prospective accreditation professionals to meet the qualification requirements for entry level building accreditation and provide a pathway for progression within the profession.

Pathways to obtain entry level building accreditation have also been more widely promoted with Consumer and Business Services (CBS)¹⁸ to encourage and attract more existing qualified personnel within the industry to these roles.

In addition to meeting qualification requirements, an applicant will also need to meet experience requirements. The current experience requirements for Building Level 4 accreditation are:

A minimum of 6 months full time or equivalent experience through examples of inspections of class 1 and 10 buildings not more than 2 storeys in height and not more than 500 square meters in floor area.

The Accreditation Authority recommends a minimum of:

- 10 examples in classes 1a or 1b
- 10 examples in classes 10a, 10b or 10c
- Including at least 1 swimming pool assessment

It is further recommended the examples cover the following areas:

- undertaking inspections of building work to check compliance with relevant legislation and/or documentation

¹⁷ Reg112 of the *Planning, Development and Infrastructure (General) Regulations 2017*

¹⁸ [CBS Connect - September 2025 | Consumer and Business Services](#)

- assisting in issuing certificates to occupy buildings or parts of buildings
- assisting in undertaking enforcement action where building work does not comply with a building consent; where illegal building work has been carried out; or where unhealthy or unsafe conditions require urgent remedial action
- assessing the health and safety status of existing buildings and providing advice on appropriate upgrading requirements
- undertaking and documenting building audits that cover multiple aspects of a building or buildings

The Department is aware that several councils are exploring the development of graduate/cadet training programs that, amongst other things, could look to provide experience in these areas and assist prospective accredited professionals to meet the experience requirements for entry level building accreditation.

Further consideration of local government to pool resources for the purpose of undertaking inspections and/or providing experience in undertaking inspections could also assist councils in meeting inspection requirements and reducing costs by sharing resources. The concept of joint resourcing arrangements for multiple councils was also raised and supported in a recent March 2025 report on 'Building surveying resources in rural Victoria' by WEIR Legal and Consulting.¹⁹

The current time frames prescribed in Practice Direction 9 for carrying out an inspection for the purpose of Section 144 of the Act are at any time during construction or on completion of building work. Where a council *elects* to carry out an inspection on completion of construction, the inspection must be carried out:

- (a) within 2 business days of receipt of the completed Statement of Compliance in respect of development within Metropolitan Adelaide; and
- (b) within 3 business days of receipt of the completed Statement of Compliance for development outside Metropolitan Adelaide.

It has been suggested that were council *elects* to undertake an inspection on completion of construction for a major/complex development, these time frames limit the ability to conduct a comprehensive review of documentation to determine relevant inspection elements.

Additionally, councils outside of Metropolitan Adelaide that *elect* to undertake an inspection on completion of construction can be impacted by logistical issues, such as travel distances and the large geographic areas that they service.

There is currently no prescribed time frame for carrying out inspections during construction other than in accordance with Section 146 of the Act, where a council has directed a person to stop carrying out building work after a mandatory notification stage has been reached. This is discussed further under Topic 4.

Further, Practice Direction 8 provides that inspections in relation to swimming pools either upon notification of:

¹⁹ <https://weirlegalconsulting.com/wp-content/uploads/2025/08/WLC-Report-on-building-surveyor-resources-Final-31-March-2025-.pdf>

- i. the completion of the swimming pool and/or swimming pool safety features; or
- ii. the installation of a temporary safety barrier for a swimming pool containing a water depth greater than 300mm

must be carried out as expeditiously as possible and within 10 business days (in Metropolitan Adelaide) and 15 business days (outside of Metropolitan Adelaide).

Feedback has since been received to suggest that the mandatory inspection in relation to pools should always occur on completion of the swimming pool and/or swimming pool safety features and that an inspection of the temporary safety barrier (once the pool contains a water depth greater than 300mm) should be encouraged but not mandatory.

Concerns around the cost of resourcing inspections are discussed further under Topic 6 – Fees.

Questions

5. Are there other key areas of concerns with respect to resourcing issues that have not been identified and need to be considered in the Practice Directions updates?
6. Should inspections in relation to be pools be mandatory upon the completion of both temporary and permanent swimming pool safety features?
7. Would further guidance material around swimming pool inspection elements, and where to report issues relating to swimming pool safety, assist to ensure consistency across councils?
8. Should inspection time frames be based on a building's complexity level?
9. Should the current time frames to carry out an inspection on completion of construction be varied? If so, what would be considered reasonable giving consideration to ensure occupation is not unduly hindered by the time taken by council to inspect?
10. Should local government consider pooling resources to help combat the key concerns raised above? How could this best be achieved?
11. If pre-purchase building inspectors become licenced or registered, should a pathway be explored that provides eligibility for them to also undertake inspections during construction for the purposes of the Practice Directions?
12. Are there any other initiatives that could assist in attracting and retaining qualified building compliance personnel to the profession?

Topic 4 – Mandatory notifications

Discussion

The current requirements that relate to notifications during building work are provided under Regulation 93 of the Regulations for the purpose of Section 146 of the Act.

The prescribed mandatory notifications consist of commencement of building work on the site, commencement of the installation of a designated building product (if applicable) and intended completion of the building work.

Additionally, when granting building consent, a relevant authority may specify additional stages of building work for which a mandatory notification is required.

Similarly, when granting development approval, a council may specify additional stages of building work for which a mandatory notification is required prior to commencement and completion of that stage.

Current council specified notification stages are many and varied. Whilst there is a requirement for council to provide notice of a determination to carry out an inspection after receiving a completion notification in accordance with Regulation 103E, there is no current requirement under the Practice Directions for council to undertake an inspection upon receiving a mandatory notification.

As discussed in Topic 3, Section 146(3) of the Act provides that, a person who is carrying out building work must, if directed to do so by the council, stop building work when a mandatory notification stage has been reached pending an inspection by an authorised officer who holds prescribed qualifications. Further, Section 146(4) provides that an authorised officer must carry out an inspection under subsection (3) within 24 hours after a direction is given under that subsection and, if such an inspection is not carried out within that time, the person may proceed with the building work.

The challenge in ensuring timely notifications from developers and builders further complicates the inspection process. If councils are not notified in time, they cannot effectively assess hidden primary structural elements that may have been more easily inspectable at earlier stages of development.

The suggestion of a mobile application for submission of building notifications and inspections was raised through the Expert Panel's [Final report and government response](#).²⁰ The Panel did not make a specific recommendation about this idea, however investigation of mobile accessibility for the whole of the e-Planning portal is currently under consideration.

PlanSA are also looking at applications that could assist industry in retrieving data from the DAP and streamline the submission of building notifications along with other online solutions.

An audit of recent council specified notification stages, whether those stages were subsequently inspected and whether non-conformances were identified indicated that the most common non-conformances relate to footings, framing, waterproofing and swimming pools.

²⁰ [Final report and government response | Planning Review](#) Recommendation 64

This supports the risks that were identified as a focus for building inspections in the 2019 Botten Levinson Report²¹ including: wet areas and waterproofing, fire systems and fire separation (including ESP), bushfire protection, new products and techniques, framing, roof trusses and swimming pools.

The repealed *Development Regulations 2008* previously required mandatory notification on completion of all roof framing forming part of the building work (including top and bottom chord restraints, bracing and tie-downs).²² This was not carried over to the *Planning, Development and Infrastructure (General) Regulations 2017* and the flexibility to specify mandatory notifications was left to be determined by the relevant authorities.

Questions

13. Should the flexibility in specifying mandatory notification requirements under the Regulations be removed and replaced with prescribed mandatory notification stages of building work to provide consistency across councils?
14. What areas at greatest risk on non-conformance should be considered when specifying mandatory notifications?
15. Are there any benefits in linking mandatory notification stages to progress payment stages to mirror existing industry processes and procedures?
16. Should mandatory inspections be linked to mandatory notifications or should councils retain flexibility in directing inspections towards target areas as required?
17. Would further guidance material around notification requirements be beneficial for industry and users of the DAP?

²¹ [Botten Levinson Report to the Minister for Planning \(PDF, 1134 KB\)](#)

²² [Development Regulations 2008](#) Regulation 74(1)(ca)

Topic 5 - Reliance on other mechanisms to inspect

Discussion

As already discussed, there is no current requirement under the Practice Directions for council to undertake an inspection upon receiving a mandatory notification. However, it is expected that, (particularly where non-conformances have been identified) councils will either undertake an inspection or request information to be satisfied that non-conformances have been addressed.

Where mandatory inspections are required in accordance with Practice Directions 8 & 9, it is expected that these inspections are carried out in person.

Part 2(7) of the current Practice Direction 7 - Out of Council Areas Inspection Policy²³, provides for inspection procedures that include the ability for an authorised officer to determine the procedures to be applied for the carrying out of an inspection, provided that the authorised officer is reasonably satisfied of any outcomes or findings of such inspection and such procedures comply with the Act. This includes the ability for inspections to be carried out through external (off-site) means, including through the use of telecommunications technology (where available).

Whilst it is recognised that there will be particular inspection stages where an authorised officer must be present on site, the 2021 ABCB Mandatory inspections Model guidance on BCR recommendation 18²⁴, raised the principle of virtual inspections as an alternative to on-site inspections.

For instances when access to a building site may be difficult, particularly in remote locations or where an authorised officer may not be able to get on-site to allow for the progress of building work in a timely manner, alternative approaches may be considered suitable provided that the authorised officer is reasonably satisfied of any outcomes or findings of such inspection and such procedures comply with the Act.

Alternative proposed methods included video inspections, photographic evidence or drone inspection technology that could allow for real time inspections ensuring building work can progress in a timely manner and with appropriate oversight.

Feedback received through previous workshops and consultation further suggests that an alternative approach for councils to require site inspection certification and other documentation in lieu of undertaking physical inspections could be of benefit.

Under Regulation 74 of the *Development Regulations 2008* (under South Australia's repealed *Development Act 1993*), a roof framing notification and inspection was a mandatory step in the building process for certain classes of buildings. A duly completed supervisor's checklist²⁵ relating to the roof framing was required to be provided and following the certificate being provided to the Council an inspection would occur. This was not carried over to the *Planning, Development and Infrastructure (General) Regulations 2017*.

²³ [Practice Direction 7 – Inspection Policy for Out of Council Areas 2019 | PlanSA](#)

²⁴ [Model Guidance](#)

²⁵ [governmentgazette.sa.gov.au%2F2015%2FJune%2F2015_041.pdf](#)

Similarly, a duly completed prescribed supervisor's checklist relating to the installation of the designated building products was also required.²⁶

The current Regulations require that, when *designated building products* are used on *designated buildings*:

- prescribed information about a *designated building product* be supplied by the applicant when making an application for building consent;²⁷
- that notification be made to the local council of intended commencement of installation of a *designated building product*; and
- a checklist be completed and submitted to council on the day of installation commencement²⁸

council may schedule an inspection, but this is not mandatory.

The checklist²⁹ must reflect the information in the approved documentation and include any performance solutions. Completion of the checklist ensures the product approved for use is the product being installed, and that it is being installed in accordance with the approved documentation.

In the 2019 Botten Levinson Report to the Minister for Planning, it was raised that banks and insurers of engineers may expect that the design engineer will inspect footings prior to pour. That to reduce the burden of inspections on councils and the consumer, it was considered needless to have both the design engineer and a council inspector inspecting the footings.³⁰

It is, however, important to recognise that any site inspection certification means having an industry expert confirm that what has been built on site (including any changes made during construction) accurately reflects the approved drawings or plans. E.g. an engineer's formal certification that the building has been constructed according to the engineering design and required standards.

It is likely that these existing processes are more prevalent in commercial development, where reliance on industry experts to confirm compliance is increased.

Questions

18. Do you support the concept of virtual inspections (video inspections, photographic evidence or drone inspection technology) as an alternative to on-site inspections? If so, should this be limited to particular circumstances?
19. When considering virtual inspections how can consistency and reliability be ensured as to not compromise the quality of building outcomes and record keeping?
20. Who should be responsible for undertaking the inspection and how should this information be stored in the DAP?
21. Should the current provisions that exist in [Practice Direction 7](#) that relate to conducting off-site inspections be mirrored in Practice Directions 8 and 9?

²⁶ [Supervisors-checklist-for-designated-building-products-Regulation-74.pdf](#)

²⁷ [Notice A - Designated building products | PlanSA](#)

²⁸ [Advisory Notice Building 03 24 Requirements for designated building products on designated buildings](#)

²⁹ [Notice B - Prescribed supervisor's checklist for designated building products | PlanSA](#)

³⁰ [Botten Levinson Report to the Minister for Planning \(PDF, 1134 KB\)](#)

22. What site inspection certification processes currently exist that could be leveraged to satisfy councils of compliance and reduce duplicated work effort?

Topic 6 – Fees

Discussion

Fees and charges under the Act are provided in the Planning, Development and Infrastructure (Fees) Notice 2025, (Fees Notice)³¹ under the *Planning, Development and Infrastructure (Fees, Charges and Contributions) Regulations 2019* (Fees Regulations).

Whilst the Commission itself cannot set these fees, feedback received through this Discussion Paper can be provided to the Minister in consideration of any amendments to the Fees Notice.

The Commission appreciates that in directing councils to undertake a minimum number of inspections requires councils to have adequate recourses and to be able to charge an appropriate fee for cost recovery.

Feedback has previously been received to support a fee per inspection model as opposed to a general fee charged per development, including fees for re-inspections.³²

The following table provides a snapshot of the current fees that exist in relation to compliance under the Fees Notice. This does not take into consideration fees charged for the purpose of assessments, referrals, expiations or the broader council budget.

Compliance Fees	\$
Class 1	\$278
Swimming Pool or Swimming Pool Safety Features	\$278
Class 1 building if the building comprises multiple dwellings	\$278 for each dwelling
Class 10 if total development cost is > \$10,000	\$92.50
All other classes	Once per building—\$278.00 or 0.075% of the total development cost up to a maximum of \$2,893.00, whichever is the greater

For the 2024-2025 reporting year, around \$6.5 million dollars' worth of compliance fees were charged on behalf of councils. For some councils, it is evident that these fees alone may provide sufficient ability to resource positions for the purpose of undertaking inspection activities.

However, in comparison, it also highlights that some councils—particularly those in rural areas—are unlikely to generate sufficient revenue from these fees alone to support inspection activities, even though their inspection requirements may be lower due to reduced volume. As a result, they may require additional assistance.

Given the current economic climate, there are concerns that any significant increase in fees could contribute to an increase in construction costs.

³¹ [Planning-Development-and-Infrastructure-Fees-Notice.pdf](#)

³² [Botten Levinson Report to the Minister for Planning \(PDF, 1134 KB\)](#)

Additionally, the following fees are payable in relation to building activity and use (including in connection with the *Planning, Development and Infrastructure (General) Regulations 2017*):

Issue of a certificate relating to essential safety provisions under Regulation 94 of the <i>Planning, Development and Infrastructure (General) Regulations 2017</i>	\$278
Application for assignment of a classification to a building or a change in the classification of a building under Section 151 of the Act	\$196
Application for a certificate of occupancy under Section 152 of the Act	\$57.50

Feedback has also been received to indicate that where there is a need to upgrade essential safety provision maintenance and testing standards, the prescribed fees to issue a certificate may be inadequate in comparison to the compliance work undertaken by the council.

The introduction of Certificate of Occupancy requirements for Class 1a buildings where building consent was verified after 1 October 2024, has created further confusion around inspection requirements to confirm that any non-conformances previously identified (where relevant to occupation) have been rectified.³³

No mandatory inspection is required to be undertaken prior to occupation for the purpose of issuing a Certificate of Occupation, unless the Council believe this is necessary to satisfy itself that non-conformances relating to suitability for occupation have been addressed.

The Commission encourages inspections during construction as there will be limitations on a council's ability to confirm whether the building is suitable for occupancy once construction is complete given some elements will no longer be able to be seen or viewed.

Questions

23. If an increase to fees was proposed, what fees should be increased, by how much and who should bear that cost? Information on costs incurred to undertake inspections should be provided to support any answer to this question.
24. Could pooling of resources and providing other mechanisms to inspect (site inspection certification, video inspections, photographic evidence or drone inspection technology) reduce the need to increase fees?

³³ [Certificate of Occupancy | PlanSA](#)

Summary of Questions

1. Should mandatory inspections be aligned to specific stages of building work? If so, what stages should be mandatory? Should these differ based on the building classification?
2. Should mandatory inspections be based on a building's complexity level? If so, how should the building complexity be determined?
3. Should the percentage requirements for mandatory inspections be broken down by classification and stage?
4. Should the percentage requirements for mandatory inspections be based on a building's complexity level with the same percentage requirement for each stage of building work?
5. Are there other key areas of concerns with respect to resourcing issues that have not been identified and need to be considered in the Practice Directions updates?
6. Should inspections in relation to be pools be mandatory upon the completion of both temporary and permanent swimming pool safety features?
7. Would further guidance material around swimming pool inspection elements, and where to report issues relating to swimming pool safety, assist to ensure consistency across councils?
8. Should inspection time frames be based on a building's complexity level?
9. Should the current time frames to carry out an inspection on completion of construction be varied? If so, what would be considered reasonable giving consideration to ensure occupation is not unduly hindered by the time taken by council to inspect?
10. Should local government consider pooling resources to help combat the key concerns raised above? How could this best be achieved?
11. If pre-purchase building inspectors become licenced or registered, should a pathway be explored that provides eligibility for them to also undertake inspections during construction for the purposes of the Practice Directions?
12. Are there any other initiatives that could assist in attracting and retaining qualified building compliance personnel to the profession?
13. Should the flexibility in specifying mandatory notification requirements under the Regulations be removed and replaced with prescribed mandatory notification stages of building work to provide consistency across councils?
14. What areas at greatest risk on non-conformance should be considered when specifying mandatory notifications?
15. Are there any benefits in linking mandatory notification stages to progress payment stages to mirror existing industry processes and procedures?

16. Should mandatory inspections be linked to mandatory notifications or should councils retain flexibility in directing inspections towards target areas as required?
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18. Do you support the concept of virtual inspections (video inspections, photographic evidence or drone inspection technology) as an alternative to on-site inspections? If so, should this be limited to particular circumstances?
19. When considering virtual inspections how can consistency and reliability be ensured as to not compromise the quality of building outcomes and record keeping?
20. Who should be responsible for undertaking the inspection and how should this information be stored in the DAP?
21. Should the current provisions that exist in [Practice Direction 7](#) that relate to conducting off-site inspections be mirrored in Practice Directions 8 and 9?
22. What site inspection certification processes currently exist that could be leveraged to satisfy councils of compliance and reduce duplicated work effort?
23. If an increase to fees was proposed, what fees should be increased, by how much and who should bear that cost? Information on costs incurred to undertake inspections should be provided to support any answer to this question.
24. Could pooling of resources and providing other mechanisms to inspect (site inspection certification, video inspections, photographic evidence or drone inspection technology) reduce the need to increase fees?

How can you get involved?

Consultation on this discussion paper is open from 5 December 2025 to 19 February 2026.

Further Information is available on YourSAy: yoursay.sa.gov.au/discussion-paper-practice-direction-updates and the PlanSA website: https://plan.sa.gov.au/have_your_say/Consultations.

Feedback and comments on the discussion paper can be submitted via:

- YourSAy website: yoursay.sa.gov.au/discussion-paper-practice-direction-updates
- PlanSA website: https://plan.sa.gov.au/have_your_say/Consultations
- email: PlanSASubmissions@sa.gov.au.

You do not need to respond to every question in the Discussion Paper.

Where possible, submissions should provide reasoning for the position that is suggested and examples or evidence that supports this position.

All feedback will be carefully considered in preparing updates to Practice Directions 8 and 9. An engagement report, including all feedback will be published on the PlanSA and YourSAy websites. Names and organisations will be included with published submissions but personal addresses, email addresses and phone numbers will be redacted.