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RECEIVED

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DPTI

Sally Smith
General Manager, Planning and Development
Department for Planning Transport and Infrastructure

17th October 2018

RE: PERFORMANCE INDICATORS SCHEME DISCUSSION PAPER

Dear Sally,

Thank you for providing the UDIA (SA) with the opportunity to comment on the Performance Indicators discussion paper as part of the current planning reforms consultation process. The UDIA is a member-based organisation representing the urban development sector. Our members include developers, planners, surveyors, architects and many other representatives across the South Australian property industry.

Many of our members have very real understanding of the planning system. They recognize the importance of having a performance indicators scheme with appropriate targets to keep all parties accountable for the many processes that occur across the planning sector.

We continue to appreciate the ongoing engagement with the UDIA through its committees on the numerous policy discussion papers and the Planning and Development Code ('PDC') formation in this planning reform period. We also appreciate the early engagement on the systems indicators program and the workshop that was held at the UDIA to gain preliminary feedback on the paper.

Overall, the UDIA members believe there are some elements of the current reporting system that are useful and ought to be maintained. They have also identified some metrics that would greatly benefit the sector that should be recorded and published.

One element of the current system that our members feel they gain value from is the Land Supply and Development Monitoring platform. The reports these provided every 6 months show trends and particularly highlight sub-market activity that is otherwise difficult to detect. Continuing or receiving this information on a more regular basis is essential. The release of this report shortly after the end date of the period concerned, as occurred recently with the June 2018 report, is most useful as the information is current.

As was highlighted in the discussion paper, the UDIA supports the development of publicly accessible websites that provide the latest statistics and data on the planning system. This will incentivize transparency and accountability from councils and lead to better information availability and better decision-making capability within the private sector.

In particular, the UDIA encourages the development of a 'Know your Council' website, as has been developed in Victoria. We see this as an integral next step in ensuring the processes involved in determining development applications are kept within suitable timeframes. Further, being able to access maps or spatial records which highlight "high-performance" councils or regions in direct comparison with others of a similar size, would be useful in helping communities and the private sector understand council capabilities.

The UDIA wishes to state its support for all annual standard statistics outlined on page 16 of the discussion paper. We would seek the further following metrics to be included in addition to the new and old statistics listed:

- The number of applications per council rejected based upon development type
- The number of applications per council rejected based upon reasoning
- The number of approvals granted via automated consent
- Construction start date data
- Civil construction approvals
- Council deferral rates
- Council deferral reasoning
- Total time delays (including stop the clock) in the assessment of applications from lodgement to final approval of application.

The strong preference by our members is to ensure the information platform is easy to access, free, available online, includes maps and spatial graphics and to ensure the data fed into it is the most recent. The scheme must be transparent and clear in order to capture these metrics accurately. Gathering these analytics must not be optional and should be made compulsory as this will ensure the reforms themselves can be meaningfully measured and therefore implemented more efficiently.

The UDIA looks forward to working with DPTI on the future refinement of the performance indicators scheme and again appreciates the opportunity to respond.

Yours sincerely,

Pat Gerace
CHIEF EXECUTIVE