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RECEIVED

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SPC

Contact Officer: Anthony Marroncelli (Direct No. [REDACTED])

15 October 2018

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5001

BY EMAIL: [DPTI.PlanningEngagement@sa.gov.au](mailto:DPTI.PlanningEngagement@sa.gov.au)

Dear Sir/Madam

**Performance Indicators Discussion Paper – City of Holdfast Bay Submission**

Thank you for the opportunity to provide comments in response to the Performance Indicators Discussion Paper.

The submission below is in the form of responses to the 9 Discussion Points (DP) emanating from the Discussion Paper.

**DP1 - Are the system indicators collected now useful? How could they be enhanced?**

They are useful insofar as they provide a general overview of how development applications and inspections are tracking, but this quantitative measure does not provide a true indicator of the complexities and underlying nuances that affect the timing of decisions and actions in council development departments.

**DP2 - Is the information in the annual report released by the Planning Minister useful? How could it be improved?**

The information is useful for comparison reasons, but even then the comparisons are unreliable because each assessing authority is different in terms of spatial policies, delegations and resourcing.

**DP3 - What examples of interstate planning system performance indicators do you think could effectively be used in South Australia?**

This depends on what is defined as 'performance'. If the objective is to expedite assessments as quickly as possible irrespective of the built form outcomes, then any of the interstate examples are suitable because each equates 'performance' with timely outcomes rather than with quality outcomes.

**DP4 - Do you have suggestions for other things that are done well interstate in collecting and evaluating information about the planning system that could be introduced to the South Australian system?**

Quantitative measures are an unreliable indicator of land use planning performance. In the absence of qualitative measures, each of the models are equally flawed. Without understanding or correlating the timeliness of assessments against the quality of the assessment, it is impossible to provide an informed opinion as to which interstate system, or componentry, is best.

**DP5 - What parts of the existing System Indicators Program should be carried over into the new scheme?**

If the purpose is to collate and compare timeframes, then the current criteria is fine. However, the focus should be on quality built form outcomes as the measure of planning decisions. Would the community prefer a considered planning outcome rather than a timely one? What is the point of a timely decision if its legacy of poor design/functionality is long-lasting? The existing System Indicators Program is inept at supporting or quantifying quality planning decisions.

**DP6 - What are some important types of data or statistics that you think should be collected in the new planning system?**

The number of times that council's formally ask Private Certifiers to adhere to the legislation (providing consistent documentation, paying the correct fees, provide post-approval documentation, limit their assessment to their legislated boundaries etc.). Information relating to the development industry's performance in the context of whole-of-assessment timeframes is frustratingly lacking. The community should be made aware that bottlenecks are rarely caused by councils but rather the ineptitude of private contractors and certifiers in providing quality (even basic) information for councils to make a proper decision.

**DP7 - Do you have ideas about other ways in which data on activities in the planning system could be collected and evaluated?**

The focus on evaluating statistics rather than built form outcomes as a means to measure the performance of the planning system is cause for alarm. Meaningful, qualitative data, absent from the constraints of arbitrary timeframes, is the most reliable indicator of a healthy planning system.

**DP8 - Do you have a preference for how the State Government reports on and presents data and statistics about the planning system?**

Yes. Show the statistics in the context of the built form outcomes, which may show a correlation between timeframes and quality of architecture, which will also shine a light on the quality and functionality of the built form emanating from council planning decisions compared with alternative assessing authorities.

**DP9 - What are some alternative ways to present data and statistics?**

Visually. Actually show the types of developments that result from the forced 'timely' decisions compared with considered decision made under the necessary timeframe required to properly assess proposals.

Please contact me on [REDACTED] should you wish to discuss the submission further.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'AMarroncelli', with a long horizontal flourish extending to the right.

**Anthony Marroncelli**  
**Manager Development Services**