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City of
Norwood
Payneham
& St Peters

17 October 2018

Mr Michael Lennon
Chair
State Planning Commission
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cc. By Email: admin@saplanningcommission.sa.gov.au

Dear Mr Lennon

PERFORMANCE INDICATORS DISCUSSION PAPER

I refer to the release of the Performance Indicators Discussion Paper. Thank you for the opportunity to provide input and feedback.

The reporting and benchmarking of statistics and targets is considered an important aspect of the planning system. The data collected can provide valuable information in relation to what is working well, where improvements are required, whether strategic targets are on track and identifying trends and growing needs.

While the proposed new indicators focus on measurement of “easy” metrics of the system (assessment timeframes, investment etc.) it is disappointing that in building a new evaluation system, the opportunity has not been taken to evaluate implementation of good integrated planning, one of the 5 Ministerial State Planning Policies and one of the key Objects of the *Planning, Development and Infrastructure Act 2016* (PDI Act).

It is critical to understand how our neighbourhoods, cities, regions and rural areas are performing against the State Planning Policies and regional plans. With an anticipated implementation date of mid-2020, it is considered that this could and should be achieved with a new reporting and monitoring tool. Currently, there is no awareness or public visibility of how the *30 Year Plan for Greater Adelaide* targets are being monitored or met.

It is also critical that procedural statistics are collected and evaluated to monitor the various new processes which will be introduced in the new system, to establish what is working well and what requires revision.

Please find outlined below some comments and recommendations in relation to existing and future collection of Performance Indicators.

Purpose of Performance Indicators

Prior to evaluating the current system or proposing the new system, it is vital that consideration be given to the intended purpose and use of performance indicators. As a starting point, some key questions which should be addressed include:

- What is the purpose of the system and how will it be used?
- How does it support an understanding of the development system and future refinement of legislation or processes?
- What are the benefits to the stakeholders?
- Who and how can we ensure data is correctly collected/input and compared?
- What do we need in the new system for ensuring good planning outcomes or to support the introduction of the reforms?

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The System Indicators process is generally perceived in the local government sector to have a severe lack of purpose, which exacerbates frustration with the resource intensive data collection process. With respect to the actual data collected, the current system has a heavy focus on a 'clause-by-clause' reporting approach, rather than focusing on key elements of a healthy system. Many of the system indicator questions do not have a readily applicable or evident purpose. The data is aggregated for inclusion in the Minister's report without any visible analysis or context being applied to it. By way of example; no trend analysis is undertaken across time, no relationship is drawn between policy or legislative change and system outcomes, nor is the data considered against the context of market trend analysis.

Statistics should be used to identify and resolve system deficiencies, but there is rarely a genuine, or at least publically available, application of the system indicators information. A comprehensive review of what is and is not working well has not been made available. For example, the Rescode changes to the planning system in 2008 and, more relevantly, the current planning reform program, have not been preceded by a clear statement of facts to justify such significant changes. It is considered that the planning sector can be adaptable to change, but is much more receptive when it is clearly understood why the changes are required.

It is recommended that further consideration be given to the 2010 Review of Schedule 25 of the *Development Regulations 2008* – System Indicators. In particular, the submission prepared by the LGA which raised many of the above comments.

The Performance Indicators Discussion Paper is predicated on a 'carrying over' of the existing system into the new. It is unclear why any elements of an unsuccessful scheme should be 'carried over' without significant further consideration as to their utility within the new scheme.

Development Data

Notwithstanding that the Council seeks a more purposeful monitoring tool through measurement of the key targets and indicators which deliver good planning outcomes across the State, the following comments are offered on the monitoring of the "machinery" of development assessment.

Discussion Points addressed

- 1) *Are the system indicators collected now useful? How could they be enhanced?*
- 2) *Is the information in the annual report released by the Planning Minister useful? How could it be improved?*
- 5) *What parts of the existing System Indicators Program should be carried over into the new scheme?*
- 6) *What are some important types of data or statistics that you think should be collected in the new planning system?*
- 7) *Do you have ideas about other ways in which data on activities in the planning system could be collected and evaluated?*

Data collection in the new system

The new ePlanning system will facilitate automatic data collection, providing a range of improvements on the current system. Primarily, the central automated collection system will provide resource efficiencies compared to the manual data collection process currently undertaken in many councils, which is burdensome and has no clear purpose. The new centralised, single system will also help to provide consistency between councils providing the opportunity for clearer and easier comparisons.

In order to ensure consistency and accuracy, it is important that data is collected at the right point in time in the process and that the information is verified and correct. For example, it is understood that a 'wizard' tool will be used to assist an applicant through the lodgment process. Given the applicant may not be familiar with the planning system, land use definitions, processes and terminology, the data collection should not necessarily rely on the answers provided at the point of lodgment. This Council has made similar comments on Assessment Pathways and Accredited Professionals draft documents, emphasising the critical importance of oversight and verification of information lodged within the portal to ensure it aligns to minimum standards of documentation, measurable and unambiguous assessment criteria and correct allocation of assessment pathways.

The ePlanning process, as illustrated in the *Assessment Pathways Discussion Paper*, indicates that the relevant authority receiving the application will need to confirm the information provided by the applicant. Presumably when the relevant authority corrects any errors this would override any incorrect information entered by the applicant. (*Note the comments below regarding the need to record any lodgement errors*). Furthermore, the particulars of the development may change throughout the assessment process e.g. the number of allotments or dwellings proposed in a large development may be decreased. In this respect, it is important that development statistics are recorded at the end of the assessment process (as is currently the case). It is also important that the relevant authority verifies the key information at the time of issuing consent.

The *Planning Development and Infrastructure Act 2016* (PDI Act) introduces a range of processing pathways for an application, including the ability for consents to be issued in any order and for elements of a development to be assessed separately. The ePlanning system must account for these different pathways to avoid any duplication of data. Examples could include whether the number of dwellings in a development are recorded at the building consent stage or at planning consent stage given these can occur in any order, or if this is recorded at the time of Development Approval. With respect to separate elements being assessed by separate relevant authorities, if half of the dwellings in the large development are assessed by one relevant authority and the other half are assessed by another relevant authority, each relevant authority must be clear about what is recorded in the statistics and by who. Similarly, an outline consent may indicate indicative values (construction costs, floor areas) which get lodged as a further application sometime later, meaning it will be important to tie such recording to a property parcel, rather than just an application number to avoid misreporting data.

Existing and proposed data types

Notwithstanding that the purpose and use of the current system indicators program has not been clearly established, the historic data collection is a starting point. However, there is scope for additional types and categories of information to be collected.

Some of the proposed likely inclusions in the new scheme as outlined in the Discussion Paper appear to be very similar to, if not duplicating some of the existing data sets – for example the proposed point 6 appears to be very similar to the existing point 7 (applications processed within legislated timeframes); proposed point 21 appears to be very similar to existing point 4 (applications processed by relevant authorities). These potential replications are of no significant concern, however, if the data is collected automatically through ePlanning and doesn't require someone to manually enter very similar information twice.

The following types of development data statistics should be considered for the new scheme:

- Building height;
- Number of new dwellings;
- Affordable housing dwellings
- Dwelling type;
- Number of new allotments (and allotment type e.g. Community, Torrens);
- Allotment size/density (if possible);
- Number of apartments;
- Dwelling size, number of bedrooms;
- Number of car parks provided and any approved shortfall of policy requirement (particularly car parks per dwelling for residential development);
- Regulated/significant trees removed;
- % increase or decrease in impervious surface
- Thermal efficiency measures
- Swimming pools; and
- On-site water tank capacity.

Procedural statistics

It is recommended that the following procedural statistics also be collected in the new system:

- When incorrect information is submitted at the time of lodgment and later corrected by the relevant authority (*this will indicate whether there is a need for improvement in the ePlanning system, such as different prompts or questions or if the automated lodgment system is not proving effective as well as identify repeated mistakes by the same operator*);
- Timeframes taken for requests for further information, referrals etc (*if there are challenges in meeting statutory timeframes, this may help to indicate what can be improved*);
- Some appeals information is currently recorded, however statistics should be recorded for the new avenues for challenge and appeal as outlined in the PDI Act (*e.g appeals of assessment manager decisions to CAP, audits, complaints etc*);
- When there are inconsistencies between consents and description of the nature of those inconsistencies (*consistency between consents will be increasingly important due to the various processing pathway options under the new system*);
- Various functions which occur after development approval has been issued, e.g. commencement of work, building non-conformances etc to assist with compliance and to trigger workflows

Consistency in data collection

Consistency in data collection is vital for accurate comparisons of data between regions and over time. The use of a centralised data collection point (ePlanning) will greatly assist with this, however careful consideration should be given to whether any fields requiring manual input (such as inspections, inconsistent consents, compliance matters etc) are voluntary or mandatory. The decision to make any manual entry fields mandatory rather than voluntary will need to be carefully balanced with the likely council resources required. That said, the value of the data is significantly diminished if it is not recorded consistently across councils or over time.

Compatibility with ABS data collection

ABS data is currently collected from councils through automated reports using the development assessment operating system (e.g. Authority in City of Norwood Payneham & St Peters). Some ABS data fields differ in definition or scope compared to other statistics. For example it is understood that the definition of density in ABS statistics is related to building height rather than allotment size. It would be preferable if the same definitions could be used for both the performance indicators system and the ABS, however this may not be practical or possible given that the ABS is a national body and the South Australian planning system is unlikely to adopt all of the ABS definitions. For statistics which can be aligned with ABS data, this will provide a platform for national comparison, rather than just state-wide. It is most important, however, that the ePlanning system is able to provide automatic reporting services to the ABS so that this currently automated process doesn't become a manual process due to incompatibility with the new system.

Spatial alignment with ABS collector districts and other social mapping tools should be provided in the new system. This will help to spatially understand and compare different development statistics with demographic characteristics e.g. approval of affordable housing by areas of social disadvantage (down to collector district scale).

Using Data and Improving Systems

A critical step in the data collection process is ensuring that the information is used to identify issues and create improvements in the system. For example, if the statistics identify that a particular type of application is frequently exceeding the assessment timeframe, further consideration should be given to what may be causing delays and what changes to processes may be required. Additionally, if only 1 deemed consent is issued over a 12 month period, consideration should be given to whether this process is required or should be modified.

The current planning reforms process is introducing numerous changes to development assessment in South Australia and several of these changes are raising concerns, particularly within local government. It is disappointing that these changes have been proposed without a clear demonstration through statistics or other evidence as to why these changes are required.

In other submissions (Assessment Pathways, Accredited Professionals and P& D Code) this Council has suggested that the more contentious, ambitious or untested aspects of the Reforms implementation are not “switched on” until concepts and delivery mechanisms (ePlanning and private planning certification) are settled, understood and working well, based on good data. This would be the opportunity to align this staged implementation approach, once agreed Performance Indicator targets have been met.

In order to holistically measure the health of the planning system, qualitative as well as quantitative data should be collected. Firstly, this could be achieved by examining different experiences of the development system. One way of measuring this would be a survey at the end of a process measuring responses from applicants, relevant authority, visitors to the Portal, referral agency, or a representor (e.g. how was your experience with this process? What could be improved about the system? How easily did you access the information/input/output you were seeking?).

Secondly, there should be reviews of actual development outcomes. In July 2018, the City of Norwood Payneham & St Peters wrote to Minister for Planning outlining significant concerns with Rescode development outcomes and requested that the Minister instigate an assessment of the impact of Rescode development across metropolitan Adelaide, to better inform the development of the Planning and Design Code. This council is not aware of whether any such review has been undertaken to determine whether Rescode has achieved its intended objectives and what learnings there are from its nine years in operation in South Australia. Given the potential expansion of ‘tick-box’ development under the new system, reviews of development outcomes is considered particularly important.

Strategic Data

The collection of strategic, demographic and environmental data and trends is a key part of formulating strategic plans and policy. Examples of important strategic data to collect, measure, map or otherwise compare or illustrate include:

- land release and justification for zone changes;
- residential densities, dwelling types and other dwelling features such as bedrooms;
- public transport services (e.g go-zones, park and rides);
- tree canopy cover, tree loss on private land and changes over time;
- data relating to pervious and impervious areas for the purposes of stormwater and flood management (relationship to Online Stormwater assessment tool by Water Sensitive SA); and
- land uses (this is currently available through some online map databases but it would be valuable to illustrate and map land uses (and vacant tenancies) more specifically than is currently shown).

Mapping this type of information will help to ascertain whether strategic targets in the State Planning Policies and 30 Year Plan for Greater Adelaide are being met. For example, a comparison of changing residential densities in relation to public transport will measure the target *“60% of all new housing in metropolitan Adelaide will be built within close proximity to current and proposed fixed lines and high frequency bus routes by 2045”*. A comparison of tree canopy cover over time will measure the target *“Urban green cover is increased by 20% in Metropolitan Adelaide by 2045”*.

This information will also be used to substantiate the need for future Code Amendments and the provision of infrastructure. For example, reviewing trends in land use approvals may demonstrate whether a change of zoning is required; reviewing changes in densities and impervious areas may demonstrate where stormwater infrastructure upgrades are required or where further intensification of development should be restricted.

Comparing data over time helps to illustrate some trends, however it is important to note that various influences can affect the future needs of a community. For example, the demand for different dwelling types could significantly change over time based on our ageing population, the provision of services and infrastructure, and the need to mitigate and adapt to climate change. A review of these key demographic, infrastructure and community indicators should be taken into account before the performance indicators review is progressed any further, to ensure that the measuring tool for our performance targets will have real-world benefits.

The *30 Year Plan Implementation Plan (2017)* was intended to work hand in hand with the implementation program of the new planning system. The Implementation Plan sets out a range of Targets, however it is not clear how these have been progressed or factored into the current reform program. Examples of these targets include:

Target 1 - Containing our urban footprint and protecting our resources

A47	Develop guidelines that identify the appropriate thresholds for community infrastructure for new urban infill and growth area developments.	<i>Respond to this action in the Policy Theme Papers that will inform the Planning and Design Code</i>		4	Renewal SA Other agencies	Q4	Project scoping 
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Target 5 – A green liveable city

Timing

Quarter 4 (2017/2018)

What further investigations to support this target will be undertaken in 2017/2018?

Ref	Actions	How will this action be implemented in 2017/18?	Partners	Timing FY	Status
A62	Develop a process to ensure consistency in how green canopies and other green infrastructure are measured.	Work with key stakeholders to develop protocols around the monitoring and collection of data. Research the options for data collection to cover finer grained detail, a broader scope of indicators and a greater geographical area.	Councils AIA, AILA, PIA, UDIA + other key stakeholders	Q4 Q4	Project scoping 

The economy and jobs

What investigations will be undertaken to investigate how to best measure economic development?

Ref	Actions	Key milestones	Timing FY	Status
A39	Undertake a bench-marking process for the underlying assumptions and analysis of retail and industrial employment land supply.	<i>Undertake scoping and prepare work plan that considers opportunities and constraints</i>	Q4	In progress 
A41	Investigate the development of an economic monitoring indicator which has a land-use planning base.	<i>Project scoping</i>	Q4	Project scoping 

Notwithstanding the current planning reforms program, given the new system will not be operational until mid-2020, it is important that the current targets continue to be monitored and measured, rather than waiting a further 2 years to progress these important issues.

Presentation and Evaluation of Data

Discussion Points covered:

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

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

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

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

A snapshot of data in isolation has very limited value. As outlined above, consistency in data collection is important to allow for the comparison of the same data set over time and across different areas. For Local Government projects, a comparison of specific data with adjacent councils or the local region is normally much more valuable than comparisons with the State or greater Adelaide. Due to the limited scope of the information provided and a focus on state-wide information, the annual report released by the Planning Minister is not often used by councils and others in the community would be unaware of its existence or purpose.

An interactive webpage would greatly increase the use of data collected through the performance indicators system, as it would allow for the flexible comparisons and evaluation of the data. A good example of an existing interactive statistics webpage is the Community iD page facilitated by profile.id, accessible on the City of Norwood Payneham & St Peters website. This interactive tool uses census data and allows for the comparison of different data sets such as housing type, population age, method of travel to work etc, which can be broken down by suburb and compared against previous census years. The ABS TableBuilder is another useful and interactive tool which could be linked to the future performance indicators system.

The interactive tool should link with GIS software so that the information can be illustrated geographically, particularly for the purposes of strategic and regional planning as outlined above. This could include the ability to create 'heat maps' showing changes in density, dwelling types etc.

Thank you again for the opportunity to provide comment on the Performance Indicators Discussion Paper. The Council hopes that the above recommendations will be considered to accelerate the development of previously committed strategic indicators when reviewing the Performance Indicators system and that further consultation is undertaken as a new scheme is developed.

Should you have any questions regarding the comments raised in this submission or require further information, please contact Eleanor Walters on [REDACTED] or [REDACTED] or Emily Crook on [REDACTED] or [REDACTED]

Yours sincerely



Carlos Buzzetti
GENERAL MANAGER URBAN PLANNING & ENVIRONMENT