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Michael Lennon
Chair, State Planning Commission
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Dear Mr Lennon

Performance Indicators Discussion Paper

I am writing to you to provide Council's feedback on the Performance Indicators Discussion Paper released for consultation on 23 August 2018.

The City of Adelaide values and appreciates the opportunity to continue to provide input and feedback to documents that are informing the creation of the State's new planning system. The use of performance indicators in the planning system could be a very valuable tool, however, the current paper suggests maintaining the status quo and we urge the State Planning Commission to recognise this golden opportunity to create a better system.

The current performance indicators system under the *Development Act 1993 (SA)* and *Development Regulations 2008 (SA)* incorporates a list of standard questions to capture development application activity, efficiency and processing. The City of Adelaide provides the requested data quarterly, which is used within the annual report prepared by DPTI to the Minister of Planning. Regrettably, it does not appear that this information is utilised for the purpose of identifying issues for improvements to be made from a policy or systems perspective.

Schedule 4, section 1 of the *Planning, Development and Infrastructure Act 2016 (SA)* (PDI Act) enables the Minister to set targets 'in relation to an goal, policy or objective under a state planning policy' and that the Commission 'must monitor the extent to which a target is being achieved'. Additionally, section 14 of the PDI Act conveys the 'principles of good planning', including that the planning system should establish 'long-term focus principles' by creating policy frameworks that are 'able to respond to emerging challenges and cumulative impacts identified by monitoring, benchmarking and evaluations programs'.

The Performance Indicators Discussion Paper states that 'regular monitoring of performance and trends is essential to track emerging issues, identify where improvements are needed and evaluate outcomes'. The paper generally maintains the status quo, rather than broadening its reach such that other useful information can be captured and analysed. The questions proposed in the 'Performance Indicators Discussion Paper' indicates that the system will not collect data that monitors our State's targets or identify trends, but rather proposes simply to

continue monitoring the administrative processing of development applications. The City of Adelaide considers that this is a missed opportunity as only collecting basic information will not facilitate the gathering of information to enable evidence-based policy development and reform.

With a major element of the Planning reform involving creating one state-wide ePlanning portal, the City of Adelaide is of the opinion that this work presents a golden opportunity to develop a true set of performance measures that if set up well, can be utilised to inform decision making into the future. The ePlanning solution presents a very achievable opportunity to embed extract fields within the system, such that useful information can be extrapolated and analysed to assist in the identification of trends to inform future policy. Examples of information that could be recorded in a way that can be easily extracted are (but are not limited to): building height, number of apartments, number of bedrooms per apartment, external materials, thermal performance etc. Additionally, the number of times deemed to satisfy criteria are met could be modelled to a deemed to satisfy criteria that isn't being met as often to understand why. The system needs to be flexible but should capture as much information as possible so that different queries can be made.

Collecting information in a proactive and intelligent way allows us to be better prepared rather than reactive. The new system should be established to collect both quantitative data, as well as qualitative. For example, currently the performance indicators collect data on the processing of development applications in a quantitative measure/tool. The ePlanning portal could be used to undertake voluntary surveys to users of the portal to collect qualitative data on user experience as a comparative tool.

Finally, through the ePlanning system, the performance indicators system should include a proactive continuous improvement cycle. It should be established to consistently strive to improve systems and policies and should ensure there is a continuous loop to provide lessons and feedback in to the new system.

For the reasons outlined, the City of Adelaide considers that the framework being presented is a missed opportunity if not incorporated in to the 1st generation of the Planning reform.

The City of Adelaide would welcome any opportunity to discuss these matters further with the Commission and look forward to continuing working collaboratively with the State Planning Commission and Department of Planning, Transport and Infrastructure.

Please find below our responses to the questions asked within the paper.

Yours Sincerely



Shanti Ditter
Associate Director – Planning and Development



FEEDBACK ON PERFORMANCE INDICATORS

Questions	Comments / Recommendations
<p>1. Are the system indicators collected now useful? How could they be enhanced?</p>	<ul style="list-style-type: none"> ▪ Not really. They simply report on processing of development applications through the planning system. A report is created, but it doesn't appear although this leads to issues being identified and/or improvements being made. ▪ The recording of information also stops at Development Approval being granted. It would be very useful to introduce additional check points, so that, for example, construction commenced, construction timeframes, compliance action underway etc. could be recorded also. Recording this data is also useful for coordinated infrastructure planning etc. ▪ The current questions asked are lagging questions/indicators rather than leading questions. Whilst leading indicators can be difficult to construct upfront, they can be much more informative and should be explored. ▪ The current questions do not seem to undertake analysis of resources of relevant authority, types of developers etc. ▪ The planning system should go far beyond simply measuring the processing of applications through the system. Trends in the planning system (not processing, but trends such as emerging land uses, technologies, dwelling types) should be captured by data inputs so that they can be measured, analysed and used to inform and improve planning policies. ▪ Data that relates to our state targets should be recorded, extrapolated and reported on, it current cannot be. This will require these targets being embedded in to the P&D Code, such that each individual assessment can consider meeting these targets. These policies should be written in a way so that they can then be reported on to assess how the planning system is tracking to meet the state targets. ▪ We should create an ePlanning solution that is clever and uses intelligent technology. A smart system that can be forward thinking allows us to be proactive in our processing and policy making rather than reactive.

<p>2. Is the information in the annual report released by the Planning Minister useful? How could it be improved?</p>	<ul style="list-style-type: none"> ▪ Councils/Relevant Authorities do not receive a copy of the annual report. Having looked it up, it doesn't provide anything overly useful which could relate to why the system does not result in issues being clearly identified so that improvements can be made. ▪ Relevant Authorities should receive a copy of the report and also some feedback to see where they sit across the board. For relevant authorities which are rated lower, a poor result may empower them to make changes themselves to improve practices. ▪ The report does not identify any trends or whether any of the state planning targets have been met.
<p>3. What examples of interstate planning system performance indicators do you think could effectively be used in South Australia?</p>	<ul style="list-style-type: none"> ▪ The examples provided in the paper do not go far enough. The data output is back to front as it does not take into account different variable, i.e. size of Council or Relevant Authority, value of development, resources of the relevant authority, complexity of the DA, i.e. statutory referrals, internal referrals, public notification required etc. All these variables affect processing times but are not recorded, which does not provide a true picture of performance. ▪ The interstate examples simply show processing of development applications through the system, but don't record trends/targets which could be much more valuable.
<p>4. 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?</p>	<ul style="list-style-type: none"> ▪ Being able to interact with the data is excellent and something the community has come to expect today. ▪ It's unclear whether relevant authorities can extract the hard data to undertake their own research, this will be essential.
<p>5. What parts of the existing System Indicators Program should be carried over into the new scheme?</p>	<ul style="list-style-type: none"> ▪ The time should be spent now to amend the questions and influence the ePlanning solution to collect leading indicators which are much more influential in identifying issues. ▪ Additionally, all questions should remain, with new questions and data collected as discussed. Further, a continuous improvement cycle needs to be enforced to ensure that the data being collected is being used to inform the planning system and make improvements.
<p>6. What are some important types of data or statistics that you think should be collected in the new planning system?</p>	<ul style="list-style-type: none"> ▪ Information spatially. ▪ Cumulative gains – i.e. water, waste, energy. We need to record more qualitative information about trends, not just quantitative information about processing or efficiencies of development



	<p>applications processes.</p> <ul style="list-style-type: none"> ▪ Amend questions to leading questions/indicators wherever possible as this provides data of much higher value to identifying trends/issues etc. This allows us to be proactive in our processing and policy making rather than reactive. ▪ Future system needs to include what happens after approval so other areas of Councils can forward plan i.e. City works / Permits / Infrastructure. Additionally, can permits issued come across in a GIS layer, against developments approved? ▪ City of Adelaide records a 'complexity factor' against each application during the allocation stage. We highly recommend that this be introduced across the ePlanning system. The complexity factor sets out criteria which assists you to understand how high a complexity number you need to give an application, based on factors such as the assessment pathway, referrals required, public notification, CAP report required, value, possibly contentious application etc. This complexity number assist with monitoring workloads but can also be used to assist with understanding processing times, something that the current system indicators questions lacks. ▪ As Council is the relevant authority for issuing all Development Approvals, it will be critical that the previous relevant authority (for example, SCAP and private building professional) has a process to tick off whether all conditions and/or reserved matters have been met, prior to the application for development approval being lodged with Council. ▪ We need to be able to forward plan our policies rather than being reactive and often too late for emerging technologies, trends or to identify issues. For example, if materials had been recorded in a system and extracted, ACP panels on all buildings could have been quickly identified and created efficiencies in the major check of ACPs panel across our state following the Grenfell Tower fire.
<p>7. Do you have ideas about other ways in which data on activities in the planning system could be collected and evaluated?</p>	<ul style="list-style-type: none"> ▪ Relevant Authorities will need to be able to access the data, so we can undertake our own detailed studies. This is relevant to inform improvements to policy of the P&D Code and can also be used by Councils for projects and internal policies to better the community. ▪ As the ePlanning solution will only commence collecting data from July 2020, it will be critical that we can access the data so that we can cross-correlate with older data we may have. ▪ We agree and support the need to monitor the system, but technology is sophisticated, and we need to keep up with what it can achieve and what the community and relevant authorities will



	<p>expect. We need to be able to record and extract as much information as possible. The system needs this flexibility, as you never know how you might need to use data in the future to identify trends to improve and achieve the planning system we want.</p>
<p>8. Do you have a preference for how the State Government reports on and presents data and statistics about the planning system?</p>	<ul style="list-style-type: none"> ▪ Statistics without methodology is not helpful, we need to be able to access the methodology as well. ▪ We need to be able to evaluate and review. But at what point does this feedback in to the system and how? A continuous improvement cycle needs to be enforced to ensure that the data being collected is being used to inform the planning system and make improvements. ▪ The PDI Act allows anyone to initiate an amendment to the P&D Code, we will need to track this, who is doing it, what the amendment involves, area that it covers etc.
<p>9. What are some alternative ways to present data and statistics?</p>	<ul style="list-style-type: none"> ▪ Interactive information that can be drilled-down in to depending on the individual persons interest is critical. But dashboards are not the only way. The data collected need to be flexible so that it can be applied in a number of formats for differing needs (i.e. 3D modelling, GIS mapping)
<p>10. Other Comments/recommendations</p>	<ul style="list-style-type: none"> ▪ The data collected could also relate to census information. Census questions are all lagging indicators but analysing the data together can create patterns which can identify useful information which can be utilised to inform future policies. ▪ Additionally, the data should be accessible by other Government agencies to support cross-functional decision making. ▪ Has DPTI engaged with the Universities to assist with this piece of work? If not, City of Adelaide recommends DPTI to engage with the universities who could provide useful information and resources to assist in developing a true set of performance measures that if set up well can be utilised to inform decision making into the future.

