

Tuesday 16 October 2018

Mr Michael Lennon
Chairperson - State Planning Commission
Department of Planning, Transport and Infrastructure
GPO BOX 1815
ADELAIDE SA 5001

Via email - DPTI.PlanningEngagement@sa.gov.au

Dear Mr Lennon

Performance Indicators

The Planning Institute of Australia (PIA) welcomes the opportunity to provide feedback on monitoring the performance of the South Australian planning system. This submission has been prepared following consultation with members based on the Performance Indicators Discussion Paper.

While there is currently a performance monitoring process as part of the SA planning system it is clear through consultation with PIA members that there is not a high level of awareness of the existing reporting and measures. Increasing awareness and use of such information provides opportunity to better use data that is already available. There is much data potentially available through development processes although at present it is not easily accessible. The Planning Institute supports investment in the new ePlanning system to enable greater access and use of data in the future.

The development of new performance indicators is intrinsically linked to the new ePlanning system. Reviewing performance indicators for the new SA Planning System provides the opportunity to measure and monitor the elements of the planning system that are important to achieving the desired outcomes. Reporting through the existing System Indicators Program is well established, however the new SA Planning System provides the opportunity to reassess this program and consider the purpose of such reporting. It is important to understand the purpose of collecting and monitoring data

and how this activity relates to the outcomes being sought. In many spheres, these types of reporting programs often result in measuring and reporting on levels of activity and outputs as they are relatively simple to measure, rather than on the physical and qualitative outcomes, which are generally more difficult to measure. With the chance to set new indicators for SA, the opportunity should be taken to consider what outcomes from the planning system are important and most valued, and in turn, how they should be measured.

The discussion paper appears to have a strong focus on measuring the efficiency of the SA system and while this is important, there is a strong case for including more focus on the qualitative aspects of development outcomes and the linkages to system and policy improvement. Performance indicators linked to ePlanning have the potential to provide a stronger focus on leading rather than lagging indicators and to connect with other parts of development process to develop a world class planning and development system.

The discussion paper poses a series of points for discussion and the following presents the collective thoughts of PIA members on these matters.

DP1 ARE THE SYSTEM INDICATORS COLLECTED NOW USEFUL? HOW COULD THEY BE ENHANCED?

The current system indicators collected are largely focused on the processing of development applications through the system. These lag indicators provide information on processing efficiency and provide an indication of “busy-ness” in the planning system, but beyond that, they are not particularly useful in informing, shaping and leading the improvement of the planning system and delivery of improved planning outcomes. This relates to both the nature of the indicators and the manner in which they are reported and used. The use of system indicators should be enhanced to enable issues in the system to be identified and improvements made.

There are two types of enhancements that should be pursued:

Reporting the full development process

The current system indicator reporting stops at Development Approval being granted. Introduction of some additional check points would be valuable to capture the full picture of development activity in order to inform infrastructure planning, policy review and to monitor performance against the Planning Strategy targets. The check points could include dates for commencement and completion of construction, from which the overall construction time could be calculated, as could the holding time between approval and commencement. This would add data to the debates around where the time delays are in the development process. Some form of recording of compliance action would also be of value to understand the performance of the construction industry.

Outcomes and trends

It is understood from the discussion paper that further work is to be undertaken on reporting against the Planning Strategy, however as an interim or staged measure, planning system data could be captured in a manner that can report on development outcomes. Emerging land use trends based on type and location of development should be able to be captured and reported through the system so that it can be measured, analysed and used to inform ongoing policy development. The data provided on development type should be able to capture some additional specific features of the development including numbers of dwellings and approximate floor area for retail, commercial and industrial uses. This data should be readily available in the application and its capture would support more meaningful analysis of the outputs of the planning system. A smart, spatially linked system of indicators should be able to locate the development geographically and this would be of value in the analysis of Planning Strategy targets such as regarding metropolitan housing in existing urban areas and proximity to public transport.

DP2 IS THE INFORMATION IN THE ANNUAL REPORT RELEASED BY THE PLANNING MINISTER USEFUL? HOW COULD IT BE IMPROVED?

Feedback from PIA members has revealed that generally, they were unaware of the annual report released by the Minister. Members suggested that Relevant Authorities should receive a copy of the report, if they do not already, as they may assist in motivating performance improvement, where required. It was also suggested that Accredited Professionals should receive copies of the report.

In viewing the annual report, PIA members generally indicated that it didn't provide sufficient analysis of the planning system to inform improvements to the system. It was also perceived to be very focused on metropolitan planning, although this is likely to be a product of the quantity of applications in the system.

The annual report could be improved by including a greater focus on analysis that identifies what is currently occurring in the planning system, the trends identified in the system and the implications for planning policy. It should also flag potential areas for system improvement.

DP3 WHAT EXAMPLES OF INTERSTATE PLANNING SYSTEM PERFORMANCE INDICATORS DO YOU THINK COULD EFFECTIVELY BE USED IN SOUTH AUSTRALIA?

Planning system performance indicators interstate are limited, with no published indicators systems other than New South Wales and Victoria. It is understood that Queensland is considering some form of indicators to accompany its new planning system. A case study of interest, is Queensland's State Assessment and Referral Agency

(SARA), which operates with a set of performance indicators against which it reports annually. In addition to the typical assessment timeframe indicators that feature in the existing SA system and the systems of Victoria and New South Wales, the SARA reporting includes a set of qualitative indicators around customer satisfaction to provide insight into the experience of SARA's customers beyond the numbers.

The examples presented for New South Wales and Victoria are interesting approaches for digital functionality in the presentation of the assessment system data, however the key issue remains regarding the usefulness of the outputs and how that informs improvements to the system. Both of the system examples provided express some interesting data in graphical formats, but essentially the message that it conveys is the level of "busy-ness" and the impact on assessment cost and timelines. While this information is useful, a model that includes trends and targets would be more valuable.

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?

Beyond the quantitative data, collecting some form of qualitative data from system users of their experience would be of value to understand the performance of the assessment component of the planning system. While the quantitative data on assessment timeframes provide an important aspect, some accompanying qualitative data of the user experience would provide a more complete picture of satisfaction with the system. The Queensland SARA example does collect this data, but other simpler options could be explored such as the ability of applicants use a simple emoji based satisfaction survey to rate their experience. The technology used in other fields such as retail could be explored for use in this context.

Interactivity with the data is valuable and users including applicants, Councils, other Relevant Authorities and the community should have the ability to interact with the data and generate their own reports in SA. Relevant authorities should also be able to access the raw or base data to undertake their own research and a culture of inquiry should be fostered as through this, innovations can be developed.

DP5 WHAT PARTS OF THE EXISTING SYSTEM INDICATORS PROGRAM SHOULD BE CARRIED OVER INTO THE NEW SCHEME?

It is anticipated that the new System Indicators scheme may need to be implemented in stages based on the timing of the roll out of the ePlanning system. Ultimately when the ePlanning system is in place, a wide range of indicator data and variables should be able to be processed and reported through the system. The ePlanning system should be

designed with the capability to generate multi-factor reporting to better interrogate the data. While the list of indicators in the discussion paper is useful, being able to ask more complex questions of the system, extract the relevant data and analyse the material is a key benefit of a comprehensive online system. Likewise, reporting should be able to be produced on demand, as the data is captured in real time rather than through quarterly manual data processing. The design of the ePlanning system is critical and the ability to interrogate, report and compare data needs to be factored into the system design upfront.

The existing and proposed indicators outlined in the discussion paper are valid indicators to be carried over to the new system. Additional indicators as addressed elsewhere in this submission relating to greater detail about the types of development should also be included.

DP6 WHAT ARE SOME IMPORTANT TYPES OF DATA OR STATISTICS THAT YOU THINK SHOULD BE COLLECTED IN THE NEW PLANNING SYSTEM?

Firstly, the new system needs to be linked spatially so that all data collected is linked to central spatial information. This will connect to system process and performance reporting and to planning outcome reporting.

As indicated above there are two key types of data that should be collected in the new planning system, those about the operation and performance of the system, and those that inform the outcomes of the system. In relation to the performance of the system, in addition to the indicators already listed in the discussion paper, the following data would be valuable:

- A 'complexity factor' for each application. A useful tool that is currently used by the City of Adelaide, the complexity factor is based on criteria such as the assessment pathway, referrals required, public notification, value and the likelihood of it being contentious. This complexity factor assists with monitoring workloads and can also be used to assist with understanding processing times, which would be valuable in monitoring performance of the assessment system. An expansion of this tool with common criteria across councils should be explored and considered for inclusion in the ePlanning system.
- As part of the ePlanning system, data for the various stages of the application needs to be captured including the relationships with the relevant authorities such as certifiers for various aspects of the process, and matters related to conditions that need to be addressed prior to Development Approval.
- For refused applications, the reason for refusal, both in a codified manner as well as the written explanation.

In relation to the outcomes of the planning system, some of the data or issues that should be considered in the system design include:

- More specific details of applications that are important for monitoring strategy and policy development could include:
 - dwelling /building type
 - number of storeys and total height
 - number of bedrooms
 - number of dwellings/ allotments per application
 - lot and allotment size
 - roof area
 - build cost
 - exterior building material
 - private open space
 - tenure types
 - affordable housing/dwellings produced
 - star rating
 - estimated value of the development
 - zone
 - types of non-residential uses
 - floor area
 - number of car and bike parking spaces
 - change in green space – increase or decrease

The cumulative effect of these elements impacts on policy development and also enables reporting against strategic targets.

- Services and the connection between the Development Approvals and the cumulative impact upon provision of water, waste, energy and other services.
- Leading information that connects to the next steps for approvals such as infrastructure works and business licensing for commercial activities such as food premises. A smart ePlanning system should have the capacity to be pre-emptive to inform other sections of the development system to enable them to be prepared for the development activity and to assist the development industry to inform investment decisions. Such a process could also provide a digital experience for users, where government is a proactive rather than a reactive service provider.

DP7 DO YOU HAVE IDEAS ABOUT OTHER WAYS IN WHICH DATA ON ACTIVITIES IN THE PLANNING SYSTEM COULD BE COLLECTED AND EVALUATED?

Subject to the protection of privacy and confidentiality of specific parts of applications, access to the data should be open to a range of parties to undertake research and evaluation including Relevant Authorities and research organisations. Relevant Authorities should have the ability to access the raw data to undertake their own studies to support policy development and other activities that will enhance the built environment and their community. Access to general enquiries on the data should be free to the public and Relevant Authorities and research institutions should be able to access all the relevant data at no charge.

Providing open data should encourage others to access, interrogate and use the data and this may open up a range of new possibilities for evaluation and use of the data as different parties engage. Technology and new digital platforms are continually being developed and so rather than pre-empt what might occur, the system should ensure that the data is readily available and that entrepreneurs are encouraged to explore its uses and applications in ways that improve the planning outcomes and processes for the greater good.

DP8 DO YOU HAVE A PREFERENCE FOR HOW THE STATE GOVERNMENT REPORTS ON AND PRESENTS DATA AND STATISTICS ABOUT THE PLANNING SYSTEM?

All reporting must include clearly documented methodology and assumptions so that it is transparent. There should be an ability and openness to allow the methodology and assumptions to be reviewed and questioned.

In relation to the Planning and Development Code, the Act allows anyone to initiate amendments and this will need to be tracked including who the amendment is proposed by, what it involves and the areas that it covers.

DP9 WHAT ARE SOME ALTERNATIVE WAYS TO PRESENT DATA AND STATISTICS?

Data needs to be available in a range of formats and presented in different ways depending on the audience. Simple interactive tools that are able to synthesise the key information are valuable, however it is important that the technology and tools for presentation do not become more of the focus than the intent of the data analysis itself. Dashboards for high level reporting are useful with interactive tools that enable users to drill down into specific areas of interest. The data sets should also be publicly available, as discussed above, to enable deeper and more complex analysis including integration with spatial data to produce 3D modelling and GIS mapping.

The Planning Institute of Australia supports the review of performance indicators and the linkage of new indicators to the ePlanning system. A key principle of this approach is around streamlining the planning system and reducing unnecessary administrative activity, and so it is important that the ePlanning system is designed to efficiently collect and analyse the data. Given the importance of the design of the ePlanning system, PIA would like to be engaged in its continuing development.

Please feel free to contact the undersigned if any further comment is sought via sa@planning.org.au

Yours sincerely



Emma de Jager RPIA
Executive Officer SA